ERRATA TO THE FINAL EIR

This errata presents specific text changes made to the Final EIR since its publication to address minor edits as well as recommendations by the Planning Commission at their September 17 and 18, 2025 hearing. The changes are presented in the order in which they appear in the original Final EIR and are identified by the Final EIR page number.

The information contained within this errata clarifies and expands on information in the Final EIR and does not constitute "significant new information" requiring recirculation (Public Resources Code Section 21092.1; State CEQA Guidelines Section 15088.5).

REVISIONS TO SECTION 2.1 IN THE DRAFT EIR, "PROJECT MODIFICATION"

During the Planning Commission hearing that occurred September 17 and 18, 2025, recommendations were made to the proposed Program.

To address these changes, Chapter 2 of the Final EIR, "Project Updates," has been updated to include the following.

Modification to Exhibit A General Plan Amendment

Policy AR 4-d is amended to expressly not include cannabis in the Right to Farm Ordinance

Modification to the Proposed Zoning Code

The proposed zoning code would now reflect the following standards for cannabis uses recommended by the Planning Commission Hearing that occurred on September 17 and 18, 2025:

- Retain 10-acre minimum parcel size
- Retain cap of nine dispensary permits
- Add a cannabis exclusion combining zone with criteria that include consideration of inadequate road access, existing residential uses, intense odor from overconcentration, fire hazard, and low water supply.
- Clarify maximum attendees is per activity day for visitor serving activities.
- Require a 1,000-foot setback from residential zoning districts and incorporated city boundaries
- Add cap of nine permits for delivery (non-storefront retail)
- Proposed Code Section 26-18-115(C)(4)(h) has been revised to more clearly state that parking lots and storage cannot be expanded beyond the existing site footprint and that roads cannot be added, expanded, or relocated.

Additionally, the proposed zoning code has been clarified with regards to which crops qualify for crop swap and that the entire cannabis premises must be within the previously developed footprint and that new road development is not allowed.

REVISIONS TO SECTION 2.2 IN THE DRAFT EIR, "PROJECT MODIFICATION"

As noted above, the Planning Commission Hearing that occurred on September 17 and 18, 2025, recommendations were made to the Cannabis Program Update, as noted above. To address these changes, Chapter 2 of the Final EIR, "Project Updates," has been modified to include the following.

Modification to Exhibit A General Plan Amendment

The modifications to Exhibit A General Plan Amendment reflect a change in the proposed program to explicitly exclude cannabis from the Right to Farm Ordinance. This modification would not create new cannabis use activity or expansion of proposed cannabis uses under the proposed Cannabis Program Update that are evaluated in Draft EIR Sections 3.1 through 3.17 and Chapter 4. Thus, the environmental impact analysis provided in the Draft EIR adequately addresses this Code modification.

Modification to the Proposed Zoning Code

The modifications to proposed zoning Code recommended by the Planning Commission would clarify the number of days visitor-serving activities could occur, without changing the intent of the original provision, and increase setbacks from residential zoning districts and incorporated city boundaries to 1,000 feet. A cannabis exclusion combining zone would be added that would prohibit cannabis uses in areas of the county where inadequate road access, existing residential uses, intense odor from overconcentration, fire hazard, and low water supply may exist. Additionally, the proposed zoning code was clarified that to state that all areas of the cannabis premises must be within the developed footprint and that roads cannot be added, expanded, or relocated. Also, the definition of active cultivation for crop swap was amended to more clearly state that in order to be eligible for crop swap hay must have been plowed, seeded, and harvested annually and that grazing land is not eligible. These modifications would not create new cannabis use activity or an expansion of proposed cannabis uses under the proposed Cannabis Program Update that are evaluated in Draft EIR Sections 3.1 through 3.17 and Chapter 4. Thus, the environmental impact analysis provided in the Draft EIR adequately addresses this Code modification.

REVISION TO SECTION 3.2.1 MASTER RESPONSE 1: EVALUATION OF CANNABIS ODOR IMPACTS AND ASSOCIATED MODELING

The following text is added to Final EIR Chapter 3, "Response to Comments," under Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," after the fourth paragraph on page 3-10 to clarify the Draft EIR treatment of cumulative odor impacts:

- Several comments state that the Draft EIR failed to address cumulative impacts from multiple cannabis cultivation sites generating odors near receptors. As described above, the proposed Cannabis Program Draft EIR was prepared as a "Program EIR" consistent with State CEQA Guidelines Section 15168. The Draft EIR has been prepared to determine the overall environmental effects of multiple cannabis uses (including odor) in the unincorporated county that would be allowed under the proposed Cannabis Program Update and not a single cannabis site or use. Draft EIR Impact 3.3-4 (Draft EIR pages 3.3-21 through 3.2-26) specifically address each of the allowed cannabis uses and their potential to create odor impacts. It is acknowledged implementation of the Cannabis Program Update could result in cannabis cultivation uses with similar odor characteristics located close to each other resulting in multiple odor detections by receptors consistent with the conclusions of Impact 3.3-4. However, these cannabis odor impacts are impacts of the project and are not associated with a county-wide cumulative odor impact from other land uses. As identified on Draft EIR page 4-7, odor impacts tend to not to be cumulative in nature with odor issues generally limited to within 1 to 4 miles of an odor-emitting source.

The title for Figure 3-1 in the Final EIR Chapter 3, "Response to Comments," under Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," on page 3-11 to corrected to read: "Ground-Level Odor Concentration vs. Distance from 1 Acre Facility."

The text for the first bullet on page 3-12 of the Final EIR Chapter 3, "Response to Comments," under Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," has been updated.

The original text was:

- Mischaracterization of human health risks associated with exposure to beta-myrcene.

New updated text:

- Mischaracterization of human health risks associated with exposure to beta-myrcene, molecular debris, and atmospheric reactions from cannabis plant emissions of biogenic volatile organic compounds that create formaldehyde, ozone, and formic acid.

The following text is added to Final EIR Chapter 3, "Response to Comments," under Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," above the title "Inadequate Determination of Safe Exposure Levels to Beta-Mycrene Established in the Occupational Exposure Limit Monograph for Beta-Myrcene Report Prepared by SafeBridge Consultants" on page 3-14 to provide further response to concerns regarding potential emissions and health impacts from cannabis plant emissions of molecular debris and biogenic volatile organic compounds that create formaldehyde, ozone, and formic acid:

Human Health Risk Associated with Exposure to Molecular Debris, Formaldehyde, Ozone, and Formic Acid

In addition to exposure to beta-myrcene, comments also identified health concerns associated with exposure to cannabis emissions of molecular debris and atmospheric reactions from cannabis plant emissions of biogenic volatile organic compounds that create formaldehyde, ozone, and formic acid. The comments refer to the following technical studies to support the assertion that cannabis cultivation could create a health hazard.

