

COUNTY OF SAN MATEO, PLANNING AND BUILDING DEPARTMENT

**NOTICE OF INTENT TO ADOPT
MITIGATED NEGATIVE DECLARATION**

A notice, pursuant to the California Environmental Quality Act of 1970, as amended (Public Resources Code 21,000, et seq.), that the following project: *Half Moon Grow Cannabis Cultivation License Application*, when adopted and implemented, will not have a significant impact on the environment.

FILE NO.: MNA2018-00022

OWNER: SKRRC LLC

APPLICANT: Half Moon Grow, Inc.

ASSESSOR'S PARCEL NO.: 048-320-020

LOCATION: 37 Frenchman's Creek Road, Half Moon Bay

PROJECT DESCRIPTION

Proposed license for the cultivation of cannabis plants within existing greenhouse buildings, including both mature cannabis plants and nursery stock. A total of five greenhouse buildings will be used as shown below (please see attached Figure 1 for location of referenced greenhouses):

GREENHOUSE NUMBER	LICENSE TYPE	LICENSE NUMBER	SIZE OF CANOPY
2	Nursery	TCA18-9557*	4,064 sq. ft.
3	Nursery	TCA18-9557*	37,779 sq. ft.
8	Small Mixed Light	TCA18-9561	5,940 sq. ft.
		TCA18-9564	9,504 sq. ft.
		TCA18-9566	9,504 sq. ft.
9S	Medium Mixed Light	TCA18-9567#	8,640 sq. ft.
9N	Medium Mixed Light	TCA18-9567#	8,640 sq. ft.

*The applicants are proposing to split the Nursery license between two greenhouses.

#The applicants propose to split the Medium Mixed Light license between the two greenhouses.

In addition to the greenhouses cited above, four existing warehouse buildings will be used for storage of fertilizer and other agricultural supplies, a drying shed, and office/personnel use.

The applicants propose using hydroponic growing practices to minimize water use. All water will be supplied from existing permitted sources. No new water sources are proposed. The applicants are proposing a workforce of eight full-time employees with up to an additional eight part-time employees during harvest periods. No new buildings are proposed.

FINDINGS AND BASIS FOR A NEGATIVE DECLARATION

The Current Planning Section has reviewed the initial study for the project and, based upon substantial evidence in the record, finds that:

1. The project will not adversely affect water or air quality or increase noise levels substantially.
2. The project will not have adverse impacts on the flora or fauna of the area.
3. The project will not degrade the aesthetic quality of the area.
4. The project will not have adverse impacts on traffic or land use.
5. In addition, the project will not:
 - a. Create impacts which have the potential to degrade the quality of the environment.
 - b. Create impacts which achieve short-term to the disadvantage of long-term environmental goals.
 - c. Create impacts for a project which are individually limited, but cumulatively considerable.
 - d. Create environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The County of San Mateo has, therefore, determined that the environmental impact of the project is less than significant.

MITIGATION MEASURES included in the project to avoid potentially significant effects:

Mitigation Measure 1: Prior to the issuance of the requested Type 2B or 3B (Mixed Light, Cultivation) licenses, the applicant shall install a carbon filter system (or a comparable system) on the exhaust outlets for all buildings that will contain flowering cannabis plants or their product. This includes the greenhouses and the drying and processing buildings. The applicant shall also submit a maintenance plan (which includes record keeping) for review and approval prior to issuance of the requested licenses.

RESPONSIBLE AGENCY CONSULTATION

Regional Water Quality Control Board
CalCannabis Cultivation Licensing

INITIAL STUDY

The San Mateo County Current Planning Section has reviewed the Environmental Evaluation of this project and has found that the probable environmental impacts are insignificant. A copy of the initial study is attached.

REVIEW PERIOD: February 18, 2019 – March 20, 2019

All comments regarding the correctness, completeness, or adequacy of this Negative Declaration must be received by the County Planning and Building Department, 455 County Center, Second Floor, Redwood City, no later than **5:00 p.m., March 20, 2019.**

CONTACT PERSON

Michael Schaller
Project Planner, 650/363-1849
mschaller@smcgov.org



Michael Schaller, Project Planner

County of San Mateo
 Planning and Building Department

**INITIAL STUDY
 ENVIRONMENTAL EVALUATION CHECKLIST**
 (To Be Completed by Planning Department)

1. **Project Title:** Half Moon Grow Cannabis Cultivation License application
2. **County File Number:** MNA2018-00022
3. **Lead Agency Name and Address:** San Mateo County Planning Department
 455 County Center, 2nd Floor
 Redwood City, CA 94063
4. **Contact Person and Phone Number:** Michael Schaller, Senior Planner
 650/363-1849
5. **Project Location:** 37 Frenchman’s Creek Road
 Half Moon Bay, CA 94019
6. **Assessor’s Parcel Number and Size of Parcel:** 048-320-020
7. **Project Sponsor’s Name and Address:** Half Moon Grow, Inc.
 3110 E. Garvey Ave S.
 West Covina, CA 91791
8. **General Plan Designation:** Agriculture (Rural)
9. **Zoning:** Planned Agricultural Development (PAD)
10. **Description of the Project:** Proposed license for the cultivation of cannabis plants within existing greenhouse buildings, including both mature cannabis plants and nursery stock. A total of five greenhouse buildings will be used as shown below (please see attached Figure 1 for location of referenced greenhouses):

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In addition to the greenhouses cited above, four existing warehouse buildings will be used for storage of fertilizer and other agricultural supplies, a drying shed, and office/personnel use.

The applicants propose using hydroponic growing practices to minimize water use. All water will be supplied from existing permitted sources. No new water sources are proposed. The applicants are proposing a workforce of eight full-time employees with up to an additional eight part-time employees during harvest periods. No new buildings are proposed.

