



Sonoma County Board of Zoning Adjustments STAFF REPORT

FILE: UPC17-0017
DATE: December 20, 2018
TIME: 1:05 pm
STAFF: Scott Davidson

Appeal Period: 10 calendar days

SUMMARY

Applicant: Revelation Operating Company I, LLC
c/o Mr. Patrick Corrigan, COO
1370 Industrial Ave., Ste. D, Petaluma, 94952
c/o Mr. Nicholas Otani, CEO/CFO
9100 Green Valley Road, Sebastopol, CA 95472

Owner: 9100 Green Valley LLC
c/o Mr. Leon Sharyon, Manager
2386 Goodwin Avenue, Penngrove, CA 94951

Location: 9100 Green Valley Road, Sebastopol

APN: 130-080-078

Supervisorial District No.:
District No. 5

Subject: Minor Conditional Use Permit for Specialty Indoor Cultivation and Level 1
Manufacturing Cannabis Operation

PROPOSAL: Request for a Five-Year Limited Minor Conditional Use Permit for Specialty
Indoor Cannabis Cultivation and Level 1 Manufacturing on a 0.26-acre parcel.

Environmental



Determination: Categorically Exempt under CEQA Section 15301 (Existing Facilities).

General Plan: Limited Industrial (LI).

Specific/Area Plan: Russian River Area

Land Use: Limited Industrial (LI).

Ord. Reference: Sonoma County Ordinance No. 6245, Zoning Code Section 26-88-250 (Commercial Cannabis Uses), Section 26-88-252 (Enforcement), and Section 26-88-254 (Cannabis Cultivation – Commercial).

Zoning: Limited Rural Industrial District (M3); Scenic Resources Combining District (SR).

Land Conservation Contract: N/A

Application Complete for Processing: Yes

RECOMMENDATION: Staff recommends the Board of Zoning Adjustments approve the limited term Use Permit for 3,262 square foot commercial cannabis operation on a 0.26 acres site zoned Limited Rural Industrial Development (M3) with conditions.

EXECUTIVE SUMMARY: Staff is recommending the approval of the five-year limited term Minor Use Permit for Specialty Indoor and Level 1 Manufacturing Cannabis operation, as well as the legalization of an approximately 1,350 square foot single-story addition at the rear of the property subject to the recommended conditions of approval because:

- Commercial cannabis cultivation is an allowed use in the Limited Rural Industrial District (M3) zoning district and land use designation;
- The proposed project meets the development criteria of Sonoma County Cannabis Ordinance and will meet the operating standards of the Ordinance through compliance with recommended conditions of approval;
- The project is consistent with the Russian River Area Plan policies and standards;
- The design, location, size, and operating characteristics of the project and proposed addition are considered compatible with the neighborhood and surrounding uses in the vicinity.

Staff supports the applicant’s request based on the scope of the proposal and recommends the Board of Zoning Adjustments grant approval of the five-year limited term Minor Use Permit for

Specialty Indoor Cannabis Cultivation and Level 1 Manufacturing as proposed. Permit approval would remain in effect for a period of five years before requiring renewal by the applicant. Below is a summary of key considerations addressed.

ANALYSIS

Background:

In October 2015, the Governor signed three bills into law collectively known as the Medical Cannabis Regulations and Safety Act establishing the State's first licensing system for commercial medicinal cannabis activity. In November 2016, California voters approved Proposition 64, legalizing the adult use and possession of cannabis. In June 2017, the Governor signed SB 94 creating a single regulatory scheme for both medicinal and adult use cannabis businesses.

In response to these changes in the regulation of cannabis, the Sonoma County Board of Supervisors adopted a series of ordinances to establish a comprehensive local program to permit and regulate cannabis. These ordinances were created to preserve environmental resources, protect the health and safety of communities, and ensure the industry contributes positively to the economic vitality of the County.

The applicant applied for a One-Year Limited Term Specialty Indoor Cannabis Cultivation and Level 1 Manufacturing on August 10, 2017, including a Penalty Relief application, indicating the business has been in operation since 2016.

The applicant originally applied for a limited term (one-year) Use Permit for a medical cannabis operation. Following the Board of Supervisors adoption of the Cannabis Ordinance amendments on October 16, 2018, the applicant has requested a longer-term use permit (five-year) and to provide both medical and adult use cannabis products consistent with the amended Cannabis Land Use Ordinance.

