

MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies “to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment.” A mitigation monitoring and reporting program (MMRP) is required for the Cannabis Program Update because the EIR identifies potential significant adverse impacts related to the project implementation, and mitigation measures have been identified and adopted to reduce those impacts. Adoption of the MMRP would occur along with approval of the amendments to the Sonoma County General Plan and amendments to Sonoma County Code for the Sonoma County Comprehensive Cannabis Program Update:

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP has been prepared to ensure that all adopted mitigation measures have been incorporated into the Cannabis Program Update and would be implemented during construction and operation of individual projects. The attached table has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies the impact, mitigation measures (as amended through the Final EIR), monitoring responsibility, mitigation timing, and provides space to confirm implementation of the mitigation measures. The numbering of mitigation measures follows the numbering sequence found in the EIR. Mitigation measures that are referenced more than once in the DEIR are not duplicated in the MMRP table.

The following adopted mitigation measures were incorporated into County Code:

- ▶ Mitigation Measure 3.1-1 (ZPC, DRH, UPC):¹ Implement Additional Measures to Protect Scenic Resources
- ▶ Mitigation Measure 3.3-4a: Implement Additional Measures to Minimize Odors from Cultivation and Handling of Harvested Cannabis
- ▶ Mitigation Measure 3.3-4b: Implement Additional Measures to Minimize Odors from Cannabis Smoking
- ▶ Mitigation Measure 3.4-2c (ZPC): Limit Removal of Trees to Outside of the Nesting Bird Season
- ▶ Mitigation Measure 3.4-6a (ZPC): Utilize Wildlife-Friendly Building and Fencing Designs
- ▶ Mitigation Measure 3.10-2b (ZPC): Implement Groundwater Monitoring
- ▶ Mitigation Measure 3.12-4a: Outdoor Amplified Live Music Requires a Use Permit at Storefront Retailers
- ▶ Mitigation Measure 3.15-1a (ZPC): Protection of Tribal Cultural Resources for Permitted Uses
- ▶ Mitigation Measure 3.16-1 (All Cannabis Uses): Municipal Water Supply Verification for New Cannabis Uses
- ▶ Mitigation Measure 3.17-1a (UPC, DRH, and ZPC): Limitation of Use Types in Very High Fire Hazard Severity Zones

REPORTING

The County shall document and describe the compliance of the activity with the adopted mitigation measures either within the attached table or a separate monitoring documentation as part of processing applications under the proposed ordinance.

¹ ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- ▶ Mitigation Measure – This column provides the verbatim text of the adopted mitigation measure
- ▶ Implementation Responsibility – This column identifies the party responsible for implementing the mitigation measure.
- ▶ Timing – This column identifies the time frame in which the mitigation will be implemented.
- ▶ Verification – This column is to be dated and signed by the person (either project manager or his/her designee) responsible for verifying compliance with the requirements of the mitigation measure.
- ▶ Throughout the table, “Prior to operation” means post-approval, but before operation begins. Verification of compliance would occur through one or more of the following:
 - ▶ For measures that apply only to a specific mitigation action (e.g., installing odor control equipment, which requires a building permit), a specific post-approval checkpoint is identified (e.g., prior to building permit final);
 - ▶ For discretionary permits (UPC and DRH), all mitigation measures are incorporated into project conditions of approval, and those conditions must be verified prior to operation.
 - ▶ A Use Permit Certificate is issued by the County following completion of all pre-operational conditions for a UPC.
 - ▶ Formal signoff and authorization to operate is also provided by the County for DRH after completion of all pre-operational conditions.
 - ▶ Pre-operational conditions can be verified at different stages, depending on the condition. For example, pre-disturbance surveys would be required prior to initial ground-disturbance and/or vegetation removal; building plans would be reviewed for compliance with light and glare standards prior to issuance of building permit(s) (and sometimes a second time prior to building permit final); installation of odor control filtration equipment would be reviewed on building plans prior to building permit issuance and given final signoff after building construction, prior to building permit final.

Mitigation Monitoring and Reporting Program

AESTHETICS

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Aesthetics				
<p>Impact 3.1-4: Create a New Source of Substantial Light or Glare that Would Adversely Affect Day or Nighttime Views</p>	<p>Mitigation Measure 3.1-4b: (ZPC, UPC, DRH): Implement New Light and Glare Requirements</p> <p>The following mitigation measures would be imposed through the zoning permit, use permit, and design review with hearing processes:</p> <ul style="list-style-type: none"> ▶ A lighting plan must be submitted for new cannabis uses that are subject to a use permit or design review with hearing. The lighting plan must demonstrate compliance with the following standards. ▶ Lighting Standards <ul style="list-style-type: none"> ▪ All exterior lighting shall be “Dark-sky” compliant and fully shielded to avoid nighttime light pollution per guidance provided by the International Dark Sky Association (www.darksky.org). ▪ Lighting shall be fully shielded to prevent nighttime light pollution. ▪ Lighting shall be downward facing, located at the lowest possible point to the ground to prevent spill over onto adjacent properties, glare, nighttime light pollution and unnecessary glow in the night sky. ▪ Light fixtures shall not be located at the periphery of the property and shall not reflect off structures. Security lighting shall be put on motion sensors. ▪ Uplights are not permitted; flood lights are permitted only for temporary use in fields during harvest. ▪ Signs that emit light are prohibited and lights used to illuminate signs shall be shielded to prevent light spill beyond the sign and not exceed a total light output of 1000 lumens. ▪ Light fixtures emitting over 1000 lumens are prohibited except where needed for agriculture, commercial fishing, and first responders. 	<p>See above.</p> <p>Applicant to submit lighting plan</p> <p>County to verify compliance</p>	<p>See above.</p> <p>Lighting plan required at time of application for UPC, DRH.</p> <p>Verify compliance with lighting and glare standards prior to issuance of grading or building permits for ZPC, UPC or DRH).</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<ul style="list-style-type: none"> ▪ Total illuminance created by artificial lighting, shall not exceed 1.0 lux at the property line. Color temperature of exterior light sources shall be 3000 Kelvin or lower. ▶ Glare Standards. <ul style="list-style-type: none"> ▪ All glass used on building exteriors must have a visible light reflectance of no more than 15%. ▪ Glass with a visible light reflectance greater than 10% must incorporate glare mitigation strategies, including but not limited to exterior shading devices or non-reflective coatings. ▪ Certification from the glass manufacturer verifying compliance with reflectance limits must be provided with the building permit application. ▪ Reflectance data and specifications for all exterior glass must be included in the permit documentation. 			

