



CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE AMENDMENTS TO THE HUMBOLDT COUNTY CODE REGULATING COMMERCIAL CANNABIS ACTIVITIES

(State Clearinghouse # 2017042022)

September 1, 2017

For the

REDWAY BUSINESS PARK INDOOR CULTIVATION COMMERCIAL CANNABIS LAND USE ORDINANCE (CCLUO) AMENDMENT IN HUMBOLDT COUNTY

1.0 Introduction

This Addendum to the Certified Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities Programmatic Environmental Impact Report (PEIR)¹ (State Clearinghouse No. 2017042022) has been prepared by the Humboldt County Planning Department in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code § 21000 et seq.), and the CEQA Guidelines (Cal. Code Regs., Title 14, Chapter 3 § 15000 et seq.)². The Addendum evaluates the potential environmental impacts of implementing changes to the Humboldt County Code known as the Redway Business Park Indoor Cultivation Commercial Cannabis Land Use Ordinance (CCLUO) Amendment, and the resulting MB-Zone Indoor Cultivation Q-Qualified Combining Zone.

1.1 Background and Tiering

The Final Environmental Impact Report for the Commercial Cannabis PEIR was certified and the Mitigation Monitoring and Reporting Plan adopted in May 2018³. This PEIR is a first-tier environmental document that evaluated amendments to Humboldt County Code regulating Commercial Cannabis Activities. The PEIR evaluated an ordinance, known as the CCLUO, which established land use regulations concerning the commercial cultivation, processing, manufacturing, and distribution of cannabis within Humboldt County.

This document seeks to amend the Inland CCLUO⁴ and provide a tiered analysis of proposed amendments off the PEIR. This CEQA Addendum is appropriately tiered from the PEIR because it (1) is geographically consistent with the CCLUO; (2) is a logical and foreseeable part of its contemplated action; (3) deals with regulations, plans, and other criteria to implement a continuing program; and (4) falls under the same

¹ <https://ceqanet.opr.ca.gov/2017042022/2>.

² https://www.califaep.org/docs/2024_CEQA_Statute_and_Guidelines_Handbook.pdf.

³ <https://humboldt.gov/DocumentCenter/View/62689/Humboldt-County-Cannabis-Program-Final-EIR-60mb-PDF>.

⁴ <https://humboldt.gov/DocumentCenter/View/63734/Ord-No-2599-CCLUO-inland-certified-copy-PDF>.

authorizing statutory and regulatory authority and has generally similar environmental effects which can be mitigated in similar ways (CEQA Guidelines §15168(a)).

Under the CCLUO, new Indoor Cultivation is allowed on parcels zoned Agriculture Exclusive (AE), Agriculture General (AG), Forestry Recreation (FR), Unclassified (U), Industrial Commercial (C-3), Limited Industrial (ML), and Heavy Industrial (MH) (CCLUO §55.4.8.1). The Business Park (MB) zone, which is an industrial zone, is not included in this list. The Redway Business Park Indoor Cultivation CCLUO Amendment (the Project) would facilitate permitting of new indoor commercial cannabis cultivation within parcels zoned Business Park (MB) parcels which have a designated Q-Qualified Combining Zone (Q-Zone), known as the “Indoor Cultivation Q – Qualified Combining Zone”, through modification of the CCLUO and development of Performance Standards to mitigate potential adverse environmental impacts.

The amendment covers activities within the scope of the Commercial Cannabis PEIR and is a minor addition, the need for which has arisen subsequent to that document. When determining whether later activities under a Program EIR require an additional environmental document, §15168(c) states, in relevant part:

(c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

This Addendum evaluates the Project’s environmental effects in the light of the program EIR.

Section 1.1 of the PEIR states its purpose as a program EIR, in accordance with CEQA Guidelines Section 15168, that examines the environmental impacts of a series of actions, including issuing discretionary permits or zoning clearance certificates. The program EIR examined the county-wide environmental effects of the entire program and potential actions carried out as part of the program, including construction and operational activities. Further, it is intended to be used by the County to streamline environmental review of subsequent site-specific/individual permit application actions implementing the proposed ordinance as provided for under CEQA Guidelines Section 15168(c). Therefore, the proposed amendment pertaining to indoor commercial cannabis cultivation within MB zoned parcels fall within the scope of the PEIR’s contemplated actions.

Section 3.0 of this Addendum evaluates whether any of the conditions in §15162 of the Guidelines have occurred, requiring a subsequent EIR. Section 4.0 is a statement of findings, and Section 5.0 recites the conclusions leading to the preparation of this Addendum to the PEIR.

1.2. Prior EIRs Incorporated by Reference

This Addendum addresses updates and minor changes to the 2017 Amendments to Humboldt County Code Regulating Commercial Cannabis Activities, which was evaluated in a Programmatic Draft and Final Environmental Impact Report (PEIR) SCH 2017042022. Additionally, along with the Commercial Cannabis PEIR, the General Plan Update Final and Revised Draft Program EIR was used as background information and analysis to prepare this Addendum to the PEIR. They are a matter of public record and are hereby incorporated by reference.

- 2017 Amendments to Humboldt County Code Regulating Commercial Cannabis Activities (SCH 2017042022);



- 2017 General Plan Update Final and Revised Draft Program EIR (SCH 2007012089).

The documents are available for review during regular business hours at the Humboldt County Planning and Building Department at 3015 H Street, Eureka; or online at: <https://humboldt.gov/2308/Cannabis-EIR> and <https://humboldt.gov/547/General-Plan-Documents>.

The provisions, eligibility and siting criteria, and performance standards that make up the Project and the subject of this Addendum are contained in the Redway Business Park Indoor Cultivation Amendment, on file with the Humboldt County Planning and Building Department.

1.3 Statutory Authority and Requirements

CEQA Guidelines §15164(a) states the following with respect to an Addendum to an EIR:

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

CEQA Guidelines §15162, *Subsequent EIRs and Negative Declarations*, states the following with respect to Subsequent EIRs:

- (a) When an EIR has been certified or a negative declaration adopted 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 will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration 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 EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (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 EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The County of Humboldt is the Lead Agency. The Humboldt County Planning Commission and Humboldt County Board of Supervisors have approval authority over the Commercial Cannabis Land Use Ordinance and the Redway Business Park Indoor Cultivation CCLUO Amendment and the proposed adoption of the Indoor Cultivation Q-Qualified Combining Zone.

1.4 Summary of Analysis and Findings for an Addendum

The Redway Business Park Indoor Cultivation CCLUO Amendment is analyzed based on the Commercial Cannabis PEIR and the General Plan’s applicable goals and policies to support these regulations as well as the associated mitigation and implementation measures and the mitigation monitoring and reporting plan. Through evaluation of the new permitting option for indoor cultivation on MB-zoned parcels with the Indoor Cultivation Q – Qualified Combining Zone and associated Special Restrictions and Performance Standards, and through examination of the existing Mitigation Measures of the PEIR, it was determined that the Project does not involve changes that would result in new or more severe physical impacts, changes to land use designation, or rezoning with the potential to increase development capacities greater than the primary zone. No newly feasible or different Mitigation Measures or alternatives were found that would substantially reduce potential significant effects of the Project. Section 3.0 of this Addendum presents evidence supporting the decision not to prepare a subsequent EIR pursuant to §15162.

Based on evaluation of the potential environmental impacts resulting from the Project, none of the conditions described in CEQA Guidelines §15162 have occurred, and thus, this Addendum was prepared.

2.0 Project Description

The modified project amends the Commercial Cannabis Land Use Ordinance for the Inland portion of Humboldt County to allow indoor cultivation on Business Park (MB) zoned parcels with the Indoor Cultivation Q-Qualified Combining Zone. The project includes adopting the Indoor Cultivation Q-Qualified Combining Zone Ordinance and associated map applying the Q Zone to seven parcels in the Redway Business Park.

2.1 Project Location and Setting

Humboldt County is located along the north coast of California. It is bounded by the Pacific Ocean, Del Norte, Siskiyou, Trinity, and Mendocino counties. The proposed amendment would apply only to MB-zones with the Q-Zone on parcels within in the unincorporated area of Humboldt County and would not apply to the incorporated cities, tribal, state, and federal lands.

In the inland area of unincorporated Humboldt County, there are 32 parcels zoned MB with an approximate total of 55.26 acres, located either in the Redway Business Park, south of the community of Redway, and in the McKinleyville Airport Business Park, located near the airport in McKinleyville. The Project would have no impact on the McKinleyville Airport Business Park, as none of those properties would be subject to the proposed Q-Zone to allow indoor commercial cannabis cultivation. The location of the Redway Business Park is shown in Figure 1.



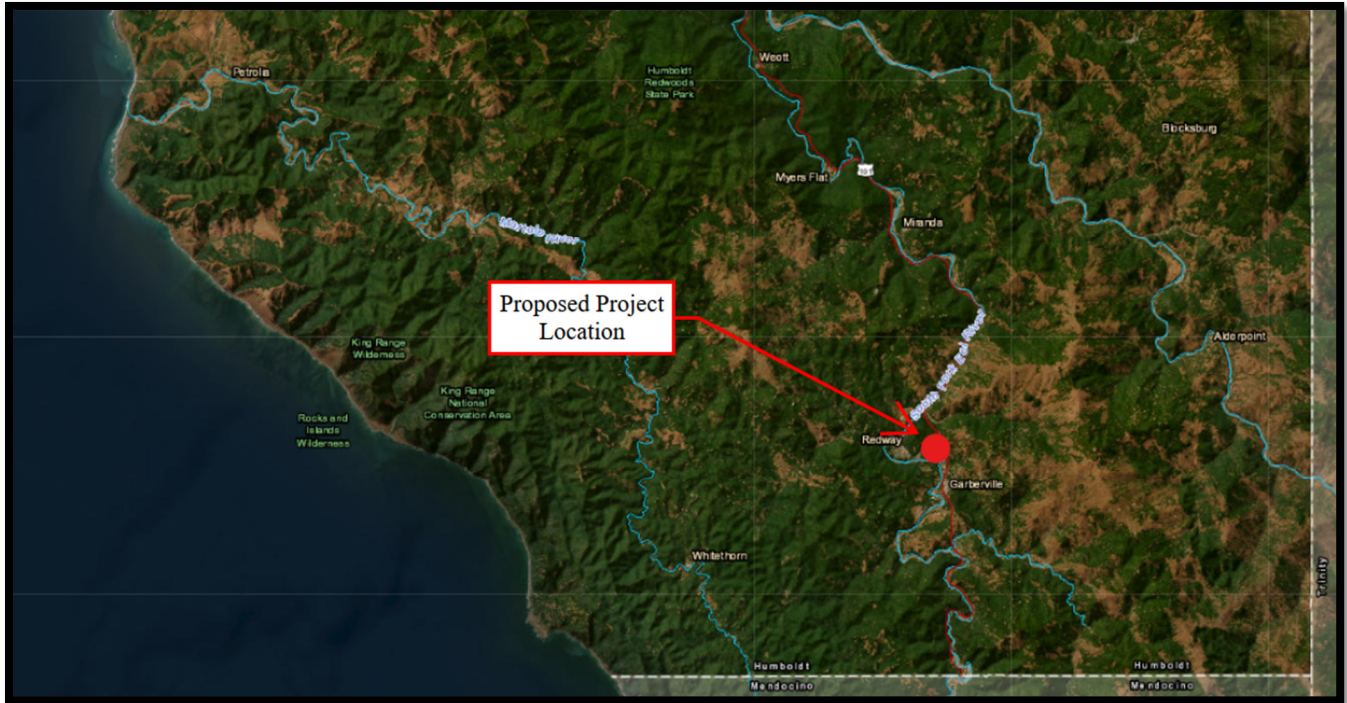


Figure 1: Project Vicinity - Redway Business Park (Source: Humboldt County Web GIS, 2024)