11. **Surrounding Land Uses and Setting:** Agricultural/Open Space. There is a residence approx. 400 feet west of the southernmost greenhouse on the project parcel. There is another residence approx. 1,000 feet north of the northernmost greenhouse proposed for use under this license application. All surrounding parcels are designated for agricultural or open space use.
12. **Other Public Agencies Whose Approval is Required:** CalCannabis Cultivation Licensing, a division of the California Department of Food and Agriculture; Regional Water Quality Control Board
13. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?:**

No California Native American tribe has requested consultation pursuant to Public Resources Code section 21080.3.1.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

	Aesthetics		Hazards and Hazardous Materials		Recreation
	Agricultural and Forest Resources		Hydrology/Water Quality		Transportation/Traffic
X	Air Quality		Land Use/Planning		Tribal Cultural Resources
	Biological Resources		Mineral Resources		Utilities/Service Systems
	Cultural Resources		Noise	X	Mandatory Findings of Significance
	Geology/Soils		Population/Housing		
	Climate Change		Public Services		

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in 5. below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources. Sources used or individuals contacted should be cited in the discussion.

1. AESTHETICS. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
1.a. Have a significant adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?				X
<p>Discussion: The proposed cultivation will occur within existing greenhouse buildings. No new structures are proposed. The project site is located in a canyon and is not readily visible any existing residentially zoned areas. No public lands, water bodies or roads are adjacent to the project site which might be impacted by the re-use of these existing buildings.</p> <p>Source: County of San Mateo, 1986, General Plan Policies; County of San Mateo Local Coastal Program; County GIS; Site reconnaissance.</p>				
1.b. Significantly damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
<p>Discussion: The project site is not within the viewshed of a state scenic highway.</p> <p>Source: San Mateo County GIS</p>				
1.c. Significantly degrade the existing visual character or quality of the site and its surroundings, including significant change in topography or ground surface relief features, and/or development on a ridgeline?				X
<p>Discussion: The proposed project will occur entirely within existing greenhouse structures and therefore will not modify the existing visual character of the site. See discussion under Question 1(a).</p> <p>Source:</p>				
1.d. Create a new source of significant light or glare that would adversely affect day or nighttime views in the area?			X	
<p>Discussion: As discussed above in the project description section, cultivation activities will be divided amongst five existing greenhouse buildings. Plants that are in the “germination” or “seedling” stage start their lifecycles in the Nursery buildings (Buildings 2 and 3 on the site plan). These two buildings currently do not have artificial lighting (aka “grow lights”), however, the applicants are proposing to install such lighting into these two buildings. Once plants have grown into the “mature” stage, they will be transferred into one of the three other greenhouses (Buildings 8, 9S or 9N). These three greenhouses are already equipped with artificial lighting. There is a history</p>				

of artificial “grow light” usage at the site, however, the site has been in a relatively low level of usage for the last 1-2 years and thus the use of the existing grow lights has been limited.

The Environmental Impact Report adopted by the State during the creation of the State’s cannabis cultivation regulations acknowledge the potential for new sources of nighttime light and included required screening measures to reduce potential impacts:

“[M]ixed-light cultivation of cannabis involves the cultivation of cannabis using both natural and artificial light and darkness for the purpose of controlling the life cycle of the plant. Techniques used to manipulate light, such as using tarps or other measures to exclude natural light or using low- or high intensity artificial lighting systems, could be visible outside of greenhouses or other mixed light facilities during the daytime or at night and could create a nuisance to adjacent and nearby properties, residences, and/or motorists traveling on affected roadways. The degree to which such lighting would create adverse impacts on sensitive receptors would vary widely among proposed cultivation sites, but could be significant in some locations. The Proposed Program regulations, however, would include implementation of environmental protection measures requiring that artificial lighting used for the manipulation of plant growth cycles be shielded to minimize the visual effects of the presence of lighting and nighttime glare (Section 8314; see Appendix A). Therefore, visual impacts from the Proposed Program would be less than significant.”

Consistent with this analysis, the State’s regulations contain the following requirement:

§ 8314. Additional Environmental Protection Measure for Mixed-Light Licenses.

Mixed Light license types of all sizes shall ensure that lights used for cultivation are shielded from sunset to sunrise to avoid nighttime glare.

With adherence to this State requirement, Staff has determined that there will be no significant visual impact due to the use of grow lights at the facility.

Source: Project Plans; California Code Of Regulations, Title 3. Food And Agriculture, Division 8. Cannabis Cultivation, Chapter 1. Cannabis Cultivation Program, Section 8314.

1.e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?				X
<p>Discussion: The project site is not adjacent to or within the boundaries of a State or County Scenic Corridor.</p> <p>Source: San Mateo County GIS</p>				
1.f. If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?				X
<p>Discussion: The project site is not within a Design Review District.</p> <p>Source: San Mateo County GIS</p>				
1.g. Visually intrude into an area having natural scenic qualities?				X

Discussion: The proposed project will occur entirely within existing greenhouse structures and therefore will not modify the existing visual character of the site. See discussion under Question 1(a).

Source:

2. AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
2.a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X

Discussion: The project site is within the Coastal Zone. The proposed use of the existing vacant greenhouses to grow cannabis will revitalize their historic use as agricultural structures. The project will not convert any farmland to non-agricultural use.

Source: San Mateo County GIS

2.b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?				X
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Discussion: The project site is zoned for agricultural use; cultivation of cannabis is an agricultural activity consistent with this agricultural zoning. The proposed site is not subject to an existing Open Space Easement or Williamson Act contract.