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<p>Impact 3.3-4: Expose a Substantial Number of People to Odors Considered Objectionable</p>	<p>Mitigation Measure 3.3-4a: Implement Additional Measures to Minimize Odors from Cultivation and Handling of Harvested Cannabis Proposed Sections 26-18-115(C), 26-20-080, 26-20-025(C) shall be amended to include the following provision:</p> <ul style="list-style-type: none"> A structure containing cannabis must be equipped with a filtration and ventilation system to control odors, humidity, and mold, except for structures containing only prepackaged cannabis products. The air filtration system shall be sufficient to prevent internal odors from being emitted externally and must rely on activated carbon filtration, negative ion generation, ozone generation, or other odor control mechanisms demonstrated to achieve the same odor reductions so that odors are not detectable outside the structure. 	<p>County to verify compliance</p>	<p>Verify compliance prior to building permit final for ZPC, UPC & DRH.</p>	

AIR QUALITY

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Air Quality				
<p>Impact 3.3-2: Generate Short-Term Construction-Related Emissions of ROG, NO_x, PM₁₀, and PM_{2.5}</p>	<p>Mitigation Measure 3.3-2 (DRH and UPC): Implement the Bay Area Air Quality Management District’s Basic Construction Mitigation Measures The following mitigation measures would be implemented through the design review with hearing (DRH) or use permit for cannabis (UPC) process for individual projects. Prior to the issuance of grading or building permits, Sonoma County shall ensure that BAAQMD’s basic construction mitigation measures from Table 5-2 of the BAAQMD 2022 CEQA Guidelines (or subsequent updates) are noted on the construction documents. These basic construction mitigation measures include the following:</p> <ol style="list-style-type: none"> All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 	<p>County to verify compliance Construction Coordinator</p>	<p>Verify compliance prior to issuance of grading or building permits for UPC, DRH. Complaint responses and resolution ongoing during construction</p>	

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	<p>3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</p> <p>4) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).</p> <p>5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</p> <p>6) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.</p> <p>7) All trucks and equipment, including their tires, shall be washed off prior to leaving the site.</p> <p>8) Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.</p> <p>9) A Construction Coordinator shall be designated by the project applicant, and a sign shall be posted on the site including the Coordinator's 24-hour phone number for public contact regarding dust, trackout, and air quality complaints. The Coordinator shall respond and take corrective action within 48 hours. The Coordinator shall report all complaints and their resolutions to County staff.</p>			

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BIOLOGICAL RESOURCES

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Biological Resources				
<p>Impact 3.4-1: Result in Disturbance to or Loss of Special-Status Plant Species and Habitat</p>	<p>Mitigation Measure 3.4-1a (DRH or UPC): Conduct Biotic Resource Assessment Consisting of Pre-Application Biological Surveys and Project-Level Analysis Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review hearing.</p> <ul style="list-style-type: none"> ▶ A biotic resource assessment must be prepared to determine the presence of biological resources within a project site. The biotic resource assessment will include a biological survey and project-level analysis, which shall be conducted by a qualified biologist. The survey area shall include the proposed disturbance area for the proposed cannabis premises and supporting improvements outside of the premises, including areas of anticipated construction, grading, other ground disturbance, or vegetation removal as well as staging areas, 	<p>Applicant to submit Biotic Resource Assessment</p> <p>County to verify compliance</p>	<p>Biotic Resource Assessment required at time of application submittal</p> <p>Verify compliance during the permit process and prior to UPC or DRH approval.</p>	

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	<p>areas of anticipated light or noise impacts, ingress and egress routes, and utility routes. The survey area shall be large enough to encompass areas subject to both direct and indirect impacts. The qualified biologist shall assess the habitat suitability of the proposed disturbance area for all special-status plants, special-status wildlife, and sensitive habitats identified as having potential to occur in the County. This shall include an analysis of the late successional forest habitat present within the Program Area, if applicable (see "Late Successional Forest" under Section 3.4.2 above) to determine if there is old-growth habitat present within the proposed disturbance area (see Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management, Appendix 1, Pacific Southwest Region [Region 5] [USFS 2023] to determine what qualifies as old-growth). The qualified biologist shall also assess the habitat suitability of the proposed disturbance area for all invasive species, as well as record locations of invasive species if they are observed during the survey. The biotic resource assessment must include sufficient evidence to support a conclusion as to whether special-status species and sensitive habitats are present or are likely to occur in the proposed disturbance area. At a minimum, the biotic resource assessment report shall include:</p> <ul style="list-style-type: none"> ▪ date, time, and weather conditions during the survey; ▪ a description and explanation of whether the site conditions are considered typical or atypical; ▪ a map depicting the proposed disturbance area and the unique, rare, and special-status species, sensitive habitats, or sensitive natural communities found; ▪ a vegetation map of the proposed disturbance area using the National Vegetation Classification System (e.g., <i>A Manual of California Vegetation</i>) and an associated table, including acreage of vegetation types that could be adversely affected by project implementation by also checking the Vital Lands Initiative priority areas for vegetation communities (Sonoma County Ag + Open Space 2024); 			

