

The logo for ASCENT, featuring the word in white capital letters on an orange rectangular background.

JUNE 20, 2022

*PROPOSAL*

# PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT AND ECONOMIC ANALYSIS FOR THE COUNTY OF SONOMA'S COMPREHENSIVE CANNABIS ORDINANCE UPDATE

**Submitted to:**  
Crystal Acker  
Supervising Planner  
2550 Ventura Avenue,  
Santa Rosa, CA 95403



June 20, 2022

Crystal Acker, Supervising Planner  
County of Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

**Subject: Qualifications for Programmatic Environmental Impact Report and Economic Analysis**

Dear Ms. Acker:

Sonoma County has taken an important step toward reaching the goals contained in the County's Resolution of Intention and Cannabis Program Update Framework. Consistent with this framework, an environmental impact report (EIR) and economic analysis will be prepared to evaluate an equity-based cannabis program that would contain areas for allowable uses based on concepts including separation criteria, exclusion zones, and inclusion zones. The County's forward-thinking approach not only will address the environmental impacts of the program but also offers the opportunity for streamlining of environmental review for individual cannabis applications under the program. We appreciate the County's foresight and are excited to assist Sonoma County with the EIR and economic analysis.

At Ascent, we are thrilled about the opportunity to leverage our recent cannabis ordinance experience in Calaveras, Humboldt, Trinity, and Yolo Counties by delivering environmental documents with practical and rigorous analyses and that use the most current and appropriate methods and withstand legal challenge. Ascent's in-house team of environmental, California Environmental Quality Act (CEQA), technical, and outreach experts will provide Sonoma County a legally defensive EIR alongside an economic analysis. To supplement our in-house services, we have partnered with W-Trans for transportation services, EPS for economic analysis, and Cybertery to provide transcription services at public meetings. Together, we are well positioned to address potentially controversial topics, including traffic effects, water resources, odors, and wildfire.

Regulatory CEQA documents require special consideration and wording with enough flexibility to allow agencies to govern while maintaining necessary technical rigor. In that regard, Ascent's experience and expertise are unparalleled, both on a local level and with respect to statewide regulations. We are proficient in the unique practice of conducting CEQA analysis of regulations, including those associated with cannabis. Our work includes CEQA analysis of both statewide regulations, such as those associated with the Global Warming Solutions Act of 2006 and Statewide Composting Requirements (Senate Bill [SB] 1383), and local regulations, such as citywide zoning ordinance changes, climate action plans, and general plans. Importantly, we offer experience in conducting CEQA analysis of regulatory proposals specific to cannabis cultivation regulations and performance standards as well as for individual cannabis projects. We have a history of developing close working relationships with agencies and enjoy the challenges relevant to the development and refinement of new land use regulations and consideration of private projects. Municipalities that have sought Ascent's cannabis services include the following:

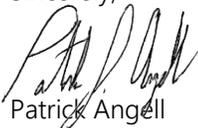
- ▶ County of Yolo: Cannabis Land Use Ordinance Program EIR (completed 2021)
- ▶ County of Yolo: Green Coast Industries Cannabis Project Mitigated Negative Declaration (MND) (completed 2021)

- ▶ County of Trinity: County Cannabis Program EIR (completed 2020)
- ▶ County of Humboldt: Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR (completed 2018)
- ▶ County of Calaveras: Medical Cannabis Cultivation Ordinance EIR

This is only a sample of Ascent's experience; we have addressed numerous "first-of-a-kind" regulations. We take a thoughtful approach to the environmental implications of these regulatory regimes. We will use our experience to benefit Sonoma County in the analysis of your proposed regulation and permitting of commercial cannabis activities associated with this contract.

By selecting Ascent, the County can be confident it will work with a firm that specializes in CEQA first, not a firm that "also does" CEQA, and can expect that the County receives top-tier environmental consulting on this contract. We are ready and excited to leverage our team's collective knowledge in cannabis work to deliver the necessary services for the pilot program. On behalf of our colleagues at Ascent, we look forward to the opportunity to continue working with the County and appreciate your consideration of our submittal.

Sincerely,



Patrick Angell

Principal

916.764.0108

[pat.angell@ascentenvironmental.com](mailto:pat.angell@ascentenvironmental.com)

Enclosures

cc: Project File (20220084.00)



Marianne Lowenthal

Project Manager

916.661.7938

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ORGANIZATIONAL  
INFORMATION

01

## 01

## ORGANIZATIONAL INFORMATION

## ASCENT

Ascent Environmental is an environmental, climate change, natural resources, and urban design/planning firm headquartered in Sacramento. Founded in 2010, we offer a broad spectrum of environmental services including California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) compliance; natural resources management planning; climate change and greenhouse gas (GHG) analyses; air quality, noise, and vibration services; sustainability planning; and regulatory compliance services.

**ADDRESS**

455 Capitol Mall, Suite 300  
Sacramento, CA 95814

**TELEPHONE NUMBER**

916.444.7301

**ORGANIZATIONAL STRUCTURE**

S-Corporation, Private Company

**PRINCIPAL-IN-CHARGE**

Patrick Angell, Principal/Project Director,  
is authorized to execute the proposed contract.

**YEARS IN BUSINESS**

12

**NUMBER OF EMPLOYEES**

100

**ENVIRONMENTAL**

- ▶ CEQA/NEPA Compliance
- ▶ Air Quality and Health Risk
- ▶ Multidisciplinary Support
- ▶ Environmental Analysis
- ▶ Streamlining Environmental Review
- ▶ Noise
- ▶ Natural Resources

**URBAN DESIGN + PLANNING**

- ▶ Urban Design and Master Plans
- ▶ Infill, Downtown, and Transit-Oriented Plans
- ▶ Commercial and Mixed-Use Revitalization
- ▶ General, Community, and Specific Plans
- ▶ Housing Solutions



QUALIFICATIONS  
AND EXPERIENCE

02

## 02

## QUALIFICATIONS AND EXPERIENCE

### FIRM QUALIFICATIONS

Ascent staff are experts in compliance with the overarching environmental planning laws and regulations used to evaluate projects, specifically CEQA and NEPA. Our environmental compliance experience includes a wide range of projects, including cannabis uses, area and specific plans, climate action plans, public and private development projects, land management plans, and proposed regulations. We are more than document preparers; we help devise the most effective and efficient environmental review strategies and work with our clients as they seek to manage future challenges. We also have extensive experience in leading and conducting public meetings, including stakeholder meetings, consensus-building meetings, public workshops, and meetings required for CEQA and NEPA public review processes. We invest time in the community to understand issues and concerns and are experts at conducting fair, impartial, and effective public outreach meetings.

We make it our business to stay informed about the ever-evolving requirements of our environmental planning practice, including published CEQA and NEPA case law, changes to the CEQA Statute and Guidelines, agency NEPA regulations, and other laws and regulations. Ascent principals have been directly involved in CEQA legislative review and guidelines development. Our principals and senior-level staff regularly instruct and give presentations on CEQA and NEPA practice, case law updates, and other topics for the University of California (UC) extension programs statewide, American Planning Association (APA), Association of Environmental Professionals (AEP), and client agencies.

In addition to preparing our own documents, we have been called upon to review documents prepared by other firms to improve quality and defensibility, often helping our clients prepare reissued environmental documents after their CEQA document has been overturned in court. An example is the Additional Environmental Analysis for the Newhall Ranch Environmental Impact Report (EIR), in response to the 2015 California Supreme Court decision, *Center for Biological Diversity v. California Department of Fish and Wildlife* (CDFW), which overturned an EIR prepared by others that evaluated a 14,000-acre new urban community in the Santa Clarita Valley of Los Angeles County.

### Vehicle Miles Traveled/SB 743 Compliance

Ascent is a leader in defining CEQA approaches to compliance with the vehicle miles traveled (VMT) analysis requirements of Senate Bill (SB) 743, assisting clients through the transition from a level of service-based analysis for CEQA compliance. Ascent principals and transportation planners have played instrumental roles collaborating with Governor's Office of Planning and Research (OPR) legal and planning staff to develop SB 743-related guidelines and the technical advisory report. For these transportation issues, we have not only supplemented our team with traffic engineers but have also included Zachary

Miller, AICP, our in-house transportation specialist, who has been helping coordinate SB 743 compliance, including the establishment of VMT thresholds, with several agencies and has been in close coordination with OPR.

## Applicable Tools Used to Ensure Performance

Ascent's staff have been working successfully together for several years. In fact, the 14 principals at Ascent have mostly been working together for over 20 years, and some for over 30 years. Our long history of succeeding together is the result of our commitment to our clients' needs and the production of top-quality work products. Reliability is the hallmark of our success. We seek to establish long-term relationships with our clients and teaming partners. Our commitment is based on our ability to maintain strong client/consultant communication, anticipate issues and risks, and develop solutions. Our philosophy

### *The Ascent Management Team's Approach Is Based on Four Principles*

- 1) *Active involvement of the senior management staff in the strategic direction and preparation and review of the technical content*
- 2) *Regular communication between the Ascent management team and County staff to keep the team informed and to explore ways to avoid issues and risks or resolve them if they arise*
- 3) *Clear, concise, understandable, and effective environmental documents and technical work products*
- 4) *Expert quality environmental review and legal defensibility of environmental documents*

of a "no surprises" approach and extensive involvement by our most experienced staff enables us to fully achieve complete project objectives, satisfy government requirements, and fulfill client needs. With the fast-paced nature of work at the County of Sonoma, it will be necessary to track critical path items and anticipate and address project issues early. If a project issue arises during our execution of County tasks, we will alert the County project manager early and meet with the project team to daylight potential risks and work collaboratively toward a solution.

## Quality Assurance

At Ascent, we take pride in the professional presentation of our reports and in producing high-quality environmental documents and analyses. We will prepare iterations of the reports identified in the scope of work for the project, starting with administrative drafts and proceeding to screencheck, public, and final draft documents. Each report will be prepared in MS Word and provided as an Adobe PDF, incorporating figures and supporting information. Documents will be submitted to the County and revised upon our receipt of consolidated comments, which will be appropriately addressed and incorporated into the subsequent draft until such time as deemed satisfactory to the County project manager. The appropriate number of hard copies will be produced and distributed to a mailing list as determined in consultation with the County, if applicable. For agencies that are accepting electronic distribution, Ascent will provide the appropriate documentation in an acceptable format.

## Cost Management Approach

Ascent has successfully completed environmental analyses on numerous complex projects with demanding schedules and budgets that required attentive project management, coordination, and communication. Direct responsibility for this project's cost management will be assigned to the project manager. The

project manager is supported by an internal accounting and job-cost monitoring system, called Vantagepoint, which is designed to provide detailed information to facilitate job-cost control.

The system uses staff budgeting controls and computer input from time records, invoices, and expense records. The following management tools and reports are provided regularly to the project manager:

- ▶ Employee person-hour reports (weekly, automatically generated)
- ▶ Job-cost reports (weekly, automatically generated)
- ▶ Billing summaries (monthly, automatically generated)

Labor reports are reviewed by the principal-in-charge and project manager every 2 weeks, or more frequently if dictated by project requirements. Billing invoices are generated monthly or at the completion of delivery orders (depending upon the contract provisions). All invoices are reviewed and approved by the project manager before being forwarded to the client. Project expectations are communicated to the entire environmental document preparation team via an in-house project initiation meeting to clearly communicate team roles and responsibilities, project data and resources, and schedule and budget information.

## Debarment or Other Disqualification

Ascent is not currently under suspension, debarment, voluntary exclusion, or determination of ineligibility by any federal agency; has not been suspended, debarred, voluntarily excluded, or determined ineligible by any federal agency; does not have a proposed debarment pending; and has not been indicted, convicted, or had a civil judgment rendered against it by a court of competent jurisdiction in any matter involving fraud or official misconduct.

## Examples of Completed Projects with References

Clients for whom we have worked in the past provide the best testimony of the Ascent team's dedication to their projects. We encourage you to contact the following client references, whose projects reflect services similar to those required by the County.

## CANNABIS LAND USE ORDINANCE PROGRAM EIR AND ENVIRONMENTAL CHECKLIST

**Client: County of Yolo**



Prior to this action, the County allowed only cannabis cultivation under its Marijuana Cultivation Ordinance. The Yolo County Cannabis Land Use Ordinance (CLUO) added Article 14 to Title 8, Chapter 2, Zoning Regulations, in the Yolo County Code that allows for personal outdoor cultivation, commercial cannabis cultivation (outdoor, mixed-light, and indoor), nurseries, processing, and a range of noncultivation cannabis uses. In addition to adoption of the CLUO, the County also amended the ordinance and amended the Yolo County General Plan that consisted of revisions to the text of Policy LU-1.1 and Table LU-4, modification of Policies LU-2.3 and AG-1.3, and inclusion of new Policies LU-1.4 and AG-3.21 to identify cannabis as a legal commercial crop.

The Board of Supervisors approved the CLUO on September 14, 2021. After the CLUO was adopted, the County retained Ascent to prepare an environmental checklist customized for subsequent cannabis applications to determine whether the environmental impacts of the applications are within the scope of the CLUO EIR.

### **Controversial and Complex Characteristics**

The County identified five alternative variations (including a preferred alternative) to the CLUO for an equal level of environmental review in the EIR, recognizing that the final CLUO may combine elements of more than one alternative. Each alternative reviewed in the EIR relied on the same underlying framework that would regulate cannabis activities through land use, zoning, and development standards. The alternatives vary by the assumed type of cannabis license/activity, limits on the number of operations, and performance standards (e.g., buffers between certain cannabis uses and defined sensitive land uses). Ascent worked closely with County staff on the development of these alternatives, cannabis use assumptions (development footprint and buildings, water use, employment, extent of vertical integration of cannabis uses on a single site, and geographic locations of future cannabis uses) and on the format of the impact analysis to clearly identify each alternative. This work effort consisted of Ascent conducting research on the character of existing licensed cannabis uses statewide that were located in similar rural/agricultural land use conditions as those found in Yolo County.