Source: San Mateo County Zoning Regulations

2.c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?				X
<p>Discussion: See discussion under Question 2(a) and (b).</p> <p>Source:</p>				
2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?				X
<p>Discussion: The proposed project will utilize the existing greenhouses on the site. No new buildings are proposed. No lands will be converted or divided.</p> <p>Source: San Mateo County GIS</p>				
2.e. Result in damage to soil capability or loss of agricultural land?				X
<p>Discussion: Because the project will be entirely located within existing greenhouse structures, there is no potential for damage to soil capability or loss of agricultural land. See discussion under Question 2(a) and (d).</p> <p>Source:</p>				
2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? <i>Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.</i>				X
<p>Discussion: The project site does not contain forestland or timberland.</p> <p>Source: San Mateo County GIS</p>				

<p>3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
3.a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
<p>Discussion: Large projects that exceed regional employment, population, and housing planning projections have the potential to be inconsistent with the regional inventory compiled as part of the Bay Area Air Quality Management District (District) 2017 Bay Area Clean Air Plan. Currently, the project site is occupied by vacant greenhouses that were historically used for production of greenhouse flowers. The proposed project is expected to require approximately eight full-time employees, and up to an additional eight part-time employees during harvest season. While the re-introduction of activities in the vacant greenhouses will increase operational vehicle trips above existing conditions, the proposed project is not expected to generate significant new operational vehicle trips above historic levels or those that could be expected with any other agricultural activity permitted by right at the site. In addition, a project of this size will not substantially affect housing, employment, and population projections within the region, which is the basis of the Bay Area Clean Air Plan projections.</p> <p>Therefore, the proposed project is not considered a regionally significant project (under CEQA Guidelines Section 15206) that will affect regional vehicle miles traveled (VMT) and warrant intergovernmental review by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC).</p> <p>Furthermore, the project falls under the threshold levels contained in BAAQMD's screening criteria, which is used to identify projects that have the potential to generate emissions that exceed the District's operational emissions thresholds. These thresholds were established to identify projects that have the potential to generate a substantial amount of criteria air pollutants. Because the project will not exceed these thresholds, the project is not considered by the District to be a substantial emitter of criteria air pollutants. Therefore, the Project will not conflict with or obstruct implementation of the 2017 Bay Area Clean Air Plan and any impacts are considered less than significant.</p> <p>Source: Bay Area Air Quality Management District (BAAQMD), 2017. Bay Area 2017 Clean Air Plan. Project Plans</p>				
3.b. Violate any air quality standard or contribute significantly to an existing or projected air quality violation?				X
<p>Discussion: The proposed project will utilize existing greenhouse buildings. There is no evidence to suggest that the cultivation activities will generate significant new levels of criteria air pollutants (ROG, NOx, PM10 and PM2.5), or Toxic Air Contaminants (TAC), or of Greenhouse Gases (GHGs). The proposed project does not include any construction activities which would generate criteria air pollutants, TACs or GHGs. Nor is there evidence to suggest that the cultivation process will generate significant levels of GHGs.</p> <p>Source: Bay Area Air Quality Management District (BAAQMD), 2017. Bay Area 2017 Clean Air Plan. Project Plans</p>				

3.c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				X
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Discussion: See discussion under Question 3(b).

Source:

3.d. Expose sensitive receptors to significant pollutant concentrations, as defined by BAAQMD?				X
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Discussion: See discussion under Question 3(b).

Source:

3.e. Create objectionable odors affecting a significant number of people?		X		
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Discussion: Odors are not a regulated air pollutant such as PM10 or ROG are. As such, the BAAQMD has developed qualitative parameters that should be considered when considering project level odor issues. The District has established odor screening thresholds for certain odor generating land uses. Cannabis cultivation operations are not on the list of odor generating land uses. However, Composting Operations are on the list. The District has established a threshold of one mile between this category of odor source (Compost Operations) and receptor. In other words, if the distance between the odor source and a receptor is less than one mile, then there will likely be an odor impact upon the receptor. As a proxy, the County proposes to use the “Composting Operations” category to establish whether there could be a potential odor impact upon nearby residences (to this proposed cannabis operation).

There are two residences within a one-mile radius of the project site. Both residences could be exposed to odor impacts due to the release of exhaust air from the greenhouses that will be utilized for the flowering plants. At the present time, there are no odor control devices on the exhaust fans of the project greenhouses. In order to mitigate this potentially significant impact, staff is imposing the following mitigation measure:

Mitigation Measure 1: Prior to the issuance of the requested Type 2B or 3B (Mixed Light, Cultivation) licenses, the applicant shall install a carbon filter system (or a comparable system) on the exhaust outlets for all buildings that will contain flowering cannabis plants or their product. This includes the greenhouses and the drying and processing buildings. The applicant shall also submit a maintenance plan (which includes record keeping) for review and approval prior to issuance of the requested licenses.

The odor associated with cannabis plants occurs during the flowering stage when buds begin to grow on each plant. This is not an issue during the plant’s early "seedling" stage, when individual plants are being propagated in the nursery greenhouses. Thus odor control measures are not necessary on the buildings proposed for nursery use.

With the installation of an odor control system on all buildings containing flowering cannabis plants and or their product, the odor that may be generated by the concentration of a large number of plants will be minimized to below a significant level.

Source: Bay Area Air Quality Management District (BAAQMD), CEQA Air Quality Guidelines (2017); CDFA CalCannabis DEIR, Vol. 1

3.f. Generate pollutants (hydrocarbon, thermal odor, dust or smoke particulates, radiation, etc.) that will violate existing standards of air quality on-site or in the surrounding area?				X
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Discussion: See discussion under Question 3(b).

Source:

4. BIOLOGICAL RESOURCES. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
4.a. Have a significant adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X

Discussion: All cultivation will occur within existing greenhouses. No new buildings or land are proposed for development. Because all activities will occur within existing greenhouses, there is no evidence to suggest that habitat will be modified or adversely impacted.

Source: Project plans

4.b. Have a significant adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
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Discussion: See discussion under Question 4(a).

Source: Project plans, SMC Co. GIS

4.c. Have a significant adverse effect on federally protected wetlands as defined				X
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<p>by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>				
<p>Discussion: See discussion under Question 4(a). Source: Project plans, SMCo. GIS</p>				
<p>4.d. Interfere significantly with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>				X
<p>Discussion: See discussion under Question 4(a). Source: Project plans, SMCo. GIS</p>				
<p>4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?</p>				X
<p>Discussion: See discussion under Question 4(a). Source:</p>				
<p>4.f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or State habitat conservation plan?</p>				X
<p>Discussion: See discussion under Question 4(a). Source:</p>				
<p>4.g. Be located inside or within 200 feet of a marine or wildlife reserve?</p>				X
<p>Discussion: There are no marine or wildlife reserves near or adjacent to the project site. Source: Project plans, SMCo. GIS</p>				
<p>4.h. Result in loss of oak woodlands or other non-timber woodlands?</p>				X
<p>Discussion: See discussion under Question 4(a). Source:</p>				