The Redway Business Park is a commercial/industrial area southeast of the community of Redway and north of the community of Garberville, in Southern Humboldt. The Redway Business Park area is well developed and disturbed, and is comprised of a wide array of existing businesses, including flooring, plumbing, gardening, mini storage, permitted cannabis facilities (e.g., distribution, manufacturing, nurseries), automotive services, glass repair, construction rental equipment, and other miscellaneous industrial and commercial businesses. The Garberville DMV offices and the Redway Community Services District (RCSD) offices are also located within the Redway Business Park.

There are 23 parcels within the Redway Business Park that are zoned MB (Business Park). These parcels are centrally located, and are primarily on existing, developed lots (Figure 2). The MB-Zone is an Industrial zoning classification, with principally permitted Use Types including Civic (Minor Utilities, Administrative), Commercial (Warehousing, Storage and Distribution, Office and Professional Services, Retail Sales, Retail Service Uses, and Transient Habitation), Industrial (Research and Light Industrial), and other Compatible Uses Permitted in the MB-Zone⁵. In the CCLUO, the MB-Zone is allowed to have Cannabis Support Facilities, including commercial Enclosed Nurseries, Distribution, Off-Site Processing Centers, Community Propagation Centers, Cannabis Testing and Research Laboratories, Non-flammable Extraction, and Infusion Activities.

The MB-zoned parcels in the Redway Business Park have a corresponding General Plan Land Use Designation of Commercial Services (CS) (Figure 3). According to the Humboldt County General Plan Land Use Element⁶, Commercial Services is a Commercial Designation intended for heavy commercial

⁵ <https://humboldt.county.codes/Code/313-3.1>.

⁶ <https://humboldt.gov/DocumentCenter/View/61996/Chapter-4-Land-Use-Element-PDF>.



uses and compatible light industrial uses. The Project would not impact the General Plan Land Use Designation of parcels within the Redway Business Park.



Figure 2: Redway Business Park Area Zoning Classification (Source: Humboldt County Web GIS, 2024)



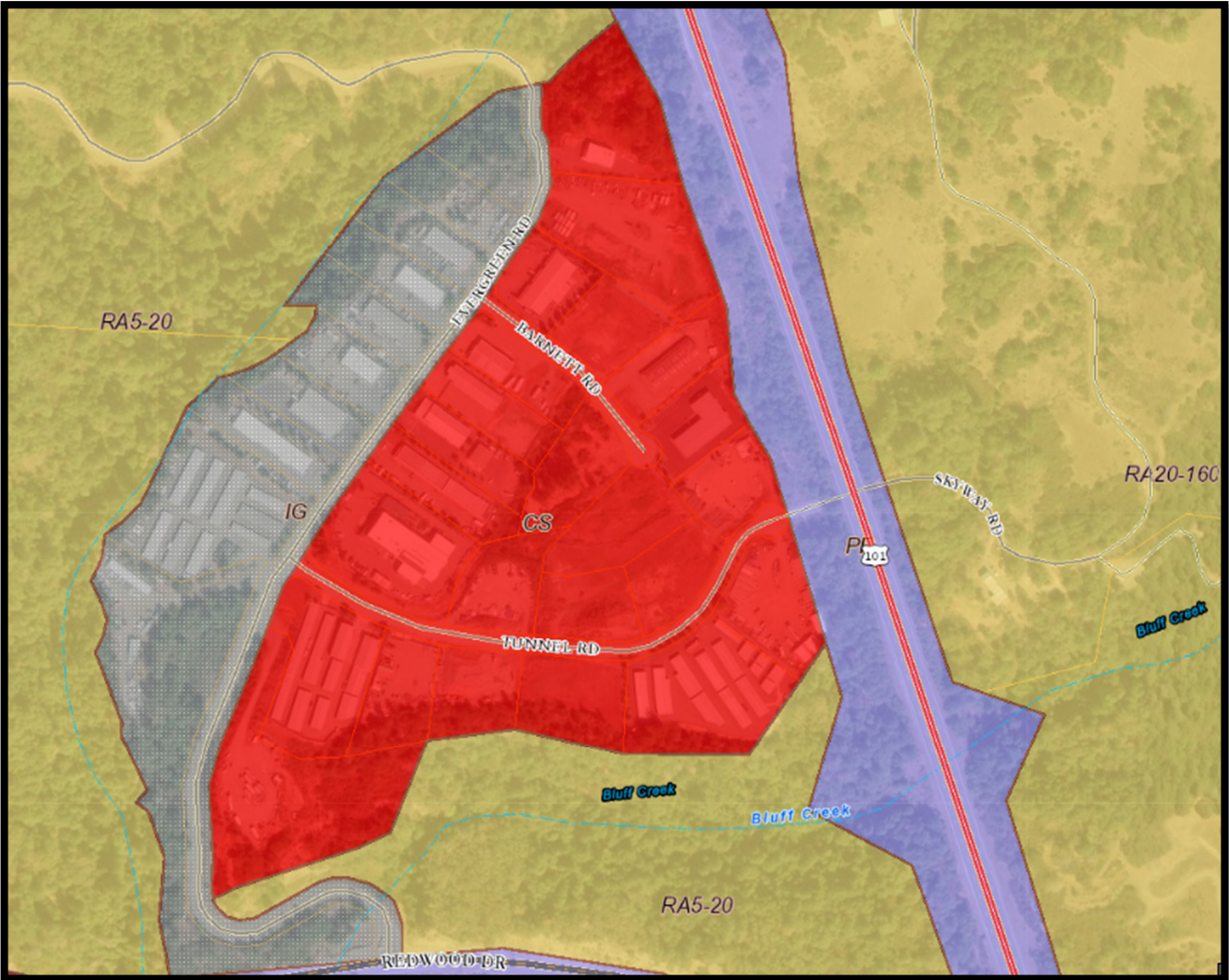


Figure 3: Redway Business Park Area General Plan Land Use Designations
(Source: Humboldt County Web GIS, 2024)



In total, the Project would affect seven parcels (APN 223-311-010, APN 223-311-011, APN 223-311-012, APN 223-311-043, APN 223-311-035, APN 223-311-030, and APN 223-311-029) within the Redway Business Park, located in Humboldt County. These parcels are denoted with the red-striped hatch in Figure 4.

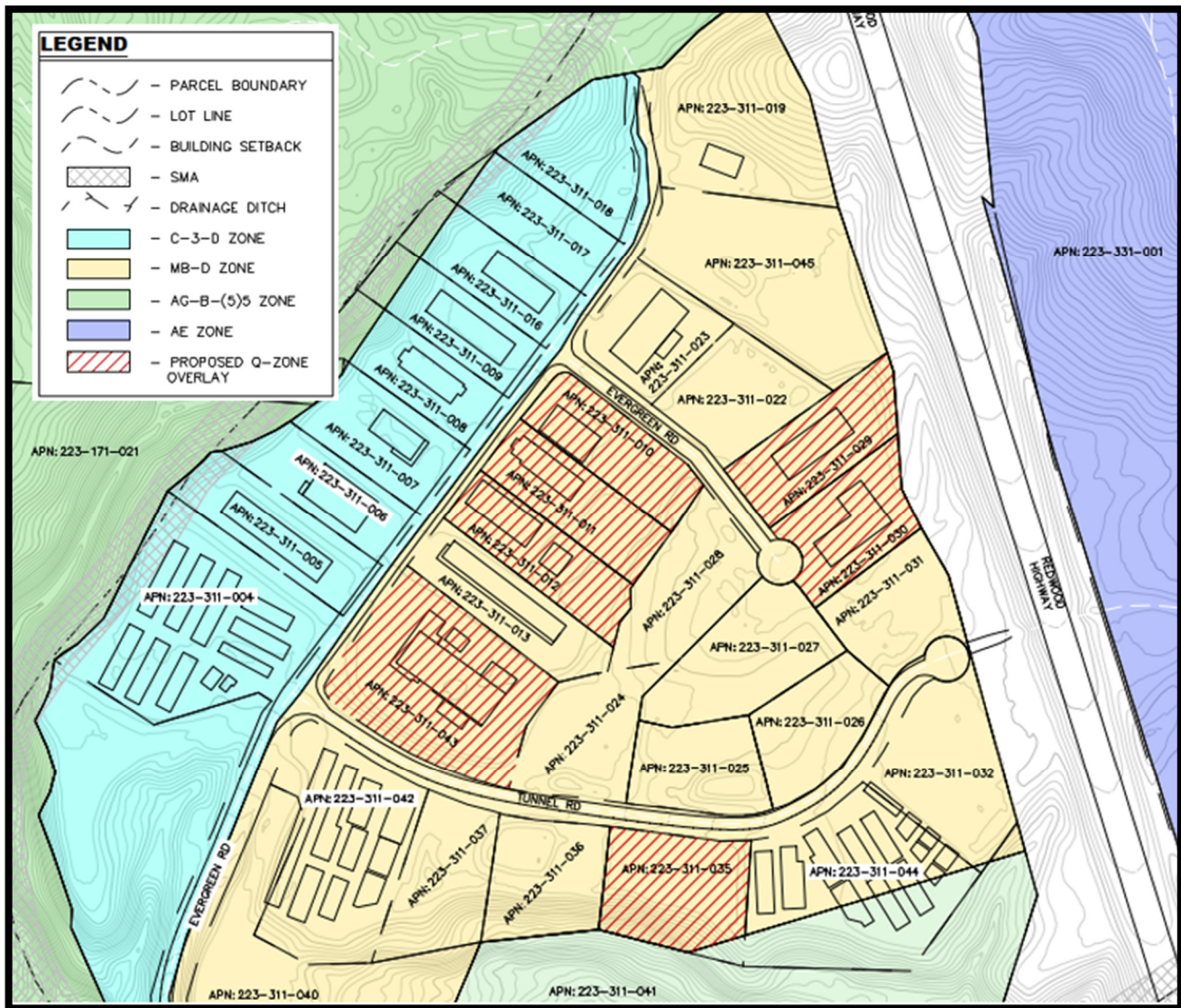


Figure 4: Proposed MB-Zone Indoor Cultivation Qualifying Zone Parcels – red-striped hatch
(Source: Plot Plan, NorthPoint Consulting Group, 2024)