On October 10, 2018, Permit Sonoma circulated notice to neighbors, posted notices in the project vicinity, and published a notice in the newspaper inquiring as to whether neighbors wanted an opportunity to discuss the project at a hearing. Three neighbors submitted a request for hearing citing the following concerns:

- 1) Potential traffic conflicts;
- 2) Compatibility with neighborhood;
- 3) Proximity to public trails (West County Trail);
- 4) Potential air quality and odor issues; and
- 5) Security.

In response to community input, Permit Sonoma scheduled this matter for hearing by the Board of Zoning Adjustments (BZA) and circulated neighborhood notification on November 20, 2018 announcing the date (December 20, 2018) of the hearing.

Project Description:

The applicant is seeking a five-year limited term Minor Use Permit for Specialty Indoor Cannabis Cultivation and Level 1 Manufacturing to allow for the Cultivation of Cannabis and associated processing within an existing 5,213 square foot structure. The cannabis operation will contain approximately 1,756 square feet of indoor cannabis cultivation, 928 square feet of manufacturing and processing (concentrate extraction using a rosin press, drying, curing, trimming, and packaging), 670 square feet for soil and compost management, and 578 square feet of propagation within an existing 5,213 square foot building. The remaining 1,281 square feet of building area contains restrooms, hallways, and mechanical equipment.

The main structure and existing water tanks were permitted in 1989 and would contain all functions of the project. The applicant also proposes to make various improvements to serve the project site and bring the existing structure up to code. These improvements would include:

- 1) Accessibility improvements (ADA compliant parking, path of travel and restroom);
- 2) Installation of fire sprinklers;
- 3) Exterior lighting that will be hooded, fully shielded, directed downward, and motion activated.
- 4) Existing fencing will remain;
- 5) Cultivation, processing and manufacturing will occur in rooms that are connected to a carbon filter exhaust system;
- 6) In the event of a power outage, emergency power would be provided by a portable gasoline generator;
- 7) Removal of an existing shipping container, two residential rooms, and unpermitted overhangs;
- 8) Legalization of an existing 1,360 square foot addition located at the rear of the building; and
- 9) Groundwater monitoring equipment.

The project will operate with up to five employees. Five (5) parking spaces are available on-site. Hours of operation allow activity to occur 24 hours per day, 7 days a week, although generally the use will occur on Mondays through Fridays from 8 a.m. to 6 p.m. The project does not include any outdoor cultivation activities.

The applicant is currently operating (cultivation, manufacturing and processing) in compliance with the Penalty Relief Program.

Site Characteristics:

The 0.26-acre project site is a level parcel, generally rectilinear with 93.7 feet of frontage along Ross Road and approximately 120 feet of frontage along Green Valley Road. The site is developed with existing structures, previously utilized as a machine shop, offices, warehouse and storage and includes five on-site parking spaces, one of which is for handicap parking, and a parking area for loading and unloading at the rear of the structure. Three of the parking spaces are located within a gated area. The site is located at the intersection of Green Valley and Ross Roads in Northwest Graton approximately 2.2 miles south of central Forestville and approximately 3.5 miles north of central Sebastopol. The site is also approximately 0.3 miles west of Highway 116.

Surrounding Land Use and Zoning:

The subject property and surrounding parcels are developed and located within unincorporated City of Sebastopol, zoned Limited Rural Industrial District (M3); and contains a structure formerly utilized for industrial use. The site is bounded by Diverse Agriculture zoning to the west, Residential zoning to the east and Industrial zoning to the north and south. The project site is not subject to the Williamson Act.

DISCUSSION OF ISSUES**Issue #1:** General Plan Consistency

The Sonoma County 2020 General Plan classifies the project site as Limited Industrial. Section 2.4 Industrial Use Land Use Policy of the General Plan, states “The ‘Limited Industrial’ land use category provides sites for development to meet service and employment needs where the range or scale of industrial uses is limited.” In discussing potential uses, the General Plan indicates “In general, this category includes resource related industrial uses not expected to need the full range of urban services, such as lumber mills and concrete and asphalt plants.”

Staff Comments: The proposed project would cultivate and process cannabis consistent with the resource related industrial uses contemplated by the General Plan. The site is served by urban sewer and electrical services provided by the Graton Community Services District and Sonoma Clean Power.