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	<ul style="list-style-type: none"> ▪ a special-status species table generated from review of the CNDDDB, the California Native Plant Society Inventory of Rare and Endangered Plants, lists maintained by USFWS, and the most recent, best-available range information for special-status species; ▪ a list of wildlife movement corridors present in the project area as well as footprint (i.e., area) of corridors, checking at least the following sources: Sonoma County General Plan (Habitat Connectivity Corridors), Sonoma County Ag + Open Space Vital Lands Initiative, and the Conservation Lands Network; ▪ a description of survey methods and any protocols utilized during the survey; ▪ a list of common and special-status species and habitats observed in the proposed disturbance area; and ▪ a list of critical times of the year (e.g., migration season, nesting bird season) where nighttime lighting mitigation measure would apply. <p>▶ Following completion of the biotic resource assessment report, the qualified biologist shall submit the report to Sonoma County Planning Department for review. If no special status species, sensitive habitat, wetlands, or other waters are identified on an individual project site, no further mitigation is required.</p> <p>▶ If special-status species, sensitive habitats, or wetlands or other waters are present or have the potential to be present, the qualified biologist developing the biotic resource assessment report shall include a discussion of potential direct and indirect impacts (temporary and permanent) on these resources, including identifying the project activities that would lead to impacts, and the appropriate biological resource protection measures identified in Mitigation Measures 3.4-1b, 3.4-1c, 3.4-2a through 3.4-2q, 3.4-4, 3.4-5, 3.4-6a through 3.4-6d, 3.4-6c, 3.4-8 shall be implemented.</p>			
<p>Impact 3.4-2 (continued)</p>	<p>Mitigation Measure 3.4-2d (DRH or UPC): Conduct Pre-Disturbance Nesting Raptor Surveys and Establish Protective Buffers</p> <p>If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that nesting raptors (excluding burrowing owl and northern spotted owl) are present or potentially present on or adjacent to the</p>	<p>Applicant to submit pre-disturbance survey(s) and</p>	<p>Survey(s) and notification to County required prior to initial</p>	

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	<p>proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:</p> <ul style="list-style-type: none"> ▶ To minimize the potential for loss of nesting raptors, disturbance activities shall occur only during the nonbreeding season (September 1 through January 31) and outside the soil disturbance avoidance timeframe outlined in the <i>Best Management Practices Cannabis Cultivation</i> (Sonoma County Department of Agriculture n.d.-a), which all cannabis cultivation operations are required to follow. As such, all disturbance activities related to cannabis cultivation shall only occur from September 1 through October 31. In addition, disturbance activities for non-cultivation uses, as well as tree removal for cultivation uses that does not involve soil disturbance shall only occur during the nonbreeding season (September 1 through January 31). ▶ If removal of trees (without soil disturbance) cannot occur during the nonbreeding season (September 1 through January 31) or if ground-disturbing activities including removal of trees involving soil disturbance cannot occur between September 1 through October 31, the following will apply: <ul style="list-style-type: none"> ▪ Before removal of any trees or ground-disturbing activities between February 1 and August 31, a qualified biologist shall conduct pre-disturbance surveys for nesting raptors and shall identify active nests within a certain distance of the disturbance area, depending on the species that are known or have potential to be present. For northern harrier and short-eared owl, surveys shall occur at a minimum of 500 feet of the proposed disturbance area. For Swainson’s hawk and white-tailed kite, surveys shall occur at a minimum of 0.25 miles of the proposed disturbance area. Additionally, for American peregrine falcon, bald eagle, and golden eagle, surveys shall occur at a minimum of 0.5 miles of the proposed disturbance area. The surveys shall be conducted between February 1 and August 31. Inaccessible areas (e.g., private property) within the 0.25-mile or 0.5-mile survey buffers shall be surveyed using binoculars or a spotting scope. 	<p>notification to County if vegetation removal occurs during nesting season (February 1 through August 31) or soil disturbance occurs during outdoor cultivation soil disturbance avoidance timeframe (November 1 through April 15)</p> <p>County to verify compliance</p> <p>County to verify use of plastic</p>	<p>ground-disturbing activities, tree removal, issuance of grading or building permits (whichever is first) for UPC or DRH.</p> <p>Verify compliance prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH.</p> <p>During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.</p>	

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	<ul style="list-style-type: none"> ▶ If no active nests are found, the qualified biologist shall submit a report documenting the survey methods and results to the applicant and CDFW, and no further mitigation shall be required. ▶ If active nests are found, impacts on nesting raptors, including direct removal and disturbance (e.g., noise, presence of construction crews) shall be avoided by establishing appropriate buffers around active nest sites identified during pre-disturbance raptor surveys. <ul style="list-style-type: none"> ▪ For northern harrier and short-eared owl, avoidance buffers will be established a minimum of 500 feet from the proposed disturbance area, including tree removal. For Swainson’s hawk and white-tailed kite, avoidance buffers will be established a minimum of 0.25 miles of the proposed disturbance area, including tree removal. For American peregrine falcon, bald eagle, and golden eagle, avoidance buffers will be established a minimum of 0.5 miles from the proposed disturbance area, including tree removal. ▪ Buffer size may be adjusted if the qualified biologist and the applicant, in consultation with CDFW, determine that such an adjustment would not be likely to adversely affect the nest. Factors to be considered for determining buffer size shall include the presence of natural buffers provided by vegetation or topography, nest height, locations of foraging territory, and baseline levels of noise and human activity. ▪ The buffer areas shall be protected with construction fencing, and no activity shall occur within the buffer areas until the qualified biologist has determined, in coordination with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. ▪ Monitoring of the nest by a qualified biologist during disturbance (e.g., ground disturbance, vegetation removal [including tree removal], installation of cannabis cultivation sites, installation of temporary event facilities, cannabis events) shall be required if the activity has potential to adversely affect the nest. ▶ Removal of bald and golden eagle nests is prohibited regardless of the occupancy status under the federal Bald and Golden Eagle Protection Act. If bald or golden eagle nests are found during pre-disturbance surveys, then the nest tree shall not be removed. 			