2.2 Project Background

A Petition requesting a Zone Reclassification and a CCLUO text edit was submitted by Mr. Jesse Jeffries, the property owner of APN 223-311-029, in November of 2022 (PLN-2022-18016)⁷. The Petition requested allowance from the Board of Supervisors to pursue amending the CCLUO to allow for indoor

⁷ <https://aca-prod.accela.com/HUMBOLDT/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=REC22&capID2=00000&capID3=0034D&agencyCode=HUMBOLDT>.



cannabis cultivation on parcels zoned Business Park (MB) in inland areas of the County. On April 18, 2023, the Board of Supervisors granted the petition request through passage of Resolution No. 23-51⁸.

Resolution No. 23-51 granted permission for the Planning and Building Department to initiate a text amendment to the CCLUO “to allow indoor cultivation in MB zones in the inland area”. Since the approval of Resolution No. 23-51, the Project description has been narrowed to include only the Redway Business Park, and exclude the McKinleyville Airport Business Park. Furthermore, the Project’s scope is limited to only seven parcels within the Redway Business Park (Figure 4), and the Q--Qualified Combining Zone has been added to avoid and mitigate significant impacts as a result of the Project.

2.3 Project Characteristics

The Redway Business Park Indoor Cultivation Amendment would amend Section §55.4.8.1.2. to allow for indoor cultivation applications to be submitted on MB-zoned parcels with the Indoor Cultivation Q – Qualified Combining Zone. The CCLUO would be amended as follows (changes in bold):

§55.4.8.1.2. *Within those zones specified under 55.4.6.2.1 (C-3, ML – MH, and U), **MB with the Indoor Cultivation Q – Qualified Combining Zone**, and C-2 as part of a microbusiness provided all cannabis activities occur within a building that is two-stories or less in height, cultivation area is limited to 2,500 square feet, and where the cultivation and cannabis activities are in scale with the surrounding community,*

- a) Up to 5,000 square feet of cultivation area may be permitted with a Zoning Clearance Certificate.*
- b) Up to 10,000 square feet of cultivation area may be permitted with a Special Permit.*
- c) A Use Permit shall be required where more than one clearance or permit is being sought on a Parcel.*

Indoor Cultivation Q – Qualified Combining Zone (“Q-Zone”) would be applied to seven parcels within the Redway Business Park. Those parcels include APN 223-311-010, APN 223-311-011, APN 223-311-012, APN 223-311-043, APN 223-311-035, APN 223-311-030, and APN 223-311-029 (Figure 4). No other APNs, nor any other MB-zoned parcels in the County (e.g., the McKinleyville Airport Business Park) would be affected by the Project.

These seven parcels were identified in coordination with the RCSD, based on parcels that have existing RCSD service hookups and meters, and parcels that were a part of the RCSD Capacity Study conducted by Waterworks Engineering in August of 2014. In addition, on March 27, 2024, RCSD sent a letter to the County supporting the Q-Zone, as described above and applied to these seven parcels, provided that the applicants comply with RCSD curtailment orders, restrictions, and policies, including the RCSD Commercial Agricultural Policy and forthcoming Water Ordinance⁹.

The Q-Zone would include the following Special Restrictions and Performance Standards:

- a. Operators of indoor cannabis cultivation intending to use municipal water shall obtain a will-serve letter from the RCSD.
- b. Water sourced from the RCSD for indoor cannabis cultivation shall not exceed 91,250 gallons (12,200 cubic feet) annually.
- c. To be able to demonstrate enough onsite water storage in the event of an RCSD Curtailment Order, operators of indoor cannabis cultivation shall demonstrate enough onsite water storage to forebear from the use of RCSD water for indoor cannabis cultivation from June 1st through October 31st.

⁸ <https://humboldt.legistar.com/LegislationDetail.aspx?ID=6171421&GUID=FF0A9111-9259-485A-ADB8-297970435542>.

⁹ <https://drive.google.com/file/d/IOB-hbsiPO76xGP27GZdSIefHfah4eysG/view>.



- d. Water sourced from the RCSD for cannabis cultivation irrigation shall be separately metered from other onsite property uses and activities.
- e. Operators of indoor cannabis cultivation who source water from the RCSD shall submit a Water Use and Storage Plan with their application to the County that includes the following:
 - i. Description of all existing or proposed onsite activities, businesses, etc., if applicable.
 - ii. Description of current service(s) and/or agreements with the RCSD.
 - iii. Description of typical monthly water usage of existing onsite activities, if applicable.
 - iv. Description of all water sources and projected monthly water demand for the indoor cannabis cultivation irrigation.
 - v. Projected monthly water demand for employees associated with proposed indoor cannabis cultivation (e.g., showers, bathrooms, etc.).
 - vi. Volume and type of proposed water storage.
 - vii. Description of how these Special Restrictions and Performance Standards will be adhered to.
- f. In addition to the above limits, operators of indoor cannabis cultivation shall follow all water restrictions, limitations, curtailment orders, and conservation measures set by RCSD, including but not limited to the RCSD Commercial Agricultural Policy when formally adopted, revised, or amended by the RCSD.
- g. Operators of indoor cannabis cultivation shall demonstrate existing onsite power from Pacific Gas and Electric Company (PG&E) is adequate for the proposed operation.
- h. Indoor cultivation occurring within the Indoor Cultivation Q – Qualified Combining Zone shall employ mechanical ventilation controls in concert with carbon filtration or other equivalent or superior method(s) minimizing the odor of cannabis outside of the structure. Ventilation controls must also regulate odor inside the structure if the structure has multiple units not occupied by indoor cultivation.

The passage of the County’s Commercial Medical Marijuana Land Use Ordinance in 2016 was the first proactive step in the County’s process of establishing regulations for commercial cultivation, processing, manufacturing, and distribution of cannabis in a manner consistent with California’s enactment of the Medical Marijuana Regulation and Safety Act (MMRSA). In September 2017, a draft environmental impact report (Draft EIR) was prepared to evaluate the proposed Amendments to Humboldt County Code regulating Commercial Cannabis Activities, as part of a new ordinance to establish land use regulations concerning the commercial cannabis activities within Humboldt County. The final program EIR (PEIR) was certified in January of 2018. This Addendum evaluates potential environmental effects of the Redway Business Park Indoor Cultivation Amendment, within the scope of the certified PEIR regulating Commercial Cannabis Land Use Ordinance.

Previous environmental review analyzed the potential effects of commercial cannabis cultivation, including establishment of land use regulations for commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis within the County. The Project is a modification of a subset of the same cultivation and regulation activities.

The Project affects the seven identified parcels zoned MB that are shown in Figure 4. All of the affected parcels are between one and five acres in size and are existing disturbed and/or developed parcels. Under the current CCLUO, the subject parcels are not eligible to apply for indoor commercial cultivation permits due to their MB-zoning but are allowed to apply for other similar commercial cannabis activities (e.g., enclosed commercial nursery). In addition, the Indoor Cultivation Q – Qualified Combining Zone Special Restrictions and Performance Standards provide additional power and water standards, including a



limitation on municipally sourced water from RCSD. No existing measures that are intended to lessen environmental impacts resulting from the Commercial Cannabis PEIR are proposed to be deleted. The full text of the Amendments to Humboldt County Code Regulating Commercial Cannabis Activities, available for review on the County's website¹⁰ and incorporated into this Addendum by reference.

3.0 Evidence Supporting the Addendum

This section compares actions in the proposed Redway Business Park Indoor Cultivation Amendment to those incorporated in the Humboldt County Code Regulating Commercial Cannabis Activities PEIR to determine whether any of the conditions in § 15162 have occurred. The decision-making body shall consider this addendum to the final certified Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities PEIR prior to deciding the project.

3.1 No Substantial Changes Requiring Major Revision

CEQA Guidelines §15162(a)(1) requires a subsequent EIR when substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The changes proposed in the Redway Business Park Indoor Cultivation Amendment pertain to the same cultivation activities examined in the previous EIR, and therefore will have, if any, the same types of impacts on the environment described previously. Further, the Amendment includes restrictions on water and power designed to prevent any significant impacts. Therefore, the Project requires no major revisions to the previous EIR, and no new significant environmental effects or a substantial increase in the severity of previously identified significant effects will result from adoption of the amendment.

3.2 No Substantial Change in Circumstances

According to §15162(a)(1) of the Guidelines, a subsequent EIR must be prepared if substantial changes occur with respect to the circumstances under which the project is undertaken, that result in major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. No substantial change in circumstances has occurred since the Commercial Cannabis PEIR was certified in 2017 that would trigger new or more severe significant environmental effects. Therefore, no new EIR is warranted on the grounds of changed circumstances.

3.3 No New, Previously Unknown Information of Substantial Importance

No new information of substantial importance has come to light, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete. In addition:

- (A) The Project extends permits for indoor commercial cannabis cultivation on a limited number of parcels (maximum of seven) where indoor cannabis cultivation was not previously allowed. The expected effects are similar to those of the whole project, with no new or more significant effects not previously discussed in the PEIR.

¹⁰ <https://humboldt.gov.org/2308/Cannabis-EIR>.