- Delikhoon, M., Fazlzadeh, M., Soroohian, A., Baghani, A.N., Golaki, M., Ashournejad, Q., and Barkhordari. A., Characteristics and Health Effects of Formaldehyde and Acetaldehyde in an Urban Area in Iran. Environ Pollut. 2018 Jul 17;242(Pt A):938–95
- Wang, C-T., Wiedinmyer, C., Ashworth, K., Harley, P.C., Ortega, J., Rasool, Q., and William, V. Potential Regional Air Quality Impacts of Cannabis Cultivation Facilities in Denver, Colorado. Atmospheric Chemistry and Physics 2019.
- Urso, K., Vizuete, W., Moravel, R., Khlystov, A., Frazier, A., and Morrison, G. Indoor Monoterpene Emission Rates from Commercial Cannabis Cultivation Facilities in Colorado. J Waste Manag Assoc 2023
- Seltenrich, N. Odor Control in the Cannabis Industry: Lessons from the New Kid on the Block. Environ Health Perspect.2022 Jun; 130(6):062001 (2022).

Each of these sources of potential health effects are addressed below.

Molecular debris is produced in plants and other organisms as a result of normal biological processes such as cellular turnover, programmed cell death, autophagy, and environmental stress responses. Plant debris, which includes molecular fragments from cells and tissues, is a major and naturally occurring component in soils and ecosystems. These natural processes continuously generate molecular debris as part of life cycles and adaptation mechanisms in plants. Molecular debris generated by plants is generally natural and does not typically pose direct health hazards to humans. However, certain types of molecular debris and other interactions, especially when associated with environmental pollutants or pesticides and herbicides can pose potential health risks (Pathak et al. 2022). As described in Draft EIR Impact 3.9-1, pesticides used on cannabis cultivation sites are required to have active ingredients that are exempt from residue tolerance requirements and that are either (1) registered and labeled for a use that is broad enough to include use on cannabis or (2) exempt from registration requirements as a minimum-risk pesticide under Section 25(b) of the Federal Insecticide, Fungicide, and Rodenticide Act. Some of these pesticides are bacterial-based insect pathogens (e.g., *Bacillus thuringiensis*) or biofungicides (e.g., *Bacillus subtilis*, *Gliocladium virens*). Active ingredients exempt from registration requirements are mostly food-grade essential oils, such as peppermint oil and rosemary oil. The use of restricted pesticides on cannabis cultivation is prohibited. Thus, no public health impacts are expected from molecular debris generated by cannabis plants. None of the above technical studies or technical information provided in comments on the Draft EIR identify a specific public health hazard associated with molecular debris from cannabis plants.

Biogenic volatile organic compounds (BVOCs) are organic chemical compounds emitted naturally primarily by vegetation (including cannabis). These compounds are carbon-based and gaseous under normal

atmospheric conditions. They play important roles in plant growth, but can influence atmospheric chemistry by contributing to the formation of ozone as the creation of formaldehyde and formic acid.[1] While comments refer to the technical studies identified above as evidence that cannabis cultivation generation of BVOCs can generate high levels of ozone, formaldehyde, and formic acid that can create public health impacts, these reports do not specifically identify BVOCs from cannabis cultivation as a primary source of BVOCs that could create these conditions. The Characteristics and Health Effects of Formaldehyde and Acetaldehyde in an Urban Area in Iran study did not specifically evaluate cannabis as a source of VOCs and concluded that the main source of VOCs that creates formaldehyde (that can also be converted to formic acid) is mobile emissions (traffic emissions) (Delikhoon et al. 2018). Both the Potential Regional Air Quality Impacts of Cannabis Cultivation Facilities in Denver, Colorado study and the Odor Control in the Cannabis Industry: Lessons from the New Kid on the Block both identified that ozone created from cannabis cultivation facilities was low (0.34 to 0.67 parts per billion associated with more than 600 registered cannabis cultivation facilities in Denver County) (Wang et al. 2019 and Seltenrich 2022). These ozone levels would be less than 1 percent of California's 1-hour ozone standard of 90 parts per billion. Thus, no significant public health impacts are expected from BVOC emissions from cannabis cultivation uses.

REVISIONS TO SECTION 3.3 OF THE FINAL EIR, "RESPONSES TO COMMENTS"

Revision to Response to Comment A2-1

To address a typographical error, the last paragraph in response to Comment A2-1 on page 3-45 of the Final EIR has been revised as follows.

Original:

The DCC has requested Sonoma County to disregard this comment letter. Please see Comment Letter A5.

Revised:

The DCC has requested Sonoma County to disregard this comment letter. Please see Comment Letter A6.

Revision to Response to Comment A3-2

To address a typographical error, the last sentence in response to Comment A3-2 on page 3-46 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

[1] Formic acid creation involves the photochemical degradation of volatile organic compounds. Specifically, formaldehyde, a common atmospheric compound, undergoes a multiphase chemical process in cloud droplets where it is converted to methanediol, which then oxidizes via reactions with hydroxyl radicals (OH) to produce formic acid.

Revisions to Response to comment A4-4 in the Final EIR

This response to comment has been modified to address clarifications made to the proposed Code, which more clearly prohibits new development under crop swap permits. To provide further detail to this response, the following modification was made to the second paragraph on page 3-50 of the Final EIR.

Original:

Crop swap activities would be prohibited from constructing any new permanent structures. The proposed Cannabis Program Update contains lighting standards for cannabis cultivation (Section 26-18-115[C][b]). These standards require all lighting to be so that it does not spill over onto neighboring properties and prohibit light escaping from cultivation within structures. While security lighting may be permitted for crop swap, Mitigation Measure 3.1-4b requires measures to reduce impacts related to artificial nighttime lighting (see response to Comment A4-11 below for additional detail).

Revised:

Crop swap activities would be prohibited from constructing any new permanent structures. This has been clarified through modifications to the Code, which now including the following as a standard to operation size: "All other areas within the cannabis premises, for example, parking lots and storage, cannot be expanded beyond the existing site footprint. Roads cannot be added, expanded, or relocated." Thus, no new permanent structures, including new parking areas or roadways would be constructed through approval of a crop swap application. While grading that does not require a permit would be allowed (e.g. minor cuts of less than 50 cubic yards), these activities do not require permits precisely because the limited extent of earth moving activity (with further limitations on depth and resulting slope) does not reasonably present the potential for environmental impacts. Any such limited grading for the cultivation site must be within the previously developed area that was used for the prior agricultural operation, which due to its prior use would not contain special status species or habitat. Similarly, the allowance for temporary hoophouses would not present the potential for environmental impacts. Temporary hoop houses do not include any permanent foundation. Temporary hoop houses are either placed on top of the ground or with poles going only a limited depth into the ground, which would not be any more intensive than the activities of the prior agricultural operation (e.g. tilling). Due their temporary nature and lack of permanent foundation, the temporary hoop houses are small in scale and use coverings that are frequently removed and thus do not present impacts associated with habitat fragmentation. Lastly, the proposed zoning code was clarified to only allow crop swaps for hay where it has been plowed, seeded, and harvested annually and to expressly state that grazing land is not eligible.