Controversial issues that the CLUO and EIR addressed included the following:

- ▶ Visual Character and Lighting of Cannabis Cultivation: Ascent worked with County staff on documenting the unique visual characteristics of cannabis cultivation that consists of small activity areas as compared to other agricultural uses in the county, use of solid fencing to secure and hide cannabis cultivation, and use of hoop houses for mixed-light cultivation that can generate significant nighttime lighting impacts.
- ▶ Definition of Cannabis and Related Activities as an Agricultural Land Use: CLUO Section 8 2.1404(E) defined cannabis and related uses as an agricultural land use. This definition was not shared with all stakeholders that perceived cannabis as a commercial use and conflicted with existing agricultural uses (e.g., crime, pesticide and herbicide contamination of cannabis crops from existing agricultural uses, water use). The Draft EIR, Final EIR, and staff report carefully addressed each of these compatibility concerns that included consultation with the County Agricultural Commissioner.
- ▶ Odors: The public and stakeholders expressed concerns regarding the impact of cannabis odors on their quality of life. Ascent worked closely with County staff on the definition of nuisance odors that was included in the CLUO using published reports and data, modeling, and documented odor complaints with atmospheric data to carefully address the issue. The EIR identifies a range of methods to minimize odor impacts but ultimately concludes that the impact is significant and unavoidable.
- ▶ Legacy of Illegal Cannabis Impacts: Several comments raised during the EIR process were associated with historic issues related to illegal cannabis uses pertaining to biological resources, water use, water quality, and crime. The EIR identified how state cannabis regulations address these concerns and provided results of research on water use by licensed cannabis cultivation uses as compared to current crop irrigation rates in the county.
- ▶ Overconcentration: Existing cannabis cultivation sites (prior to the adoption of the CLUO) were generally located in clusters in certain areas of the county. County staff and Ascent evaluated the extent of impacts that may occur when cannabis uses are overconcentrated in an area and identified a range of measures to address the issue (e.g., buffers and numeric limits of uses).

### Ordinance Summary

The adopted CLUO allows for personal and commercial cannabis cultivation (outdoor, mixed-light, and indoor), personal outdoor cultivation, commercial cannabis cultivation (outdoor, mixed-light, and indoor), nurseries, distribution, processing, manufacturing, testing, distribution, retail, and microbusinesses subject to the approval of a cannabis use permit. It set numeric limits on the number of licenses for each commercial use countywide as well as in the communities of Capay Valley and Clarksburg. The CLUO also establishes buffers between outdoor cannabis uses and defined sensitive uses that ranges from 100 to 1,500 feet.

Specific land use requirements and development performance standards are included in the CLUO to address, among many topics, a range of social and environmental issues. This includes a numeric odor concentration standard. The CLUO also provides enforcement measures to address noncompliance with the regulations as well as a 2-year evaluation period for the effectiveness of the CLUO.

The CLUO and its EIR can be viewed here: <https://www.yolocounty.org/government/general-government-departments/community-services/cannabis/cannabis-land-use-ordinance>

## CANNABIS PROGRAM EIR AND ENVIRONMENTAL CHECKLIST

**Client: County of Trinity**



Trinity County initially adopted its first cannabis cultivation ordinance in 2016 and prepared subsequent updates to this ordinance as well as additional ordinances to allow other cannabis uses in the county between 2016 and 2018. Due to litigation and application processing concerns, the County retained Ascent to prepare an EIR for these ordinances (collectively referred to as the Cannabis Program). This work included preparation of required notices, coordination with responsible and trustee agencies during the entire environmental review process (e.g., California Department of Food and Agriculture [now the Department of Cannabis Control], California Department of Fish and Wildlife [CDFW]), public outreach meetings in each of the five Board of Supervisors districts, and maintenance of the administrative record. Ascent also provided advanced input on the extent to which this environmental review process can be streamlined/tiered using the EIR for subsequent applications for cannabis uses that resulted in the preparation of a customized environmental checklist. The Cannabis Program was readopted with amendments in December 2020.

### Controversial and Complex Characteristics

Prior to the EIR, the County had licensed 286 cannabis cultivation sites and eight distribution sites and had applications in process that wished to obtain environmental review coverage from the EIR. The Board of Supervisors requested that the EIR and updates to the Cannabis Program be completed for Board consideration before the end of 2020. Ascent worked closely with the County and cannabis operators (through a survey) to develop cannabis use assumptions that factored in the cannabis cultural license limits established in the program (development footprint and buildings, water use, employment, and geographic locations of future cannabis uses).

During the process, the public and licensed cannabis operators identified concerns regarding the extent of illegal cannabis cultivation in the county. County staff and Ascent used GIS and satellite imagery to determine that there were approximately 3,641 illegal cannabis cultivation sites in Trinity County. The Draft EIR documented the existing environmental impacts associated with illegal cannabis cultivation activities related to biological resources (habitat loss and pesticide use), surface water diversions, water quality impacts to existing impaired waterways, and forestry resource impacts. The Final EIR described the illegal cannabis eradication activities in process by state and federal agencies but noted that these activities were not part of the Cannabis Program.

Lastly, there was interest in amendments to the Cannabis Program after completion of the Final EIR. Ascent worked with County staff to evaluate whether these changes would impact the conclusions of the Final EIR and presented that information to the Planning Commission and Board of Supervisors.

### **Ordinance Summary**

The readopted Cannabis Program continues the regulating of cannabis operations in the county. These include indoor, outdoor, and mixed-light cultivation operations, nurseries, processing, testing, manufacturing, distribution, and non-storefront retail activities. Trinity County has six ordinances to regulate each of the cannabis operation types that are collectively referred to as the Cannabis Program that were readopted. The following amendments were made to the program:

- ▶ An amendment to Section S315-843(1)(i) of Cultivation Ordinance 315-843 that increased the designated area for cultivation activities from 200 percent to 250 percent.
- ▶ Amendments to the various ordinances through adopted mitigation measures from the Final EIR to prevent potentially significant environmental impacts of cannabis activities.

The Cannabis Program and its EIR can be viewed here: <https://www.trinitycounty.org/Commercial-Cannabis>

## AMENDMENTS TO HUMBOLDT COUNTY CODE REGULATING COMMERCIAL CANNABIS ACTIVITIES EIR

**Client: County of Humboldt**



This project involved the repeal of Humboldt County's existing Commercial Medical Marijuana Land Use and Medical Cannabis Testing and Research Laboratories ordinances. These regulations were to be replaced by the provisions of the proposed ordinances (one addressed inland areas and the other addressed the coastal area), which would establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county. The changes would allow and regulate commercial cannabis facilities for both medical uses and adult recreational uses. Ascent prepared the EIR for the proposed ordinances. The County adopted the ordinances in April 2018.

### Controversial and Complex Characteristics

The public, CDFW, and decision-makers identified concerns regarding the extent of illegal cannabis cultivation in the county and its impacts on key watersheds. The Draft EIR and Final EIR documented the existing environmental impacts associated with illegal cannabis cultivation activities related to biological resources (habitat loss and pesticide use), surface water diversions, water quality impacts to existing impaired waterways, and forestry resources. County staff and Ascent coordinated with CDFW in the refinement of standards and mitigation measures to address watershed impacts. The performance standards in the ordinance included incentives (e.g., increases in allowed cannabis canopy area) to encourage operators of illegal cannabis cultivation sites and other sites located in sensitive habitats to obtain licensing and relocate to less impactful areas.

Odor impacts and their general land use compatibility with the county's incorporated cities were also identified during the EIR process. Ascent worked with County staff on the development of a menu of odor control options that included buffers from cities and their associated spheres of influence.

Completion of the EIR process by January 2018 was a critical item for the County to accommodate the Board of Supervisors' hearing schedule. Ascent conducted regular conference calls with County staff during Draft EIR preparation to discuss and resolve mitigation measure and ordinance performance standard conflicts in the areas of groundwater and generator noise standards to ensure consistency with the proposed ordinances and Draft EIR impact analysis and to maintain the schedule.

### Ordinance Summary

The Commercial Cannabis Land Use Ordinances (No. 2598 and 2599) addressed both the inland and coastal areas of the unincorporated county and replaced the Commercial Medical Marijuana Land Use

Ordinance (Sections 313-55.4 and 314-55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repealed the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations establish land use regulations and performance standards that address social and environmental issues for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county.

Humboldt County issues three types of authorization:

- ▶ Zoning Clearance Certificate, which requires review by the Planning Division, as a ministerial action, upon determination that the application is consistent with zoning requirements
- ▶ Special Permit, which requires noticing to surrounding property owners and occupants, and a discretionary action that may have hearing requirements waived
- ▶ Use Permit, which requires noticing to surrounding property owners and occupants and a discretionary action subject to a public hearing

The ordinances and EIR can be viewed here: <https://humboldt.gov/2308/Cannabis-EIR>

## MEDICAL CANNABIS CULTIVATION AND COMMERCE ORDINANCE EIR

**Client: County of Calaveras**



The Calaveras County Board of Supervisors recognized that numerous growers were already operating in the county and that there would be benefits in permitting and regulating this industry, especially given the new state laws legalizing commercial cultivation. Their primary concern was to protect the health, safety, and welfare of residents and to reduce or eliminate any adverse environmental effects of existing or new cannabis cultivation or commercial activities involving cannabis. Ascent's team of technical experts analyzed the implications of regulatory changes and the technical issues pertinent to cannabis cultivation and distribution. Ascent evaluated the application of pesticides to non-native plants in sensitive watersheds, as well as examined impacts from hand and mechanized weed management, which is directly analogous to increased cultivation and processing of cannabis. Ascent's air quality group called upon its experience evaluating odors from sources/facilities considering wastewater treatment plants, where distance, wind direction, and odor control play major roles.

### Controversial and Complex Characteristics

During preparation of the EIR, the Board of Supervisors also requested consideration of a ban instead of a managed industry. This request required careful crafting of the project objectives and the alternatives section of the EIR to provide the County with maximum flexibility when considering their options for countywide regulation of medical cannabis cultivation and commerce.

### Ordinance Summary

Calaveras County Code of Ordinances Chapter 17.95 currently regulates commercial and noncommercial cannabis cultivation in the county. Retail cannabis uses are regulated under Chapter 17.91. No other cannabis uses are allowed. Chapter 17.95 specifies allowed zones for commercial cannabis cultivation and establishes performance standards for cannabis uses that include greenhouse gas offsets, compliance with the State Water Resources Control Board's (SWRCB) Order No. WQ 2019-0001-DWQ, setbacks, lighting restrictions, and generator use standards.

The ordinance can be viewed here:

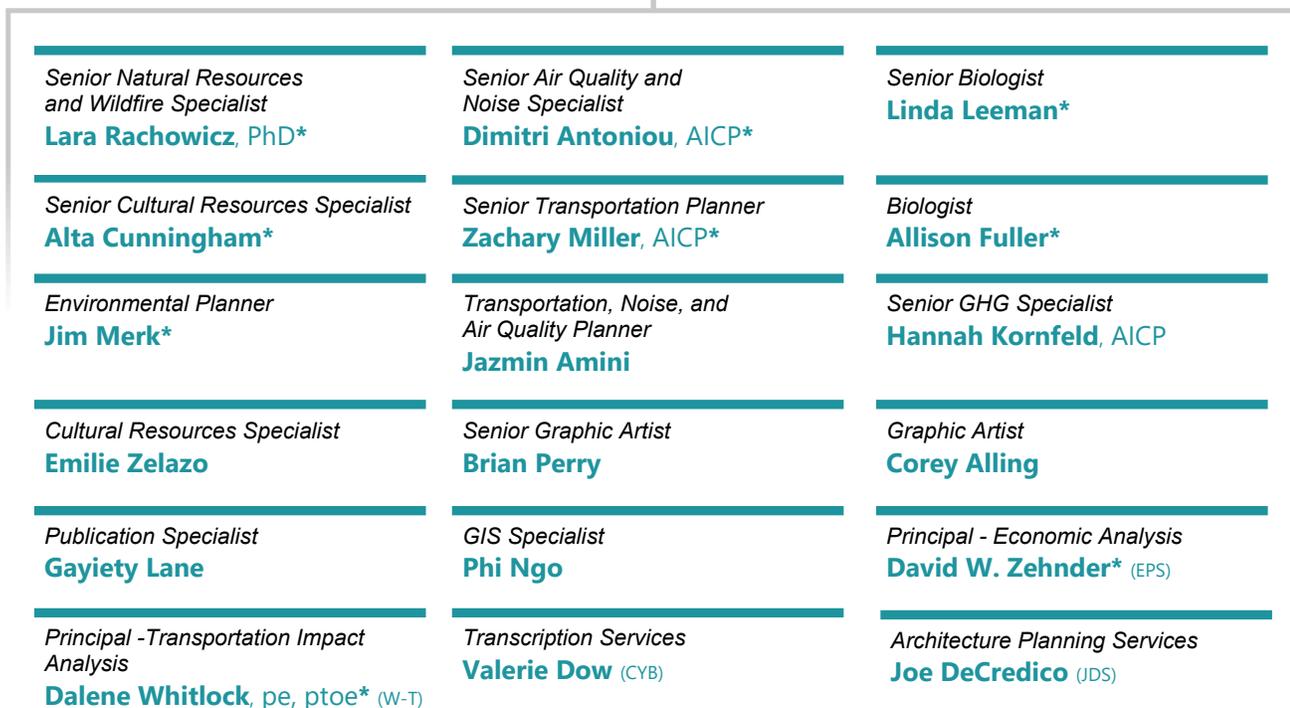
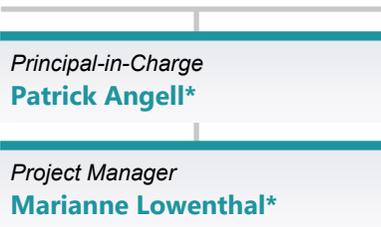
[https://cannabis.calaverasgov.us/Portals/Cannabis/Documents/Cannabis/Adopted%20Regulatory%20Ordinance%2010-22-19/Chapter%2017\\_95%20Amended%205\\_20\\_2021.pdf?ver=LZKDKoQ6Kv04OXOT9BR7hQ%3d%3d](https://cannabis.calaverasgov.us/Portals/Cannabis/Documents/Cannabis/Adopted%20Regulatory%20Ordinance%2010-22-19/Chapter%2017_95%20Amended%205_20_2021.pdf?ver=LZKDKoQ6Kv04OXOT9BR7hQ%3d%3d)

## PERSONNEL EXPERIENCE

We have identified a management team with the experience necessary to oversee successful execution of the EIR, constructively offer solutions to resolve issues that may be identified, and assist Sonoma County in bringing the EIR to completion.

The project management team will be led by Patrick Angell, who will serve as the principal-in-charge. He will provide overall quality assurance and strategic guidance. Marianne Lowenthal will serve as the project manager and will manage the team of Ascent staff and subconsultants, lead the coordination of the work, and serve as the day-to-day point of contact for County staff.

An organizational chart depicting the structure of the team is presented below, followed by brief key staff biographies. Resumes detailing the relevant experience of each team member are included in Section 8, Additional Information.