- (B) Because the applicant is required to obtain a will-serve letter from RCSD if using municipal water, not exceed the proposed limit of 91,250 gallons of water sourced from the RCSD annually, demonstrate adequate water storage to forbear from RCSD-sourced water between the dates of June 1st through October 31st, meter RCSD-sourced water for cannabis cultivation separately from other water sources and uses, submit a Water Use and Storage Plan, required to adhere to all restrictions, limitations, curtailment orders, and conservation measures set by the RCSD, and demonstrate existing onsite power from Pacific Gas & Electric, significant effects previously examined are anticipated to be minimal, or less severe than shown in the PEIR.
- (C) None of the mitigation measures or alternatives previously found not to be feasible are found in fact to be feasible, nor would they substantially reduce one or more significant effects of the project.
- (D) No new mitigation measures or alternatives are known which are considerably different from those analyzed in the previous EIR, that would substantially reduce one or more significant effects on the environment.

3.3 Environmental Impact Analysis

CEQA Guidelines §15162(a)(3) prescribe an additional EIR when a project results in new or substantially more severe significant effects not discussed in the previous EIR. This Addendum examines the potential, indirect environmental impacts of the Project measured in light of the Program EIR to determine whether there are effects not previously examined, or substantially more severe.

The EIR determined that approval of the CCLUO ordinances would have no impact on the physical environment with respect to Mineral Resources, Population and Housing, or Recreation. Evaluation of the Redway Business Park Indoor Cultivation Amendment finds no significant impacts to the physical environment with respect to these factors, and no further analysis is considered here.

3.3.1 Aesthetics

Section 3.1 of the Commercial Cannabis PEIR evaluates environmental effects related to Aesthetics. The PEIR found that cannabis operations are aesthetically not substantially different in appearance from other agricultural operations and found that new lights sources would be minimized by lighting performance standards in the CCLUO. The PEIR found that impacts to Aesthetics would be less than significant.

Relevant Project Components. The Project would amend the CCLUO to allow indoor commercial cannabis cultivation on MB-zones with the Indoor Cultivation Q – Qualified Combining Zone. The CCLUO defines Indoor Cultivation as “... cultivation within a structure primarily or exclusively using artificial lighting” (CCLUO §55.4.4 Definitions, pg. 8).

Impact Analysis. Approval of the Project would affect only seven parcels within the Inland portion of Humboldt County, located in the Redway Business Park. The Redway Business Park is located approximately 150 feet from State Highway 101, which is eligible to be designated as a State Scenic Highway. The Redway Business Park, which is currently aesthetically characterized by buildings, industrial equipment, shipping containers, etc., is partially visible through existing vegetation from State Highway 101. Regardless of visibility, indoor cultivation sites are enclosed, meaning that supplemental lighting would be within structures such that no light escapes and would thus not cause adverse impacts to lighting. Additionally, indoor cultivation would occur within existing buildings, consistent with the



current site characteristics. With regard to security lighting, the CCLUO requires that security lighting be angled in such a way as to prevent light from spilling outside the boundaries of the site, in compliance with the California Energy Commission's Building Energy Efficiency Standards for Outdoor Lighting.

The minor changes proposed by the Project, impacting a total of seven parcels within the Redway Business Park, would not impact or change the analysis of the PEIR. All potential indoor cultivation projects received as a result of this CCLUO amendment would be required to follow the Light Pollution Control Performance Standards in the CCLUO and International Dark Sky Standards.

Therefore, in light of the PEIR, the Project would not exceed impacts already considered and would have no potential new significant impacts on Aesthetics.

3.3.2 Agriculture and Forestry Resources

Section 3.2 of the Commercial Cannabis PEIR evaluates environmental effects related to Agriculture and Forest Resources. The PEIR found that cannabis operations have no impact on agricultural resources or land use. Potential impacts of cannabis on conversion of forest land were found to be less than significant, as only existing cultivation sites could have had timberland conversion and on-site remediation would be subject to performance standards.

Relevant Project Components. No Project components would impact agriculture and forestry resources.

Impact Analysis. Potential Indoor Cultivation projects on a maximum of seven parcels in the Redway Business Park are already disturbed parcels, developed with existing buildings, and/or located within an Industrial Zone slated for Cannabis Support Facilities (e.g., distribution, nursery, community propagation center, etc.) and for non-flammable extraction and infusion activities. None of the impacted parcels are located within a Williamson Act Contract, in timberland, or on Prime Agricultural Soils. Therefore, the Project would not have any additional impacts on agricultural or forestry resources.

Therefore, in light of the PEIR, the Project would not exceed impacts already considered and would have no potential new significant impacts on Agriculture and Forestry Resources.

3.3.3 Air Quality and Greenhouse Gas Emissions

Section 3.3 of the Commercial Cannabis PEIR evaluates environmental effects related to Air Quality and Greenhouse Gas Emissions. Humboldt County is located within the North Coast Air Basin (NCAB), and is subject to the authority of the North Coast Unified Air Quality Management District (NCUAQMD) and the California Air Resources Board (CARB). Humboldt County is in attainment of all federal and state criteria air pollutant standards except for State PM₁₀ levels, for which the NCAB, including Humboldt County, is currently designated as a non-attainment area. For this reason, increases in PM₁₀ emissions related to increased traffic of employees during harvest season could create significant exceedances, and although harvest season lasts approximately four to six weeks and daily PM₁₀ emissions only exceed the NCUAQMD-recommended threshold during that time, the impacts remain significant and unavoidable according to the PEIR. Additionally, exposure of people to objectionable odors was determined to be a significant impact. In certifying the Commercial Cannabis PEIR and CCLUO, the Board of Supervisors made findings that the benefits of implementing the CCLUO outweighed the unavoidable environmental effects.



Mitigation. While a NCUAQMD PM₁₀ Attainment Plan is in effect, no feasible mitigation measures have been identified that would reduce PM₁₀ to a level less than significant. Mitigation related to odors, specifically Mitigation Measure 3.3-4, prohibits the burning of cannabis and other vegetative material, will reduce odors. However, the PEIR determined that it does not reduce the impact of the odors related to outdoor cultivation and processing of cannabis. Because no feasible mitigation was identified that would reduce these impacts to a less than significant level, the impacts were considered to be significant and unavoidable in the PEIR.

Relevant Project Components. The Project would allow indoor cultivation activities on seven parcels in Humboldt County. Indoor cultivation activities could cause PM₁₀ emissions from traffic and could have the potential to create objectionable odors if not properly mitigated. The performance standards for the proposed Q-Zone include odor mitigation.

Impact Analysis. Indoor cultivation activities would have similar or less traffic to other, already-allowed cannabis activities in the MB-zone per the CCLUO (e.g., off-site processing center, distribution, enclosed nursery) and non-cannabis principally permitted uses already allowed in the MB-zone per the Zoning Code (e.g., warehouse, office and professional services, retail storefront, etc.). Therefore, impacts to PM₁₀ emissions from traffic would not cause a more significant impact, other than those already analyzed under the PEIR.

In addition, PM₁₀ emissions from traffic are exacerbated by unpaved, naturally surfaced, or dirt roads. All seven parcels in the Project would be accessed from existing, paved roads. In addition, any projects on these parcels would be required to meet the “Locational Criteria” for Indoor Cultivation sites, as described in CCLUO §55.4.8.1.3, which states that, “Indoor Cultivation sites shall be located on roads that are paved with centerline stripe, or paved meeting the Category 4 standard...” (CCLUO Inland, pgs. 25-26). While a Use Permit can be sought for an exemption to this standard, all seven of the parcels impacted by the Project would be accessed from the three primary paved roads that serve the Redway Business Park, and therefore it is not expected that exceptions to the Category 4 Standard would be anticipated. All indoor cultivation sites in the County, including those potentially allowed by this Amendment, would be required to demonstrate that they meet the Locational Criteria for Indoor Cultivation Sites, and the Performance Standards for Road Systems (CCLUO §55.4.12.1.8).

The PEIR found that impacts on exposure to objectionable odors from cultivation and processing of commercial cannabis were significant, even with the incorporation of Mitigation Measure 3.3-4, which prohibits the burning of cannabis and other vegetative material. With respect to odor, the Redway Business Park is an industrial park that is already zoned for odor-producing cannabis activities (e.g., processing such as trimming, nursery, manufacturing, and distribution activities), which was considered and analyzed under the PEIR. To reduce potential odor impacts, the CCLUO contained setback requirements from residential areas. None of the seven affected parcels are located within 600 feet of a residential area or within 600 feet of a known residence. Surrounding zones include Industrial Commercial, Agriculture General, and Unknown. In addition, Indoor Cultivation sites are “enclosed”, per the CCLUO, and are required to meet the odor mitigation standards of the CCLUO. “Enclosed” commercial cannabis activities mean that the structure is required to employ “mechanical ventilation controls in concert with carbon filtration or other equivalent or superior method(s) [to minimize] the odor of cannabis outside of the structure” (CCLUO §55.4.4 Definitions, pg. 6). The parcels proposed to have the option to apply for indoor cultivation are already allowed to apply for an enclosed indoor nursery and processing activities, which were both analyzed in the PEIR.



Therefore, in light of the PEIR, the Project's potential impacts on Air Quality would not exceed those previously considered and would not create new significant impacts.

3.3.4 Biological Resources

Section 3.4 of the Commercial Cannabis PEIR evaluates environmental effects related to Biological Resources, and finds the impacts of the PEIR to be less than significant with mitigation.

Mitigation. Species protection is assured by assessing development impacts on species diversity in wetlands, mapped sensitive habitats, threatened/endangered species ranges and in Streamside Management Areas (SMAs) as part of the review process for discretionary permits. The PEIR includes mitigation measures that restrict development and adds buffers around wildlife corridors and nursery sites; and maps biological resources to reduce potential conflicts.

Relevant Project Components. The Project components are carried out on up to seven industrially zoned parcels located within an existing industrial park. All parcels are already disturbed or developed with existing pavement and/or structures, and all parcels are located outside of mapped SMAs. One of the seven parcels identified by the Project, o (APN: 223-311-035-000), could be located within 200 feet of an SMA, and could potentially have indirect impacts on Biological Resources.

Impact Analysis. Potentially significant impacts on biological resources are reduced to less than significant levels by existing ordinance requirements. Any potential Indoor Cultivation site resulting from the Project would be limited to already disturbed / developed parcels within the existing Redway Business Park industrial zone. Parcels would be required to follow the existing Mitigation Measures within the PEIR, as applicable, however, the CCLUO states that biological evaluations are not required for proposed cannabis development activities within the footprint of existing structures or proposed on lands planned or zoned for commercial or industrial activities. Therefore, it can be assumed that new Indoor Cultivation applications, as allowed by the Project, would not require a Biological Assessment.