The proposed Cannabis Program Update contains lighting standards for cannabis cultivation (Section 26-18-115[C][b]). These standards require all lighting to be so that it does not spill over onto neighboring properties and prohibit light escaping from cultivation within structures. While security lighting may be permitted for crop swap, Mitigation Measure 3.1-4b requires measures to reduce impacts related to artificial nighttime lighting (see response to Comment A4-11 below for additional detail).

Revision to Response to Comment A4-4

To address a typographical error, the last paragraph in response to Comment A4-4 on page 3-51 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revision to Response to Comment A4-5

To address a typographical error, the last sentence of the first paragraph in response to Comment A4-5 on page 3-52 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.4, "Master Response 4: Crop Swap Approval," for further information on consideration of crop swap applications.

Revised:

The reader is referred to Section 3.2.4, "Master Response 4: Crop Swap Approval," for further information on consideration of crop swap applications.

Revisions to Response to Comment A4-6

To address a typographical error, the sixth paragraph in response to Comment A4-6 on page 3-54 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this Final EIR.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this Final EIR.

To address a typographical error, the last sentence in the eighth paragraph in response to Comment A4-6 on page 3-55 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

To address a typographical error, the last sentence in the 18th paragraph in response to Comment A4-6 on page 3-56 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

To address a typographical error, the fifth sentence in the last paragraph in response to Comment A4-6 on page 3-57 of the Final EIR has been revised as follows.

Original:

Mitigation Measures 3.10-2a has been revised to reflect this practice (see Section 3.1.5, "Master Response 5: Water Supply," and Chapter 4, "Revisions to the Draft EIR," for these modifications).

Revised:

Mitigation Measures 3.10-2a has been revised to reflect this practice (see Section 3.2.5, "Master Response 5: Water Supply," and Chapter 4, "Revisions to the Draft EIR," for these modifications).

To address a typographical error, the last sentence in the last paragraph in response to Comment A4-6 on page 3-57 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revision to Response to Comment A5-1

To address a typographical error, the last paragraph in response to Comment A5-1 on page 3-72 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.1.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," for additional details related to groundwater mitigation included in this EIR.

Revision to Response to Comment O14-4

To address a typographical error, the first sentence in the last paragraph in response to Comment O14-4 on page 3-134 of the Final EIR has been revised as follows.

Original:

The reader is also referred to Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," for a further discussion of the Draft EIR odor analysis model; Section 3.2.3, "Master Response 3: Law Enforcement and Crime," for a further discussion of law enforcement and crime associated with cannabis sites; Section 3.2.5, "Master Response 5: Water Supply," for a discussion of groundwater supply; Section 3.2.8, "Master Response 8: Consideration of Exclusion Zones," for a further discussion of the consideration of exclusion zones as part of the Cannabis Program Update; and response to Comment O14-3.

Revised:

The reader is also referred to Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," for a further discussion of the Draft EIR odor analysis model; Section 3.2.3, "Master Response 3: Law Enforcement and Crime," for a further discussion of law enforcement and crime associated

with cannabis sites; Section 3.2.5, "Master Response 5: Water Supply," for a discussion of groundwater supply; Section 3.2.8, "Master Response 8: Consideration of Exclusion Zones," for a further discussion of the consideration of exclusion zones as part of the Cannabis Program Update; and response to Comment O14-2.

Revision to Response to Comment O16-5

To address a typographical error, response to Comment O16-5 on page 3-148 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.2.2, "Master Response 2: Legality of Cannabis and the Definition of Cannabis as an Agricultural Use," for a discussion of the legal status of cannabis, and responses to Comment Letters O6 and O76 that address the February 22, 2024 and March 7, 2024 correspondence to Neighborhood Coalition.

Revised:

The reader is referred to Section 3.2.2, "Master Response 2: Legality of Cannabis and the Definition of Cannabis as an Agricultural Use," for a discussion of the legal status of cannabis, and responses to Comment Letters O6 and O7 that address the February 22, 2024 and March 7, 2024 correspondence to Neighborhood Coalition.

Revision to Response to Comment O18-4

To address a typographical error, Comment O18-4 on page 3-156 of the Final EIR has been revised as follows.

Original:

As described in "What's it Like to Live 100 feet from 15,000 Cannabis Plants?,", neighbors living near outdoor cannabis often cannot open their windows or use their yards for months each year. They are forced to breath air contaminated with cannabis emissions including Beta-Myrcene, 24 hours a day, 7 days a week. The level they inhale is toxic and, in many cases, carcinogenic.

Dr. Alan Cohen, a pulmonary physician and scientist, emphasizes that cannabis emissions "are not innocuous substances that simply make the air smell skunky and unpleasant, they carry meaningful health risks that need to be cautiously accounted for when considering allowances for commercial level cultivation of cannabis in unenclosed agricultural areas Cohen Report, Attachment 4). Appendix C to the DEIR includes two studies on cannabis emissions issues by Trinity/ Safebridge: (1) Occupational Exposure Limit (OEL) Monograph for Beta-Myrcene ("OEL Report"); and (2) Modeling to Estimate Ground-level Beta-Myrcene Concentrations ("Modeling Report.") No consultant for the DEIR has medical, pharmaceutical, or public health experience. The DEIR neither mentions nor discusses invoking the precautionary principle when public health and safety are at stake. No public health professional would confine the focus of a study to healthy adults and ignore sensitive receptors such as children, infants, the infirm, and the elderly. This is especially true when about half of Sonoma County's population are children and elderly (Eppstein Report, p. 7). Both California and the federal EPA set clean air standards to protect the health of sensitive populations such as asthmatics, children, and the elderly.

Dr. Karen Smith, the Interim Health Office for Sonoma County, submitted a letter to Scott Orr and Crystal Acker, of Permit Sonoma, that indicates her opinion that there is no evidence that emissions of beta-myrcene from cannabis plants or grows will pose any health risk to neighbors (Smith pers. comms., 2025). Note that Dr. Smith is an experienced public health official who previously served four years as director of the California Department of Public Health and state health officer, has been named interim health officer by the director of the Sonoma County Department of Health Services. A physician specializing in infectious disease and

public health with a master's degree in public health, Dr. Smith has led health departments at the state and local level.