(EPS) Economic & Planning Systems | (W-T) W-Trans | (CYB) Cyberary.com | (JDS) Joe DeCredico Studios

\*Key Staff



## Patrick Angell

### PRINCIPAL-IN-CHARGE

Pat is a principal at Ascent. He has 30 years of experience serving as a project director and manager and technical analyst for a variety of projects. Pat specializes in environmental and urban land use planning and has performed tasks for projects such as water and wastewater facilities, energy facilities, flood control, residential subdivisions, mixed-use urban developments, general plans, and redevelopment plans. His experience includes establishing environmental review divisions for cities, coordinating and facilitating large-scale private and public. He has also been involved in the preparation of several joint CEQA and NEPA documents and technical studies.

Pat served as project manager for the Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR, Yolo County Cannabis Land Use Ordinance Program EIR, and Trinity County Cannabis Program EIR.

#### EDUCATION

BA, Environmental Science with a government emphasis, California State University, Sacramento

Land Use and Environmental Planning Certificate Program, UC Davis Extension

#### PROFESSIONAL AFFILIATIONS

Association of Environmental Professionals (AEP) – Superior California Chapter Director and CEQA Portal Chairman



## Marianne Lowenthal

### PROJECT MANAGER

Marianne is an environmental planner with extensive experience analyzing projects pursuant to CEQA and NEPA requirements. She has experience working with a broad range of projects and environmental issues, participating in community outreach, conducting legal research, and preparing environmental analyses for CEQA and NEPA documents. She has managed or helped manage environmental compliance documents for flood control, water resources, wastewater treatment, public facilities, land use planning, mixed-use development projects, and regulations. She understands the regulatory guidelines and legal requirements, as well as the fundamentals, of preparing and delivering environmental documents.

Marianne has experience in the preparation of environmental documents for cannabis projects, including for the Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities, Calaveras County Medical Cannabis Cultivation Ordinance EIR, Trinity County Cannabis Program EIR, and Yolo County Cannabis Land Use Ordinance Program EIR.

#### EDUCATION

BS, Environmental Toxicology, University of California, Davis



## Lara Rachowicz, PhD

### SENIOR NATURAL RESOURCES AND WILDFIRE SPECIALIST

Lara is an ecologist with 24 years of technical and project management experience throughout California, with a focus on special-status species. She supports environmental review by providing senior technical expertise and quality assurance of environmental documents required under CEQA and NEPA. She focuses on CEQA and regulatory streamlining strategies for ecosystem resilience and wildfire risk reduction projects. Lara also has experience preparing CEQA documents for highly controversial energy and infrastructure projects (e.g., electrical transmission systems, pipeline facilities, renewable energy facilities, rail facilities). She evaluates environmental impacts and plans mitigation programs; supports project permitting and the negotiation of mitigation agreements; and manages construction, compliance, and mitigation activities.

Lara's ecological research and federal land and resource management experience has focused on threats to vulnerable wildlife populations, primarily amphibian and avian species.

#### EDUCATION

PhD, Ecology, Department of Integrative Biology, University of California, Berkeley

MPH, Biostatistics/Epidemiology, University of California, Berkeley

BS, Geography, University of Wisconsin, Madison



## Dimitri Antoniou, AICP

### SENIOR AIR QUALITY AND NOISE SPECIALIST

Dimitri is a senior air quality/greenhouse gas, energy, and noise specialist with 12 years of experience conducting, reviewing, and overseeing the preparation of technical analyses for CEQA compliance. He provides technical assistance to Ascent's staff, clients, and regulatory agencies regarding appropriate methods of analysis for consistency with local, state, and federal laws. In addition, he oversees the preparation of health risk assessments (HRAs), ranging from small construction to large university campus projects, and reviews all technical modeling for accuracy and compliance with CEQA. He also trains technical staff on the use of air dispersion models, mass emissions models, noise monitoring and noise modeling (e.g., traffic noise, stationary noise sources). Dimitri regularly conducts peer reviews of other consultants' work for CEQA compliance and technical adequacy, including reviews of model inputs and assumptions.

Dimitri provided air quality and greenhouse analysis for the Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities EIR.

#### EDUCATION

MS, City and Regional Planning, California Polytechnic State University, San Luis Obispo

BS, Environmental Management and Protection, California Polytechnic State University, San Luis Obispo

#### CERTIFICATION

American Institute of Certified Planners (No. 0287018)

#### PROFESSIONAL AFFILIATION

American Planning Association California (APACA)



## Alta Cunningham

### SENIOR CULTURAL RESOURCES SPECIALIST

Alta has 22 years of experience in the environmental consulting field. Her experience as an architectural historian includes archival research, historic building and structure surveys and evaluations, and cultural resources documentation for NEPA and CEQA projects ranging from single building evaluations to district-wide surveys for CEQA, Public Resources Code Section 5024, and Section 106 compliance documents. She has completed evaluations for higher education facilities, pre- and post-World War II residential and commercial buildings, agricultural properties, and water conveyance systems. Alta meets the Secretary of the Interior's Professional Qualification Standards for architectural history and history. She also serves as a skilled deputy project manager for EIRs and has coordinated multiple environmental projects. Alta provides technical expertise for CEQA documents and has prepared numerous technical sections, covering aesthetics, agricultural resources, cultural resources, geology and soils, land use and planning, and public services.

Alta has experience in the preparation of environmental documents for cannabis projects, including for the Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities, Trinity County Cannabis Program EIR, and Yolo County Cannabis Land Use Ordinance Program EIR.

#### EDUCATION

MA, Historic Preservation, Savannah College of Art and Design

BS, History, University of California, Davis

#### PROFESSIONAL AFFILIATION

California Preservation Foundation



## Linda Leeman

### SENIOR BIOLOGIST

Linda is Ascent's Natural Resources Principal and Practice Leader with 23 years of professional experience. She specializes in habitat assessments, biological resources impact analyses, and endangered species permitting. Linda has extensive experience with CEQA, NEPA, and federal and California Endangered Species Act (ESA) compliance for projects throughout Northern California. She is adept at managing teams of technical specialists and providing senior review, quality assurance, and budgetary oversight. She regularly coordinates with local, state, and federal regulatory and resource management agencies, providing reliable, unbiased information to help inform regulatory decisions that allow her clients to achieve their objectives. Linda is a Certified Wildlife Biologist.

#### EDUCATION

MS, Natural Resources, Humboldt State University

BS, Wildlife and Fisheries Biology, University of California, Davis

#### CERTIFICATIONS

Certified Wildlife Biologist by the Wildlife Society since February 2005

Professional Development Certificate by the Wildlife Society



## Allison Fuller

### BIOLOGIST

Allison is a wildlife biologist with more than 13 years of experience. She specializes in focused wildlife surveys in terrestrial and marine environments as well as data analysis and interpretation. Her field experience includes work with birds, terrestrial mammals, and marine mammals, including special-status species such as burrowing owl, tricolored blackbird, marbled murrelet, and Steller sea lion. Allison has experience conducting preconstruction nesting bird and burrowing owl surveys, as well as reconnaissance-level wildlife and habitat surveys. She prepares biological resource analyses for various environmental documents, including environmental impact reports, initial studies, biological assessments, and biological evaluations. Using her strong organization and communication skills, Allison is especially adept at managing data sets and providing clear interpretation of the results.

Allison has experience in the preparation of biological resource analyses for cannabis projects, including for the Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities, Trinity County Cannabis Program EIR, and Yolo County Cannabis Land Use Ordinance Program EIR.

#### EDUCATION

MS, Biological Sciences, Humboldt State University, Arcata

BS, Environmental Biology, Humboldt State University, Arcata

#### PERMIT

CDFW Scientific Collecting Permit

#### CERTIFICATION

Yolo HCP/NCCP Qualified Biologist



## Zachary Miller, AICP

### SENIOR TRANSPORTATION PLANNER

Zachary is an environmental and transportation planner with 14 years of experience in transportation planning, long-range planning, land use planning, and environmental impact analysis. He is an expert in addressing CEQA's requirement for VMT analysis as the basis for transportation impacts. Zachary has worked on a range of transportation projects throughout the state, from multibillion-dollar public transportation infrastructure and transit projects to small-scale traffic studies. He has reviewed and commented on transportation sections prepared for CEQA environmental documents by transportation subconsultants. He specializes in working with transportation planning and traffic engineering consultants to ensure their technical analysis will adequately support a CEQA section. Zachary has worked on a variety of CEQA and NEPA environmental documents, including environmental impact reports, initial studies, and technical studies.

Zach has experience in the preparation of transportation analyses for cannabis projects, including for the Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities, Trinity County Cannabis Program EIR, and Yolo County Cannabis Land Use Ordinance Program EIR.

#### EDUCATION

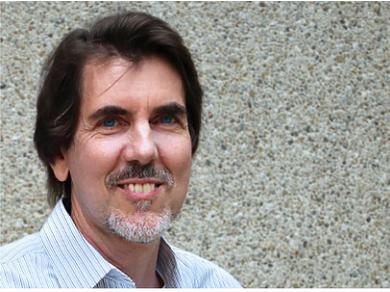
MS, City and Regional Planning, Environmental Planning Emphasis, California Polytechnic State University, San Luis Obispo

MS, Engineering, Transportation Planning, California Polytechnic State University, San Luis Obispo

BA, Urban Studies and Planning, University of California, San Diego

#### CERTIFICATION

American Institute of Certified Planners (No. 025880)



## Jim Merk

### ENVIRONMENTAL PLANNER

With more than 30 years of experience, Jim has filled a variety of roles on teams preparing environmental compliance documents. For most of this time, his work has focused on documents prepared to meet the requirements of CEQA, NEPA, and various federal and state regulatory agencies. Deliverables include technical memoranda, biological survey reports, wetland delineations, and initial studies, and multivolume EIRs and environmental impact statements (EISs). As a project analyst, Jim has prepared technical sections addressing such topics as land use, hazards and hazardous materials, population and housing, and public services. Working closely with project managers and their teams, he also has edited a broad range of documents for clarity and consistency and helped to ensure that they are grammatically and technically correct. On large projects, he has served as coordinator, working with project managers to ensure that the project teams receive the resources, including detailed document-specific guidance, needed to prepare documents accurately and efficiently.

Jim has experience in the preparation of environmental documents for cannabis projects, including for the Trinity County Cannabis Program EIR and the Yolo County Cannabis Land Use Ordinance Program EIR.

#### EDUCATION

MA, English, California State University, Sacramento,

BA, English, California State University, Sacramento



## David W. Zehnder

### PRINCIPAL - ECONOMIC ANALYSIS

David is a managing principal of Economic & Planning Systems (EPS). He is the former chair of the ULI Sacramento District Council and the national ULI Urban Revitalization Council, an advisory board member of the California Association for Local Economic Development (CALED) and the UC Davis Center for Regional Change, and a member of the Lambda Alpha International Land Economics Society. On behalf of public and private sector interests, David analyzes market and financial feasibility to align interests and evaluate impacts, and he negotiates deal points for major hotel, retail, office, R&D, industrial, residential, and mixed-use projects in downtown, waterfront, university, and infill districts. He is presently engaged in a number of tech sector evaluations of potential metro economies across the United States and recently completed a comprehensive cannabis study on behalf of the City of Sacramento, building on prior analyses of the industry in Monterey County. He is presently advising clients on mixed-use hospitality and housing development concepts in Sonoma, building on the firm's substantial prior efforts in the county.

#### EDUCATION

MCP (concentration in Regional Economics), University of California, Berkeley

BA, Economics, San Francisco State University

BA, Geography, San Francisco State University



## Dalene Whitlock, PE, PTOE

### PRINCIPAL – TRANSPORTATION IMPACT ANALYSIS

#### EDUCATION

BS, Civil Engineering, San Diego State University

BA, Physical Science, Westmont College, Santa Barbara

Dalene specializes in traffic impact analysis and is responsible for quality control for all of W-Trans' services. Through her many years in traffic engineering, she has gained experience in a wide array of areas from safety, capacity, and operational analyses to transportation system design and public involvement. Her communication skills provide a bridge between stakeholders of various backgrounds and opinions, including policymakers, agency staff, applicants, other consultants, W-Trans staff, and the public, thus allowing diverse opinions to be heard and addressed. Attention to detail is a hallmark of her work, making Dalene an excellent project manager as well as the firm's quality control officer responsible for review of all W-Trans products.

Dalene is very active in the Institute of Transportation Engineers (ITE); she has held elected office at the section, district, and international levels. She served as the chair of and remains active in the Transportation Forensics and Risk Management Council (previously known as the Expert Witness Council) from 2015 to 2017. She is currently the district administrator for the Western District and received the District's Lifetime Achievement Award in 2021. She is registered as both a Civil and Traffic Engineer by the State of California and also as a Professional Traffic Operations Engineer.



PROJECT APPROACH  
AND WORK SCHEDULE

03

## 03

## PROJECT APPROACH AND WORK SCHEDULE

## UNDERSTANDING OF PROJECT

We understand that the Sonoma County Board of Supervisors proposes to adopt a local ordinance to allow for all aspects of cannabis activities that are authorized by the Medicinal and Adult Use Cannabis Regulation and Safety Act. The ordinance includes but is not limited to commercial cannabis uses (indoor and outdoor), cultivation, distribution, testing, retail, manufacturing, and microbusinesses. The proposed ordinance will set forth land use regulations and a permitting program for cannabis-related activities.

*Ascent has experience with cannabis ordinance development/refinement and associated environmental review.*

The County's first comprehensive Cannabis Land Use Ordinance (Ord. No. 6189) was adopted under a Negative Declaration on December 20, 2016. On October 16, 2018, Ordinance No. 6245 was adopted to allow adult-use cannabis in Sonoma County in addition to medical use, enhance neighborhood compatibility with a 10-acre minimum parcel size for cultivation, add new definitions, and make minor non-substantive amendments to harmonize with California state law and regulations, where appropriate. In May 2021, the Board directed staff to update the Cannabis Ordinance and to prepare a program EIR after opting to not adopt a Mitigation Negative Declaration and a new County Code Chapter 38 to increase ministerial permitting for cannabis cultivation within Agricultural and Resources-zoned parcels.

On June 8, 2021, the Board directed staff to prepare a comprehensive program update to the Cannabis Ordinance. Community engagement occurred from August through September 2021. The summary report compiled from the community engagement was used to identify the overall goals and policy options for the program update.

On September 28, 2021, the Board received a report summarizing results of community engagement conducted in August and early September 2021 and provided direction to staff on overall goals and policy options for updating the Cannabis Ordinance and associated EIR. On March 15, 2022, the Board adopted the Resolution of Intention and Cannabis Program Update Framework that directs and guides staff in its preparation of a draft ordinance, potential General Plan Amendments, and a programmatic EIR to amend the Cannabis Land Use Ordinance and related regulations. The framework guides development of an EIR and economic analysis that will evaluate the Cannabis Program, which may contain the following key components.