Indoor Cultivation would not be allowed to use diversionary sources. Water sourced from the RCSD would be required to follow the Special Restrictions and Performance Standards of the proposed Q-Zone, including not utilizing more than 91,250 gallons (12,200 cubic feet) annually, storing enough onsite water to forbear from the use of RCSD water from June 1st through October 31st to be able to comply with a potential Curtailment Order in the event of a drought year, meter cannabis-related water use separately from other onsite water uses, develop a Water Use and Storage Plan to be submitted with the County application, and comply with all RCSD restrictions, limitations, curtailment orders, conservation measures, and policies, including the RCSD Commercial Agricultural Policy.

The Project would limit indoor cultivation permits to seven MB-zoned, already-disturbed parcels within the industrially-zoned Redway Business Park, which are already allowed to have enclosed commercial cannabis nurseries, off-site processing centers, extraction, infusion, and distribution centers – all commercial cannabis activities that were analyzed in the PEIR. All new indoor cultivation sites on these parcels would be required to adhere to the Mitigation Measures of the PEIR, if applicable, and the CCLUO Biological Resource Protections Performance Standards in the CCLUO (CCLUO §55.4.12.1.10).

Therefore, in light of the PIER, the associated Mitigation Measures, and the Performance Standards of the CCLUO, the Project would not create any new significant impacts and would not exceed impacts already considered on Biological Resources.



3.3.5 Cultural Resources

Section 3.5 of the Commercial Cannabis PEIR evaluates environmental effects related to Cultural Resources. The CCLUO contains performance standards which protect historical and archaeological resources or mitigate impacts to them.

Mitigation. Mitigation Measures in the Commercial Cannabis PEIR identify potentially significant historical and archaeological resources; however, potential impacts have been reduced to a less than significant level through mitigation measures for protection of historic resources (Mitigation Measure 3.5-1) and unique archaeological resources (Mitigation 3.5-2). In addition, requirements in the CCLUO for compliance with California Health and Safety Code Sections 7050.5 and 7052 and California Public Resources Code Section 5097 would make this impact less than significant.

Impact Analysis. Any construction as a result of new Indoor Cultivation cannabis projects would be required to adhere to the inadvertent discovery protocol and protections for historic and archaeological resources Mitigation Measures described in the PEIR.

Therefore, in light of the PEIR, the Project's impact on Cultural Resources would not exceed those previously considered and would remain less than significant with mitigation.

3.3.6 Energy

Section 3.14 of the Commercial Cannabis PEIR evaluates environmental effects related to Energy. According to the PEIR, the energy needs for construction of commercial cannabis cultivation sites would be temporary and would not require additional capacity or increase peak or base period demands for electricity or other forms of energy. The ordinance requires all new cultivation and non-cultivation sites to derive their energy from up to 100 percent renewable energy sources. Therefore, the PEIR found that commercial cannabis sites across the County would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts were found to be less than significant. Given the anticipated development pattern of operations under the proposed ordinance and the amount of renewable energy that would be generated at individual sites, the impact to energy services and facilities was found to be less than significant.

Relevant Project Components. The Project components would require energy use for indoor cultivation activities, potentially impacting energy use.

Impact Analysis. The Project allows for indoor cultivation sites at seven parcels in the industrially zoned Redway Business Park. The sites area currently allowed principally permitted uses under the MB-zone, including cannabis activities (e.g., enclosed commercial nursery, manufacturing centers, etc.) and non-cannabis activities (e.g., heavy commercial, retail sales, light industrial, etc.), all of which could be energy-intensive activities. Indoor cultivation is also an energy-intensive activity, and could increase the site's energy usage and could increase impacts to energy services and facilities.

In Fall of 2022, it was widely reported by local news outlets that PG&E, the energy supplier to Humboldt County, was close to reaching the limits of electrical transmission line capacity to southern Humboldt



County¹¹. The Project would affect seven parcels within the area potentially impacted by PG&E's transmission shortage. However, one of the Special Restrictions and Performance Standards of the Proposed Q-Zone for these parcels includes the requirement for operators using grid power to demonstrate that existing onsite power is available from PG&E and is adequate for the proposed operation.

Any new construction for indoor cultivation buildings would be required to follow the California Building Code and would be required to obtain a Building Permit through the Humboldt County Building Department. The State of California Building Energy Efficiency Standards under the California Building Code, known widely as Title 24, outline requirements for all new commercial and residential construction projects. Title 24 is part of California's wider strategy to require all new commercial construction projects to be zero net energy by 2030¹². Title 24 standards would apply to any applicants seeking to construct new commercial buildings for indoor cultivation, and compliance with these standards would be required to be demonstrated during the Building Permit process.

In addition, all commercial cannabis activities under the CCLUO, including indoor cultivation sites, must meet the Performance Standards for Energy Use, which include compliance with one or more of the following standards: (1) using grid power supplied 100% from a renewable energy, (2) using on-site renewable energy systems with 20% non-renewable energy source, or (3) purchase of grid power supplied by partial or wholly non-renewable source with the purchase of carbon offset credits made through reputable sources (CCLUO §55.4.12.5). With grid power, this can be achieved by cultivators using the renewable-energy sourced plans through PG&E, including the Redwood Coast Energy Authority's REPower+ Plan or 100% Solar Choice plan, or similar.

Therefore, in light of the PEIR, the Project's potential impacts on Energy would not exceed those previously considered and would not create new significant impacts. Impacts would remain less than significant.

3.3.7 Geology and Soils

Section 3.6 of the Commercial Cannabis PEIR evaluates environmental effects related to Geology and Soils. The CCLUO contains performance standards which protect against damage as a result of geologic hazards or destruction of soil and undiscovered paleontological resources or mitigate impacts to them.

Mitigation. The Commercial Cannabis PEIR identifies potentially significant damage to/or destruction of undiscovered paleontological resources and potential impacts have been reduced to a less than significant level through the mitigation measure that requires the contractor to cease all work activities if paleontological discoveries are made (Mitigation Measure 3.6-5).

Relevant Project Components. The Project components are carried out in industrial settings, on already-disturbed sites, with potential indirect impacts from geological hazards, soil losses, or paleontological resources.

Impact Analysis. Potentially significant impacts relating to geology and soil resources from the Project would be reduced to less than significant levels by adherence to existing law, including the California Building Code, and by adherence to existing CCLUO requirements. All new indoor cultivation permitted

¹¹ <https://lostcoastoutpost.com/2022/sep/19/pges-electricity-transmission-limits-threaten-thro/>.

¹² <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/energy-efficiency-strategic-plan>.



by the Project would comply with state and local regulatory requirements related to seismic or geologic hazards such that the exposure of people or structures to risk of loss, injury or death resulting from rupture of a known earthquake fault, strong seismic shaking, or exposure to expansive or unstable soils would be avoided or reduced. Any grading that moves greater than 50 cubic yards of material would be required to obtain a Grading Permit through the Humboldt County Planning and Building Department, and any new construction (or potentially a change of use within an existing building) would be required to adhere to the California Building Code. Any indoor cultivation sites would be required to follow Mitigation Measure 3.6-5, for inadvertent paleontological discovery protocol during construction.

In addition, all of the parcels affected by the Project are relatively flat, with slopes of less than 15%, and located on soils of primarily Low Instability, per Humboldt County Web GIS¹³. In addition, per Humboldt County Web GIS, the Project area does not contain any mapped historic landslides or areas of potential liquefaction, per Humboldt County Web GIS.

Therefore, in light of the PEIR and with adherence to existing Mitigation Measures, the Project's potential impacts on Geology and Soils would not exceed those previously considered and would not create new significant impacts.

3.3.8 Greenhouse Gas Emissions

Greenhouse Gas Emissions and impacts related to Climate Change were evaluated in Section 3.3 of the PEIR, prior to when Greenhouse Gas Emissions were a separate CEQA category. That analysis found that construction and operation of commercial cannabis cultivation under the CCLUO would result in GHG emissions, but it is anticipated that existing cultivation sites would be required to use at least 80 percent renewable energy (or 100% renewable energy, if using grid systems), which would substantially reduce GHG emissions from current operations, offsetting the emissions generated by new cultivation operations. The proposed ordinance would not conflict with any applicable plan, policy, or regulation of an agency adopted for reducing GHG emissions. Therefore, this impact was found to be less than significant.

Relevant Project Components. The Project components would require energy use for indoor cultivation activities, potentially increasing greenhouse gas emissions from energy use, from cultivation of plants and from traffic.

Impact Analysis. It is anticipated that the Project would not have any significant impacts from GHG emissions. Under the proposed Amendment, the Project would allow indoor cultivation on seven parcels in Humboldt County, representing a small fraction of eligible parcels that were analyzed in the CCLUO. The parcels impacted by the Project are already allowed to use energy for other commercial cannabis activities that are similar in intensity, including commercial enclosed nurseries, off-site processing centers, distribution centers, non-flammable extraction, and infusion, and the parcels are already slated for non-cannabis energy-intensive industrial/commercial uses. Indoor cultivation would have similar traffic and energy demands as these other, already-allowed cannabis and non-cannabis uses.

Furthermore, energy sourced from grid power for indoor cultivation sites would be required to use 100% renewable energy through PG&E or 80% through an onsite renewable energy system (e.g., solar), which would reduce GHG emissions from fossil-fuel sourced electricity. If using grid power, the Q-zone Special

¹³ <https://webgis.co.humboldt.ca.us/HCEGIS2.0/>



Restrictions and Performance Standards of the Q-zone would require the indoor cultivation site applicant to demonstrate that existing onsite power is available.

As already required in the CCLUO, GHG producing generators would not be allowed as a primary source of energy.

Any new construction of indoor cultivation buildings would be required to be constructed in compliance with Title 24 Requirements of the California Building Code, which includes renewable energy requirements to minimize fossil fuel dependence.

Since the PEIR was developed, the County has released their draft Climate Action Plan¹⁴ (CAP), which includes GHG reduction strategies. The CAP draft is currently being revised, however, potential new indoor cultivation sites facilitated by the Project would be required to follow the CCLUO and Title 24 California Building Code standards and requirements for renewable energy, and would thus be in alignment with expected GHG emission reduction strategies of the CAP.

Therefore, in light of the PEIR and adherence to the CCLUO and Proposed Q-Zone Special Restrictions and Performance Standards, and given the minimal scope of the Project, the Project's impacts on GHG Emissions would not exceed those previously considered when assessing impacts to Air Quality, and would not create any new significant impacts to GHG emissions.