Revised:

As described in "What's it Like to Live 100 feet from 15,000 Cannabis Plants?,", neighbors living near outdoor cannabis often cannot open their windows or use their yards for months each year. They are forced to breath air contaminated with cannabis emissions including Beta-Myrcene, 24 hours a day, 7 days a week. The level they inhale is toxic and, in many cases, carcinogenic.

Dr. Alan Cohen, a pulmonary physician and scientist, emphasizes that cannabis emissions "are not innocuous substances that simply make the air smell skunky and unpleasant, they carry meaningful health risks that need to be cautiously accounted for when considering allowances for commercial level cultivation of cannabis in unenclosed agricultural areas Cohen Report, Attachment 4). Appendix C to the DEIR includes two studies on cannabis emissions issues by Trinity/ Safebridge: (1) Occupational Exposure Limit (OEL) Monograph for Beta-Myrcene ("OEL Report"); and (2) Modeling to Estimate Ground-level Beta-Myrcene Concentrations ("Modeling Report.") No consultant for the DEIR has medical, pharmaceutical, or public health experience. The DEIR neither mentions nor discusses invoking the precautionary principle when public health and safety are at stake. No public health professional would confine the focus of a study to healthy adults and ignore sensitive receptors such as children, infants, the infirm, and the elderly. This is especially true when about half of Sonoma County's population are children and elderly (Eppstein Report, p. 7). Both California and the federal EPA set clean air standards to protect the health of sensitive populations such as asthmatics, children, and the elderly.

Revision to Response to Comment O18-4

To address a typographical error, response to Comment O18-4 on page 3-156 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.2.2, "Master Response 2: Legality of Cannabis and the Definition of Cannabis as an Agricultural Use," for a discussion of the legal status of cannabis, and responses to Comment Letters O6 and O76 that address the February 22, 2024 and March 7, 2024 correspondence to Neighborhood Coalition.

Revised:

Dr. Karen Smith, the Interim Health Office for Sonoma County, submitted a letter to Scott Orr and Crystal Acker, of Permit Sonoma, that indicates her opinion that there is no evidence that emissions of beta-myrcene from cannabis plants or grows will pose any health risk to neighbors (Smith pers. comms., 2025). Note that Dr. Smith is an experienced public health official who previously served four years as director of the California Department of Public Health and state health officer, has been named interim health officer by the director of the Sonoma County Department of Health Services. A physician specializing in infectious disease and public health with a master's degree in public health, Dr. Smith has led health departments at the state and local level.

The reader is referred to Section 3.2.2, "Master Response 2: Legality of Cannabis and the Definition of Cannabis as an Agricultural Use," for a discussion of the legal status of cannabis, and responses to Comment Letters O6 and O7 that address the February 22, 2024 and March 7, 2024 correspondence to Neighborhood Coalition.

Revision to Response to Comment O19-10

To address a typographical error, response to Comment O19-10 on page 3-210 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," and response to Comments O24-18 through O24-21 for a further discussion of the use of groundwater and the efficacy of mitigation measures provided in the Draft EIR and responses to Comment O24-46 through O24-61, which address Greg Kamman's full comment letter.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," and response to Comments O24-18 through O24-21 for a further discussion of the use of groundwater and the efficacy of mitigation measures provided in the Draft EIR and responses to Comment O24-46 through O24-51, which address Greg Kamman's full comment letter.

Revision to Response to Comment O19-11

To address a typographical error, response to Comment O19-11 on page 3-210 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.2.1, "Master Response 5: Evaluation of Cannabis Odor Impacts and Associated Modeling," regarding the evaluation of odor impacts and health effects from cannabis odor emissions.

Revised:

The reader is referred to Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," regarding the evaluation of odor impacts and health effects from cannabis odor emissions.

Revision to Response to Comment O23-1

To address a typographical error, the last sentence in response to Comment O23-1 on page 3-224 of the Final EIR has been revised as follows.

Original:

The reader is referred to response to Comment A4-4 for further discussion related to the use of plastic weed block materials.

Revised:

The reader is referred to response to Comment A4-12 for further discussion related to the use of plastic materials.

Revision to Response to Comment O24-4

To address a typographical error, the third paragraph in response to Comment O24-4 on page 3-230 of the Final EIR has been revised as follows.

Original:

With regard to comments on baseline water use and the definition of no net increase, the reader is referred to Section 3.2.6, "Master Response 5: Water Supply."

Revised:

With regard to comments on baseline water use and the definition of no net increase, the reader is referred to Section 3.2.5, "Master Response 5: Water Supply."

To address a typographical error, the first sentence in last paragraph in response to Comment O24-4 on page 3-231 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.2.6, "Master Response 5: Water Supply," where further refinements to Mitigation Measures 3.10-2a and 3.10-2b have been incorporated into the EIR to provide more prescriptive requirements for localized conditions.

Revised:

The reader is referred to Section 3.2.5, "Master Response 5: Water Supply," where further refinements to Mitigation Measures 3.10-2a and 3.10-2b have been incorporated into the EIR to provide more prescriptive requirements for localized conditions.

Revisions to Response to comment O24-30 in the Final EIR

To address publishing of the final Sonoma County Civil Grand Jury report regarding evacuation routes in the County, the follow modification was made to the third paragraph on page 3-277 of the Final EIR.

Original:

The comment and reference to the 2025 grand jury report are based in part on a misunderstanding of how evacuations are managed. The County's Emergency Operations Plan (EOP) is a strategic and operational framework designed to guide the County's preparedness, response, recovery, and mitigation efforts. Instead of prescribing evacuation routes and shelter locations ahead of time, it is intentionally flexible and impact driven to ensure the evacuation routes and shelter locations used are appropriate to the specific emergency. While the road networks in some areas of the County present challenges for emergency evacuation, the County has demonstrated the capacity to evacuate effectively through coordinated planning, early warning, and adaptive traffic management, such as during the 2019 Kincade Fire. With the implementation of Mitigation Measure 3.17-1d requiring site-specific evacuation modeling and planning, the Program will not impede the County's evacuation and emergency response plans. The 2025 grand jury report was issued in June 2025. Formal responses to the grand jury report are not yet available but will be filed on or before September 21, 2025, as required by law.

Revised:

The comment and reference to the 2025 grand jury report are based in part on a misunderstanding of how evacuations are managed. The County's Emergency Operations Plan (EOP) is a strategic and operational framework designed to guide the County's preparedness, response, recovery, and mitigation efforts. Instead of prescribing evacuation routes and shelter locations ahead of time, it is intentionally flexible and impact driven to ensure the evacuation routes and shelter locations used are appropriate to the specific emergency. While the road networks in some areas of the County present challenges for emergency evacuation, the

County has demonstrated the capacity to evacuate effectively through coordinated planning, early warning, and adaptive traffic management, such as during the 2019 Kincade Fire. With the implementation of Mitigation Measure 3.17-1d requiring site-specific evacuation modeling and planning, the Program will not impede the County's evacuation and emergency response plans. The 2025 grand jury report was issued in June 2025. Formal responses to the grand jury report were approved by the Board of Supervisors on September 16, 2025, and submitted to the court.