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	<ul style="list-style-type: none"> ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground. 			
<p>Impact 3.4-2 (continued)</p>	<p>Mitigation Measure 3.4-2e (DRH or UPC): Conduct Take-Avoidance Survey for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows or Nests</p> <p>If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that burrowing owl is present or potentially present on or adjacent to the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:</p> <ul style="list-style-type: none"> ▶ A qualified biologist shall conduct a pre-disturbance survey for burrowing owls in areas of habitat suitable for the species (e.g., grasslands, agricultural areas; as determined during the biotic resources assessment [Mitigation Measure 3.4-1a]) on and within a minimum of 1,640 feet of the cannabis site using survey methods described in Appendix D of the <i>Staff Report on Burrowing Owl Mitigation</i> (hereinafter, Staff Report; CDFG 2012), or any subsequent updated guidance. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the site. If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur. Inaccessible areas (e.g., private 	<p>Applicant to submit pre-disturbance survey(s) and notification to County</p> <p>County to verify surveys, additional requirements (if any), and final report compliance</p> <p>County to verify use of plastic</p>	<p>Survey(s) and notification to County required prior to initial ground-disturbing activities, issuance of grading or building permits (whichever is first) for UPC or DRH.</p> <p>Verify compliance prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.</p> <p>During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.</p>	

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	<p>property) within the 1,640-foot survey buffer shall be surveyed using binoculars or a spotting scope.</p> <ul style="list-style-type: none"> ▶ If no burrowing owls, including occupied burrowing owl burrows, are found, the qualified biologist shall submit a burrowing owl report documenting the survey methods and results to the applicant, Sonoma County, and CDFW, and no further mitigation shall be required. ▶ If an active burrow is found during the surveys, the project applicant shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls. <ul style="list-style-type: none"> ▪ During the non-breeding season (September 1 through January 31), the minimum buffer distance shall be 164 feet (50 m). During the breeding season (February 1 through August 31), the minimum buffer distance shall be increased to 1,640 feet (500 meters). ▪ The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and re-establish a buffer consistent with the first bullet until the agitated behavior ceases and normal behavior resumes. ▪ The buffer shall remain in place around the occupied burrow and associated satellite burrows until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days. 			

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	<ul style="list-style-type: none"> ▪ Locations of burrowing owls detected during surveys shall be reported to the CNDDDB. ▶ If implementation of a buffer to prevent take of burrowing owl is not feasible, the project applicant shall consult with CDFW and obtain an Incidental Take Permit (ITP) prior to commencing project related ground-disturbing activities. The impacts of taking burrowing owl shall be minimized and fully mitigated. Alternatively, ground disturbance can be delayed until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days. ▶ If take of burrowing owl is likely to occur, the project applicant shall compensate for the loss of burrowing owl by establishing permanent protection and perpetual management on land that provides burrowing owl habitat. Habitat management lands for burrowing owl may be established by conservation easement or fee title or credits may be purchased from a CDFW-approved conservation or mitigation bank. The compensatory mitigation shall satisfy permit conditions and all other permit conditions shall be implemented. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting may not be placed directly on the ground. 			
Impact 3.4-2 (continued)	<p>Mitigation Measure 3.4-2g (DRH or UPC): Conduct Pre-Disturbance Special-Status Nesting Bird Surveys and Establish Protective Buffers If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that bank swallow, black swift, California black rail, California Ridgway's rail, grasshopper sparrow, purple martin, saltmarsh common yellowthroat, San Pablo song sparrow, tricolored blackbird, western snowy plover, western yellow-billed cuckoo, yellow rail, yellow warbler, and yellow-headed blackbird, or other bird nests are present or</p>	Applicant to submit pre-disturbance survey(s) and notification to County if vegetation removal occurs during nesting season	Survey(s) and notification to County required prior to initial ground-disturbing activities, vegetation removal, issuance of grading or building permits	

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	<p>potentially present on or adjacent to the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:</p> <ul style="list-style-type: none"> ▶ To minimize the potential for disturbance to or loss of bank swallow, black swift, California black rail, California Ridgway’s rail, grasshopper sparrow, purple martin, saltmarsh common yellowthroat, San Pablo song sparrow, tricolored blackbird, western snowy plover, western yellow-billed cuckoo, yellow rail, yellow warbler, and yellow-headed blackbird, and other bird nests, vegetation removal activities shall occur only during the nonbreeding (September 1 through January 31) season and outside soil disturbance avoidance timeframe outlined in the <i>Best Management Practices Cannabis Cultivation</i> (Sonoma County Department of Agriculture n.d.-a). As such, disturbance activities related to cannabis cultivation shall only occur from September 1 through October 31. In addition, disturbance activities for non-cultivation uses, as well as tree removal for cultivation uses that does not involve soil disturbance, disturbance activities shall occur only during the nonbreeding season (September 1 through January 31. ▶ If seasonal avoidance is not possible (see bullet directly above), a pre-disturbance survey shall be conducted by a qualified biologist familiar with these species and survey protocols (where protocols are available) before removal of any vegetation or any ground disturbance. The surveys shall be conducted no more than 7 days before disturbance commences or as required by established protocols. The survey radius within which the qualified biologist will search for nests will include the proposed disturbance area and a 0.5-mile area surrounding the disturbance area (to account for the largest required no-disturbance buffer of 0.5 miles for western yellow-billed cuckoo). Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. Pre-disturbance surveys shall follow survey methods outlined in survey protocols where such protocols have been established, including <i>General Survey Methods for Covered Species</i> (for California black rail), USFWS 	<p>(February 1 through August 31) or soil disturbance occurs during outdoor cultivation soil disturbance avoidance timeframe (November 1 through April 15)</p> <p>County to verify survey(s), additional requirements (if any), and final report compliance</p> <p>County to verify compliance or whether compliance is not feasible due to federal status ((i.e., California Ridgway’s rail, western snowy plover, western yellow-billed cuckoo)</p> <p>County to verify use of plastic</p>	<p>(whichever is first) for UPC or DRH.</p> <p>Verify compliance prior to initial ground-disturbing activities, vegetation removal, issuance of grading or building permits (whichever is first) for UPC or DRH.</p> <p>During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.</p>	