3.3.9 Hazards and Hazardous Materials

Section 3.7 of the Commercial Cannabis PEIR evaluates environmental effects related to Hazards and Hazardous Materials, and finds that the CCLUO contains performance standards which protect damage as a result of hazards and hazardous materials or mitigate impacts to them. In addition, compliance with existing, applicable rules and regulations specifically designed to protect public health would be sufficient to preclude significant hazardous materials impacts.

Mitigation. The Commercial Cannabis PEIR identifies potentially significant impacts as a result of potential human hazards from exposure to existing on-site hazardous materials and potential impacts have been reduced to a less than significant level through mitigation measures requiring preparation of Environmental Site Assessments (ESAs) for industrial sites (Mitigation Measures 3.7-2a and b), as follows:

- Mitigation Measure 3.7-2a requires that “applicants for new cannabis activities in commercial, business park, or industrial sites shall include a site assessment for the presence of potential hazardous materials, including an updated review of environmental risk databases. If this assessment indicates the presence or likely presence of contamination, the applicant shall prepare a Phase I ESA in accordance with the American Society for Testing and Materials’ E-1527-05 standard. For work requiring any demolition, the Phase I ESA shall make recommendations for any hazardous building materials survey work that shall be done. All recommendations included in a Phase I ESA prepared for a site shall be implemented. If a Phase I ESA indicates the presence or likely presence of contamination, the applicant shall prepare a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented prior to ground disturbance, which will be made a condition of approval for the project” (PEIR, pg. ES-24).

¹⁴ <https://humboldt.gov/2464/Climate-Action-Plan>.



- Mitigation Measure 3.7-2b requires that “applicants for new cannabis activities in commercial, business park, or industrial sites shall include a hazardous materials contingency plan for review and approval by Humboldt County Division of Environmental Health. The plan shall describe the necessary actions that would be taken if evidence of contaminated soil or groundwater is encountered during construction. The contingency plan shall identify conditions that could indicate potential hazardous materials contamination, including soil discoloration, petroleum or chemical odors, and presence of USTs or buried building material. The plan shall include the provision that, if at any time during constructing the project, evidence of soil and/or groundwater contamination with hazardous material is encountered, the project applicant shall immediately halt construction and contact Humboldt County Division of Environmental Health. Work shall not recommence until the discovery has been assessed/treated appropriately (through such mechanisms as soil or groundwater sampling and remediation if potentially hazardous materials are detected above threshold levels) to the satisfaction of Humboldt County Division of Environmental Health, RWQCB, and DTSC (as applicable). The plan, and obligations to abide by and implement the plan, shall be incorporated into the conditions of approval for the project” (pg. ES-24).

Relevant Project Components. The Project impacts MB-zoned parcels, which could have potential higher rates of hazards or hazardous materials due to past industrial activities. Potential hazards or hazardous materials could be unearthed during construction activities.

Impact Analysis. The Project components would be carried out in an industrial setting, on parcels zoned MB. Therefore, Mitigation Measures 3.7-2a and 3.7-2b would apply to any indoor cultivation site in the MB-Zone. In addition, applicants would be required to adhere to the Adaptive Reuse of Industrial Sites provisions within the CCLUO, if applicable (CCLUO §55.4.9) and the Performance Standards for Adaptive Reuse of Developed Industrial Site(s), if applicable (CCLUO §55.4.12.12).

The Project parcels are located in the Redway Business Park, which is not located in close proximity to any schools or airports. All cannabis activities associated with indoor cultivation would be required to be “enclosed” within a structure, per the CCLUO. Adherence to the Mitigation Measures and Performance Standards of the CCLUO on industrial sites would prevent the release of hazardous materials potentially unearthed during construction activities.

Therefore, in light of the PEIR, existing Mitigation Measures, and the Adaptive Reuse of Industrial Site Performance Standards of the CCLUO, the Project’s impacts on Hazardous and Hazardous Materials would not exceed those previously considered and would not create any new significant impacts.

3.3.10 Hydrology and Water Quality

Section 3.8 of the Commercial Cannabis PEIR evaluates environmental effects related to Hydrology and Water Quality, and finds the impacts of the PEIR to be less than significant with Mitigation Measures incorporated.

Mitigation. Mitigation Measures listed in Section 3.8 were found to reduce significant and potential impacts to operational water quality, groundwater supply, surface drainage and on-site flooding, and diversion of surface water and through Performance Standards and Mitigation Measures, were reduced to levels less than significant. These Mitigation Measures include size restrictions on commercial cultivation activities, annual groundwater and adaptive management, design features to attenuate increase in



drainage, water diversion and monitoring and reporting requirements (Mitigation Measures 3.8-2, 3.8-3, 3.8-4, and 3.8-5).

Relevant Project Components. Project components could impact hydrology and water quality, as indoor cultivation involves the use of water for irrigation, which could impact surface water and/or groundwater. Construction/operational impacts could indirectly impact water quality.

Impact Analysis. Indoor cultivation projects would require water to irrigate. Water could not be sourced directly from diversionary sources as it is prohibited in the CCLUO (CCLUO §55.4.6.3.2). Water for the new indoor cultivation sites could potentially be sourced from rainwater, or municipal water, or from a groundwater well, if proven to be non-diversionary. Potential impacts from each of these water sources are analyzed as follows:

- New indoor cultivation sites facilitated by the Project could utilize rainwater collection and storage as the water source for their cultivation. In the CCLUO, applicants are required to provide information detailing projected water use, method of irrigation, and a water budget showing monthly irrigation demands. For rainwater catchment, operators are required to calculate how their site can capture and store adequate rainwater to meet expected demand. The Project would impact only seven parcels in the watershed, totaling approximately 9.98 acres. The Eel River watershed area upstream of the Project is approximately 480 square miles (307,200 acres¹⁵). Therefore, the catchment area of the Project is only 0.003% of the overall watershed area. Thus, the potential rainwater catchment of the Project is insignificant when compared to the watershed.
- New indoor cultivation sites facilitated by the Project could utilize municipal water sourced from the Redway Community Services District (RCSD). RCSD sources water from the South Fork of the Eel River. If diverted irresponsibly, the Project could have significant impacts on the Eel River through RCSD-sourced water. However, as described in the Project Description in Section 2, the RCSD has been consulted about the Project. The Special Restrictions and Performance Standards of the proposed Q-Zone have been specifically designed to minimize impacts to RCSD and, subsequently, to RCSD-sourced surface water. Under the Q-Zone, indoor cultivation sites would be limited to 91,250 gallons of RCSD-sourced water annually and would be required to have enough water storage onsite to last from June 1st through October 31st (to continue operating in the event of an RCSD-curtailed order). Therefore, new indoor cultivation applicants sourcing water from RCSD would be required to divert water during the wet months (up to the maximum of 91,250 gallons annually) rather than the dry months, thus minimizing impacts to surface water during drier months. The RCSD treatment system can treat approximately 580,000 gallons of water per day during the wet season¹⁶, or approximately 69.6 million gallons over the entire wet season. As a conservative estimate, if all seven parcels included in the Project utilized RCSD-sourced water, a maximum of 638,750 gallons would be diverted over the wet season, representing only 0.9% of the system's treatment capacity during the wet season. Furthermore, the RCSD sent a letter of support for the Project, indicating that the proposed maximum water sourced from the RCSD is within the system's capacity. Additional requirements of the Q-Zone stipulate that indoor cannabis cultivators who source water from the RCSD shall separately meter water for cultivation, shall adhere to RCSD-issued restrictions, limitations, curtailment orders, conservation measures, and policies, and shall submit a Water Use and Storage Plan that details existing/proposed uses of RCSD-water, a description of typical monthly water usage for all onsite

¹⁵ <https://streamstats.usgs.gov/ss/>

¹⁶ https://www.waterboards.ca.gov/northcoast/board_info/board_meetings/02_2023/pdf/4/redway_eosr.pdf



uses and for the indoor cannabis cultivation uses, projected monthly water demand for employees and ancillary uses associated with proposed indoor cannabis cultivation, volume and type of proposed water storage, and a description of how all of these Special Restrictions and Performance Standards will be adhered to.

- New indoor cultivation sites facilitated by the Project could utilize groundwater from wells as the water source for their cultivation. The California Department of Water Resources (DWR) prioritized 517 groundwater basins and subbasins in California as either high, medium, low, or very low based on eight components to determine which basins are in overdraft and/or require groundwater management as part of the Sustainable Groundwater Management Act (SGMA)¹⁷. Per the Groundwater Basin Boundary Assessment Tool¹⁸, the Redway Business Park is not located within a defined groundwater basin, and therefore it is not in a priority groundwater basin under jurisdiction of the SGMA. In addition, per the DWR's Well Completion Report Map Application, there are no existing permitted wells within the Redway Business Park MB-Zoned parcels¹⁹. Therefore, per County policy, new indoor cultivation sites facilitated by the Project intending to use groundwater wells would be required to drill and permit a new well through the Humboldt County Department of Environmental Health, and have it analyzed by a hydrogeologist, or similarly qualified professional, for connectivity to surface water prior to use. The Project would not substantially decrease groundwater supplies that would interfere with sustainable groundwater management of the basin, since the site is not located within a managed groundwater basin or a priority groundwater basin. Similarly, the Project would not interfere with a Sustainable Groundwater Management Plan.

As discussed under the PEIR, commercial cannabis cultivation sites are required to enroll in the North Coast Regional Water Quality Control Board's Cannabis General Order, which includes Best Practicable Treatment or Control Measures to manage erosion and sediment onsite. Indoor Cultivation activities are conditionally exempt from this order, if they can demonstrate proper disposal of wastewater from indoor cultivation sites (or from enclosed nurseries). In addition, construction associated with new commercial buildings for Indoor Cultivation potentially allowed by the Project would be required to obtain a Grading and Building Permit through the Humboldt County Planning and Building Department, which would require development of an Erosion and Sediment Control Plan.

Impacts to Hydrology and Water Quality from enclosed commercial nurseries, a similar activity to indoor cultivation, that are already allowed on the sites affected by the Project, were already analyzed under the PEIR, the Project would not cause additional significant impacts or impacts requiring additional mitigation that was not already considered.

The Project would allow for indoor cultivation on seven parcels that were previously analyzed for other water-intensive cannabis activities, such as commercial enclosed nurseries, under the PEIR.