5. CULTURAL RESOURCES. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
5.a. Cause a significant adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?				X
<p>Discussion: All proposed cultivation will occur within existing greenhouses. These buildings do not meet the definition of historical resources. No new buildings or land are proposed for development. Because all activities will occur within existing greenhouses, there is no evidence to suggest that any documented or undocumented cultural resources will be modified or adversely impacted.</p> <p>Source: Project plans, SMC Co. GIS</p>				
5.b. Cause a significant adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?				X
<p>Discussion: See discussion under Question 5(a).</p> <p>Source:</p>				
5.c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
<p>Discussion: See discussion under Question 5(a).</p> <p>Source:</p>				
5.d. Disturb any human remains, including those interred outside of formal cemeteries?				X
<p>Discussion: See discussion under Question 5(a).</p> <p>Source:</p>				

6. GEOLOGY AND SOILS. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
6.a. Expose people or structures to potential significant adverse effects, including the risk of loss, injury, or death involving the			X	

following, or create a situation that results in:				
<p>i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other significant evidence of a known fault?</p> <p><i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i></p>				X
<p>Discussion: The nearest identified earthquake fault zone is located approximately 2.8 miles west of the project location. There is no additional evidence to conclude that the project site is subject to fault rupture.</p> <p>Source: Alquist-Priolo Earthquake Fault Zoning Map (Half Moon Bay Quad) – Calif. Dept. of Conservation</p>				
ii. Strong seismic ground shaking?			X	
<p>Discussion: The nearest known fault zone to the project site is the Seal Cove fault zone which is approximately 2.8 miles west of the project site. The San Andreas fault zone lies approximately 4.5 miles northeast of the project site. A major earthquake along either fault line could produce strong ground shaking. The proposed project will utilize the existing greenhouse buildings which were built in accordance with the building code at the time of their construction. These existing buildings are non-habitable and have withstood previous earthquake events, including the 1989 Loma Prieta earthquake.</p> <p>Source: Alquist-Priolo Earthquake Fault Zoning Map (Half Moon Bay Quad) – Calif. Dept. of Conservation; Project Plans</p>				
iii. Seismic-related ground failure, including liquefaction and differential settling?				X
<p>Discussion: The project site is not within a mapped liquefaction hazard zone or on soils known to be susceptible to liquefaction or differential settling.</p> <p>Source: Calif. Geological Survey Seismic Hazards Zones maps; Project Plans</p>				
iv. Landslides?				X
<p>Discussion: The project site is not within a mapped landslide hazard zone. No new buildings are proposed as part of this proposed project. There is no evidence to conclude that adjacent slopes will fail and damage the existing structures on the project site.</p> <p>Source: Calif. Geological Survey Landslide Hazards Zones maps; Project Plans</p>				
<p>v. Coastal cliff/bluff instability or erosion?</p> <p><i>Note to reader: This question is looking at instability under current conditions. Future,</i></p>				X

<i>potential instability is looked at in Section 7 (Climate Change).</i>				
Discussion: The project site is over a mile from the nearest coastal bluff. There is no evidence to suggest that instability of this bluff will have any impact upon the existing buildings on the project site. Source: SMC Co. GIS				
6.b.	Result in significant soil erosion or the loss of topsoil?			X
Discussion: No construction or soil disturbance is proposed as part of this application. All cultivation activities will occur within existing greenhouse buildings which have concrete floors. Source: Project Plans, Site visit				
6.c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse?			X
Discussion: There is no evidence to suggest that the underlying geology or surface soils on the project site are unstable, nor are any activities proposed that would create new instability. All cannabis-related activities will occur within existing structures. Source: SMC Co. GIS, Project plans				
6.d.	Be located on expansive soil, as noted in the 2010 California Building Code, creating significant risks to life or property?			X
Discussion: See discussion under Question 6(c). Source:				
6.e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			X
Discussion: As discussed previously, no new buildings are proposed. There is no evidence to suggest that the existing septic systems on the site need to be replaced or modified at this time. Source: Project plans				

7. CLIMATE CHANGE. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
7.a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?				X
<p>Discussion: See discussion under Questions 3(a) and 3(b).</p> <p>Source:</p>				
7.b. Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X
<p>Discussion: See discussion under Questions 3(a) and 3(b).</p> <p>Source:</p>				
7.c. Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?				X
<p>Discussion: The project involves the re-use of existing greenhouse buildings. No forestland will be lost or converted.</p> <p>Source: SMCo. GIS, Project plans</p>				
7.d. Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?				X
<p>Discussion: The nearest coastal bluff is over one mile to the west of the project site. There is insufficient evidence to suggest that sea level rise or bluff erosion will be severe enough to impact the project site.</p> <p>Source: SMCo. GIS</p>				
7.e. Expose people or structures to a significant risk of loss, injury or death involving sea level rise?				X
<p>Discussion: See discussion under Question 7(d).</p> <p>Source:</p>				

7.f. Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
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Discussion: As stated previously, the proposed project will utilize existing buildings and structures on the project site. No new structures or buildings are proposed.

Source: Project plans

7.g. Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?				X
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Discussion: See discussion under Question 7(f).

Source:

8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
8.a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?			X	

Discussion: The applicant's propose to limit any chemical controls (products classified as pesticides or fungicides) to be used on their plants to those substances listed on the California Department of Pesticide Regulations' "Legal Pest Management Practices for Cannabis Growers in California" document. These substances are exempt from residue tolerance requirements and either exempt from registration requirements or registered for a use broad enough to include use on cannabis.

While cannabis is a newly legal agricultural crop in California, any pesticide or herbicide use associated with its production is subject to the same rules and regulations as any other agricultural crop. The California Department of Pesticide Regulations and the San Mateo County Agricultural Commissioner enforce the use and sale of pesticides under Divisions 6 and 7 of the California Food and Agricultural Code, and Title 3 of the California Code of Regulations. These laws and regulations apply to all pesticide use; cannabis is no exception. The applicants are required to comply with the regulations regarding transportation, use and storage of all regulated pesticides and herbicides. Compliance with these regulations will reduce any potential impact to a less-than-significant level.