Revision to Response to Comment O24-33

To address a typographical error, the first sentence in the third paragraph in response to Comment O24-33 on page 3-281 of the Final EIR has been revised as follows.

Original:

See response to Comment A3-5 regarding site-specific survey requirements and Response to Comment A3-6 regarding hydrologic carrying capacity concerns addressed by CDFW.

Revised:

See response to Comment A4-5 regarding site-specific survey requirements and Response to Comment A4-6 regarding hydrologic carrying capacity concerns addressed by CDFW.

Revision to Response to Comment O24-34

To address a typographical error, the first sentence in response to Comment O24-34 on page 3-283 of the Final EIR has been revised as follows.

Original:

The reader is referred to Section 3.2.8, "Master Response 8: Consideration of Exclusion Zones," for a discussion of consideration of exclusion zones for environmental issues under the Cannabis Program Update and Draft EIR; response to Comment O24-18, O24-133 and Section 3.2.5, "Master Response 5: Water Supply," regarding water supply and surface water impacts addressed in the Draft EIR; response to Comment A3-4 regarding the potential effects on biological resources through the proposed ministerial permitting pathway of crop swap; and response to Comment A3-5 regarding CDFW's recommendations for exclusion zones.

Revised:

The reader is referred to Section 3.2.8, "Master Response 8: Consideration of Exclusion Zones," for a discussion of consideration of exclusion zones for environmental issues under the Cannabis Program Update and Draft EIR; response to Comment O24-18, O24-33 and Section 3.2.5, "Master Response 5: Water Supply," regarding water supply and surface water impacts addressed in the Draft EIR; response to Comment A4-4 regarding the potential effects on biological resources through the proposed ministerial permitting pathway of crop swap; and response to Comment A4-5 regarding CDFW's recommendations for exclusion zones.

Revision to Response to Comment O24-35

To address a typographical error, the first sentence in response to Comment O24-35 on page 3-284 of the Final EIR has been revised as follows.

Original:

The reader is referred to response to Comment A3-4 regarding the potential effects on biological resources through the proposed ministerial permitting pathway of crop swap.

Revised:

The reader is referred to response to Comment A4-4 regarding the potential effects on biological resources through the proposed ministerial permitting pathway of crop swap.

Revision to Response to Comment O24-36

To address a typographical error, the first sentence in response to Comment O24-36 on page 3-285 of the Final EIR has been revised as follows.

Original:

The reader is referred to responses to Comments A3-5, A3-6, A3-7, A3-10, and A3-11 regarding cumulative impacts to biological resources.

Revised:

The reader is referred to responses to Comments A4-5, A4-6, A4-7, A4-10, and A4-11 regarding cumulative impacts to biological resources.

Revision to Response to Comment I65-5

To address a typographical error, the first sentence in response to Comment I65-5 on page 3-415 of the Final EIR has been revised as follows.

Original:

See responses to comment I64-1 through I64-4.

Revised:

See responses to comment I46-1 through I46-4.

Revision to Response to Comment PC7-1

To address a typographical error, the second paragraph of response to Comment PC7-1 on page 3-573 of the Final EIR has been revised as follows.

Original:

The reader is referred to the responses to Comment Letter I138 for Commissioner Bahning's written comments that also address these comments and Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," regarding odor impacts and modeling.

Revisions:

The reader is referred to the responses to Comment Letter I38 for Commissioner Bahning's written comments that also address these comments and Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," regarding odor impacts and modeling.

Revision to Response to Comment PC12-1

To address a typographical error, the second paragraph in response to Comment PC12-1 on page 3-576 of the Final EIR has been revised as follows.

Original:

The reader is referred to the responses to Comment Letter I138 for Commissioner Bahning's written comments that also address these comments. and Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," regarding odor impacts and consideration of setbacks.

Revised:

The reader is referred to the responses to Comment Letter I38 for Commissioner Bahning's written comments that also address these comments and Section 3.2.1, "Master Response 1: Evaluation of Cannabis Odor Impacts and Associated Modeling," regarding odor impacts and consideration of setbacks.

Revision to Response to Comment PC14-1

To address a typographical error, the second paragraph in response to Comment I65-5 on page 3-578 of the Final EIR has been revised as follows.

Original:

The reader is also referred to the responses to Comment Letter I138 for Commissioner Bahning's written comments that also address these comments.

Revised:

The reader is also referred to the responses to Comment Letter I38 for Commissioner Bahning's written comments that also address these comments.

Revision to Response to Comment PC17-1

To address a typographical error, the second paragraph in response to Comment PC17-1 on page 3-582 of the Final EIR has been revised as follows.

Original:

The reader is referred to the entirety of Comment Letter I138 for Commissioner Bahning's full comments.

Revised:

The reader is referred to the entirety of Comment Letter I38 for Commissioner Bahning's full comments.

REVISIONS TO SECTION 3.4 OF THE DRAFT EIR, "BIOLOGICAL RESOURCES"

To expand the discussion of potential impacts on California tiger salamander, the second to last paragraph on page 3.4-171 of the Draft EIR has been revised as follows.

Original:

Applications Meeting Crop Swap Requirements

The discussion in Impact 3.4-1 (Special-Status Plants) related to crop swap applies to this impact. Therefore, the impact on California tiger salamander and Conservation Strategy special-status plants for crop swap is less than significant.

Revised:

Applications Meeting Crop Swap Requirements

Impacts on California tiger salamanders would not be expected to occur because crop swap projects would only be allowed on lands that have been subject to ongoing cultivation for at least 5 years, which is not conducive with California tiger salamander occupation (for breeding or upland uses) or movement. California tiger salamanders are known to use annual grassland habitat, the grassy understory of valley-foothill hardwood habitats, and stream courses in valley-foothill riparian habitats. The species is not expected to occur in agricultural areas with active cultivation. Furthermore, crop swap activities would be limited to the existing footprint of the previous agricultural operation and no expansion would be permitted. Therefore, impacts on California tiger salamanders are not expected to occur as a result of crop swap activities and impacts would be less than significant.

As noted above, the impact on California tiger salamander and Conservation Strategy special-status plants for crop swap is less than significant. Because mitigation is not required for impacts that are less than significant, the text to Mitigation Measure 3.4-8 has been modified to remove reference to ministerial permits both in the title and in the last sentence of the measure. This text on page 3.4-172 through 3.4-173 of the Draft EIR has been revised as follows.