Therefore, in light of the PEIR, existing Mitigation Measures, the CCLUO Performance Standards, and the proposed Special Restrictions and Performance Standards of the proposed Q-Zone, the Project's impacts on Hydrology and Water Quality would not exceed those previously considered and would not create any new significant impacts.

¹⁷ <https://water.ca.gov/sgma>.

¹⁸ <https://gis.water.ca.gov/app/bbat/>.

¹⁹ <https://gis.water.ca.gov/app/wcr/>.



3.3.11 Land Use and Planning

Section 3.9 of the Commercial Cannabis PEIR evaluates environmental effects related to Land Use and Planning, finding that the impacts of implementing the CCLUO would be less than significant.

Relevant Project Components. Project components are carried out on commercial / industrial lands and may impact land use and planning.

Impact Analysis. The Project would impact seven parcels within the Redway Business Park, which is located near the community of Redway and within the boundaries of the Garberville/Redway/Benbow/Alderpoint Community Plan²⁰. The impacted parcels are zoned MB and have a Land Use Designation of Commercial Services (CS). The Q-Zone would be applied only to the subject seven parcels and would not impact any other MB-Zoned parcels in the County.

As described above, commercial cannabis activities are already allowed on the parcels targeted for potential indoor cultivation by the Project. Distribution, offsite processing, enclosed nurseries, community propagation centers, and non-flammable extraction are already allowed on MB-Zones.

According to the Resolution 23-51 for approval of Petition PLN-2022-18016, allowing indoor cultivation on MB-Zones is consistent with the General Plan because indoor cultivation would fall under a similar compatible use to those uses already allowed in CS-designated land²¹. Indoor cultivation is considered similarly compatible use because it has fewer impacts than heavy commercial uses, which are already allowed under (e.g., processing of waste materials, automobile wrecking, construction and agricultural equipment, etc.), and because other similar commercial cannabis uses are already allowed. The Project would not displace other existing businesses, nor would it impact residential housing or displace existing housing. Potential cultivators would be required to follow the Special Restrictions and Performance Standards Q-Zone, comply with the existing PEIR Mitigation Measures, and comply with the existing Performance Standards in the CCLUO which would limit water, energy, odor, and noise impacts from potential indoor cultivation sites facilitated by the Project to less than significant levels and would thus not create a public nuisance. Therefore, the Project, and implementation of the proposed Q-zone, would not conflict with the General Plan Land Use Element, the Community Plan, nor other known land use plans, policies, or regulations.

Therefore, in light of the PEIR, existing Mitigation Measures, the CCLUO Performance Standards, and the proposed Special Restrictions and Performance Standards of the proposed Q-Zone, the Project's impacts on Land Use and Planning would not exceed those previously considered and would not create any new significant impacts.

3.3.12 Noise

Section 3.10 of the Commercial Cannabis PEIR evaluates environmental effects related to Noise, including short-term construction noise, long-term operational noise, and long-term traffic noise, finding that the impacts of the second two categories were less than significant, and the impact of short-term construction noise was less than significant as mitigated.

²⁰ <https://humboldt.gov/DocumentCenter/View/285/Garberville-Redway-Benbow-Alderpoint-Community-Plan-PDF>.

²¹ <https://humboldt.legistar.com/View.ashx?M=F&ID=11896578&GUID=2ADB9E4B-9FC9-4D63-B26D-3A3812FFF8C4>.



Mitigation. The Commercial Cannabis PEIR identifies potentially significant impacts of short-term, construction-related noise, and requires limiting the times of operation for outdoor construction activity and use of heavy equipment to between 7:00 a.m. and 6:00 p.m., Monday through Friday, and between 9:00 a.m. and 6:00 p.m. on Saturday and Sunday.

Relevant Project Components. Activities of the Project pose potential impacts to noise similar to other CCLUO operations.

Impact Analysis. The Project would limit potential new Indoor Cultivation sites to seven parcels, already analyzed in the PEIR for similar activities (including noise associated with enclosed nurseries, off-site processing centers, distribution activities, etc.). In addition to the Mitigation Measures in the PEIR, which comply with the Humboldt County General Plan Noise Restrictions, the CCLUO includes Noise Performance Standards, which stipulate that, “noise from cultivation and related activities shall not result in an increase of more than three decibels of continuous noise above existing ambient noise levels at any property line of the site.” (§55.4.12.6). The Project area is within existing industrial and commercial zoned areas and is not located near any residentially zoned areas. In addition, any new indoor cultivation sites facilitated by the Project would be required to adhere to the heavy use equipment operating times for construction activities as required by Mitigation Measure 3.10-1.

Therefore, in light of the PEIR, the existing Noise Mitigation Measure, and the Noise Performance Standards of the CCLUO, the Project’s impacts on Noise would not exceed those previously considered and would not create any new significant impacts.

3.3.13 Public Services

Section 3.11 of the Commercial Cannabis PEIR evaluates environmental effects related to Public Services. It found that compliance with existing building, electrical, and fire code regulations as well as roadway access performance standards set forth in the ordinance provide sufficient access for fire prevention and emergency response. Commercial cannabis production and operation under the ordinance would not require increased law enforcement services resulting in the need for new or altered facilities. Therefore, the impacts to public services of implementing the CCLUO would be less than significant.

Relevant Project Components. Indoor Cultivation activities would be required to be conducted in permitted structures that comply with the California Building Code, and are permitted through the Humboldt County Building Department. These buildings would be required to comply with existing building, electrical, and fire code regulations, as well as road standard regulations, as was already concluded in the PEIR.

Impact Analysis. The Project would not have any additional impacts to public services, as the impacted parcels were already considered in the PEIR for commercial cannabis activities. Indoor Cultivation activities would not have an increased need for public services (e.g., police, fire protection) when compared to other commercial cannabis activities (e.g., enclosed nursery, distribution centers, off-site processing, etc.) that are currently allowed on the parcels impacted by the Project.

In light of the PEIR, the Project’s impacts on Public Services would not exceed those previously considered and impacts would remain less than significant.

3.3.14 Transportation



Section 3.12 of the Commercial Cannabis PEIR describes environmental effects related to Transportation and Circulation, finding that the impacts of implementing the CCLUO would be less than significant. The analysis uses the Level of Service (LOS) metric to evaluate transportation impacts. Beginning on July 1, 2020, amendments to the CEQA guidelines establish Vehicle Miles Traveled (VMT) as the preferred metric for transportation impacts.

Relevant Project Components. The Project could result in increases to traffic if permitted new indoor cultivation sites generated additional vehicle trips.

Impact Analysis. It is anticipated that the Project would not have any additional impacts to Transportation and Circulation greater than those already allowed by the CCLUO and analyzed under the PEIR. As the properties impacted by the Project were already analyzed for commercial enclosed nurseries, distribution centers, off-site processing centers, non-flammable extraction, etc., which would have similar traffic trips to an indoor cultivation site. Other, higher-intensity and higher-traffic activities, such as retail stores, are currently principally permitted under the MB-Zone and allowed under the CS designation. As such, the Project would not create increased traffic at levels not already considered by the PEIR.

Similarly, the Project would not remove or impact existing bicycle and pedestrian facilities. Per the Humboldt County Association of Governments (HCAOG), no designated bicycle routes²² or trails are located within the Redway Business Park. Potential indoor cultivation sites would be required to maintain pedestrian access (e.g., sidewalks) through the Building Permit process. No public transit services are located directly within the vicinity of the Project²³. Additionally, no impacts to public transit would be expected from the addition of seven indoor cultivation sites on sites already approved for similar cannabis activities. Projects would also be required to maintain emergency access.

Since the certification of the PEIR, CEQA analysis for transportation impacts has generally transitioned from LOS to VMT. The County of Humboldt has not yet adopted VMT thresholds. According to the 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA from the Governor’s Office of Planning and Research, “projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact”, barring inconsistency with a Sustainable Communities Strategy or general plan (OPR, 2018). While the number of generated trips would vary from project to project, it is reasonable to assume that indoor cultivation operations would not generate traffic at this level. Based on a review of approved indoor cultivation sites on the County’s Accela website²⁴, none of them generate greater than 110 trips per day. The largest approved indoor cultivation site in the County, approved at 5.39 acres of indoor cultivation, would only generate 102 trips per day²⁵. As all seven of the impacted parcels are under 5 acres, potential indoor cultivation sites would be limited by the size of the parcel, development setbacks, and building heights. In addition, a Use Permit would be required if an applicant was seeking greater than 10,000 square feet of indoor cultivation, at which time a project-specific analysis of estimated trips would occur. Therefore, it is not anticipated that the Project would have a significant impact on VMT.

²² <https://www.hcaog.net/map/>

²³ <https://hta.org/agencies/southern-humboldt-intercity/>

²⁴ <https://aca-prod.accela.com/HUMBOLDT/Default.aspx>.

²⁵ <https://aca-prod.accela.com/HUMBOLDT/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=REC22&capID2=00000&capID3=000EM&agencyCode=HUMBOLDT>.



Therefore, in light of the PEIR, the Project would not generate any additional impacts greater than those already considered, nor would it generate any additional significant impacts.

3.3.15 Tribal Cultural Resources

Section 3.5 of the Commercial Cannabis PEIR evaluates environmental effects related to cultural resources and California tribal cultural resources. Potentially significant impacts that involve disturbance or destruction of cultural resources from land conversion and new development will be mitigated to a less than significant level through ordinance requirements to conduct a survey of the site and for submittal of associated technical reports documenting, assessing and avoiding impacts on resources in Areas of Traditional Tribal Cultural Affiliation in Sections 313-55.4.5.1.5 and 313-55.4.5.1.5. Further, impacts due to inadvertent discovery of human remains or tribal cultural resources would be prevented by ordinance requirements for compliance with California Health and Safety Code Sections 7050.5 and 7052 and California Public Resources Code Section 5097. Impacts of the CCLUO were therefore found to be less than significant.

Relevant Project Components. Indoor Cultivation sites permitted by the Project could be located on lands that contain, or are nearby previously unknown Tribal Cultural Resources.

Impact Analysis. The Project would apply to seven parcels located within the existing disturbed, developed Redway Business Park. A majority of the seven parcels are already developed, however, potential new construction for indoor cultivation buildings could be facilitated by the Project. All new construction would be subject to the consultation requirements described in Section 314-55.4.5.1.5. Impacts due to inadvertent discovery of human remains or tribal resources on Project parcels are required by the CCLUO to comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.

Therefore, in light of the PEIR and existing Mitigation Measures, the Project's impacts on Tribal Cultural Resources would not exceed those previously considered and impacts would remain less than significant.