The water supply is from a neighboring well, and the project site is located within a Class 2 groundwater area and outside any medium priority basin. The project is, however, within the Atascadero Creek watershed, a high habitat value fish bearing stream. Given the habitat value of the watershed, staff is recommending conditions of approval that require monitoring to ensure a net zero increase in water consumption over past uses. The project uses water efficient irrigation practices and

a recirculating system of dehumidifiers and air conditioners. A small quantity of groundwater will be used by employees. Recommended conditions of approval require the Applicant/Operator to grant an easement giving Sonoma County personnel access to conduct quarterly monitoring to ensure that water use does not exceed 0.1 ac-feet per year. The County's Natural Resource Geologist has determined that this amount is comparable to the minimum amount of water any business could be expected to use at the existing facility and represents no net increase in water consumption.

The project would occupy an existing structure, previously utilized for industrial uses without expanding the need for urban services. In adopting the Cannabis Ordinance, the Sonoma County Board of Supervisors determined that cannabis uses (including cultivation and manufacturing) are consistent with the overall goals, objectives, policies, and programs of the Sonoma County General Plan. The project site is located in an area with diverse land uses (industrial, residential and agricultural). In establishing the industrial zoning for the project and some surrounding properties, the General Plan established development intensity criteria to ensure land use consistency. As discussed in Issues #2 and #3 below, the existing facilities comply with the building intensity and development criteria for the industrial area and the proposed project complies with operational requirements for cannabis cultivation and manufacturing to provide compatibility with surrounding uses.

Issue #2: Zoning Consistency

1) Limited Rural Industrial District (M3)

Commercial cannabis cultivation is allowed by Use Permit in the Limited Rural Industrial Zoning District pursuant to the Cannabis Land Use Ordinance (Sonoma County Code Sections 26-88-250 through 258), which was adopted on December 20, 2016 (Ordinance No. 6189) and amended on October 16, 2018 (Ordinance No. 6245). The applicant requests a Minor Conditional Use Permit for a Specialty Indoor cannabis cultivation and Level 1 Manufacturing operation. Pursuant to the development standards for the M3 zone, all structures used for indoor cultivation and manufacturing shall comply with the following limits.

Staff Comment: The project conforms to the building intensity and development criteria for the property as follows:

- c. South (side) property line: 0 feet
 - d. West (rear) property line: 0 feet
- 5) Parking Spaces. Permit Sonoma requires on-site parking space for every employee to address employee demand as well as occasional delivery and pick-up activity. The project provides 6 parking spaces (including one van accessible space). Delivery and pick-up activities for the proposed project would occur approximately four times a month and would utilize the parking space at the rear of the building. The proposed parking complies with the County parking standard and is adequate for the demand generated by the maximum of five employees proposed at the project site as well as periodic delivery functions.

Further, the project is consistent with the Scenic Resource Combining District (Sonoma County Code Section 26-64-005) because it preserves the visual character and scenic resources of County lands. The proposed project is located entirely within an existing structure and would not significantly alter the exterior appearance of the site.

The proposed project is consistent with the building intensity and development criteria established by the Sonoma County Code Title 26 for a cannabis cultivation and manufacturing operation subject to Use Permit approval in the M3 Zoning District and is consistent with the purpose and objectives of the Scenic Resource Combining District.

II) Cannabis Ordinance– Commercial Cultivation and Manufacturing

Commercial cannabis cultivation and manufacturing are allowed uses in the Limited Rural Industrial Zoning District pursuant to the Cannabis Land Use Ordinance (Sonoma County Code Sections 26-88-

250 through 258), which was adopted on December 20, 2016 (Ordinance No. 6189) and amended on October 16, 2018 (Ordinance No. 6245). Cannabis cultivation operations must comply with the development criteria and operating standards within Sections 26-88-250 through 26-88-254 of the Zoning Regulations including the following standards for indoor cultivation and manufacturing:

- 1) The project will satisfy the operational requirements within Sections 26-88-250 through 26-88-254 of the Sonoma County Code.
- 2) Specialty indoor cannabis cultivation cannot exceed 5,000 square feet of cultivation area; and
- 3) There is no minimum parcel size for specialty indoor cultivation operations on parcel zoned for industrial use.
- 4) All structures used for indoor cultivation shall comply with the setbacks for the base zone and any applicable combining zone.
- 5) Structures associated with cultivation shall not be located in the front yard setback area and shall be screened from public view.
- 6) There shall be no exterior evidence of cultivation either within or outside the structure.
- 7) Indoor cultivation areas must be at least 600 feet from a school

Staff Comment: The project would comply with Zoning Regulations Sections 26-88-250 through 26-88-254. The project as currently designed is compliant with the development criteria and operating standards for cannabis cultivation operations pursuant to Zoning Regulations Section 26-88-254.