Original:

Mitigation Measure 3.4-8 (DRH or UPC and ZPC): Limit New Disturbance Activities in the Santa Rosa Plain Conservation Strategy Plan Area

If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that California tiger salamander or Conservation Strategy special-status plants are present, potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), or the project site is within the Conservation Strategy plan boundary, the following shall apply:

- If a new disturbance area is within the Santa Rosa Plain Conservation Strategy plan area and is specifically located within 1.3 miles of known California tiger salamander breeding or in an area with potential for California tiger salamander presence, as defined in the Conservation Strategy, the project shall be redesigned such that all new disturbance activities which include construction, installation of temporary event facilities such as tents or other activities that could involve trampling, grading, vegetation removal, and other ground disturbance activities, would occur outside of these designations. If the project cannot be redesigned to avoid these designations (e.g., the applicant's parcels are completely within the designations), then the application will be denied, and cannabis activities will not be permitted on the site. These prohibitions shall apply until such a time that cannabis uses are legalized under federal law and federal incidental take permitting through participation in the Conservation Strategy may be pursued. This measure shall apply to ministerial and discretionary permits under the Program.

Original:

Mitigation Measure 3.4-8 (DRH or UPC): Limit New Disturbance Activities in the Santa Rosa Plain Conservation Strategy Plan Area

If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that California tiger salamander or Conservation Strategy special-status plants are present, potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), or the project site is within the Conservation Strategy plan boundary, the following shall apply:

- If a new disturbance area is within the Santa Rosa Plain Conservation Strategy plan area and is specifically located within 1.3 miles of known California tiger salamander breeding or in an area with potential for California tiger salamander presence, as defined in the Conservation Strategy, the project shall be redesigned such that all new disturbance activities which include construction,

installation of temporary event facilities such as tents or other activities that could involve trampling, grading, vegetation removal, and other ground disturbance activities, would occur outside of these designations. If the project cannot be redesigned to avoid these designations (e.g., the applicant's parcels are completely within the designations), then the application will be denied, and cannabis activities will not be permitted on the site. These prohibitions shall apply until such a time that cannabis uses are legalized under federal law and federal incidental take permitting through participation in the Conservation Strategy may be pursued.

REVISIONS TO SECTION 4.8 OF THE FINAL EIR, "REVISIONS TO SECTION 3.17, "WILDFIRE"

There were no changes to Mitigation Measure 3.17-1a (UPC, DRH, and ZPC): Limitation of Use Types in Very High Fire Hazard Severity Zones. This mitigation measure was referred to as a typographical error.

To address a typographical error the revisions provided in Chapter 4, the revisions to Mitigation Measures 3.17-1a and 3.17-1d have been updated to read as follows:

Changes to Mitigation Measure 3.17-1d included two additional clarifying sentences in the third bullet that were unintentionally omitted: "Minimum response objectives shall be evaluated and approved by the local fire district or the County. Unless otherwise established by the County or the local fire district, emergency response standards established by the National Fire Protection Association shall be used to determine if emergency response time of the associated fire district is adequate." Thus, the of this modification, provided in response to Comment O24-30, of Mitigation Measure 3.17-1d on pages 3.17-36 and 3.17-37 of the Draft EIR is revised as follows:

Original:

Mitigation Measure 3.17-1d (UPC and DRH): Develop and Implement Site-Specific Fire Protection and Prevention Plan

Applicant must prepare a Fire Protection and Prevention Plan that includes site-specific and detailed plans to address increased wildfire risk at the cannabis site. The Fire Protection and Prevention Plan will be subject to review and approval by the County Fire Marshal and the fire district with jurisdiction over the cannabis site before issuance of a permit by the County. The County Fire Marshal shall use the Fire Protection and Prevention Plan to establish conditions of approval for the site that will be incorporated into requirements for issuance of a use permit or design review approval.

The site-specific Fire Protection and Prevention Plan shall include the following minimum components. Additional requirements and inspections may be included in the plan at the discretion of the County Fire Marshal or local fire district.

- Verification that Mitigation Measures 3.17-1a, 3.17-1b, and 3.17-1c are feasible and incorporated into project plans.
- Verification that the cannabis site is located within a fire district with adequate capacity to serve the site in the event of unintended fire ignition.
- Identification of emergency response and evacuation routes. Unless the site is located along a State or federal Highway, a street identified by the County as an arterial or collector, or as otherwise directed by the County Fire Marshal, the adequacy of emergency response shall be determined based on modeling prepared by a traffic engineer. Minimum response objectives shall be evaluated and approved by the local fire district or the County. Unless otherwise established by the County or the local fire district, emergency response standards established by the National Fire Protection Association shall be used to determine if emergency response time of the associated fire district is adequate.
- Defined staff roles and responsibilities, including staff responsible for communicating with emergency service providers. Communication protocols must also be included to ensure that staff, customers, and

vendors are informed of potential emergencies and needed actions due to an emergency, up to and including evacuation of the site.

- Verification that roadway conditions are consistent with all applicable requirements.
- Verification that all roads leading up to the individual site and buildings on the site are designated by names or numbers posted on signs clearly visible and legible from the roadway and at interchanges.
- Identification of emergency water supply that is available, accessible, and maintained in quantities and locations specified consistent with all applicable requirements.
- Verification that areawide fuel breaks are sufficient and in compliance all applicable requirements.
- Confirmation that roadways are in compliance with the State and local roadway standards.
- Identification of operational requirements, including the following:
  - Mowing shall occur before 10 a.m. and never on a hot or windy day, or a red flag warning or a particularly dangerous situation event issued by the National Weather Service.
  - String trimmers shall be used rather than lawnmowers for clearing vegetation wherever feasible.
  - All dead or dying vegetation shall be removed during drought conditions when water use restrictions are in place.

Revised:

Mitigation Measure 3.17-1d (UPC and DRH): Develop and Implement Site-Specific Fire Protection and Prevention Plan

Applicant must prepare a Fire Protection and Prevention Plan that includes site-specific and detailed plans to address increased wildfire risk at the cannabis site. The Fire Protection and Prevention Plan will be subject to review and approval by the County Fire Marshal and the fire district with jurisdiction over the cannabis site before issuance of a permit by the County. The County Fire Marshal shall use the Fire Protection and Prevention Plan to establish conditions of approval for the site that will be incorporated into requirements for issuance of a use permit or design review approval.

The site-specific Fire Protection and Prevention Plan shall include the following minimum components. Additional requirements and inspections may be included in the plan at the discretion of the County Fire Marshal or local fire district.