Source: California Department of Pesticide Regulations - "Legal Pest Management Practices for Cannabis Growers in California" (2017); Project Plans

8.b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
<p>Discussion: See discussion under Question 8(a).</p> <p>Source:</p>				
8.c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
<p>Discussion: There are no existing or planned schools within .25 miles of the project site.</p> <p>Source: SMC Co. GIS</p>				
8.d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
<p>Discussion: This question is in reference to the “Hazardous Waste and Substances Sites List” also known as the Cortese List. This list is a planning document used by the State, local agencies, and developers to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites. The project site is not on said list.</p> <p>Source: California Department of Toxic Substances Control “EnviroStor” website</p>				
8.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?				X
<p>Discussion: The project site is outside of the adopted airport safety zone for the Half Moon Bay airport, which is located approximately 3.5 miles north-west of the project site.</p> <p>Source: SMC Co. GIS</p>				
8.f. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?				X
<p>Discussion: There are no private airstrips within a 2 mile radius of the project site.</p>				

Source: SMCo. GIS					
8.g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
<p>Discussion: There is no evidence to suggest that the project will interfere with any emergency response plan. No work will occur that will impede or close a public road.</p> <p>Source: Project Plans, Site visit, County GIS database</p>					
8.h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X
<p>Discussion: While the project site is within an area designated as “Very High Fire Hazard Risk”, the site itself has been maintained to keep the threat of wildfire relatively low. Fuel loads in and around the site structures have been kept low through active vegetation management measures. No large trees exist on the site which could serve as a fuel ladder to propel wildfire into the heart of the project site.</p> <p>Source: Project Plans, Site visit, County GIS database</p>					
8.i.	Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
<p>Discussion: The project site is not within a mapped 100-year flood hazard area, nor does the project contain a housing component.</p> <p>Source: Project Plans, County GIS database</p>					
8.j.	Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?				X
<p>Discussion: The project site is not within a mapped 100-year flood hazard area.</p> <p>Source: County GIS database</p>					
8.k.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
<p>Discussion: There are no dams or levees on or adjacent to the project site. See discussion under Question 8(j) for discussion of flood potential.</p>					

Source: Project Plans, County GIS database					
8.i.	Inundation by seiche, tsunami, or mudflow?				X
<p>Discussion: The project site is outside of any mapped tsunami zones. There are no lakes or other water bodies on or adjacent to the project site that could be susceptible to seiche (A short-term standing wave oscillation of the water level in a lake, characteristic of its geometry). There are no substantial rivers or creeks on the project site that could serve as a transportation medium for a mudflow event.</p> <p>Source: Project Plans, County GIS database</p>					

9. HYDROLOGY AND WATER QUALITY. Would the project:					
		<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
9.a.	Violate any water quality standards or waste discharge requirements (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?				X
<p>Discussion: See discussion under Question 18(a) and (b).</p> <p>Source:</p>					
9.b.	Significantly deplete groundwater supplies or interfere significantly with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
<p>Discussion: See discussion under Question 18(b).</p> <p>Source:</p>					

9.c. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in significant erosion or siltation on- or off-site?				X
<p>Discussion: The proposed cannabis cultivation will occur within existing greenhouses. No new buildings or structures are proposed. The applicant is not proposing to alter the existing drainage patterns on the project site.</p> <p>Source: Project Plans, Site visit</p>				
9.d. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or significantly increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?				X
<p>Discussion: The proposed project will continue to utilize the existing greenhouse buildings/structures on the site. No new buildings are proposed. Absent any physical alteration of the site, there is no evidence to conclude that cannabis cultivation will increase the rate or amount of surface runoff above existing levels.</p> <p>Source: Project Plans, Site visit</p>				
9.e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide significant additional sources of polluted runoff?				X
<p>Discussion: See discussion under Question 9(d).</p> <p>Source:</p>				
9.f. Significantly degrade surface or ground-water water quality?				X
<p>Discussion: See discussion under Question 18(a) and (b).</p> <p>Source:</p>				
9.g. Result in increased impervious surfaces and associated increased runoff?				X
<p>Discussion: See discussion under Question 9(c).</p> <p>Source:</p>				

10. LAND USE AND PLANNING. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
10.a. Physically divide an established community?				X
<p>Discussion: There is no community adjacent to the project site.</p> <p>Source: Project Plans, Site visit, County GIS database</p>				
10.b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
<p>Discussion: The County's cannabis cultivation ordinance directs cannabis cultivation towards vacant/underutilized greenhouses to minimize any potential land use related conflicts and revitalize the struggling greenhouse agricultural industry. As such, this application furthers the County's goal of reusing the underutilized greenhouse market and ensuring continued employment opportunities within the County's agricultural workforce.</p> <p>Source: Project Plans, County Cannabis Cultivation Ordinance</p>				
10.c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
<p>Discussion: The project site is not within the boundaries of an approved habitat conservation plan or natural community conservation plan.</p> <p>Source: Project Plans, County GIS database</p>				
10.d. Result in the congregating of more than 50 people on a regular basis?				X
<p>Discussion: The applicants anticipate approximately eight full time staff will be on-site each day with potentially eight more part-time staff that will be on-site as needed during harvest periods.</p> <p>Source: Project Plans</p>				
10.e. Result in the introduction of activities not currently found within the community?				X

Discussion: Commercial cultivation of cannabis was recently legalized in California pursuant to voter approval of Proposition 64 and subsequent State legislation. State law (the *Medicinal and Adult-Use Control Regulation and Safety Act*, Business and Professions Code Section 26069(a)) defines cannabis as an agricultural product for purposes of the State’s cannabis cultivation program. As a result, the cultivation of cannabis is considered an agricultural activity largely similar to hothouse tomatoes or orchids. Any unique characteristics of cannabis as compared to traditional agricultural products are addressed through provisions of the County’s cannabis ordinance or conditions of license approval.

Source: Project Plans

10.f. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?