- 1) The project is consistent with the operating requirements of the Sonoma County Code because:
 - a) Wastewater is discharged to the Graton Community Services District.
 - b) Gas and electrical services are provided by Sonoma Clean Power and will continue to be from 100% renewable sources. Existing electrical service will be upgraded to comply with code and occupancy requirements.
 - c) Fire suppression is provided from two on-site storage tanks (15,000 gallons each) and fire hydrant.
 - d) Solid waste will be sorted into four categories, landfill, recycling, compost and hazardous materials.
 - i. Landfill and recycling are stored in cans that are emptied every Friday and transported to the Guerneville land fill.
 - ii. Green waste will be ground for composting on-site and used in the cultivation operation or exported once a week for composting off-site. Inflorescence (the complete flower head of a plant including stems, and stalks) will be destroyed in compliance with the Department of Agriculture, Weights and Measures requirements.
 - iii. Hazardous materials are and will be collected, handled, stored, and disposed of in compliance with governing State and County regulations.

- 2) The proposed cultivation area includes less than 1,800 square feet of indoor cannabis cultivation and less than 600 square feet of propagation. In total, no more than 2,400 square feet would be used for cultivation and propagation, less than half the 5,000 square foot limit;
- 3) The 11,325 square foot site complies with the 10,000 square foot minimum lot size of the M3 zone for parcels that are served by public sewer service.
- 4) As discussed under issue #1, the existing structure complies with the setback requirements for the Limited Rural Industrial District (M3). and the Scenic Resources Combining District.
- 5) The existing structure is not located within the front-yard setback area required for the M3 Zoning District, and existing mature vegetation screens the structure from public vantage points.
- 6) Proposed cultivation is located entirely within the existing structure that is surrounded by mature vegetation that effectively screens the building from off-site locations. The building has relatively few windows except at the primary entrance, a location that is used for office space, restroom and foyer. In combination, the building design and existing landscaping combine to ensure there is no external evidence of cultivation and is not evident from the building exterior.

Issue #3: Consistency with the Russian River Planning Area Policy

The General Plan establishes the Russian River Planning Area as extending from the Laguna de Santa Rosa westward to Austin Creek and includes the Russian River resort area, Forestville, Guerneville, Monte Rio, Guerneville Park and Rio Nido. The Russian River Planning Area policies focus on recreational activities, natural resources protection, resource industries, limiting urban service, and property specific recommendations. None of the policies for the Russian River Planning Area directly address Limited Industrial land uses.

Staff Comments: Although the project site is located within the Russian River Planning Area, it is in the southeast quadrant of the Planning Area away from the locations of focus in the General Plan and is also within a developed, industrial area that is not the subject of Planning Area policies. The 0.26-acre site is currently developed with industrial uses containing required utilities, is large enough to support the proposed use and would not require the extension of new infrastructure, utilities or services. As such the project will limit urban services to the area and will not interfere with recreational activities, resources protection or resource industries in alignment with the Russian River Planning Area issue focus.

Issue #4: Environmental Determination

The project is subject to the California Environmental Quality Act (CEQA).

Staff Comments: Staff has determined that the project is categorically exempt under CEQA Guidelines Section(s) 15301, Existing Facilities. *Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.*

The project proposes to change the use of the facility from shop, warehouse, and office uses (uses that were permitted in the M3 Zoning District) to cannabis cultivation and manufacturing (uses that also are consistent with the M3 Zoning District). The project also proposes to legalize a 1,350 square foot, single story addition to an existing facility that was originally approved for shop, warehouse, and office uses.

- Consistent with CEQA Guidelines Section 15301(a), physical improvements needed to support the change in use consists of interior and exterior alterations that are limited to interior partitioning as well as minor building and site improvements to satisfy operational and code requirements.
- Consistent with CEQA Guidelines Section 15301(e)(1), the proposed addition will not result in an increase of more than 50% of the structure before the addition or 2,500 square feet.

This project would result in minor alteration of an existing private structure involving negligible expansion of uses allowed in the industrial (M3) zoning district. The project is consistent with the General Plan and Sonoma County Code requirements for the property, would result in no net increase in water use, is located on an existing developed site, will not involve notable changes to the existing facilities, and provides adequate parking for proposed operations. For these reasons, there is no reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances (15300.2).