- Verification that Mitigation Measures 3.17-1a, 3.17-1b, and 3.17-1c are feasible and incorporated into project plans.
- Verification that the cannabis site is located within a fire district with adequate capacity to serve the site in the event of unintended fire ignition.
- Identification of emergency response and evacuation routes. Unless the site is located along a State or federal Highway, a street identified by the County as an arterial or collector, or as otherwise directed by the County Fire Marshal, the adequacy of emergency response shall be determined based on modeling prepared by a traffic engineer that takes into account expected numbers of workers and total estimated amount of operational traffic, the capacity of roadways near the facility, reasonably foreseeable wildfire scenarios, evacuation time, and emergency response time. Minimum response objectives shall be evaluated and approved by the local fire district or the County. Unless otherwise established by the County or the local fire district, emergency response standards established by the National Fire Protection Association shall be used to determine if emergency response time of the associated fire district is adequate.
- Defined staff roles and responsibilities, including staff responsible for communicating with emergency service providers. Communication protocols must also be included to ensure that staff, customers, and

vendors are informed of potential emergencies and needed actions due to an emergency, up to and including evacuation of the site.

- Verification that roadway conditions are consistent with all applicable requirements.
- Verification that all roads leading up to the individual site and buildings on the site are designated by names or numbers posted on signs clearly visible and legible from the roadway and at interchanges.
- Identification of emergency water supply that is available, accessible, and maintained in quantities and locations specified consistent with all applicable requirements.
- Verification that areawide fuel breaks are sufficient and in compliance all applicable requirements.
- Confirmation that roadways are in compliance with the State and local roadway standards.
- Identification of operational requirements, including the following:
  - Mowing shall occur before 10 a.m. and never on a hot or windy day, or a red flag warning or a particularly dangerous situation event issued by the National Weather Service.
  - String trimmers shall be used rather than lawnmowers for clearing vegetation wherever feasible.
  - All dead or dying vegetation shall be removed during drought conditions when water use restrictions are in place.

REVISIONS TO SECTION 4.4 OF THE FINAL EIR, "REVISIONS TO SECTION 3.10, "GROUNDWATER MITIGATION"

The Final EIR contained revisions to Mitigation Measure 3.10-2a on page 3.10-46 and 3.10-47of the Draft EIR to provide clarifications. These revisions contained a typographical error and are revised as follows to address additional standards for project wells within 500 feet of a stream (first sub bullet), wells located within upper portions of critical habitat watersheds (fourth bullet), and standards for groundwater use (fifth and sixth bullets):

Original:

Mitigation Measure 3.10-2a (DRH and UPC): Implement Additional Measures to Protect Groundwater Resources

Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review with hearing.

- For projects that demonstrate no increase in groundwater production at a site, no further mitigation is necessary.
- For water supply wells located within Class 3 or 4 groundwater availability areas, no cannabis permit shall be granted without meeting the following standards.
  - Proof of sufficient yield demonstrated through an 8-hour dry season well yield test with sustained yield of 5 gallons per minute per 1 AFY of irrigation demand, plus sufficient yield for other existing uses.
  - A hydrogeologic report that meets the requirements set forth under Policy and Procedure 8-1-14 shall be prepared that contains supporting data and analysis to demonstrate that the onsite groundwater supply is adequate to meet the proposed uses and cumulative projected land uses in the area on a sustained basis, and that the operation will not: (1) result in or exacerbate an overdraft condition in basin or aquifer; (2) result in reduction of critical flow in nearby streams; or (3) result in well interference at offsite wells.

- For water supply wells located within medium- and high-priority groundwater basins, a groundwater report must be prepared in compliance with requirements set forth under Policy and Procedure 8-1-14. The report must demonstrate the following standards for issuance of a cannabis permit:
  - consistency with applicable sustainable groundwater management programs, and
  - that the project does not decrease the likelihood of achieving sustainability in the underlying basin.
- For water supply wells located within upper portions of critical habitat watersheds identified in the 2015 SWRCB's Emergency Information Order, and within the "Groundwater Sustainability Priority Areas" adopted by the Sonoma Valley GSA, or as further updated, a cannabis permit may only be granted if the report demonstrates that the cannabis use meets net zero groundwater standards consistent with Policy and Procedure 8-2-2.
- A maximum level of groundwater use shall be established for each cannabis permit. If monitoring data collected in compliance with Policy and Procedure 8-1-3 indicates groundwater use in excess of the maximum allowed for a permit, the facility operators, in conjunction with the County, shall develop adaptive management measures to reduced groundwater to net zero levels. Adaptive management measures may include forbearance (e.g., prohibition of groundwater extraction from the months of May to October), water conservation measures, reductions in on-site cannabis cultivation, alteration of the groundwater pumping schedule, or other measures determined appropriate. Adaptive management measures will remain in place until groundwater use levels have recovered based on quarterly monitoring data provided to the County as part of subsequent annual inspections.

Revised:

Mitigation Measure 3.10-2a (DRH and UPC): Implement Additional Measures to Protect Groundwater Resources

Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review with hearing.

- For projects that demonstrate no increase in groundwater production at a site, no further documentation of water supply is required. Monitoring measures listed below would continue to apply.
  - If the project well is within 500 feet of a stream where water use, streamflow records, and other available information indicate streamflow is reduced below natural unimpaired levels, and reduced flows impact aquatic habitat, as determined by the County professional engineer or geologist. Zero net increase in groundwater use shall be established both annually and during the dry season from May 1 – October 31.
- For water supply wells located within Class 3 or 4 groundwater availability areas, no cannabis permit shall be granted without meeting the following standards.
  - Proof of sufficient yield demonstrated through an 8-hour dry season well yield test with sustained yield of 5 gallons per minute per 1 AFY of irrigation demand, plus sufficient yield for other existing uses.
  - A hydrogeologic report that meets the requirements set forth under Policy and Procedure 8-1-14 shall be prepared that contains supporting data and analysis to demonstrate that the onsite groundwater supply is adequate to meet the proposed uses and cumulative projected land uses in the area on a sustained basis, and that the operation will not: (1) result in or exacerbate an overdraft condition in basin or aquifer; (2) result in reduction of critical flow in nearby streams; or (3) result in well interference at offsite wells.