X

Discussion: There is no evidence to suggest that approval of the proposed project (cultivation of cannabis within existing greenhouses) will encourage off-site development or require the need for new or expanded public utilities.

Source: Project Plans

10.g. Create a significant new demand for housing?

X

Discussion: As discussed previously, the proposed cannabis operation will only employ eight full time employees with eight additional part-time staff. These numbers, when viewed within the larger context of employment growth rate within San Mateo County, are less than significant. See also discussion under Question 13(a).

Source: Project Plans

11. MINERAL RESOURCES. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
11.a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				X

Discussion: The proposed project will utilize existing greenhouses and does not propose to convert any new lands or areas. The project site has not been identified as a site of known mineral resources.

Source: Project Plans, SMC Co. GIS				
11.b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
Discussion: See discussion under Question 11(b).				
Source:				

12. NOISE. Would the project result in:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
12.a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
<p>Discussion: The existing greenhouses are equipped with exhaust fans which generate on average 80 dB of noise when measured 10 feet from the source. There are two residences on adjacent parcels to the project site. The closest residence, 840 Frenchmans Creek Road, is approximately 400 feet to the southwest of the nearest greenhouse. Sound pressure levels decrease by 6 dB with the doubling of the distance from noise source to receptor. Based upon this ratio, noise levels generated by the use of the exhaust fans in these closest greenhouses should be in the range of 45 to 50 dB. This is on par with the noise levels generated by a refrigerator within a home (typically 50 dB). The other nearby residence, 511 Frenchmans Creek Road, is approximately 800 feet away from the nearest greenhouse. Based upon the ratio, noise from exhaust fans in these greenhouses should be less than 45 dB. This level of noise does not violate County noise regulations (Ordinance Code Chapter 4.88) nor does it conflict with EPA noise limits designed to protect hearing.</p> <p>Source: SMC Co. GIS; Center for Hearing and Communication, "Common Environmental Noise Levels"</p>				
12.b. Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?				X
<p>Discussion: Typical sources of ground-borne vibration or noise include construction (i.e. – grading of a site prior to construction) or the use of manufacturing equipment (for example a metal lathe or grinding equipment). As stated previously, no new construction is proposed nor is the applicant proposing to utilize heavy industrial equipment that would generate ground-borne vibration or noise.</p> <p>Source: Project Plans, Site Visit</p>				

12.c. A significant permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X
<p>Discussion: The existing greenhouses are equipped with air exhaust fans, which have been used historically by the previous agricultural businesses that occupied the site. The current applicant has not proposed adding additional fans and there is no evidence to suggest that continued use of the existing greenhouses will cause a significant increase in ambient noise levels above existing and historical levels.</p> <p>Source: Project Plans, Site Visit</p>				
12.d. A significant temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				X
<p>Discussion: See discussion under Question 12(b) and 12(c).</p> <p>Source:</p>				
12.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?				X
<p>Discussion: The project site is not within an airport land use plan or within 2 miles of an airport or private airstrip.</p> <p>Source: SMC Co. GIS</p>				
12.f. For a project within the vicinity of a private airstrip, exposure to people residing or working in the project area to excessive noise levels?				X
<p>Discussion: See discussion under Question 12(e).</p> <p>Source:</p>				

13. POPULATION AND HOUSING. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
13.a. Induce significant population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
<p>Discussion: The proposed project involves the re-use of existing agricultural buildings. No new public infrastructure such as roads or sewer lines are proposed. No new homes are proposed. The project would not generate a significant number of new employees. The applicant anticipates approximately eight full-time staff will be on-site each day with potentially eight more part-time staff that would be on-site as needed during harvest periods. The applicants, based on information provided by the previous agricultural operator, estimates that approximately 4 to 6 people were actively employed at the project site over the last five to ten years. The applicants anticipate that they will be able to hire a majority of their labor force from within the existing Coastside agricultural labor pool.</p> <p>Source:</p>				
13.b. Displace existing housing (including low- or moderate-income housing), in an area that is substantially deficient in housing, necessitating the construction of replacement housing elsewhere?				X
<p>Discussion: The project site is an agricultural greenhouse complex. There is no existing housing on the project site.</p> <p>Source: Project Plans, Site Visit</p>				

14. PUBLIC SERVICES. Would the project result in significant adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
14.a. Fire protection?				X
14.b. Police protection?				X
14.c. Schools?				X

14.d. Parks?				X
14.e. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?				X
<p>Discussion: The proposed project does not include a residential component nor is it anticipated that the proposed business will cause a significant population increase such that existing schools, parks and other public facilities would be negatively impacted. The project site is already developed and fire breaks and other fire prevention measures have been maintained by the previous owner. The current applicants have submitted a fire prevention plan which will be implemented on a regular basis to reduce the threat of wildland fire to the project site as much as possible. The applicants have submitted a detailed surveillance and security plan as required by the County's cannabis ordinance. There is no evidence to suggest that permitting cultivation at this site will require an increase in Sheriff patrols or responses to calls such that additional Sheriff staffing would be required for this area of the County.</p> <p>Source: Project Plans, Site Visit</p>				

15. RECREATION. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
15.a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated?				X
<p>Discussion: As discussed previously, the proposed project does not include a residential component nor is it anticipated that the proposed business will cause a significant population increase such that existing neighborhood or regional parks and other public facilities would be negatively impacted.</p> <p>Source: Project Plans</p>				
15.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
<p>Discussion: No new recreational facilities are proposed as part of this project, nor is it anticipated that the project will generate population growth which might require new or expanded recreational facilities.</p> <p>Source: Project Plans</p>				

16. TRANSPORTATION/TRAFFIC. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
16.a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				X
<p>Discussion: As stated previously, the proposed project will re-use the existing greenhouse complex, where historically fruit, vegetables and flowers were grown both indoors and outdoors. The applicant anticipates approximately eight full time staff will be on-site each day with potentially eight more part-time staff that would be on-site as needed during harvest periods. The public road which serves the project site (Frenchman’s Creek Road) is a two lane paved road that serves eight other residences/agricultural operations. There is no evidence to suggest that the proposed re-use will generate significantly more traffic than previous levels such that it will significantly impact the effectiveness of this road or the road network within the Mid-Coast area in general.</p> <p>Source: Project Plans, San Mateo Co. GIS</p>				
16.b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?				X
<p>Discussion: See discussion under Question 16(a).</p> <p>Source:</p>				
16.c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in significant safety risks?				X
<p>Discussion: The project site is outside of the established landing and take-off zones for Half Moon Bay airport, which is the closest airfield. No new buildings are proposed which would impact flight patterns.</p> <p>Source: Project Plans, San Mateo Co. GIS</p>				