3.3.16 Utilities and Service Systems

Section 3.13 of the Commercial Cannabis PEIR evaluates environmental effects related to Utilities and Service Systems, finding that the impacts of implementing the regulations would be less than significant as mitigated.

Mitigation. Mitigation measures and performance standards listed in Section 3.13 were found to reduce significant and potentially significant impacts related to exceeding wastewater service demand, increases in water demand from public water systems, and contribution to solid waste generation. These Mitigation Measures include treatment programs and verified wastewater services, requiring verification of adequate water supply and service, and preparation of a treatment program for all new indoor and non-cultivation activities.

Relevant Project Components. Water needed for irrigation, power, and wastewater for the new indoor cultivation sites facilitated by the Project could impact water, energy, and/or wastewater utilities and services.



Impact Analysis. It is anticipated that indoor cultivation sites would require water for irrigation purposes, and wastewater which would be sourced from the Redway Community Services District (RCSD), and power for energy purposes, which could be sourced from PG&E. In order to obtain municipal water services from the RCSD, the applicant would be required to obtain a will-serve letter and submit a Water Use and Storage Plan that describes monthly use, onsite water demand, and onsite storage. In addition, the applicant would be limited to sourcing a maximum of 91,250 gallons annually of municipal water so as not to impact the RCSD's capacity and would be required to demonstrate onsite forbearance to comply with a curtailment order during a drought year, if issued by RCSD. Applicants would also be required to follow all orders, policies, regulations, and limitations issued by RCSD. RCSD already provides municipal water and wastewater services to the Redway Business Park which the CCLUO already allows cannabis support facilities (e.g., distribution, nursery, community propagation center, etc.). If using grid power, indoor cultivation sites would also be required to demonstrate that existing onsite power from PG&E is adequate for the proposed operation. All of these requirements are Special Restrictions and Performance Standards in the Q-Zone that applicants would be required to demonstrate compliance with. Therefore, the Project would not have a significant impact on the RCSD or PG&E.

Therefore, in light of the PEIR, the existing Mitigation Measures, and the Special Restrictions and Performance Measures of the proposed Q-Zone, the Project's impacts on Utilities and Service Systems would not exceed those previously considered and impacts would remain less than significant with Mitigation Measures incorporated.

3.3.17 Wildfire

Section 3.7 of the Commercial Cannabis PEIR, relating to Hazards, evaluates environmental effects due to risk of wildfires. Commercial cannabis cultivation in rural areas, areas designated as High Fire Hazard Severity Zones, or at the urban-wildland interface could expose workers, structures, and firefighters to risk of loss from wildfire hazards. The analysis found that this hazard would not be substantially worse than that for other types of land uses in the same areas, and would be reduced compared to existing cannabis cultivation occurring under baseline conditions. Existing laws would be anticipated to reduce potential impacts. For these reasons, the impact of implementing the CCLUO would be less than significant.

Relevant Project Components. The Redway Business Park is within the Cal Fire State Responsibility Area (SRA), and has a designated fire risk of High Fire Hazard Severity. Fire response to the area is from the Redway Fire Protection District. Indoor Cultivation Sites include electrical equipment which could malfunction and potentially cause a fire.

Impact Analysis. It is reasonable to assume that Indoor Cultivation Sites pose no greater fire risk than an enclosed commercial nursery, which was considered by the PEIR for the seven affected parcels and is allowed on MB-zones across the County. All potential new indoor cultivation sites would be required to demonstrate compliance with local and state fire safety regulations, including building fire safety, defensible space, and SRA setbacks from property lines. Cultivators would be required to obtain a Building Permit for new building construction, which would require fire safety analysis. Additionally, potential new indoor cultivation sites would be referred to applicable agencies (e.g., the Redway Fire Protection District) during the referral period process with Humboldt County.

Therefore, in light of the PEIR, the Project's impact on Wildfire would not exceed those previously considered, nor would it create any additional significant impacts.



3.3.18 Significant Unavoidable Impacts

The Redway Business Park Indoor Cultivation Amendment (Project) would not change the conclusions reached by the certified 2017 Commercial Cannabis PEIR regarding the environmental effects addressed in the Significant Unavoidable Impact Section of the PEIR.

The Project, like the CCLUO it modifies and the inclusion of a Q-Zone, is intended to regulate cannabis cultivation in the county and to minimize impacts, including environmental impacts. The Project would affect seven parcels in the County. Like the CCLUO, the Project would not 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.

The cumulative impacts of commercial cannabis cultivation have already been reviewed in the Commercial Cannabis PEIR. Cumulative impacts of the CCLUO overall are considered not cumulatively considerable except with respect to air quality (PM¹⁰ and odors) and water impacts. In those categories, cumulative impacts are found to be potentially significant and unavoidable. In its Resolution of May 8, 2018, the Board of Supervisors determined that the benefits of the CCLUO outweigh its unavoidable, adverse environmental impacts so that the impacts may be considered acceptable. In evaluating the Project, the incremental effects of potentially permitting up to seven new indoor cultivation sites, on parcels already allowed to have other similarly intensive commercial cannabis activities, are likely to be similar to those of any other indoor cultivation activity carried out elsewhere in the County. In light of the PEIR, cumulative impacts of implementing the Project do not exceed those previously considered in that document. *Due to the limited scope of the Project and with the Special Restrictions and Performance Standards of the Q-Zone, approval of the Project would, for that reason, have impacts that are both individually and cumulatively less than significant.*

Project Environmental Impact Conclusions. The Project would have no significant impact on any of the topical issues reviewed above, beyond those identified in the PEIR. Although the Commercial Cannabis PEIR identified significant unmitigated impacts associated with a particular area of assessment, the Project would not result in an increase in the severity of any of those potential impacts. Accordingly, for purposes of this Addendum, the Project would only result in less than significant changes in the level of impact identified or the mitigation measures proposed by the Commercial Cannabis PEIR.

4.0 STATEMENT OF FINDINGS

An addendum to a previous EIR is appropriate when all of the required findings described below can be made.

1. No substantial changes are proposed in the project which will require revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§15162(a)(1)].

The changes proposed in the Redway Business Park Indoor Cultivation Amendment pertain to the same cultivation activities examined in the Commercial Cannabis PEIR, and therefore will have, if any, the same types of impacts on the environment described in the Commercial Cannabis PEIR. Further, the



amendment includes the implementation of a Q-Zone to further avoid and mitigate potential impacts to water and energy. Therefore, the Project requires no major revisions to the Commercial Cannabis PEIR, and no new significant environmental effects or substantial increase in the severity of previously identified significant effects will result from adoption of the amendment.

2. No substantial changes occur with respect to the circumstances under which the project is undertaken which will require revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§15162(a)(2)].

No substantial change in circumstances has occurred since the Commercial Cannabis PEIR was certified in 2018 that would trigger new or more severe significant environmental effects. Therefore, no new EIR is warranted on the grounds of changed circumstances.

3. 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 Board of Supervisors certified the previous EIR, shows any of the following:

a. The project will not have one or more significant effects not discussed in the previous EIR [§15162(a)(3)(A)];

The Project would allow permit applications for new indoor commercial cannabis cultivation sites on seven MB-Zoned parcels in an industrial park where no permit for indoor cultivation sites was allowed previously. However, those same parcels were previously analyzed for similar cannabis uses, including enclosed commercial nursery, processing centers, and distribution centers, and also allow for heavier principally permitted non-cannabis activities (e.g., manufacturing, warehousing, automobile servicing, retail stores, construction staging, etc.). The expected effects are similar to those of the whole project, with no new or more significant effects not previously discussed in the Commercial Cannabis PEIR. *Therefore, there is no evidence that the Project will result in one or more significant new effects not discussed in the Commercial Cannabis PEIR.*

b. Significant effects previously examined will not be substantially more severe than shown in the previous EIR [§15162(a)(3)(B)];

In light of the scale of permitted cultivation under the Project, combined with eligibility criteria, changes in significant effects previously examined are anticipated to be minimal, or less severe than those considered in the Commercial Cannabis PEIR. No new information of substantial importance has been introduced that would increase the severity of the identified cumulative impacts or cause new significant effects not discussed in the Commercial Cannabis PEIR. *Based on projected development, adopting the Redway Business Park Indoor Cultivation Amendment will not have significant effects substantially more severe than shown in the Commercial Cannabis PEIR.*

c. No 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 [§15162(a)(3)(C)];

No new information of substantial importance has been introduced that would make mitigation measures or alternatives previously found not to be feasible that were discussed in the Commercial Cannabis PEIR to now be feasible. No significant impacts are anticipated as a result of the Project, beyond those identified



in the Commercial Cannabis PEIR. Statements of overriding consideration were adopted for those significant and unavoidable impacts of the CCLUO, which relate to air quality (PM¹⁰ and odors) and water supply capacity. Additional mitigation measures and alternatives that were previously considered would not reduce the identified impacts for the same reasons stated in the Commercial Cannabis PEIR. *Therefore, no mitigation measures or alternatives previously found not to be feasible would in fact be feasible that would substantially reduce one or more significant effects of the project.*

d. No mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative [§15162(a)(3)(D)].

No new information of substantial importance has been introduced that would require mitigation measures or alternatives which are considerably different from those that were discussed in the Commercial Cannabis PEIR and/or that would substantially reduce one or more significant effects on the environment. Statements of overriding consideration were adopted for the previously identified impacts. *No new or previously rejected mitigation measures or alternatives would reduce potential impacts.*

5.0 Conclusion Regarding Preparation of an Addendum

The proposed Redway Business Park Indoor Cultivation Amendment would not change any previous conclusions associated with effects disclosed in the Commercial Cannabis PEIR. Impacts previously found to be less than significant would not be elevated to significant as a result of the proposed Redway Business Park Indoor Cultivation Amendment. No new significant impacts or more severe impacts resulting from the proposed modifications were identified, and no changes would occur in the Commercial Cannabis PEIR analysis of significant impacts. Therefore, based on the information above, none of the conditions described in Section 15162 of the CEQA Guidelines have occurred and there is no substantial evidence to warrant the preparation of a subsequent EIR. The decision-making body shall consider this Addendum to the final certified 2018 Amendments to Humboldt County Code Regulating Commercial Cannabis Activities Program EIR prior to deciding the project.

LINK TO THE PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE CCLUO

<https://humboldt.gov/DocumentCenter/View/62689/Humboldt-County-Cannabis-Program-Final-EIR-60mb-PDF>