- ▶ **General Plan Amendments.** General Plan land use categories and corresponding zoning districts may be amended to allow specific cannabis activities by right or through a business license, ministerial permit, or discretionary permit. The ordinance may include a General Plan Amendment to include

cannabis within the meaning of “agriculture” and “agricultural use,” as used in the Sonoma County General Plan. The intent of considering a General Plan Amendment to classify cannabis as agriculture is to ensure the new ordinance is consistent with the General Plan, should the new ordinance expand allowed cannabis activities on agricultural lands.

- ▶ **Separation Criteria.** The amended ordinance will address the potential for separation criteria related to issues such as odor, groundwater, visual resources, public safety, and noise.
- ▶ **Rural Neighborhood Enclave.** If designated rural neighborhood enclaves are adopted, the cannabis land use ordinance will include maps of all such enclaves that would include consideration of residential density and community character.
- ▶ **Criteria for Exclusion Zones.** Exclusion zones may be identified on maps based on existing conditions related to groundwater, topography, infrastructure (road access, lack of electrical/other utilities), safety (wildfire risk/emergency response), and biological habitat protections.
- ▶ **Permit Streamlining.** Cannabis permitting streamlining opportunities may include Inclusion Zone establishment and mapping, site development and operating standards for project requiring ministerial permits, and a CEQA within-the-scope checklist.
- ▶ **Equity.** To address substantial and adverse effects of poverty, the criminalization of cannabis, and the disparities that occur along racial and socioeconomic lines, the cannabis land use ordinance would be developed consistent with Strategic Plan Racial Equity and Social Justice Pillar – Goal 3. This goal ensures racial equity throughout all County policy decisions and service delivery, and directs consideration of socioeconomic equity throughout all policy decisions.

As noted above, Ascent has extensive experience with cannabis ordinance development and refinement and associated environmental review that have had similar guidance on program development. Our approach is to use this experience to ensure that the EIR adequately addresses impacts and allows environmental review streamlining of future cannabis applications. Specific recommendations are provided in our scope below.

## APPROACH TO THE PROJECT

The following draft scope of work describes the anticipated tasks and activities to be conducted by the Ascent team to assist the County with this program. The draft scope has been prepared to show Ascent’s approach to ensure a legally defensible EIR.

### TASK 1: PROJECT MANAGEMENT

Ascent’s principal-in-charge and project manager will attend a project kickoff meeting with County staff. The meeting’s purpose will be to further discuss project characteristics; confirm project objectives; discuss areas of controversy and potential strategies; establish communication/review protocols; review the project schedule and milestones associated with program development and refinement, community engagement process in relation to the EIR timing, and EIR preparation; and discuss any other key details. It is assumed that this meeting would be a virtual meeting or held in-person, depending on circumstances related to COVID-19. This task will also permit coordination with the Ascent EIR team and the sharing of available information and resources for their review. A communications memorandum and finalized project, scope, budget, and schedule will be delivered to the County after the kickoff meeting is held. This information will be provided in Microsoft Word (Word or MS Word).

For the duration of the project, Ascent will conduct regular coordination meetings with County staff on the preparation of the program and the EIR. This task includes 36 coordination meetings (meetings once or twice a month based on the task in progress) that would occur virtually or in person (as necessary at critical decision points). These meetings will be attended by Ascent’s principal-in-charge and project manager as well as by technical staff when issue areas are to be discussed.

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#### DELIVERABLES

- **Kickoff meeting attendance, agenda, and notes – electronic copy in MS Word**
  - **Finalized project scope, budget, and schedule – electronic copy in MS Word**
  - **Communications memorandum – electronic copy in MS Word**
  - **Meetings agendas and notes/action during life of the project – electronic copy in MS Word**
- 

## TASK 2: ENVIRONMENTAL IMPACT REPORT

### Subtask 2.1: Environmental Review Scoping

Upon receipt of the preliminary project description, prepared by the County, Ascent will prepare a draft Notice of Preparation (NOP) for the proposed project using the County’s preferred format and will ensure that the content is consistent with CEQA Guidelines Section 15082(a). The NOP will include a brief project description, project location, and list of probable environmental effects. Following one round of review by the County, Ascent will finalize the NOP and prepare a Notice of Completion (NOC) for the County to submit electronically to the State Clearinghouse. We will assist the County in making sure all needed information is available and will provide to the County a list of responsible and trustee state agencies. The public version of the NOP will be provided as a remediated digital PDF.

We will work with County staff to prepare materials for the public scoping meetings and will attend the meetings and collect public comment. This task will include preparing for the potential of a video conference scoping meeting, depending on circumstances involving COVID-19. Ascent will support the County with facilitating a virtual/in-person public meeting that will be held during the NOP review period. The scoping meeting could be either a virtual public meeting or in person, which would be determined during preparation of the NOP. We will prepare a list of comment letters and commenting entities, organized and formatted as agreed prior to comment submittal. Ascent will work with Cybertary to provide a written transcription of all verbal comments from the public scoping meeting based on County video or audio recordings of the meeting.

It is assumed that the County will take the lead on Assembly Bill (AB) 52 consultation requests and subsequent meetings if requested by a tribe.

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#### DELIVERABLES

- **Draft NOP – electronic copy in MS Word and fully remediated digital PDF**
  - **Final NOP – electronic copy in fully remediated digital PDF**
  - **NOC - electronic copy in fully remediated digital PDF**
  - **List of responsible and trustee state agencies – electronic copy in fully remediated digital PDF**
  - **Public scoping meeting presentation materials and attendance by the principal-in-charge and project manager at one scoping meeting – PowerPoint presentation**
  - **Written transcript of verbal public comments made during the public scoping meeting – electronic copy in fully remediated digital PDF**
  - **List of comment letters and commenting entities – agreed-upon format**
-

## Subtask 2.2: Data Collection

Ascent will review the County's current Cannabis Ordinance, Zoning Ordinance, General Plan, and Area/Specific Plans, the Sonoma County Uniform Rules for Agricultural Preserves and Farmland Security Zones, County geographic information system (GIS) data layers, and all other available data sources relevant to the environmental analysis. We will review available materials, identify any data gaps and additional information needs, and prepare a memorandum detailing a list of existing data sources and a timeline for collection of additional data. In addition, Ascent will prepare a methodology memorandum for review and approval by County staff. The methodology memorandum will contain proposed significance thresholds and analysis methodology (such as software, modeling techniques, etc.) for each environmental resource topic to be addressed in the EIR. Since the proposed Ordinance would not immediately entitle specific cannabis uses, this memorandum will also include development and operation assumptions for cannabis uses (e.g., type and number of uses, construction activities, geographic extent of uses, and operational characteristics that would include building square footage, employees, irrigation demands, and other related items) for the evaluation of significant environmental impacts. These assumptions will be based on based County data on current cannabis uses, and statewide cannabis operation practices that has been collected by Ascent.

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### DELIVERABLES

- Memorandum containing a list of existing data sources and timelines for collection of remaining data need – electronic copy in fully remediated digital PDF
  - Methodology memorandum to County staff – electronic copy in fully remediated digital PDF
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## Subtask 2.3: Technical Studies - Environmental

Consistent with the requirements of State CEQA Guidelines Section 15168, the EIR will contain an analysis of the potential impacts of implementing the overall program, rather than project-level or site-specific physical impacts of such actions. For the majority of resource areas, these analyses will be contained within the environmental analysis chapters of the EIR. However, several technical studies would be appended to the EIR to support the analysis that will be based on the methodology memorandum prepared under Task 2.2. The scope of the economic analysis is provided in Task 3. These studies include:

### Air Quality and Greenhouse Gas

#### *Air Quality and Odors*

A brief description of applicable federal, state, and local regulations and of regional and local conditions in the county will be presented, including current federal and state attainment designations. Using the land use change/cannabis cultivation and noncultivation assumptions developed, Ascent will evaluate the potential criteria pollutant operational emissions of the program, using the California Emissions Estimator Model (CalEEMod) in comparison with Bay Area Air Quality Management District (BAAQMD) threshold guidance.

Ascent will also quantitatively and qualitatively evaluate potential odor impacts associated with the program. Cannabis cultivation produces odors, especially during the final parts of the cultivation cycle. Odors are generally regarded as an annoyance rather than a health hazard. However, a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., increase in blood pressure, nausea, vomiting, headache). Odor impacts are typically determined based on proximity of the source and receptor and the number of complaints received. Also available are substantial data and experiences of other local agencies, states, and Canada regarding the quantification of what constitutes an

odor impact. Some agencies have established numeric odor standards for determining whether an odor source has become a nuisance and requires abatement (dilution-to-threshold values—the proportion of “clean air”) to “odorous” air). Ascent will provide technical assistance and input on the development of odor standards for use in the program (if desired).

### **Greenhouse Gas Emissions**

The analysis of greenhouse gas will include a brief discussion on the current state of the topic, along with the applicable regulatory framework and relevant guidance (e.g., SB 32 and BAAQMD recent threshold guidance update). The analysis will determine whether subsequent commercial cannabis cultivation and noncultivation activities under the program would generate significant GHG emissions and result in a cumulatively considerable contribution to the global impact of climate change. The analysis will factor in the degree to which cannabis cultivation replaces other agricultural production versus conversion of non-farmed land. Changes in carbon sequestration associated with changes in vegetation from establishment of cultivation areas and plant growing cycles will be considered. Ascent will work with County staff to identify appropriate GHG reduction measures to be included in the impact analysis. All mitigation proposed will be real, permanent, quantifiable, verifiable, and enforceable.

### **Biological Resources**

Because of the county’s size, no site reconnaissance surveys will be conducted. Ascent will prepare the setting and analysis based on information obtained through document review and databases. A brief overview of relevant federal, state, and local laws and regulations pertaining to the protection of biological resources will also be included in the section.

Biological resource impacts will be considered in light of the existing conditions compared to the reasonably foreseeable compliance responses associated with the program as well as protection measures in Attachment A (General Requirements and Prohibitions) of SWRCB Order WQ 2019-0001-DWQ. Topics covered in the biological resources discussion will include potential impacts to special-status species, critical habitat, and regionally sensitive and locally important watersheds, including fish-bearing streams, riparian habitat, the Laguna de Santa Rosa, and other wetland areas.

### **Cultural Resources**

The analysis of cultural resources will be developed based on existing information (Cultural Resources Information Center data, local plans, and other relevant documents) and information from local tribes to make impact conclusions. Ascent will contact the California Historical Resources Information System for a summary report of known cultural resources in Sonoma County. Given the size of the county, analysis will be limited to a literature review. This section will include a brief summary of the prehistory and history of the area, a summary of the methods used to evaluate cultural resources, a listing of the criteria for determining significance, and a description of historic properties or historical resources will identify potential impacts.

Cultural resource impacts will be considered in light of the existing conditions compared to the reasonably foreseeable compliance responses associated with the program as well as protection measures in Attachment A (General Requirements and Prohibitions) of SWRCB Order WQ 2019-0001-DWQ.

### **Hydrology and Water Quality**

The EIR will describe the existing hydrologic setting of the county and surrounding area based on available documentation (i.e., water quality information, flood and topographic mapping, and information from the County and the North Coast Regional Water Quality Control Board). It will include the impaired water

status waterways in the county, including the current status of the Dry Creek Watershed and Mark West Creek Watershed both of which are designated as Cannabis Priority Watersheds by SWRCB. Ascent will also summarize appropriate federal, state, and County regulations and policies related to these issues, including SWRCB Order WQ 2019-0001-DWQ. Using this information, we will qualitatively evaluate the effects of the program on runoff and drainage patterns, pollutant discharges to surface waters, and potential flooding hazards. The section will include a description of the effectiveness of best management practices through compliance with County and SWRCB Order WQ 2019-0001-DWQ standards.

This will include identification of like water supply sources (public water systems, surface water, and groundwater), availability and limits of these water sources within each geographic area, estimated water demand based on County data as well as cannabis irrigation demand data collected by Ascent for cannabis cultivation state-wide, and determination of whether adequate water supplies exist to accommodate cannabis uses. This will include a discussion of SWRCB Order WQ 2019-0023-DWQ requirements that surface water diversions for cultivation operations occur only when determined to be available by SWRCB, mandatory water diversion forbearance period during the dry months of the year when waterway flows low. SWRCB's flow standards and diversion requirements were developed to protect fish spawning, migration, and rearing for endangered anadromous salmonids, and flows needed to maintain natural flow variability within each watershed. No formal engineering evaluations are proposed or considered necessary at this time.

## Noise

The noise analysis will be consistent with the content requirements of County of Sonoma Guidelines for the Preparation of Noise Analysis to support the California Environmental Quality Act. It will generally describe the existing noise environment in the county based on existing environmental documentation and available noise data. It will include identification of existing areas with concentrations of noise-sensitive receptors and major noise sources, ambient levels, and natural factors that relate to the attenuation thereof, including building and topographic features. Noise levels of specific equipment used for construction, cultivation (generator noise, fans, well pumps, and mechanical trimmers), and noncultivation uses (manufacturing and special events) will be briefly discussed and the distance at which such effects can substantially affect sensitive receptors will be determined. Ascent staff have noted the use of grading equipment and mechanical trimmers at previous visits to cannabis cultivation sites related to other contracts. No noise measurements will be taken as part of this analysis. The analysis will assess the exposure of sensitive receptors or generation of excessive groundborne vibration or noise levels from these types of construction and operational equipment that may result from uses allowed under the program. Where appropriate, potential noise and vibration levels will be characterized using published reference noise levels and will be evaluated for compliance with County General Plan noise standards. The noise analysis will include potential impacts related to emergency generator use, air filtration and ventilation equipment, transportation noise, activities associated with cannabis tourism, and special events. If potential impacts are identified, Ascent will recommend performance-based mitigation measures to ensure compliance with applicable County noise standards.

## Traffic Impact Analysis

Ascent and W-Trans will prepare the traffic impact analysis that will focus on potential changes in vehicle miles traveled (VMT) in the county consistent with current County VMT policies and thresholds that are currently in development. W-Trans will review the comments obtained during the scoping meeting for their applicability to transportation and will provide a list of available data and data needed to perform the

analysis. Transportation analysis will be performed to assess potential transportation impacts under the four bullet points identified in CEQA, as follows:

- ▶ Policies and facilities relevant to pedestrians, bicyclists, and transit will be indicated and their adequacy discussed within the general framework of a planning-level EIR.
- ▶ The potential impact on VMT will be assessed. Given that the project is an ordinance rather than a project or plan, it is assumed that the assessment will primarily be qualitative in nature. If site-specific land use assumptions are developed, a custom model run using the Sonoma County Transportation Authority (SCTA) regional model will be completed if the resulting VMT outputs would add value in determining the potential for VMT impacts to occur. (It is assumed that appropriate County departments will collaborate to provide a single set of consolidated, internally consistent comments and clear direction on the VMT significance threshold to be applied.)
- ▶ The potential for any safety impacts will be evaluated.
- ▶ The project's impact on emergency response will be analyzed.