16.d. Significantly increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
<p>Discussion: As stated previously, the project will re-use existing greenhouse structures on the project site; as such there are no hazards created by a design feature. No activities will occur off site (such as movement of farm equipment).</p> <p>Source: Project Plans, San Mateo Co. GIS</p>				
16.e. Result in inadequate emergency access?				X
<p>Discussion: See discussion under Question 16(a) and (d).</p> <p>Source:</p>				
16.f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X
<p>Discussion: The project site is not near any existing public transit facilities, nor is there any facet of the project that could impact such facilities.</p> <p>Source: Project Plans, San Mateo Co. GIS</p>				
16.g. Cause noticeable increase in pedestrian traffic or a change in pedestrian patterns?				X
<p>Discussion: The project site is not readily accessible by pedestrians. Frenchman’s Creek Road is a rural two lane road with no sidewalks and ditches on one or both sides for most of its reach up to the project site. The site is also approximately one mile from Cabrillo Highway, at the end of the road. Such a distance generally dissuades most people from walking. It is likely that all workers at the project site will arrive via automobile.</p> <p>Source: Project Plans, San Mateo Co. GIS</p>				
16.h. Result in inadequate parking capacity?				X
<p>Discussion: The project plans indicate 18 designated parking spaces will be provided on-site which should be sufficient based upon the anticipated number of employees (8 to 16) on any given day.</p> <p>Source: Project Plans</p>				

17. TRIBAL CULTURAL RESOURCES. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
17.a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				X
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)				X
<p>Discussion: The project site has been developed with greenhouses for over 30 years. There is no evidence that the site contains historic or cultural resources. The proposed license will re-use the existing greenhouses. No new development is proposed.</p> <p>Source: Project Plans, SMCo. GIS</p>				
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. (In applying the criteria set forth in Subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)				X
<p>Discussion: See discussion under Question 17(a)(i).</p> <p>Source:</p>				

18. UTILITIES AND SERVICE SYSTEMS. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

18.a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
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Discussion: The applicants are proposing to use a hydroponic growing system which minimizes the production of irrigation tail water. To maintain suitable growing conditions, wastewater is discharged from hydroponic systems when the irrigation water contains excessive salinity or nutrients. Irrigation tail water is generated when excess water drains from the growth media. Irrigation tail water or hydroponic wastewater may contain nutrients (e.g., phosphate or nitrate), salinity constituents (e.g., sodium, chloride, potassium, calcium, sulfate, magnesium), and other constituents (e.g., iron, manganese, zinc, molybdenum, boron, and silver). Other sanitation-based wastewaters may also be generated at indoor commercial cannabis cultivation sites. These miscellaneous industrial wastewaters may contain biocides, bleach mixtures, or other chemical waste streams. See Question 18(b) for discussion of the applicant’s plan to dispose of wastewater.

The State Water Resources Control Board (SWRCB or Water Board) regulates the discharge of waste materials that could affect the quality of the waters of the state. Water Code section 13260 requires that any person discharging waste or proposing to discharge waste that could affect the quality of the waters of the state must file a report of waste discharge to obtain coverage under waste discharge requirements (WDRs) or a waiver of WDRs. In establishing a regulatory program for cannabis cultivation, SWRCB has created a tiered system depending upon the type (indoor or outdoor) and size of cultivation. Commercial cannabis cultivation activities that occur within a structure with a permanent roof, a permanent impermeable floor (e.g., concrete or asphalt paved), and that discharge irrigation tail water, hydroponic wastewater, or other miscellaneous industrial wastewaters from indoor cannabis cultivation activities to an on-site wastewater treatment system (such as a septic tank and leach field), must obtain separate regulatory authorization (e.g., WDRs, conditional waiver of WDRs, or other permit mechanism) to discharge the wastewater.

The applicants have applied for and received a Conditional Waiver of Water Quality from the Water Board. As such, the project has complied with the Water Board’s “Cannabis Cultivation Policy” and “General Waste Discharge Requirements”. The cultivation activities will not exceed the wastewater treatment requirement of the Water Board.

Source: *Cannabis Cultivation Policy - Principles and Guidelines for Cannabis Cultivation*, State Water Resources Control Board, October 2017; *Notice Of Applicability, Conditional Waiver Of Water Quality Order WQ-2017-0023-DWQ*, Half Moon Grow, Inc, San Mateo County, San Francisco Bay Regional Water Quality Control Board

18.b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
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Discussion: The proposed cultivation activities will not require the need for new water or wastewater facilities. With regards to wastewater, what little irrigation tail water, hydroponic wastewater, or other miscellaneous industrial wastewater that is generated by the hydroponics growing system will be discharged to a collection tank. The wastewater in the collection tank will be regularly collected by an authorized waste hauler who will dispose of the wastewater at a licensed community sewer system treatment facility, consistent with the Water Board’s sewer system requirements and as approved by the Water Board.

With regards to water supply, the project parcel has established rights with the SWRCB to divert 10.66 acre-feet (3.5 million gallons) of water per year from Frenchman’s Creek, which borders the project parcel to the north. Diversion is only allowed from January 1 through March 31 of each year. Surface water from Frenchman’s Creek is diverted via a weir with an adjustable height that is set each year based on the required bypass flow in the creek. The surface water that overtops the weir flows into a series of settling basins and is pumped to interim sedimentation storage tanks. From there, the main pump house pumps surface water to the reservoir and storage tanks on top of the hill (that overlooks the greenhouse complex). Additionally, during an average year, rainfall over the reservoir results in an additional 1.12 acre-feet (365,000 gallons) of water capture. This water collection system is already existing and was previously operated in the same manner for prior agricultural operations on the site.