Issue #5: Neighborhood Compatibility***1) Traffic Conflicts***

The operator/owner has submitted trip generation information to account for employee traffic, deliveries and pick-up, as well as miscellaneous trips associated with mail delivery, garbage collection. The number of trips generated by the proposed operation were found to be consistent with standard trip volumes generated by limited industrial uses and that the volume of trips generated by the project did not generate

enough traffic volumes to require further study and would not alter the level of service in the project area or require any modification or additions to existing infrastructure.

The project will not significantly increase the use or degrade the condition of Green Valley Road or Ross Road or surrounding public streets. The project includes five employees and five on-site parking spaces. Due to the scope of the operation, the project is not anticipated to be detrimental to public roads or traffic.

II) *Neighborhood Compatibility*

Findings on the design, location, size, and operating characteristics are used to evaluate the project's neighborhood compatibility. These findings are used to determine if the proposed project/use would be detrimental to the health, safety, peace, comfort, and general welfare of persons residing or working in the neighborhood. This determination does not require that there be an environmental impact to prove the project/use may be detrimental.

Staff Comments: The project would be located within an existing industrial structure and would not expand or increase the existing footprint. Residential uses are separated from the existing structure by a roadway and existing mature landscaping. The proposed cultivation and manufacturing areas will not be visible or audible nor will cannabis plants at any point be visible from the public right of way. Security measures are robust and will deter potential theft and other crime. All exterior lighting will be downward casting and not project onto neighboring properties or the night sky. The project includes five on-site parking spaces.

For these reasons, and compliance with the Cannabis Ordinance, the project is compatible with the surrounding neighborhood.

III) *Trails Proximity*

Indoor cultivation and manufacturing are not required to maintain setbacks from sensitive uses (e.g. parks, schools, rehabilitation centers). While park setbacks apply to Class 1 bike paths owned and operated by Regional Parks, these setbacks only apply to outdoor and mixed light cultivation operations and do not apply to the proposed project.

The West County / Rodota Trail terminates at Green Valley Road approximately 60 feet away, and across the street from the project site. With the exception of loading approximately four times a month for shipping to a distributor, all cannabis activities would occur within the existing building. The majority of activity would occur on the northeast side of the building where parking and the building entrance are located. The existing building blocks the trail from the main building entrance. The building layout screens the majority of activity from the trail; employee parking and occasional deliveries that would occur adjacent to the trail would have short durations of activity;

and recommended conditions of approval require a negative pressure air filtration system and noise compliance to reduce the potential for odor and noise to interfere with the use and enjoyment of the trail.

IV) Air Quality and Odors

Staff considers the cultivation proposed by the applicant to be a potential odor generator and requires a negative pressure air filtration system to ensure odors do not escape the project site. In response to this requirement, the applicant prepared an odor control plan that includes the following components:

- All manufacturing and cultivation will occur within sealed rooms,
- Sealed room, negative pressure, carbon filter exhaust,
- A mobile 14” carbon filter and fan will run perpetually inside the rooms,
- A 6” fan and carbon filter system will run continuously exhausting the air from the propagation room, and
- In the event of a power outage facility protocols use generator to power to run the filtered exhaust fans as the first priority.

In combination, these systems and management practices will reduce the potential for air quality and odor issues outside of the building.

V) Security

In adopting the Cannabis Land Use Ordinance, the Board of Supervisors found that security issues could be addressed through compliance with the security and fencing requirements. The operation shall maintain all aspects of the approved site security plan (held confidentially at Permit Sonoma). This shall, at a minimum, include professionally monitored video surveillance, of which recordings will be kept for at least 30 days, locking doors, lighting, and alarms. Weapons and firearms are prohibited at the cultivation site. Cash is not stored on-site and shall be limited to the minimum need for daily operations.

Staff Comment: Security measures have been adequately outlined through the Cannabis Security and Fencing Plan which is required to generally comply with the above requirements from the Cannabis Ordinance. There will be no external evidence of cannabis operations. The site is fully screened from public view due to fencing surrounding the building. All cultivation and propagation lighting will be fully contained within the structure. All structures will have locking doors for security. Because cultivation is fully contained, odor is not anticipated to be an issue. The applicant will also implement a carbon filtration system and re-circulating ceramic carbon “scrubbers” to ensure air quality and purify the air of any odors. The lack of odors will decrease the chances of the site being detected as a cannabis cultivation site and therefore also enhance security.