W-Trans will prepare a traffic impact report. This report will document the data, analysis, calculations, and results of the work. A draft version of the report will be submitted to the County for review. Ascent will incorporate the revised/final report into the transportation section of the EIR.

## Wildfire

The technical analysis will evaluate whether the establishment of commercial cannabis uses in the county could create new or increase the severity of wildfire hazards and evacuation conflicts using the questions in Appendix G of the State CEQA Guidelines. The wildfire analysis will include a discussion of the potential impacts related to road access (i.e., physical road condition and configuration to support concurrent emergency access by first responders and evacuation by residents), wildfire risk (i.e., site characteristics that influence fire likelihood and fire behavior), emergency response times, and availability of water for firefighting purposes. Any significant impacts will be discussed, and mitigation will be proposed if required.

Air Quality and Greenhouse Study, Noise Study, and Traffic Analysis Study would not be provided in remediated digital PDF format because of difficulties in supporting modeling outputs in this manner.

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## DELIVERABLES

- **Technical studies provided in electronic copy in PDF appended to the Administrative Draft EIR**
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### Subtask 2.4: Administrative Draft EIR

The RFP indicates that the County will provide the project description. Based on this project description, adopted Cannabis Program Update Framework, and public and agency comment, the Ascent team will prepare a Draft EIR annotated outline and a revised Methodology Memorandum.

Upon approval of the Draft EIR annotated outline and revised methodology memorandum (if changes are needed due to new/modified information), Ascent will commence preparation of the Administrative Draft EIR. We will prepare the Administrative Draft EIR in accordance with CEQA, the State CEQA Guidelines, and the preferred Sonoma County EIR format. The EIR will adhere to all CEQA requirements and will evaluate all resource categories in the chapters described below. This submittal will include preparation of a mitigation monitoring and reporting plan.

## Summary

The summary will provide an overview of the project, alternatives evaluated, areas of controversy and issues to be resolved, and project impacts and mitigation measures. This chapter will include a summary table of all impacts and mitigation measures identified in the EIR. The summary table will be included in the Screencheck Draft EIR submittal.

## Project Description, Location, and Environmental Setting

Using the project description provided by the County, Ascent will review this chapter and compile other introductory chapters. These chapters will include a description of the project, purpose of the EIR and its intended uses, a list of controversial issues, and an outline of the EIR contents.

## Significant Environmental Effects of the Project

Each environmental resource section will include a description of the environmental setting of the county, regulatory setting (i.e., federal, state, and local regulations), criteria used to determine the significance of impacts, analysis methodology and assumptions, and a detailed discussion of the potential environmental effects of the project. Consistent with CEQA and the State CEQA Guidelines, the baseline conditions will be identified that will include the existing cannabis operations within the county.

The introduction to the environmental analysis section will identify that the adoption of the program would not immediately entitle commercial cannabis uses and that the EIR draws on development and operation assumptions for cannabis uses (e.g., type and number of uses, geographic extent of uses, operational characteristics) for the evaluation of significant direct and indirect environmental effects from the adoption and implementation of the program. Consistent with the requirements of State CEQA Guidelines Section 15168, this chapter will incorporate a program-level discussion of the potential impacts of implementing the overall program, rather than project-level or site-specific physical impacts of such actions. The following resource issue areas are anticipated to be included in the Significant Environmental Effects of the Project chapter.

### *Aesthetics*

This section will qualitatively describe Sonoma County's current visual resources, consistent with the County General Plan. It will include a description of the county's designated scenic highways and roadways. The analysis will describe how program implementation could generally change aesthetics in the county, especially from important viewpoints. Changes may include fences and other visual screens that block views of cannabis cultivation (e.g., outdoor cultivation) and the creation of features that could appear out of character with the surrounding area (e.g., stockpiles of equipment used in outdoor cultivation operations such as containers and growth media, temporary hoop houses, permanent structural development). Siting requirements (i.e., required distances between project-related uses and "sensitive uses," setback specifications from public or private use types, and lighting standards) that may be established in the program will be reflected in the analysis. The analysis will also include a discussion of light- and glare-related impacts and a discussion of potential impacts to the existing viewshed associated with mixed-light cultivation using hoop houses. Given the programmatic nature of the analysis, visual simulations are not anticipated to be required.

### *Agriculture and Forestry Resources*

Health and Safety Code Section 11362.777(a) and Business and Professions Code Section 26067(a) define medical and adult-use cannabis as agricultural products. However, the cannabis uses may not ultimately be determined by the County to be agricultural. The analysis will describe the program's consistency with

County General Plan and agricultural and forestry zoning provisions and will identify whether program implementation could result in the loss of timberlands or in conflicts with agricultural operations. The agriculture analysis will consider compatibility of cannabis operations with traditional agriculture and potential conversion of agricultural lands to nonagricultural uses based on the program's determination of whether cannabis uses (cultivation and noncultivation) are agricultural uses.

### *Air Quality and Odors*

The air quality and odors section of the EIR will be based on the Air Quality and Greenhouse Gas Technical Study (prepared under Subtask 2.3) and will include mitigation measures for any air quality and odor impacts identified.

### *Biological Resources*

The biological resources section of the EIR will be based on the Biological Resources Technical Study (prepared under Subtask 2.3) and will include mitigation measures for any impacts identified.

### *Cultural and Historical Resources*

The cultural and historic resources section of the EIR will be based on the Cultural Resources Technical Study (prepared under Subtask 2.3) and will include mitigation measures for any impacts identified.

### *Energy*

This section will describe existing energy production and consumption in the county, including existing energy facilities and services, energy production types and sources, and a profile of energy consumption. The existing setting will also describe federal, state, and local regulations related to energy consumption, energy efficiency, and/or energy conservation. Appendix F of the State CEQA Guidelines requires consideration of the potentially significant energy implications of a project and mitigation measures to reduce "wasteful, inefficient, and unnecessary" energy usage. However, neither law nor the CEQA Guidelines establish thresholds that define wasteful, inefficient, or unnecessary use of energy. Therefore, this section will include a qualitative discussion. Ascent will evaluate whether cannabis operations allowed under the program, including indoor and mixed-light cultivation activities, would result in a wasteful, inefficient, or unnecessary use of energy (stationary and mobile). The analysis will factor in Title 24 building efficiency requirements and state licensing provisions that require the use of renewable energy or purchase of carbon offsets. The analysis will use VMT to estimate gasoline use. Construction energy use will also be addressed.

### *Geology, Soils, and Mineral Resources*

Ascent will use existing information from soil surveys and other readily available documents to describe the geologic setting of the county, including topography and soil characteristics. This information will be used to evaluate impacts related to the potential to create unstable soil, slopes, soil erosion, potential impacts to paleontological resources, and conflicts with mineral resource extraction uses (existing and potential). Impacts will be identified and assessed, and mitigation measures will be recommended for any significant or potentially significant impacts that are not adequately addressed through compliance with the Sonoma County Code or SWRCB Order WQ 2019-0001-DWQ. The program would not be expected to affect risks associated with seismic ground shaking, so seismic-related issues will be scoped out of the environmental analysis. Potential conflicts with mineral extraction will also be addressed.

### *Greenhouse Gas Emissions*

The greenhouse gas emissions section of the EIR will be based on the Air Quality and Greenhouse Gas Technical Study (prepared under Subtask 2.3) and will include mitigation measures for any impacts identified.

### *Hazards and Hazardous Materials*

Using available information, include the California Department of Pesticide Regulation's standards and guidance on pest management practices for cannabis cultivation (including in the SWRCB Cannabis Policy and hazard control standards for manufacturing uses in California Code of Regulations [CCR] Title 4, Division 19), the analysis will identify typical hazardous materials used in cannabis cultivation and noncultivation operations and will evaluate the effectiveness of the program and existing regulations to mitigate potential impacts. It will also consider any impacts related to proximity to airports, the effect on emergency response and evacuation plans, the potential for increased wildland fires, and the program's effect on vector control.

### *Hydrology and Water Quality*

The hydrology and water quality section of the EIR will be based on the Hydrology and Water Quality Technical Study (prepared under Subtask 2.3) and will include mitigation measures for any impacts identified.

### *Land Use and Planning*

Ascent will evaluate the project relative to the County General Plan Land Use Element and Conservation and Open Space Element policies, coastal policies and provisions, and applicable provisions of the County's Zoning Ordinance. We will also qualitatively describe existing land uses in the county and describe any potential for division of existing communities.

### *Noise*

The noise section of the EIR will be based on the Noise Technical Study (prepared under Subtask 2.3) and will include mitigation measures for any impacts identified.

### *Population and Housing*

The program would license and regulate cannabis uses in the county and is not anticipated to result in any General Plan land use changes or rezoning that would impact housing. The program would also not involve the development of housing or otherwise induce population growth. Thus, no significant impacts are expected.

### *Public Services*

The analysis will evaluate how commercial cannabis operations under the program may affect service ratios, response times, or other performance objectives related to these public services that trigger the need for physical improvements. The analysis will factor in fire protection and security measures for commercial cannabis uses provided under CCR Title 4, Division 19. It is assumed that there would be no substantial changes to schools, parks, and other governmental facilities, and thus no significant impacts are expected.

### *Transportation*

The transportation section of the EIR will be based on the Traffic Impact Study (prepared under Subtask 2.3) and will include mitigation measures for any impacts identified.

### *Tribal Cultural Resources*

We are not proposing to provide assistance with AB 52 consultation and assume the County will conduct all necessary consultation as identified in the RFP; however, we can finalize assumptions after discussing with the County. Ascent will include the results of the consultation in the EIR. The primary issue area to be analyzed is whether the program would result in a significant impact on tribal cultural resources.

### *Utilities and Service Systems*

Cannabis cultivation and noncultivation uses can require unique irrigation, wastewater, and septic system demands, as well as careful consideration of solid waste disposal of cannabis waste (track and trace requirements under state regulations and potential impacts related to cultivation waste products, including hoop house membrane materials, growth media and containers, and green waste). The analysis will evaluate whether implementation of the program may affect the provision of these utilities and related service systems that could create environmental impacts. The water supply analysis will be based in part on the Hydrology and Water Quality Technical Study (prepared under Subtask 2.3).

### *Wildfire*

The wildfire section of the EIR will be based on the Wildfire Technical Study (prepared under Subtask 2.3) and will include mitigation measures for any impacts identified.

## **Alternatives**

Ascent will include up to three alternatives that are anticipated to be variations of the program (e.g., reduced extent of cannabis uses allowed, indoor cannabis cultivation restriction to address odor, expanded buffer requirements) plus the No Project Alternative. The impacts of all alternatives selected and analyzed will be compared to the impacts of the program. The chapter will identify the environmentally superior alternative (if the No Project Alternative, the environmentally superior alternative among the other alternatives will be identified).

Prior to Ascent starting the Alternatives chapter, the County will approve each alternative for inclusion in the EIR. Once all alternatives are approved, Ascent will prepare the Alternatives chapter of the EIR. This approach will help avoid unnecessary work and any potential delays that may be associated with redoing any part of the alternatives analysis.

## **Other CEQA Sections**

Ascent will prepare a complete EIR, containing all sections required by CEQA. Sections required by CEQA not mentioned above include the table of contents, discussion of irreversible commitment of resources, growth-inducing effects, references, and individuals and agencies consulted. This chapter will also contain the cumulative impact analysis, which will describe the potential impacts related to multiple cannabis operations in specific geographical areas (i.e., overconcentration).

## **Draft Mitigation Monitoring and Reporting Plan**

Ascent will prepare the Mitigation Monitoring and Reporting Plan (MMRP) for mitigation measures proposed in the Administrative Draft EIR. The MMRP will include all mitigation measures in the EIR and will include a brief discussion of the monitoring required, responsible parties, and time frame for implementation. Ascent will prepare a draft MMRP for the program and will submit it (electronically) to the County for review and comment. A final version of the MMRP will be provided with Subtask 2.6.

Consistent with the RFP this scope assumes one round of review for the Administrative Draft EIR that will result in revised Administrative Draft EIR for final County approval. These versions will be provided electronically in Microsoft Word (Word).

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#### DELIVERABLES

- **Draft EIR Annotated Outline– electronic copy in Word**
  - **Revised Methodology Memorandum – electronic copy in Word**
  - **Administrative Draft EIR – electronic copy in Word**
  - **Technical Studies identified in Subtask 2.3**
  - **Draft MMRP – electronic copy in Word**
  - **Revised Administrative Draft EIR, Draft MMRP, and Technical Studies – electronic copy in Word**
- 

### Subtask 2.5: Public Draft EIR

Following receipt of comments on the Administrative Draft EIR, Ascent will revise the document and prepare a Draft EIR consistent with County comments and edits suitable for public review. We will also finalize the Notice of Availability (NOA) and NOC. It is assumed that the County will distribute the EIR, post the NOA at the County Clerk’s Office, publish the NOA in the local newspaper, and submit all CEQA documents electronically to the State Clearinghouse. At the time of publication of the Draft EIR, Ascent will also provide the County with a complete electronic record of all references used in the environmental analysis, which must be made available to the public upon request. The references will be provided via file transfer or flash drive/USB.

Ascent will coordinate with County staff to compile all written comments received during the public review period for the Draft EIR and will work with Cybertery to provide a written transcription of all verbal comments from public hearing(s) on the Draft EIR based on County video or audio recordings of the hearing(s).

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#### DELIVERABLES

- **Public Draft EIR – electronic copy in MS Word and in fully remediated digital PDF**
  - **Electronic record of all references used in the Draft EIR – flash drive/USB or via file transfer**
  - **NOC and NOA – electronic copy in fully remediated digital PDF**
  - **List of comment letters and commenting entities – electronic copy in fully remediated digital PDF**
  - **Written transcription of verbal public comments from Planning Commission hearings on the Draft EIR – electronic copy in fully remediated digital PDF**
- 

### Subtask 2.6: Final EIR and Environmental Checklist

After comments on the Public Draft EIR are received, Ascent will confer with the County to discuss the comments and to develop a strategy for responses. We will prepare a list of commenters, compile and organize the comments, and develop draft responses to significant environmental points raised in the comments. Generally, when many comments are received, a comment matrix is the best way to review comments and responses and identify similar comments that may require a master response. We anticipate preparing a comment matrix for general use by the County and the Ascent team. The level of effort needed to respond to comments received cannot be known at this time. Ascent will discuss with the County to determine an appropriate estimate of hours. It is assumed that one round of review will be sufficient to prepare the Final EIR (Administrative Final EIR and public Final EIR).