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	<p><i>California Clapper Rail Survey Protocol</i> (for California Ridgway's rail), <i>Yellow-Billed Cuckoo Survey Protocols</i> (SWRCB n.d.; USFWS 2015; Halterman et al. 2016), and any other appropriate, current protocol published by CDFW or USFWS.</p> <ul style="list-style-type: none"> ▪ If no active nests are found during pre-disturbance surveys, no further action under this measure (i.e., Mitigation Measure 3.4-2g) shall be required. ▪ If active nests associated with species listed under ESA (i.e., California Ridgway's rail, western snowy plover, western yellow-billed cuckoo) are found during pre-disturbance surveys, the applicant must avoid impacts by implementing no-disturbance buffers or redesigning the project until such time as federal permits, authorizations, and procedures/protocols can be applied. No-disturbance buffers for these species shall be at least 1,000 feet for western snowy plover and California Ridgway's rail, and at least 0.5 miles for western snowy plover. ▪ If active nests of species not listed under ESA are located during the pre-disturbance surveys, a no-disturbance buffer shall be established around active nests. The no-disturbance buffer shall be a minimum of 100 feet from the nest to avoid disturbance, depending on the species identified, until the nest is no longer active. No-disturbance buffers surrounding bank swallow and tricolored blackbird colonies or California black rail nests shall be a minimum of 500 feet. For species listed under CESA (i.e., bank swallow, California black rail, tricolored blackbird), occupied habitat shall be retained regardless of the activity status of the nest or colony. If avoidance of this habitat after the colony or nest is no longer active, is determined to be infeasible (e.g., most project objectives cannot be met) the applicant shall consult with CDFW to determine whether incidental take permitting and/or compensatory mitigation would be required to reduce impacts on these species. <p>▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent</p>			

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>introduction of plastic into the natural environment, including waterways.</p> <ul style="list-style-type: none"> ▶ Polyethylene plastic sheeting shall not be placed directly on the ground. 			
<p>Impact 3.4-2 (continued)</p>	<p>Mitigation Measure 3.4-2n (DRH or UPC): Conduct Pre-Disturbance Special-Status Bat Surveys and Establish Protective Buffers If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that pallid bat, Townsend’s big-eared bat, or western red bat are present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:</p> <ul style="list-style-type: none"> ▶ Within 30 days of commencing any disturbance related to cannabis activities, a qualified biologist shall conduct surveys for roosting bats. If evidence of bat use is observed, the species and number of bats using the roost shall be determined. Bat detectors may be used to supplement survey efforts. If no evidence of bat roosts is found, then no further mitigation is required. ▶ If pallid bats, Townsend’s big-eared bats, or western red bats are detected during the surveys, a program addressing mitigation for the specific occurrence (including at a minimum, compensation, exclusion methods, and roost removal procedures) shall be submitted to CDFW by the qualified biologist subject to the review and approval of CDFW. Implementation of the mitigation plan shall be a condition of project approval. The mitigation plan shall establish a buffer area around the roost during hibernation or while females in maternity colonies are nursing young that is large enough to prevent disturbance to the colonies (typically at least 250 feet). ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. 	<p>Applicant to submit pre-disturbance survey(s) and notification to County</p> <p>County to verify survey(s), additional requirements (if any), and final report compliance</p> <p>County to verify use of plastic</p>	<p>Survey(s) and notification to County required prior to initial ground-disturbing activities, tree removal, issuance of grading or building permits (whichever is first) for UPC or DRH.</p> <p>Verify compliance prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH.</p> <p>During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<ul style="list-style-type: none"> ▶ Polyethylene plastic sheeting shall not be placed directly on the ground. 			
Impact 3.4-2 (continued)	<p>Mitigation Measure 3.4-2p (ZPC, UPC, DHR): Implement Mitigation Measure 3.1-4b</p> <ul style="list-style-type: none"> ▶ Mitigation Measure 3.1-4b: (ZPC, UPC, DRH): Implement New Light and Glare Requirements 	See above.	See above.	
Impact 3.4-6 (continued)	<p>Mitigation Measure 3.4-6c (DRH or UPC): Utilize Wildlife-Friendly Building and Fencing Designs</p> <p>If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that wildlife habitat and movement occurs or potentially occurs on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:</p> <ul style="list-style-type: none"> ▶ To avoid impacts on wildlife, monofilament plastic netting, which is commonly used as trellising on cannabis plants, shall be taken down immediately after plants are harvested and disposed of properly. ▶ Buildings and other permanent structures in the Program Area that would be constructed under the Program update, including for processing and ancillary activities shall be designed to minimize impacts on wildlife, including disruption to wildlife movement, bird strikes, and wildlife entanglement. ▶ Building design shall utilize guidelines regarding building height, materials, external lighting, and landscaping provided in the <i>American Bird Conservancy's Bird-Friendly Building Design</i> (American Bird Conservancy 2015). The County shall require review of the conceptual design plans by a qualified biologist to determine whether the plans are sufficient to reduce the likelihood of bird strikes or recommend additional measures. ▶ Fencing associated with the Program update, including for cultivation sites or around buildings for processing and ancillary activities will utilize wildlife-friendly fencing designed to minimize the risk of 	<p>County to verify building and fencing compliance with standards</p> <p>County to verify use of plastic</p>	<p>Verify compliance during the permit process and prior to UPC or DRH approval.</p> <p>During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>entanglement, entrapment, or impalement of wildlife. The County shall require the review of fencing design by a qualified biologist prior to installation. The fencing design shall meet, but not be limited, to the following standards:</p> <ul style="list-style-type: none"> ▶ Minimize the chance of wildlife entanglement by not using barbed wire, loose or broken wires, or any material that could impale, snag, or entrap a leaping animal (e.g., wrought iron fencing with spikes). ▶ Allow wildlife to jump over easily without injury. Typically, fences should be no more than 40 inches high on flat ground to allow adult deer to jump over. The determination of appropriate fence height will consider slope because steep slopes are more difficult for wildlife to pass. If fencing is required to be greater than 40 inches high for security or logistical purposes, then the fencing shall be high enough to deter wildlife from attempting to jump over (i.e., greater than 8 feet tall). ▶ Hollow posts and pipes shall be capped, and metal fence stakes used in the project shall be plugged with bolts or other plugging materials. ▶ Allow smaller wildlife to pass under easily without injury or entrapment by ensuring that fencing material is not installed directly touching the earth. 			