STAFF RECOMMENDATION

Staff recommends the Board of Zoning Adjustments hold a public hearing and approve the Use Permit for a Five-Year Limited Term Specialty Indoor Cannabis Cultivation and Level 1 Manufacturing subject to the attached Conditions of Approval.

FINDINGS FOR RECOMMENDED ACTION

1. General Plan Consistency: The proposal is consistent with the overall goals, objectives, policies, and programs of the Limited Industrial (LI) General Plan designation because:
 - a. Commercial cannabis cultivation and manufacturing help meet the service and employment needs of the County on property that has existing public and private services (e.g. sewer, water, gas and electric services) that are adequate to support the proposed operation;
 - b. The project is consistent with the development intensity criteria of the LI designation; and
 - c. The project is located on lands that have convenient access to arterial roads, are located near population concentrations, that are not subject to flooding, or geologic hazards, and that have been identified to serve projected employment needs, complies with the overall goals, objectives, policies, and programs of the Limited Industrial Land Use Designation.

2. Russian River Area Plan Consistency: The proposed project is consistent with the goals, policies and objectives of the Russian River Planning Area because it will not alter existing natural resources, would support and industry associated with harvesting natural resources, and does not require the expansion of urban services.

3. Zoning Consistency: The proposal is consistent with the Limited Rural Industrial District (M3) Zoning Classification, because:
 - a. The proposed cannabis cultivation and manufacturing uses are allowed uses in the Limited Rural Industrial Zoning District pursuant to the Sonoma County Code Sections 26-50-020 and 26-88-250 through 258;
 - b. The proposed project complies with the building intensity and development criteria established for the M3 Zone in Sonoma County Code Section 26-50-030; and
 - c. The proposed project will satisfy the Cannabis Ordinance operational requirements established by Sections 26-88-250 through 26-88-254 of the Sonoma County Code.

 - d. The establishment, maintenance or operation of the use for which application is made will not, under the circumstances of this particular case, be detrimental to the

health, safety, peace, comfort and general welfare of persons residing or working in the neighborhood of such use, nor be detrimental or injurious to property and improvements in the neighborhood or the general welfare of the area. The design, location, size, and operating characteristics of the use is compatible with the existing and future land uses within an M3 Zoning District and on adjoining property that are zoned for Diverse Agricultural, Rural Residential, and Single Family Residential uses because:

- i. The cannabis cultivation operation would not involve more than 5,000 square feet of cannabis cultivation and processing area;
 - ii. Hours of operation for processing, delivery and shipping activities shall be limited to 8:00 AM to 6:00 PM;
 - iii. The existing structure is separated from residential uses by existing arterial roadways is screened from public view by existing mature vegetation;
 - iv. Security measures will be implemented to uphold the health, safety, peace, comfort, and general welfare of persons residing or working in the project area;
 - v. No public access or retail sales are permitted;
 - vi. Hazardous materials (e.g. cultivation nutrients and cleaning products) will be stored on site and disposed of in compliance with Fire Code requirements;
 - vii. All equipment shall comply with General Plan Noise Standards;
 - viii. All energy from Sonoma Clean Power and will be 100% renewable;
 - ix. The project includes an Odor Control Plan that establishes systems and management practices that will reduce the potential for air quality and odor issues outside of the building; and
4. Environmental Finding for Exemption: The physical impacts associated with permitting the proposed cannabis operation within an existing facility would result in no, or negligible, expansion of the existing facility or intensity of the use, and result in minor land alterations which are exempt from further environmental review pursuant to Section 15301, Existing Facilities, of the California Environmental Quality Act Guidelines. Specifically, CEQA Guideline section 15301 categorically exempts the proposed minor modifications (e.g. interior wall partitions, electrical and plumbing improvements) and legalization of the proposed addition because it is less than 50% of the floor area and less than 2,500 square feet in size.

LIST OF ATTACHMENTS

EXHIBIT A: Draft Resolution and Conditions of Approval

EXHIBIT B: Draft Notice of Exemption

EXHIBIT C: Proposal Statements (2)

EXHIBIT D: Planning Application

EXHIBIT E: Vicinity Map

EXHIBIT F: Zoning Map

EXHIBIT G: General Plan Land Use Map

EXHIBIT H: Site Plan

EXHIBIT I: Site Photos