The Administrative Final EIR will include responses to all written and oral comments received from agencies and the public during the public review period and to show revisions to the Public Draft EIR. The

Administrative Final EIR will include the Draft EIR with modifications indicated in ~~strikeout~~ for deletions and underline for additions or highlighted text where changes have been made. Ascent will incorporate County edits and comments on the Administrative Final EIR and produce a Final EIR suitable for public distribution.

Adobe screen reader software does not recognize underline/strikeout or highlighted text; however, MS Word readers will announce underline/strikeout and highlighted text. Thus, the Final EIR errata chapter will be provided in MS Word format to allow for the use of underline/strikeout or highlighted text to indicate changes to the Draft EIR. Other sections of the Final EIR will be submitted as a fully remediated digital PDF. The final format of the Final EIR that is useable as a fully remediated digital PDF format will be coordinated between the County and Ascent.

### Environmental Checklist for Subsequent Projects

The Final EIR will also include in its appendix a customized environmental checklist template that the County may use to determine if the environmental impacts of an individual cultivation projects are adequately addressed in the EIR. The environmental checklist will provide substantial evidence to determine if no further environmental review is required or that additional environmental review is required or could require focused environmental review.

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#### DELIVERABLES

- **Administrative Final EIR and Final EIR with Environmental Checklist– electronic copy in MS Word**
  - **Revised and Final Mitigation Monitoring and Reporting Plan– electronic copy in MS Word**
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### Subtask 2.7: Review and Adoption

The Final EIR will be provided to those agencies at least 10 days prior to certification of the EIR (i.e., final Board hearing), in accordance with Public Resources Code Section 21092.5. Following project approval and EIR certification, County staff will prepare and file the Notice of Determination (NOD) with the County Clerk’s Office and the State Clearinghouse. A full administrative record will be provided along with submittal of the Final EIR (as certified – including any edits made during public hearings).

As requested in the RFP, Ascent will attend up to five public hearings, both Planning Commission and Board of Supervisors hearings. County staff will present the project at all hearings, but the Ascent team will be present, as needed, to respond to technical questions on the environmental analysis and findings.

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#### DELIVERABLES

- **Final EIR (certified) and Mitigation Monitoring and Reporting Plan – electronic copy in fully remediated digital PDF (errata chapter will be provided in MS Word)**
  - **Administrative record – jump drive or access to a shared drive**
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## Task 3: Economic Analysis

Economic & Planning Systems (EPS) will conduct a cannabis study, which revolves around the following four questions:

- ▶ What is the scale of the industry and its constituent elements in Sonoma County?
- ▶ How does the industry affect the county’s economy and real estate?
- ▶ Does the industry cover its related service costs and generate surplus revenue to the County?

- ▶ Based on the literature and case studies, what are some possible directions to explore regarding appropriate municipal oversight of the industry in regard to taxing and other issues?

The analysis will rely on an industry questionnaire, case study analysis, literature reviews, and industry interviews. This information will provide overall profiles of key industry issues.

### **Subtask 3.1: Project Initiation and Data Review**

EPS will initiate the project by conducting a full review of available file information, including past cannabis studies and analyses from the County and other municipalities, gross tax receipts and other economic/financial data, notes from meetings, past staff reports, and other applicable data. EPS will discuss findings and discuss with staff to gain clarity and perspective on past regulatory/policy successes and failures, as well as ideas for future policy.

### **Subtask 3.2: Industry Literature and Existing Case Study Review**

On a parallel track with Subtask 3.1, EPS will review a range of policy resources for evaluation of best practices across the following category groups.

#### **Group 1: Land Use Regulation**

EPS will explore comparable county land use regulations related to the location of the various cannabis industry sectors and adjacent uses.

#### **Group 2: Ownership Structure**

EPS will explore the range of ownership structures in the industry, from sole proprietors to large organizational models, with the intent to understand current trends and operational specifics across the range.

#### **Group 3: Taxation and Fees**

EPS will investigate trends regarding the primary sources of tax revenue generation from the cannabis industry. In particular, decreasing or increasing reliance on the use of any types of taxes, changes in the tax rates applied since legalization, and the introduction of exemptions will be explored, including both numeric trends and any identifiable goals driving changes. EPS will also identify other jurisdictions' strategies for allocating additional tax revenues.

### **Subtask 3.3: Outreach – Sonoma County Industry Size and Profitability**

EPS will develop a detailed questionnaire for distribution to all major cannabis operations in the county. The County will distribute the questionnaire and collect the results. EPS will tabulate and analyze the data and apply it in the tasks provided below.

The County will provide a list of potential industry contacts that represent a broad spectrum of industry subsectors, business sizes, ownership types, and locations. EPS will choose among the potential contacts as needed to ensure a diverse cross-section of respondents are represented.

The questionnaire will be designed specifically to better understand the size (revenue and employee count) and general ranges of profitability in the county, and trends and influences affecting viability.

Subsequently, EPS will conduct interviews with up to three operators in each major industry group reflecting a sampling of smaller and larger operators. These interviews will be paired with known data, case study information, and various rules of thumb/known relationships to characterize the size and function of

the industry in the county. Of particular interest, where possible, will be the collection and analysis of individual firm profit and loss statements, allowing for better insight into factors affecting the strength of operations in Sonoma County.

### **Subtask 3.4: Industry Profile and Market Analysis**

EPS will develop an assessment of the strength of the industry in Sonoma County based on a number of performance metrics used in past studies (e.g., gross receipts per square foot over time). The market analysis will analyze all major components of the industry in the county. EPS will seek to use a set of “industry function groupings” (IFGs) for reference in the study. For example, the industry could be organized according to the following functions:

- ▶ Cultivation
- ▶ Delivery
- ▶ Distribution (large-scale)
- ▶ Storefront dispensaries
- ▶ Manufacturing
- ▶ Testing labs
- ▶ Microbusiness (vertical integration)

Data permitting, for each of the below subtasks, EPS will tabulate data for each IFG. Major questions to be answered include: As this study is inherently open-ended and multifaceted, it is not feasible to understand the entire universe of data available to the study. It is anticipated that Subtask 3.1 of the analysis will be instrumental in informing the research team in terms of data availability and quality and that potential amendments to the scope of work and budget may be necessary based on specific circumstances.

- ▶ Are cannabis-related impacts and benefits “leaking” outside the county?
- ▶ Is the County reaching the limits of practicality for any cannabis permit types, and what are the policy implications?
- ▶ Should fees applying to these businesses be adjusted?
- ▶ Are the County’s current cannabis tax rates appropriate and competitive, given regional and statewide trends?

#### **3.4.1: Direct Receipts and Estimated Sales Taxes**

EPS will evaluate trendlines regarding gross receipts tax payments, implied total sales, implied sales tax, and other potential metrics.

#### **3.4.2: Estimated Direct Cannabis Industry Jobs**

EPS will overlay the results of the industry outreach effort with known industry rules of thumb regarding sales/square footage and employment density to estimate probable ranges of total jobs. In addition, case study and interview information will be used to estimate the industry job hierarchy by income range. Because of the interconnected nature of real estate and employment, a detailed examination of job displacement is included with the optional Real Estate Market and Displacement Effects subtask below.

### Optional Subtask 3.5: Real Estate Market and Displacement Effects

Building on the findings from previous subtasks, EPS will evaluate possible industry “crowding out” dynamics (ability to pay higher leases and asset prices). A particular area of focus will be the degree to which the industry contributes to the displacement of full-time, higher-wage jobs (often represented by unions) by part-time/non-benefitted or “gig economy” jobs (i.e., short-term or freelance work). The displacement research may require a variety of approaches dependent on any indicators of potential displacement identified during the course of the study. Specific displacement trends/issues to be explored include:

- ▶ Displacement of businesses or industries by cannabis. If displacement is occurring, were these businesses/industries already on their way out?
- ▶ Are non-cannabis businesses being priced out of commercial spaces?
- ▶ How have vacancy rates compared/changed from before permitting versus after?

### Subtask 3.6: Industry Multiplier Effects – Total Contribution to County Economy

EPS will define the direct, indirect, and induced economic impacts of the industry on Sonoma County. Economic impacts comprise both direct and secondary (indirect and induced) effects. Direct effects represent those impacts that are attributable directly to an activity, such as jobs in a cultivation facility. Indirect and induced effects represent the spin-off or multiplier effects of that activity.

EPS will conduct the analysis using an Input/Output (I/O) modeling framework and economic multipliers, which will measure the direct, indirect, and induced impacts of the various cannabis-related activities in the county. EPS will use I/O software developed by IMPLAN, which includes industry data collected from multiple federal and state sources, including the Bureau of Economic Analysis (BEA), the Bureau of Labor Statistics (BLS), and the US Census Bureau.

The direct, indirect, and induced impacts will be grouped by type of cannabis business. Direct impacts will be drawn from operator surveys/interviews. Indirect and induced impacts likely will be determined using comparable industry sectors, adjusted with findings from surveys/interviews.

In addition to the I/O modeling to determine economic multiplier effects, the economic impact analysis will draw on the previous subtasks and incorporate the following elements:

- ▶ Cannabis employee origins: same district where their employer is located, elsewhere in the county, outside of the county? What are the implications?
- ▶ Support industry-qualitative description—other implications (e.g., requirement for proximity, land use/zoning, labor force profile from outreach phase).
- ▶ Qualitative distinctions among county subareas.

### Subtask 3.7: Fiscal Impacts and Related Policy

The starting point for the fiscal analysis will be a standard Fiscal Impact Analysis model that derives baseline cost and revenue parameters from the County General Fund budget. The model will be based on the current Fiscal Year County budget, presented in current dollars, and will reflect current service levels and tax regulations and statutes. Layered into the standard fiscal impact model will be cannabis industry-specific cost and revenue line items including the following:

- ▶ Industry-related revenues (gross receipts tax, property tax, sales and use tax [including B2B], motor vehicle in-lieu [MVIL], other)
- ▶ Indirect industry revenues (real estate appreciation, sales and use taxes from employee spending, etc.)
- ▶ Industry-specific service costs (beyond offsetting charges for services), including code enforcement calls, traffic, crime

#### Cost Basis: Cannabis Regulation and Services Provision

A key element driving the cost side of the fiscal analysis will be the size and character of County departmental expenses related not just to public safety and infrastructure maintenance but also to the specific departmental structure assumed to oversee the industry in the county. To provide guidance for these latter cost assumptions, EPS will conduct case study analysis of up to six similar jurisdictions in California and provide a discussion of pros and cons around representative approaches used by these jurisdictions.

#### Tax Revenue Spending Priorities

To the extent the fiscal impact analysis identifies any potential public service funding deficiencies, or the preceding economic impact analysis identifies any shortfalls in the distribution of economic benefits, these will be explored as potential targets for spending the gross receipts tax. EPS will identify case studies of spending earmarks in up to six other communities and assess applicability to Sonoma County in light of the findings of the other elements of the study.

#### **Subtask 3.8: Scenario Analysis**

Based on County and Ascent team needs, EPS has reserved an allocation of funds to specifically address more specific scenarios and issues raised during the course of the study. These scenarios are likely to apply to specific proposals or ideas around the topics of taxation by type of operation, land use buffers/concentrations, market saturation and competitive dynamics, and ownership regulations.

#### **Subtask 3.9: Project Meetings, Program Recommendations, Report, and Presentation**

EPS will coordinate with the County and the Ascent team to document and present key findings. The budget includes six team meetings, contributions to draft and final reports, and two presentations.

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#### DELIVERABLES

- **Data Memorandum (provided in Task 2.2)**
  - **Methodology Memorandum (provided as part of Task 2.2)**
  - **Draft Economic Analysis report – electronic copy in MS Word**
  - **Final Economic Analysis report– electronic copy in fully remediated digital PDF**
-

## Schedule

Task and Work Effort	Duration	Date
<b>Task 1: Project Management</b>		
Kickoff Meeting/County provides Project Description	—	October 12, 2022
Finalized project scope, budget, and schedule	2 weeks	October 26, 2022
Ascent submits communications memorandum	2 weeks	October 26, 2022
Coordination meetings		On-going
<b>Task 2: Environmental Impact Report</b>		
<b>SUBTASK 2.1: ENVIRONMENTAL REVIEW SCOPING</b>		
Ascent submits Draft NOP	4 weeks after Ascent receives Project Description from the County	November 9, 2022
County review of Draft NOP	2 weeks	November 23, 2022
Ascent submits Final NOP and list of Responsible and Trustee Agencies	2 weeks	December 7, 2022
Public scoping meeting and presentation	-	To be determined
NOP comment period	30 days	December 8 – January 9, 2023
Ascent submits list of comment letters and commenting entities and written transcript of verbal public comments made during the scoping meeting	2 weeks	January 23, 2023
<b>SUBTASK 2.2: DATA COLLECTION</b>		
Ascent submits data memorandum	2 weeks	January 31, 2023
Ascent submits methodology memorandum	6 weeks	February 20, 2023
County review of methodology memorandum	2 weeks	March 6, 2023
Ascent submits revised methodology memorandum	2 weeks	March 20, 2023
<b>SUBTASK 2.3: TECHNICAL STUDIES</b>		
Biological Resources	20 weeks	August 7, 2023
Cultural Resources		
Hydrology and Water Quality		
Wildfire		
Traffic Impact Analysis		
Air Quality and Greenhouse Gas		
Noise		

<b>SUBTASK 2.4: ADMINISTRATIVE DRAFT EIR</b>		
Ascent submits Draft EIR annotated outline and revised methodology memorandum	2 weeks	August 21, 2023
County review of Draft EIR annotated outline and revised methodology memorandum	2 weeks	September 6, 2023
Ascent finalizes Draft EIR annotated outline and methodology memorandum	1 week	September 22, 2023
Ascent submits Administrative Draft EIR, technical studies, and draft MMRP	6 weeks	November 3, 2023
County review of Administrative Draft EIR, technical studies, and draft MMRP	4 weeks	December 4, 2023
Ascent submits revised Administrative Draft EIR, technical studies, and draft MMRP	2.5 weeks	December 22, 2023
County review of revised Administrative Draft EIR, technical studies, and draft MMRP	3 weeks	January 12, 2024
<b>SUBTASK 2.5: DRAFT EIR</b>		
Ascent submits Public Draft EIR, technical studies, all reference materials, NOC, and NOA	2 weeks	January 26, 2024
Draft EIR public review period	45 days	January 31, 2024 – March 15, 2024
<b>SUBTASK 2.6: FINAL EIR AND ENVIRONMENTAL CHECKLIST</b>		
Ascent submits list of comment letters and commenting entities and written transcript of verbal comments	1.5 weeks	March 27, 2024
Ascent submits Administrative Final EIR, revised MMRP, and environmental checklist template	6 weeks	April 24, 2024
County review of Administrative Final EIR, revised MMRP, and environmental checklist template	4 weeks	May 22, 2024
Ascent Submits Public Final EIR and MMRP, environmental checklist NOD, and administrative record	3 weeks	June 14, 2024
<b>SUBTASK 2.7: REVIEW AND ADOPTION</b>		
Attendance at public hearings	-	To be determined
Certified Final EIR, environmental checklist, and MMRP	1 week (after certification action)	To be determined
<b>Task 3: Economic Analysis</b>		
EPS submits draft economic analysis report	25 weeks	November 3, 2023
County review of draft economic analysis report	5 weeks	December 11, 2023
EPS finalizes economic analysis report	4 weeks	January 12, 2024



COST OF SERVICE 04

## 04

## COST OF SERVICE

The proposed price for the Consultant Services to Prepare a Programmatic EIR and Economic Analysis is presented in the attached spreadsheet. To promote clarity, the following assumptions explain the basis of the proposed price. The price is estimated based on a good-faith, current understanding of the project's needs. If selected, Ascent is interested in discussing the County's needs and revising the scope of work and price, as warranted, to meet expectations. The price proposed to carry out the scope of work is valid for 120 days from the date of submittal, after which it may be subject to revision.