CULTURAL RESOURCES

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Cultural Resources				
<p>Impact 3.5-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources</p>	<p>Mitigation Measure 3.5-2a – (UPC and DRH) Cultural Resource Pre-Approval Evaluation Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review hearing.</p>	<p>Applicant to submit study</p> <p>County to verify study, additional requirements (if</p>	<p>Study required and prior to UPC or DRH approval.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<ul style="list-style-type: none"> ▶ The applicant must retain an archaeologist who meets the Secretary of the Interior’s professional standards in archaeology to conduct a site-specific survey of the area and prepare a cultural resource survey report. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search and/or Native American consultation identifies archaeological resources near or within the treatment area. The cultural resource survey report must also include a search of the Sacred Lands Inventory that is maintained by the Native American Heritage Commission. The cultural resource survey report must comply with the applicable state or local agency procedures and include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources, to the extent that the resource’s physical constituents are preserved or their destruction is offset by the recovery of scientifically consequential information. The report must include whether archeological monitoring is required to ensure impacts to resources are avoided. ▶ The County shall send a referral to the Northwest Information Center to perform a records search of potential archeological or cultural resources contained in the California Historical Resources Information System (CHRIS). 	any), and final report compliance	Verify during the permit process and prior to UPC or DRH approval.	
Impact 3.5-2 (continued)	<p>Mitigation Measure 3.5-2b – (UPC and DRH) Archeological Site Avoidance Cannabis project applications shall be designed to avoid impacts to archaeological sites identified by Mitigation Measure 3.5-2a. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts. The applicant must retain a qualified archeological monitor if the cultural resources survey report indicates that one is required to avoid impacts to archeological sites.</p>	County to verify compliance of exclusion fencing/flagging and archeological monitor, if required	Verify compliance prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.	
Impact 3.5-2 (continued)	<p>Mitigation Measure 3.5-2c (ZPC): Implement Mitigation Measure 3.15-1a ▶ Mitigation Measure 3.15-1a (ZPC): Protection of Tribal Cultural Resources for Permitted Uses</p>	See below.	See below.	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.5-3: Disturb Human Remains	Mitigation Measure 3.5-2a (UPC and DRH): Cultural Resource Pre-Approval Evaluation	See above.	See above.	
Impact 3.5-3 (continued)	Measure 3.5-3a (UPC and DRH): Implement Mitigation Measure 3.15-1c ▶ Measure 3.15-1c (UPC and DRH): Tribal Cultural Resources Pre-Approval Consultation	See below.	See below.	
Impact 3.5-3 (continued)	Mitigation Measure 3.5-3b (UPC and DRH): Implement Mitigation Measure 3.15-1e ▶ Measure 3.15-1e. (UPC and DRH) Avoidance of Human Remains	See below.	See below.	

ENERGY

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Energy				
Impact 3.6-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency	<p>Mitigation Measure 3.6-2 (DRH and UPC): Implement Energy Conservation and Renewable Energy Measures</p> <p>The following mitigation measures would be implemented through the design review with hearing or use permit for cannabis process for individual projects.</p> <ul style="list-style-type: none"> ▶ Implement Tier 2 requirements of the most current CALGreen Code’s EV-charging standards. ▶ On-site natural gas or propane use shall be avoided, with the exception of an emergency generator during emergencies. ▶ If natural gas or propane use cannot be feasibly avoided by a new cannabis cultivation or supply chain use’s project design due to infrastructure limitations for rural project sites, other relevant project design characteristics may be implemented. A combination of the following measures shall be applied to individual cannabis cultivation and supply chain use sites to the degree that the additional British thermal units from natural gas combustion are completely offset as 	County to verify compliance	Verify compliance prior to issuance of grading or building permits and prior to building permit final for UPC or DRH.	

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>demonstrated in an energy or greenhouse gas report to be submitted to the County for review:</p> <ul style="list-style-type: none"> ▪ a requirement to exceed the mandatory requirements of the most recent version of Part 6 of the Title 24 California Building Code (California Energy Code), ▪ a requirement to use low-flow appliances, ▪ a requirement to use Energy Star appliances, ▪ a requirement to procure all electricity from the Sonoma Clean Power Authority Evergreen Program, and ▪ a requirement to implement zero net energy buildings through the incorporation of on-site renewable energy features (i.e., solar photovoltaic or wind systems). 			

GEOLOGY, SOILS, AND MINERAL RESOURCES

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Geology, Soils, and Mineral Resources				
<p>Impact 3.7-4: Directly or Indirectly Destroy a Unique Paleontological Resource or Site</p>	<p>Mitigation Measure 3.7-1 (DRH and UPC): Protection of paleontological resources.</p> <p>The following mitigation measures would be implemented through the design review with hearing or use permit for cannabis process for individual projects.</p> <p>Where paleontological resources are discovered during grading and drainage, all work shall be halted in the vicinity of the find, the director shall be notified, and the following shall occur and be approved by the County before work may resume. The permittee shall retain a Qualified Professional Paleontologist to prepare a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP). A qualified professional paleontologist is an individual with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of</p>	<p>Applicant to submit Paleontological Resource Mitigation and Monitoring Program, if resources are discovered</p> <p>County to verify stop work, compliance with Paleontological Resource Mitigation and Monitoring Program, additional</p>	<p>During grading or construction activities, prior to operation for UPC or DRH.</p> <p>Verify compliance during grading or construction activities, and prior to approving recommencement of grading or construction activities for UPC or DRH.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>California, and who has worked as a paleontological mitigation project supervisor for a least two years. Monitoring shall be conducted by a qualified paleontological monitor with experience in collection and salvage of paleontological resources. The PRMMP procedures and protocols shall include:</p> <ol style="list-style-type: none"> 1. Location and type of ground disturbance requiring paleontological monitoring based on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. 2. Timing and duration of paleontological monitoring. 3. Procedures for work stoppage and collection of scientifically significant fossils; including identifiable specimens of vertebrate fossils, uncommon invertebrate, plant, and trace fossils. This must include the authority to temporarily direct, divert or halt construction activity to ensure that larger fossils can be removed in a safe and timely manner. 4. The type and extent of data that should be collected with recovered fossils, such as field notes, photos, data, and maps. 5. Procedures for preparation and curation of fossils. Significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological. 6. Minimum qualifications for qualified paleontologists and paleontological monitors. 7. Conditions under which modifications to the monitoring schedule could be implemented, such as when sediments are likely too young, or conditions are such that fossil preservation would have been unlikely, or that fossils present have little potential scientific value. <p>Upon completion of grading and drainage work (and curation of fossils if necessary) the Qualified Professional Paleontologist shall prepare a final report outlining the results of the PRMMP. The report shall include discussion of the location, duration, and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the County prior to occupancy permits. If the</p>	<p>requirements (if any), and final report compliance</p>		

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.			