- For water supply wells located within medium- and high-priority groundwater basins, a groundwater report must be prepared in compliance with requirements set forth under Policy and Procedure 8-1-14. The report must demonstrate the following standards for issuance of a cannabis permit:
  - consistency with applicable sustainable groundwater management programs, and
  - that the project does not decrease the likelihood of achieving sustainability in the underlying basin.
- For water supply wells located within upper portions of critical habitat watersheds identified in the 2015 SWRCB's Emergency Information Order, and within the "Groundwater Sustainability Priority Areas" adopted by the Sonoma Valley GSA, or as further updated, a cannabis permit may only be granted if the report demonstrates that the cannabis use meets net zero groundwater standards consistent with Policy and Procedure 8-2-2. For critical habitat watersheds, zero net increase in groundwater use shall be established both annually and seasonally during the dry season from May 1 – October 31.
- For all discretionary projects reliant on water supply wells for irrigation that are increasing net groundwater use, a hydrogeologic report will be prepared in accordance with Policy and Procedure 8-1-14 if :
  - The project well is within 500 feet of a stream where water use, streamflow records, and other available information indicate streamflow is reduced below natural unimpaired levels, and reduced flows impact aquatic habitat, as determined by the County professional engineer or geologist. The hydrogeologic report must establish no reduction of critical flow in nearby streams.
  - The project well is within 500 feet of a production well on a nearby parcel and available information indicates that pumping of the project well could impact production of the nearby wells due to drawdown of water levels due to pumping and/or contribution to a condition of overdraft in the local aquifer, as determined by the County professional engineer or geologist. The hydrogeologic report must establish no well interference at offsite wells.
- A maximum level of groundwater use shall be established for each cannabis permit. Groundwater level and total quantity of water pumped shall be recorded monthly, or more frequently as specified in conditions of approval, and reported annually. Groundwater metering, groundwater level monitoring, reporting, maintenance, and meter calibration shall be conducted in accordance with Policy and Procedure 8-1-3. If monitoring data collected in compliance with Policy and Procedure 8-1-3 indicates groundwater use in excess of the maximum allowed for a permit, the facility operators, in conjunction with the County, shall develop and implement adaptive management measures to reduce groundwater extraction to comply with permitted levels. Adaptive management measures may include forbearance (i.e., prohibition of groundwater extraction from the months of April 1 to October 31, consistent with SWRCB Cannabis Policy under Order WQ 2023-0102-DWQ for surface water diversions), water conservation measures, reductions in on-site cannabis cultivation, alteration of the groundwater pumping schedule, or other measures determined appropriate. Adaptive management measures will remain in place as needed to maintain groundwater extraction within permitted levels.

To provide clarification, Mitigation Measure 3.10-2b on page 3.10-47 of the Draft EIR is revised as follows to clarify monitoring requirements (second bullet) and to include allowance of a maximum of 100,000 gallons of new tank (third bullet):

Original:

Mitigation Measure 3.10-2b (ZPC): Implement Groundwater Monitoring

Sonoma County shall require the following mitigation measures for cannabis project applications subject to zoning permit.

- Groundwater Metering and Monitoring. An easement shall be recorded to provide Sonoma County personnel access to any on-site water well serving the proposed use and any required monitoring well to collect water meter readings and groundwater level measurements. Access shall be granted for this

purpose Monday through Friday from 8:00 a.m. to 5:00 p.m. All easement language is subject to review and approval by Permit Sonoma and County Counsel prior to recordation. Groundwater level and total quantity of water pumped shall be recorded quarterly and reported annually. Groundwater metering, groundwater level monitoring, reporting, maintenance, and meter calibration shall be conducted consistent with Policy and Procedure 8-1-3.

- If monitoring data collected in compliance with Policy and Procedure 8-1-3 indicates groundwater use exceeds net zero production from the time that the cannabis permit was granted, the facility operators, in conjunction with the County, shall develop adaptive management measures to allow for recovery of groundwater levels. Adaptive management measures may include forbearance (e.g., prohibition of groundwater extraction from the months of May to October), water conservation measures, reductions in on-site cannabis cultivation, alteration of the groundwater pumping schedule, or other measures determined appropriate. Adaptive management measures will remain in place until groundwater levels have recovered based on annual monitoring data provided to the County as part of subsequent annual inspections.

Revised:

Mitigation Measure 3.10-2b (ZPC): Implement Groundwater Monitoring

Sonoma County shall require the following mitigation measures for cannabis project applications subject to zoning permit.

The following requirements shall be included as new performance standards for new cannabis cultivation and crop swaps using groundwater in Section 26-18- 115(C)(4)(h):

- Net zero must be achieved both annually and during the dry season from May 1 – October 31.
- Groundwater Metering and Monitoring. An easement shall be recorded to provide Sonoma County personnel access to any on-site water well serving the proposed use and any required monitoring well to collect water meter readings and groundwater level measurements. Access shall be granted for this purpose Monday through Friday from 8:00 a.m. to 5:00 p.m. All easement language is subject to review and approval by Permit Sonoma and County Counsel prior to recordation. Groundwater level and total quantity of water pumped shall be recorded monthly and reported annually. Groundwater metering, groundwater level monitoring, reporting, maintenance, and meter calibration shall be conducted in accordance with Policy and Procedure 8-1-3.
- If groundwater extraction exceeds net zero production during the dry season (i.e., May 1 through October 31) or annually, the facility operators, in conjunction with the County, shall develop and implement adaptive management measures to reduce groundwater extraction to permitted levels. Adaptive management measures may include forbearance (e.g., prohibition of groundwater extraction from the months of April 1 to October 31, consistent with SWRCB Cannabis Policy under Order WQ 2023-0102-DWQ for surface water diversions), water conservation measures, reductions in on-site cannabis cultivation area, alteration of the groundwater pumping schedule, or other measures determined appropriate.
- A maximum of 100,000 gallons of new tank storage is allowed.

REVISIONS TO CHAPTER 4 OF THE FINAL EIR, TO ADD SECTION 4.11 "REVISIONS TO SECTION 3.8, "GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE"

The County has identified an additional method to feasibly reduce greenhouse gas emissions. No new significant environmental impacts would result from this mitigation measure as subscribing to Sonoma Clean Power Authority Evergreen Program and incorporation of on-site renewable energy features were already contemplated by Mitigation

Measure 3.6-2, however are made mandatory through this mitigation measure. Still, the impact would remain significant and unavoidable. Mitigation measure 3.8-2 is added as follows:

Mitigation Measure 3.8-2: Require Renewable Electrical Energy for Cultivation

Sonoma County shall require the following mitigation measure for all cannabis cultivation projects.

The following requirement shall be included as a new performance standard for cannabis cultivation in Section 26-18-115(C)(1):

- Electrical power used for a cultivation site must be provided by on-grid power with 100% renewable source or on-site renewable energy generation, or a combination of the two.

REVISIONS TO CHAPTER 5 REFERENCES

The following references are added to this chapter:

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Seltenrich, N. 2022 (June). "Odor Control in the Cannabis Industry: Lessons from the New Kid on the Block." *Environ Health Perspect.* 130(6):062001 (2022).

Urso, K., Vizuete, W., Moravel, R., Khlystov, A., Frazier, A., and Morrison, G. 2023. *Indoor Monoterpene Emission Rates from Commercial Cannabis Cultivation Facilities in Colorado*. J Waste Manag Assoc.

Wang, C-T., Wiedinmyer, C., Ashworth, K., Harley, P.C., Ortega, J., Rasool, Q., and William, V. 2019. "Potential Regional Air Quality Impacts of Cannabis Cultivation Facilities in Denver, Colorado." *Atmospheric Chemistry and Physics*.