The following are assumptions associated with the proposed budget.

1. **Lump-Sum Price.** The proposal is a lump-sum price to perform the proposed scope of work. Monthly invoices will be submitted based on percentage of progress toward completion occurring in each billing period.
2. **Compliance with CEQA.** The price assumes that environmental services are offered in compliance with CEQA. Work related to NEPA compliance, Section 404, or other permit processes is not included. This work can be provided with a contract amendment.
3. **Schedule.** The price is based on the proposed schedule. If the schedule is protracted significantly (more than 60 days) for reasons beyond Ascent's control, a budget amendment may apply to the remaining work. Ascent will consult with the County about a course of action.
4. **Completion of Work.** The scope of work is complete upon the acceptance by County staff of the final deliverable.
5. **Price and Staff Allocation to Tasks.** Labor, subconsultant, and other direct costs have been allocated to tasks to determine the total budget. Ascent may reallocate costs and labor resources, as needed, as long as the total contract price is not exceeded.
6. **Meetings and Conference Calls.** The number and duration of proposed meetings and conference calls are specified. If they are exceeded, a budget augmentation would be warranted.
7. **Subcontractor Administrative Cost.** An administrative cost of 5 percent will be applied to subcontractor prices for purposes of contract execution and management, invoicing, and payment processing.
8. **Billing Rates.** Costs were determined based on the proposed scope of work and Ascent's current billing rates. Any budget augmentations or contract amendments in subsequent years will be calculated using updated billing rates, unless precluded by contract terms.
9. **Changes to the Project or Alternatives.** If the descriptions of the project and alternatives are changed after they have been approved for use by County, a budget amendment will be warranted to the extent completed work needs to be revised or redone.

10. **Scope of Analysis.** The price is based on the proposed scope of analysis. If new technical issues, alternatives, field surveys, modeling, or analyses are identified after contract execution, a budget amendment would be warranted.
11. **Adequacy of Provided Materials.** Materials provided by others are assumed to be complete and adequate for use in the analysis. If supplemental or revised analysis, studies, data, or fieldwork is needed to render such materials adequate, a budget amendment would be warranted.
12. **Tribal Consultation.** Whether a tribe or tribes will request consultation under AB 52 is unknown. The scope and budget therefore do not include performance of this consultation. Consultation assistance can be added, if needed, with a scope and budget amendment.
13. **Preliminary Draft Review Cycles and Reviewers.** Preliminary draft review cycles are specified in the scope of work. Preliminary drafts will be reviewed by County staff and not by other agencies or entities. Responses to additional reviewers, review cycles, or versions of preliminary drafts can be provided with a budget augmentation.
14. **Consolidated Comments.** The County will provide Ascent with one consolidated set of reconciled, nonconflicting comments on preliminary drafts.
15. **Responses to Public Comments.** After public review of the draft environmental document, Ascent will prepare a list of commenters; compile, organize, review, and evaluate comments; and coordinate with the County to develop response strategies. Labor hours budgeted for preparing responses to comments is identified in the proposed budget spreadsheet. If the number or complexity of comments requires a greater level of effort, Ascent and the County will coordinate about a course of action and budget augmentation, if needed.
16. **References Cited.** Ascent will maintain electronic copies of cited references and provide electronic files during public review. Ascent will submit electronic copies of all references to the County for archiving upon completion of the scope of work.
17. **Reproduction Costs.** The number of copies, document length, and extent of color graphics are not yet known, so the reproduction cost for paper copies is not included. Ascent will advise the County of the costs to produce the documents after they are known. The cost will be passed through as charged to Ascent without an additional administrative fee.
18. **Final Environmental Document.** The final environmental document will consist of a comments and responses to comments volume or chapter. Text revisions to the draft document, if needed, will be assembled in a section. Modification, redline/strikethrough, and reproduction of the entire draft document are not included but can be provided with a budget amendment.
19. **Litigation Support.** Ascent is available to assist in the lead agency's response to a lawsuit, subject to a contract amendment. Except for electronic files of cited references, assembly of an administrative record or project record is not included but can be provided with a budget augmentation.

**PRICE PROPOSAL**

Qualifications for Programmatic EIR and Economic Analysis for the County of Sonoma's Comprehensive Cannabis Ordinance Update

20-Jun-22

hourly rate:

Task 1: PROJECT MANAGEMENT	Price	Hours
Kick-off meeting	\$ 1,960	8
Finalized project scope, budget, and schedule	\$ 2,000	10
Communication memorandum	\$ 3,360	18
Meetings and meeting notes	\$ 25,560	120
<b>Subtotal, Task 1</b>	<b>\$ 32,880</b>	<b>156</b>

Principal	Project Manager	Principal - Biological Resources	Sr. Natural Resources	Sr. AQ and Noise	Sr. GHG	Sr. Cultural Resources	Cultural Resources	Biologist	Sr. Trans Planner	Tran/Noise/AQ Planner	Env Planner	Sr Graphic Artist	Graphic Artist	GIS Specialist	Publication
\$320	\$170	\$275	\$230	\$195	\$170	\$165	\$160	\$165	\$175	\$135	\$150	\$140	\$120	\$130	\$135
4	4														
2	8														
2	16														
30	60	4	2	8		8		8							
<b>38</b>	<b>88</b>	<b>4</b>	<b>2</b>	<b>8</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Task 2: ENVIRONMENTAL IMPACT REPORT	Price	Hours
2.1 Environmental Review Scoping	\$ 9,300	52
Notice of Preparation	\$ 2,935	18
Scoping Meeting Presentation	\$ 2,365	14
Attendance at Public Scoping Meeting	\$ 1,960	8
Compilation of Comments from Public Scoping Meeting	\$ 2,040	12
2.2 Data and Methodology Memorandums	\$ 11,710	62
2.3 Technical Studies	\$ 79,700	464
2.4 Administrative Draft EIR	\$ 196,340	1175
Annotated Outline and Revised Methodology Memorandum	\$ 5,870	36
Summary	\$ 2,720	16
Aesthetics	\$ 8,580	58
Agriculture and Forestry Resources	\$ 11,320	60
Air Quality and Odors	\$ 3,450	20
Biological Resources	\$ 4,050	24
Cultural and Historical Resources	\$ 4,840	30
Energy	\$ 3,450	20
Geology, Soils, and Mineral Resources	\$ 5,140	34
Greenhouse Gas Emissions	\$ 3,790	22
Hazards and Hazardous Materials	\$ 3,940	26
Hydrology and Water Quality	\$ 3,000	20
Land Use and Planning	\$ 11,860	74
Noise	\$ 2,850	20
Population and Housing	\$ 2,740	18
Public Services	\$ 6,340	42
Transportation	\$ 2,850	20
Tribal Cultural Resources	\$ 3,230	20
Utilities and Service Systems	\$ 8,720	56
Wildfire	\$ 4,280	20
Effects Found Not to Be Significant	\$ 1,540	10
Alternatives	\$ 8,900	50
Other Required CEQA Sections	\$ 2,740	18
Documentation Production, and Final QA-QC	\$ 31,440	172
Draft MMRP	\$ 2,200	13
Revised Administrative Draft EIR and Draft MMRP	\$ 46,500	276
2.5 Draft EIR	\$ 18,740	108
2.6 Final EIR and Environmental Checklist	\$ 57,320	332
2.7 Review and Adoption	\$ 30,240	152
Public Hearings	\$ 19,600	80
Certified Final EIR, MMRP, and Environmental Checklist	\$ 10,640	72
<b>Subtotal, Task 2</b>	<b>\$ 403,350</b>	<b>2,345</b>

8	26	0	0	0	0	0	0	0	0	0	0	2	6	6	4
2	6											1	4	4	1
2	4											1	2	2	3
4	4														
	12														
8	40		2		2			2	2						4
8	56	4	50	16	120	8	50	50	8	70		4	8	12	
63	350	2	20	8	56	8	44	24	8	40	466	8	8	20	50
2	8										24				2
	16														
	2										50		4	2	
8	50													2	
	2			2	16										
	2	2						16						4	
	2						4	24							
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4	40											4		2	
	2										16				
32	40										60				40
1	4										8				
16	100		4	2	8	2	4	8	4	8	100	4	4	4	8
12	40		2		2	2	2	2	2	2	4	2	2	2	32
28	100	2	12	2	8	6		12	8	12	80	4	4	4	50
40	56	0	0	0	0	0	0	0	0	0	24	0	0	0	32
40	40														
	16										24				32
<b>167</b>	<b>668</b>	<b>8</b>	<b>86</b>	<b>26</b>	<b>188</b>	<b>26</b>	<b>96</b>	<b>90</b>	<b>28</b>	<b>124</b>	<b>574</b>	<b>20</b>	<b>28</b>	<b>44</b>	<b>172</b>

Task 3: ECONOMIC ANALYSIS	Price	Hours
Review and Management of Economic Technical Work	\$ 5,280	24
<b>Subtotal, Task 3</b>	<b>\$ 5,280</b>	<b>24</b>

8	16														
<b>8</b>	<b>16</b>	<b>0</b>													

<b>LABOR SUBTOTAL</b>	<b>\$ 441,510</b>	<b>2,525</b>
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213	772	12	88	34	188	34	96	98	28	124	574	20	28	44	172
\$ 68,160	\$ 131,240	\$ 3,300	\$ 20,240	\$ 6,630	\$ 31,960	\$ 5,610	\$ 15,360	\$ 16,170	\$ 4,900	\$ 16,740	\$ 86,100	\$ 2,800	\$ 3,360	\$ 5,720	\$ 23,220

REIMBURSABLE EXPENSES	Price	Hours
Printing	\$ 2,200	
Record Searches	\$ 3,300	
Mileage / Parking / Travel	\$ 1,500	
Postage	\$ 50	
Subconsultants	\$ 174,678	
W-Trans (Subtask 2.3: Traffic Impact Analysis)	\$ 31,350	
EPS (Task 3 - Economic Analysis)	\$ 132,000	
Cyberarty (Task 2 - Transcription of Hearings)	\$ 3,010	
Administrative Cost (5%)	\$ 8,318	
<b>TOTAL PRICE</b>	<b>\$ 623,238</b>	

**ASSUMPTIONS**  
Assumptions that explain the basis of the proposed price are enclosed and are an integral part of this proposed scope for work for services.



**Table 1**  
**Sonoma County**  
**Cannabis Study**  
**EPS Sub Budget Estimate**

*Estimate as of:*  
*June 14, 2022*

Task No.	Task Description	EPS Hours				EPS Fee	Contracted	Total Fee
		Zehnder	Martens	Sr. Assoc.	Admin.			
1	Project Initiation	12	18	20	2	\$11,450	\$1,000	\$12,450
2	Literature Review/Case Studies	4	12	24	2	\$8,320	\$2,500	\$10,820
3	Industry Outreach	6	6	24	2	\$7,590	\$2,500	\$10,090
4	Industry Profile and Market Analysis	10	22	40	2	\$15,230	\$2,500	\$17,730
5	Real Estate Market Impacts (Optional)	6	22	12	2	\$9,090	\$0	\$9,090
6	Economic Multiplier Analysis	8	24	40	2	\$15,060	\$0	\$15,060
7	Fiscal Analysis	8	24	40	2	\$15,060	\$0	\$15,060
8	Scenario Analysis	16	32	64	2	\$23,540	\$6,500	\$30,040
9	Meetings, Report, Presentations	14	26	40	6	\$17,730	\$2,500	\$20,230
<b>TOTAL PHASE I</b>		<b>84</b>	<b>186</b>	<b>304</b>	<b>22</b>	<b>\$123,070</b>	<b>\$17,500</b>	<b>\$141,000</b> <b>\$132,000</b>



**Cannabis Ordinance EIR  
W-Trans Fee Estimate**

Task	HOURS BY STAFF MEMBER						Total Hours
	Dalene Whitlock	Zack Matley	Associate Engineer	Assistant Eng'r/Plnr	Admin	Misc	
Task 1.0 Project Management	2	0	7	0	0	\$0	9
Task 2.0 Environmental Impact Report	22	39	34	44	2	\$1,115	141
	24	39	41	44	2	\$1,115	150

Task	FEE AT HOURLY RATES INDICATED						TOTAL
	\$330	\$245	\$160	\$135	\$130	LS	
Task 1.0 Project Management	\$660	\$0	\$1,120	\$0	\$0	\$0	\$1,780
Task 2.0 Environmental Impact Report	\$7,260	\$9,555	\$5,440	\$5,940	\$260	\$1,115	\$29,570
	\$7,920	\$9,555	\$6,560	\$5,940	\$260	\$1,115	\$31,350

These rates are valid for work performed prior to December 31, 2022. Work performed after January 1, 2023, and any subsequent year may be billed at the revised rates established for that year. \* Mileage charge will be based on the IRS Standard Mileage Rate (set at \$0.585/mile effective January 1, 2022) plus 10 percent.