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Greenhouse Gas Emissions and Climate Change				
Impact 3.8-1 (continued)	<p>Mitigation Measures 3.8-2: Require Renewable Electrical Energy for Cultivation.</p> <p>Sonoma County shall require the following mitigation measure for all cannabis cultivation projects.</p> <p>The following requirement shall be included as a new performance standard for cannabis cultivation in Section 26-18-115(C)(1):</p> <ul style="list-style-type: none"> ▶ 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. 	County to verify compliance	Verify compliance prior to building permit final.	

HYDROLOGY AND WATER QUALITY

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Hydrology and Water Quality				
Impact 3.10-2: Decrease of Groundwater Supplies or Interfere Substantially with Groundwater Recharge Such That the Project May Impede Sustainable	<p>Mitigation Measure 3.10-2a (DRH and UPC): Implement Additional Measures to Protect Groundwater Resources</p> <p>Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review with hearing.</p>	Applicant to submit groundwater study	Study required prior to UPC or DRH approval.	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
<p>Groundwater Management of the Basin</p>	<ul style="list-style-type: none"> ▶ 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 <ul style="list-style-type: none"> ▪ 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. <ul style="list-style-type: none"> ▪ 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: <ul style="list-style-type: none"> ▪ 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 	<p>County to verify study, additional requirements (if any), and final report compliance, and to establish maximum level of groundwater use</p> <p>Applicant to conduct groundwater monitoring and reporting to the County</p> <p>County to verify compliance with groundwater use limits, and impose adaptive management measures if use limits are exceeded</p>	<p>Verify compliance during the permit process and prior to UPC or DRH approval.</p> <p>Monitoring required monthly or as specified in conditions of approval and reporting required annually during operation</p> <p>Verify monitoring data annually upon receipt of monitoring reports</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>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.</p> <ul style="list-style-type: none"> ▶ 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 : <ul style="list-style-type: none"> ▪ 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 			

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>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.</p>			

NOISE AND VIBRATION

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Noise and Vibration				
<p>Impact 3.12-1: Result in Excessive Short-Term Construction Noise Impacts</p>	<p>Mitigation Measure 3.12-1a (DRH or UPC): Incorporate Noise Reduction Measures into Construction Specifications Sonoma County shall require the following mitigation measures for cannabis project applications subject to issuance of a use permit or design review with hearing. To minimize noise levels during construction activities, the development of cannabis uses shall comply with the following measures during construction work.</p> <ul style="list-style-type: none"> ▶ Noise-generating construction activities should be restricted to between the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday. No construction activities should occur on weekends or holidays. If work is necessary outside of these hours, the County should require the contractor to implement a construction noise monitoring program and, if feasible, provide additional mitigation as necessary (in the form of noise control blankets or other temporary noise barriers, etc.) for affected receptors. A sign(s) shall be posted on the site regarding allowable hours of construction. ▶ All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and 	<p>County to verify compliance with noise measures</p>	<p>Verify measure is included on construction and/or building plans prior to issuance of grading or building permits.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>engine shrouds, in accordance with manufacturer recommendations. Equipment shrouds shall be closed during equipment operation.</p> <ul style="list-style-type: none"> ▶ Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. Equipment shall be properly maintained and turned off when not in use. ▶ Unnecessary idling of internal combustion engines should be strictly prohibited. ▶ Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors. ▶ Utilize "quiet" air compressors and other stationary noise sources where technology exists. ▶ Construction maintenance, storage and staging areas for construction equipment shall avoid proximity to residential areas to the maximum extent practicable. Stationary construction equipment, such as compressors, mixers, etc., shall be placed away from residential areas and/or provided with acoustical shielding. Quiet construction equipment shall be used when possible. ▶ Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. ▶ Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. 			

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TRIBAL AND CULTURAL RESOURCES