Based upon records for other cannabis operations that the applicants maintain in Humboldt County, it is estimated that the project will generate the following water demand:

Nursery Stock

Proposed canopy area for nursery stock is 37,800 sq. ft. and requires 7.5 gallons per sq. ft. of irrigation each year. Total demand for nursery stock is 283,500 gallons per year.

Mature Cultivation Stock

Proposed canopy area for mature cultivation stock is 46,900 sq. ft. and requires 10 gallons per sq. ft. of irrigation each year. Total demand for mature cultivation stock is 469,000 gallons per year.

Incidental Use

Incidental use includes all other miscellaneous water uses, such as equipment washing, dust control, fire protection, domestic (treated) use, other agriculture use, etc. The water demand for incidental use is approximately 100,000 gallons per year.

Altogether, the total proposed water demand for cannabis cultivation operations is 852,500 gallons per year, where average yearly supply will be over 3.5 million gallons. Based upon these estimates, existing water supply facilities are adequate and there will be no impact.

Source: Notice Of Applicability, Conditional Waiver Of Water Quality Order WQ-2017-0023-DWQ, Half Moon Grow, Inc, San Mateo County, San Francisco Bay Regional Water Quality Control Board; Water Supply Memorandum, BKF Engineering, January 2019

18.c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
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Discussion: See discussion under Question 18(a).

Source:				
18.d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
Discussion: See discussion under Question 18(b).				
Source:				
18.e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
Discussion: The project site is not connected to a municipal wastewater treatment system.				
Source: Project Plans				
18.f. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
Discussion: For all non-cannabis waste materials, disposal shall be at the County's only landfill – Ox Mountain, which currently has sufficient space to accommodate the anticipated waste stream from this site. All cannabis-related plant waste (i.e. – regulated material) must be either disposed of at a regulated site or, as proposed for this project, composted on site for use as fertilizer.				
Source: Project Plans				
18.g. Comply with Federal, State, and local statutes and regulations related to solid waste?				X
Discussion: See discussion under Question 18(f).				
Source:				
18.h. Be sited, oriented, and/or designed to minimize energy consumption, including transportation energy; incorporate water conservation and solid waste reduction measures; and incorporate solar or other alternative energy sources?				X
Discussion: The site is existing and no changes in use are proposed that will significantly increase transportation related energy consumption. Water consumption and solid waste reduction efforts were discussed previously. The greenhouses, by their very nature, are solar "powered".				
Source: Project Plans				

18.i. Generate any demands that will cause a public facility or utility to reach or exceed its capacity?				X
<p>Discussion: See discussion under Question 18(a) - (h).</p> <p>Source:</p>				

19. MANDATORY FINDINGS OF SIGNIFICANCE.				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
19.a. Does the project have the potential to degrade the quality of the environment, significantly reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
<p>Discussion: A potentially significant impact related to odor was identified and mitigation measures were proposed which will reduce this impact to a less than significant level. Because the project will re-utilize existing greenhouse buildings and no new construction is proposed, it is not expected to degrade the quality of the environment, or substantially reduce habitat or affect populations of any wildlife, fish, or plant species. It has been determined that re-use of the existing greenhouse buildings will not have any impact on any examples of the major periods of California history or prehistory.</p> <p>Source:</p>				
19.b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
<p>Discussion: The project will not have impacts to agriculture or forestry resources, mineral resources, or population and housing that would combine with other projects. The proposed cannabis cultivation activities could have potential impacts with respect to odors. However, such</p>				

impacts would be limited to the project site and, where necessary, mitigated such that they would not substantially combine with other off-site impacts.

For the reasons presented in the above document, the proposed project is not expected to result in adverse impacts to human beings, either directly or indirectly. All impacts identified in this document are less than significant, or reduced to less than significant levels with implementation of mitigation measures, and the project's incremental contribution to potential cumulative impacts will not be cumulatively considerable. Therefore, the project's impact is considered less than significant.

Source:

19.c. Does the project have environmental effects which will cause significant adverse effects on human beings, either directly or indirectly?			X	
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Discussion: See Question 19(b) above.

Source:

RESPONSIBLE AGENCIES. Check what agency has permit authority or other approval for the project.

AGENCY	YES	NO	TYPE OF APPROVAL
U.S. Army Corps of Engineers (CE)		X	
State Water Resources Control Board		X	
Regional Water Quality Control Board	X		Notice of Applicability, Conditional Waiver of Water Quality Order WQ-2017-0023-DWQ
State Department of Public Health		X	
San Francisco Bay Conservation and Development Commission (BCDC)		X	
U.S. Environmental Protection Agency (EPA)		X	
County Airport Land Use Commission (ALUC)		X	
Caltrans		X	
Bay Area Air Quality Management District		X	
U.S. Fish and Wildlife Service		X	
Coastal Commission		X	
City		X	
Sewer/Water District:		X	

AGENCY	YES	NO	TYPE OF APPROVAL
Other:	X		CalCannabis Cultivation Licensing

<u>MITIGATION MEASURES</u>		
	<u>Yes</u>	<u>No</u>
Mitigation measures have been proposed in project application.		X
Other mitigation measures are needed.	X	
<p>The following measures are included in the project plans or proposals pursuant to Section 15070(b)(1) of the State CEQA Guidelines:</p> <p>Mitigation Measure 1: Prior to the issuance of the requested Type 2B or 3B (Mixed Light, Cultivation) licenses, the applicant shall install a carbon filter system (or a comparable system) on the exhaust outlets for all buildings that will contain flowering cannabis plants or their product. This includes the greenhouses and the drying and processing buildings. The applicant shall also submit a maintenance plan (which includes record keeping) for review and approval prior to issuance of the requested licenses.</p>		

DETERMINATION (to be completed by the Lead Agency).

On the basis of this initial evaluation:

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

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures in the discussion have been included as part of the proposed project. A
 X MITIGATED NEGATIVE DECLARATION will be prepared.

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

M. Schaller

(Signature)

SENIOR PLANNER

(Title)

2/12/19

Date