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Tribal Cultural Resources				
<p>Impact 3.15-1: Change the Significance of a Tribal Cultural Resource</p>	<p>Mitigation Measure 3.15-1a (ZPC): Protection of Tribal Cultural Resources for Permitted Uses The following measures would be included as standards in Section 26-18-115(C)(4)(h):</p> <ul style="list-style-type: none"> ▶ The applicant must attest that they do not know of or have reason to believe that an archaeological tribal cultural resource is present within the cannabis premises. ▶ The applicant must provide search results from the Sacred Lands Inventory maintained by the Native American Heritage Commission. The application cannot be approved if the search returns a positive result demonstrating that the project will impact a known archeological or tribal cultural resource. ▶ A referral must be sent to the Northwest Information Center. The application cannot be approved if the project will impact a known archaeological resource identified by the Northwest Information Center. ▶ A referral must be sent to the local tribes. The application cannot be approved if the project will affect a known tribal cultural resource as identified by a local tribe. Documentation must be provided by a local tribe to support a finding that a tribal cultural resource is present. The County must maintain the confidentiality of supporting documentation in accordance with California Government Code Sections 7927.000 and 7927.005. ▶ If requested by a local tribe, the applicant must retain a tribal cultural monitor, at the applicant’s own cost, during crop removal and initial ground disturbing replanting activities. The retention of a tribal cultural monitor must be demonstrated through the submittal of an executed monitoring agreement prior to permit approval. 	<p>Applicant to submit attestation and Sacred Lands Inventory Search results for ZPC</p> <p>County to verify attestation, Sacred Lands Inventory search results, and Northwest Information Center search results for ZPC</p> <p>Applicant to retain a tribal cultural monitoring, if requested by a Tribe</p> <p>County to verify monitoring agreement</p>	<p>Required at time of application submittal</p> <p>Verify compliance during the permit process and prior to ZPC approval.</p> <p>Required prior to ZPC approval.</p> <p>Verify compliance during the permit process and prior to ZPC approval.</p>	
<p>Impact 3.15-1 (continued)</p>	<p>Mitigation Measure 3.15-1b (UPC and DRH): Implement Mitigation Measure 3.5-2a</p> <ul style="list-style-type: none"> ▶ Mitigation Measure 3.5-2a – (UPC and DRH) Cultural Resource Pre-Approval Evaluation 	<p>See above.</p>	<p>See above.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.15-1 (continued)	<p>Mitigation Measure 3.15-1c. (UPC and DRH) Tribal Cultural Resources Pre-Approval Consultation</p> <p>The County shall send a project referral to all tribes that are traditionally and culturally affiliated with the area. A cultural resources survey report generated under Mitigation Measure 3.5-2a may be released only to those tribes who have requested consultation. If requested by a tribe, the County shall engage in consultation to identify potential impacts to tribal cultural resources. The information provided by tribes through consultation with the applicant shall be maintained as confidential in accordance with California Government Code Sections 7927.000 and 7927.005 and all other applicable laws.</p>	County to send referrals to tribes and engage in consultation if requested	During the permit process and prior to UPC or DRH approval.	
Impact 3.15-1 (continued)	<p>Mitigation Measure 3.15-1e. (UPC and DRH) Avoidance of Human Remains</p> <p>Impacts to human remains must be avoided. For a site where human remains are expected to be present based on the results of studies or consultation conducted under Mitigation Measure 3.5-2a or Mitigation Measure 3.15-1c, the County shall consult with the local tribe(s) on whether to employ a canine forensics team. If appropriate, the County shall require the use of a canine forensics team to attempt to identify the location of human remains in a noninvasive way for purpose of avoidance. Any requirements for the use of a canine forensics team shall be documented in a tribal cultural resources treatment plan prepared under Mitigation Measure 3.15-1d. The tribal cultural resources treatment plan may require revision or an addendum to reflect additional recommendations or requirements if human remains are present.</p>	County to verify compliance with plan submission, acceptance by local tribe(s), and any additional requirements	<p>If the County requires the use of canine forensics team, the application shall include the results of this activity and will be documented in the tribal cultural treatment plan identified in Mitigation Measure 3.15-1d prior to any action on the application.</p> <p>Verify treatment measures are implemented prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.</p>	

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WILDFIRE

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Wildfire				
Impact 3.17-1 (continued)	<p>Mitigation Measure 3.17-1b (ZPC, UPC and DRH): Require All Structures to Meet Defensible Space</p> <p>The following requirements shall be included as conditions of approval for issuance of a use permit or approval under the design review with hearing processes.</p> <p>All structures irrespective of occupancy type shall meet the defensible space standards outlined below:</p> <ul style="list-style-type: none"> ▶ 0 to 5 feet from a structure: <ul style="list-style-type: none"> ▪ Only hardscape materials (e.g., gravel, pavers, concrete) ▪ No dead or dying plants, weeds, or debris on roof, gutter, deck, porch stairways, or under structure ▪ Remove all branches within 10 feet of any chimney or stovepipe outlet. ▪ No combustible outdoor furniture or planters within decks or attached patios ▪ No stockpiling of firewood or lumber ▪ No attached fencing, gates, or arbors constructed with combustible materials ▶ 5-30 feet from a structure: <ul style="list-style-type: none"> ▪ Remove all dead plants, grass, and weeds ▪ Remove all dead or dry leaves ▪ Trim trees regularly to keep branches a minimum of 10 feet from other trees ▶ 30-100 feet from a structure: <ul style="list-style-type: none"> ▪ Cut or mow annual grass down to a maximum height of four inches. ▪ Create horizontal space between shrubs and trees. ▪ Create vertical space between grass, shrubs and trees. 	County to verify compliance	Verify compliance prior to building permit final or prior to operation (whichever is first) for ZPC, UPC or DRH.	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<ul style="list-style-type: none"> ▪ Remove fallen leaves, needles, twigs, bark, cones, and small branches greater than a depth of three inches. ▪ Keep 10 feet of clearance around exposed wood piles, down to bare mineral soil, in all directions. ▪ Clear areas around outbuildings and propane tanks. Keep 10 feet of clearance to bare mineral soil and no flammable vegetation for an additional 10 feet around their exterior. 			
<p>Impact 3.17-1 (continued)</p>	<p>Mitigation Measure 3.17-1c (UPC and DRH): Require All Structures to Be Constructed with Noncombustible Materials</p> <p>The following requirements shall be included as conditions of approval for issuance of a use permit or approval under the design review with hearing processes for all cannabis uses within the unincorporated County, including both the SRA and LRA.</p> <ul style="list-style-type: none"> ▶ The facility would be subject to an annual inspection by either the local fire district or the County Fire Division. ▶ Building materials, including siding, decks, doors, and trim, shall consist of noncombustible material, as listed on the State Fire Marshal’s Building Materials Listing Program. ▶ Roofs shall be constructed with noncombustible or ignition resistant materials, and must meet Class A fire rating. ▶ Vents must prevent intrusion of embers and flame (i.e., ember-resistant vents). ▶ Windows shall be dual paned tempered glass and constructed with fire-resistant materials. ▶ Parking areas shall be designated and consist of noncombustible materials (e.g., poured concrete or gravel). ▶ Vegetation shall not be permitted within 10 feet of power poles. ▶ Gutters and downspouts shall be noncombustible, and cleared of debris on a monthly basis. ▶ No solid wood fencing shall be constructed. ▶ A minimum of 30 feet between structures shall be maintained. 	<p>County to verify compliance</p>	<p>Verify compliance prior to building permit final or prior to operation (whichever is first) for UPC or DRH.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
<p>Impact 3.17-1 (continued)</p>	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> ▶ 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 	<p>Applicant to submit plan</p> <p>County to verify draft plan compliance with minimum requirements, recommend additional requirements (if necessary), and approve final plan</p>	<p>Plan required prior to UPC or DRH approval.</p> <p>Verify compliance during the permit process and prior to UPC or DRH approval.</p>	

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Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	<p>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.</p> <ul style="list-style-type: none"> ▶ 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: <ul style="list-style-type: none"> ▶ 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. 			

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