IDENTIFICATION OF  
SUBCONTRACTORS

05

## 05

## IDENTIFICATION OF SUBCONTRACTORS

## TEAMING PARTNERS

We have supplemented our team with the specialized expertise of EPS for the Economic Analysis (see Task 3), W-Trans for the Traffic Impact Analysis (see Subtask 2.3), and Cybertary for meeting transcription services (see Task 2). These firms are well respected in their discipline areas. The proposed team will be proactive in communication, accurate in analysis, and reliable in providing the County excellent service. The extent of their work effort associated with the over project work is provided in the budget spreadsheet.



Economic & Planning Systems is a land economics consulting firm that has provided the full spectrum of services related to issues of land use economics for both public- and private-sector clients since 1983. EPS was founded on the principle that real estate development and land use-related public policy should be built on realistic assessment of market forces and economic trends, feasible implementation measures, and recognition of public policy objectives, including provisions for required public facilities and services. EPS's professional staff, dispersed among offices in Oakland, Sacramento, Los Angeles, and Denver, include specialists in public finance, real estate development, land use and transportation planning, government organization, and computer applications. EPS excels in preparing concise analyses that disclose risks and impacts, support decision-making, and provide solutions to real estate development and land use-related problems. Areas of expertise include:

- ▶ Real Estate Economics
- ▶ Public Finance
- ▶ Land Use and Transportation
- ▶ Economic Development and Revitalization
- ▶ Fiscal and Economic Impact Analysis
- ▶ Housing Policy
- ▶ Public-Private Partnership (P3)
- ▶ Parks and Open Space Economics

EPS staff work across a wide range of project types, adopting their tools and techniques to many industries and jurisdictions. As shown in our Sacramento Comprehensive Cannabis study

(<https://www.cityofsacramento.org/-/media/Corporate/Files/CMO/Cannabis/SCCS-Final-Report-03-08-22.pdf?la=en>) the firm is adept at multidisciplinary, collaborative studies intended to advise on evidence-based public policy.



W-Trans provides traffic engineering and transportation planning services that emphasize mobility within available resources and help transform streets to serve all potential users. They have applied their skills to a variety of projects ranging from analyses for traffic studies, including initial studies and EIRs, traffic collision reduction programs, transportation facilities design including traffic signal and roundabout design as well as pedestrian and bicycle facilities to downtown revitalization, streetscape planning efforts, and complete streets projects. They take a holistic approach to traffic engineering, realizing that solutions cannot be developed in a vacuum or strictly follow the standards of the past. Traffic analysis and design must be sensitive to the context of the surrounding land use and community goals to be successful.

- ▶ omplete Streets
- ▶ Municipal Staff Services
- ▶ Parking
- ▶ Pedestrian Safety and Design
- ▶ Roundabouts
- ▶ Safe Routes to School
- ▶ Traffic Calming
- ▶ Traffic Engineering Design
- ▶ Traffic Impacts
- ▶ Traffic Operations
- ▶ Traffic Safety
- ▶ Transportation Demand Management
- ▶ Trip Generation Rate Development
- ▶ VMT Impacts

W-Trans is certified as a woman-owned business (Disadvantaged Business Enterprise [DBE]) by the California Department of Transportation. A copy of their certification can be provided upon request.



Cybertary staff are highly skilled and well-qualified professionals who work the same way a regular employee does, only more efficiently, more cost-effectively, and with a broader skill set. They use the most advanced technology tools and the most efficient time-saving office products and work delivery methods, working independently and virtually, to provide administrative support and specialized services to businesses, entrepreneurs, and executives. Cybertary provides meeting transcription services for several cities and local agencies.



## 06

## INSURANCE

Ascent has reviewed the insurance requirements of the County identified in the Sample Agreement. Documentation of this is provided below.



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

3/3/2022

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an **ADDITIONAL INSURED**, the policy(ies) must have **ADDITIONAL INSURED** provisions or be endorsed. If **SUBROGATION IS WAIVED**, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> AssuredPartners Design Professionals Insurance Services, LLC 3697 Mt. Diablo Blvd., Suite 230 Lafayette CA 94549	<b>CONTACT NAME:</b> Nancy Ferrick <b>PHONE (A/C. No. Ext):</b> 510-272-1400 <b>FAX (A/C. No):</b> <b>E-MAIL ADDRESS:</b> nancy.ferrick@assuredpartners.com
	<b>INSURER(S) AFFORDING COVERAGE</b>
License#: 6003745 ASCENENVI	<b>INSURER A:</b> Travelers Property Casualty Company of America <b>INSURER B:</b> The Travelers Indemnity Company of Connecticut <b>INSURER C:</b> Underwriters at Lloyd's, London <b>INSURER D:</b> Beazley Insurance Company Inc <b>INSURER E:</b> <b>INSURER F:</b>
<b>INSURED</b> Ascent Environmental, Inc. 455 Capitol Mall Suite 300 Sacramento CA 95814-4405	<b>NAIC #</b> 25674 25682 37540

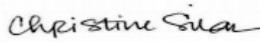
**COVERAGES** **CERTIFICATE NUMBER:** 661632608 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> <b>COMMERCIAL GENERAL LIABILITY</b> <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER:	Y	Y	6806H400124	3/15/2022	3/15/2023	EACH OCCURRENCE \$2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$1,000,000 MED EXP (Any one person) \$10,000 PERSONAL & ADV INJURY \$2,000,000 GENERAL AGGREGATE \$4,000,000 PRODUCTS - COMP/OP AGG \$4,000,000 \$
B	<input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY	Y	Y	BA4R770955	3/15/2022	3/15/2023	COMBINED SINGLE LIMIT (Ea accident) \$1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	<input checked="" type="checkbox"/> <b>UMBRELLA LIAB</b> <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$	Y	Y	CUP3384T427	3/15/2022	3/15/2023	EACH OCCURRENCE \$4,000,000 AGGREGATE \$4,000,000 \$
A	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N	N/A	UB7K512607	3/15/2022	3/15/2023	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$1,000,000 E.L. DISEASE - EA EMPLOYEE \$1,000,000 E.L. DISEASE - POLICY LIMIT \$1,000,000
D C	Professional Liability Cyber Liability			ENP000709001 ESK0139431348	3/15/2022 3/15/2022	3/15/2023 3/15/2023	\$2,000,000 \$3,000,000 \$1,000,000 per Claim Annual Aggregate each Claim/Aggr.

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required) FOR USE WITH PROPOSALS. An actual certificate will be issued at the request of the named insured.

**CERTIFICATE HOLDER** **CANCELLATION** 30 Days Notice of Cancellation

** SAMPLE CERTIFICATE **	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE 
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ACCESSIBILITY  
STANDARDS 07

**07****ACCESSIBILITY STANDARD**

Ascent has experience in compliance with preparing documents consistent with State and Federal accessibility standards (e.g., 36 C.F.R. Section 1194, pursuant to Section 508 of the Rehabilitation Action of 1973) and can provide the EIR and related compliant with these and County standards.



CONTRACT TERMS

08

# 08

## ADDITIONAL INFORMATION

This section includes a signed version of the RFP addendum and key staff resumes.



## COUNTY OF SONOMA

**ADDENDUM NO. 1**  
**SUBJECT: Addendum Number 1 to RFP No. SC001-0000001504**  
**for RFP Consultant Svcs Related to Cannabis Ordinance**  
**DATE: 06-07-2022**

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This addendum is issued to furnish information that is supplemental to, will clarify, or modify the above-referenced solicitation.

### **SUPPLEMENTAL INFORMATION:**

Question 1: Can a consultant bid on just the EIR or just the Economic Analysis alone versus both? My firm could easily do the Economic Analysis, not the Environmental Impact Report.

Answer 1: The RFP proposal must include all tasks. The County anticipates that sub-consultants with technical specialties would be part of a larger proposal team.

Question 2: What is the budget for the report(s), especially if they can be bid individually (meaning the budget for each Task 2.0 and 3.0 individually)?

Answer 2: Total budget is a consideration for the County; however, there is no target or maximum budget for individual reports.

Question 3: Is the timeline for both major Tasks 2 years, and if Tasks 2.0 and 3.0 were done by two firms, do the timelines for both need to be the same?

Answer 3: Timelines for Task 2 (EIR) and Task 3 (Economic Analysis) do not need to be the same; one could be completed before the other, as long as both meet the overall timeframe of being completed by summer of 2024.

Question 4: The RFP lists written transcription of verbal public comments from the public meetings and hearings as deliverables. Does this require in-person, real-time, professional transcription? If not, would a summary of comments be acceptable? Or comments transcribed, but done after the meetings from audio recordings?

Answer 4: I was thinking real-time court reporter, but after-the-fact transcription from recording would also be ok? I do not want summary comments.

Question 5: Would the scoping meeting and other public meetings be in-person, virtual, or a hybrid?

Answer 5: I don't think we can answer this definitively, as direction from the County Health Officer and/or State Governor could change between now and then, which means meetings could occur in all three formats.

- Proposers should provide budget options for both (attending in person or via zoom)

Question 6: Has the County decided whether to include cannabis within the meaning of "agriculture" and "agricultural use" as used in the Sonoma County General Plan?

Answer 6: Staff will consider, as one of the potential General Plan Amendments, whether classification of cannabis as agriculture is necessary to maintain consistency with existing General Plan policies to protect and promote agriculture. This final decision will lay with the Board of Supervisors at the end of the process when the final ordinance is adopted. The EIR should evaluate both scenarios- existing condition where cannabis is considered an agricultural product but not an agricultural crop, and re-classification of cannabis as an agricultural crop.

All other terms and conditions of **RFP No. SC001-0000001504** remain unchanged.

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Please sign and date below as acknowledgment of receipt of Addendum No. 1 and include with your bid submittal.

Signature and Date:  June 20, 2022

Printed Name: Patric Angell, Principal

Firm: Ascent Environmental. Inc.



## Patrick Angell

### PRINCIPAL-IN-CHARGE

#### YEARS OF EXPERIENCE 29

#### EDUCATION

BA, Environmental Science with a government emphasis, California State University, Sacramento

Land Use and Environmental Planning Certificate Program, UC Davis Extension

#### PROFESSIONAL AFFILIATIONS

Association of Environmental Professionals (AEP) – Superior California Chapter Director and CEQA Portal Chairman

#### REPRESENTATIVE PROFESSIONAL WORKSHOPS/PRESENTATIONS

"Climate Change and Water Supply Planning." 2009 California AEP Conference.

"Climate Change and Adaption." 2009 California APA Conference.

"CEQA Training Sessions." 2009 California AEP.

"Smart Growth Concepts and CEQA with General Plans." 2007 California AEP Conference.

"Mitigation Monitoring and Reporting Survey of California Cities and Counties." 2006 AEP Conference and 2006 National APA Conference.

#### AWARDS

Rancho Cordova General Plan EIR, SACOG Regional Excellence Award and CCAPA Award.

#### PUBLICATIONS

"Land Use Issues Associated with Power Plant Facility Siting." California Energy Commission. 2002.

Patrick Angell is a principal at Ascent. He has 29 years of experience serving as a project director and manager and technical analyst for a variety of projects. Pat specializes in environmental and urban land use planning and has performed tasks for projects such as water and wastewater facilities, energy facilities, flood control, residential subdivisions, mixed-use urban developments, general plans, and redevelopment plans. His experience includes establishing environmental review divisions for cities, coordinating and facilitating large-scale private and public. He has also been involved in the preparation of several joint CEQA and NEPA documents and technical studies.

Pat has served as project manager for the Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR, Yolo County Cannabis Land Use Ordinance Program EIR, Trinity County Cannabis Program EIR, Stockton Cannabis Ordinance CEQA Review, and Yolo County Cannabis Project Environmental Review, and as project director for the Green Coast Industries Environmental Review project.

## PROJECT EXPERIENCE

### Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR

County of Humboldt

#### Project Manager

The project involves the repeal of the County's existing Commercial Medical Marijuana Land Use Ordinance (Sections 313-55.4 and 314-55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repeal of the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations would be replaced by the provisions of the proposed ordinance, which would establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county. The changes would allow and regulate commercial cannabis facilities for both medical and adult recreational uses. Ascent prepared the EIR for the proposed ordinance. Key environmental issues addressed in the EIR include disclosure of existing illegal cannabis operations, nighttime lighting, air quality impacts associated with roadway dust and odors, biological resources, hydrology and water quality, noise from cultivation and harvesting operations, and groundwater resources. The ordinance was adopted in 2018.

### Trinity County Cannabis Program EIR and Environmental Checklist

County of Trinity

#### Project Manager

Trinity County initially adopted its first cannabis cultivation ordinance in 2016 and prepared subsequent updates to this ordinance as well as additional ordinances to allow other cannabis uses in the County between 2016 and 2018. Due to litigation and application processing concerns, the County retained Ascent to prepare an EIR for these ordinances (collectively referred to as the Cannabis Program). This work included preparation of required notices, coordination with responsible and trustee agencies during the entire environmental review process (e.g., California Department of Food and Agriculture [now the Department of Cannabis Control], California

## Patrick Angell

Department of Fish and Wildlife), public outreach meetings in each of the five Board of Supervisor districts, and maintenance of the administrative record. Ascent also provided advanced input on the extent that this environmental review process can be streamlined/tiered using the EIR for subsequent application for cannabis uses that resulted in the preparation of a customized environmental checklist. The Cannabis Program was re-adopted with amendments in December 2020.

### Yolo County Cannabis Land Use Ordinance Program EIR

County of Yolo

#### Project Manager

On March 22, 2016, in response to the Medical Marijuana Regulation and Safety Act and to effect greater local control, the Yolo County Board of Supervisors adopted Ordinance Number 1467 adding Chapter 20 to Title 5 of the Yolo County Code regulating medical cannabis cultivation in the county. The Board structured this ordinance as an interim measure to limit harmful environmental impacts while protecting patient access to medical cannabis. This "interim ordinance" would be in effect while state and County staff developed more comprehensive regulatory programs. The interim ordinance, since renamed the Marijuana Cultivation Ordinance, has been amended several times since it was first enacted. The Yolo County-proposed Cannabis Land Use Ordinance (CLUO) would add Article 14 to Title 8, Chapter 2, of the Zoning Regulations within the Yolo County Code. It would regulate all cannabis operations in the unincorporated area of the county. Specific land use requirements and development performance standards are included in the CLUO that address, among many topics, a range of social and environmental issues. Ascent prepared a program EIR for the County's proposed Cannabis Land Use Ordinance. The Final EIR was released in September 2020.

### Green Coast Industries Environmental Review, Yolo County

County of Yolo

#### Project Director

Green Coast Industries is proposing to enter into a Development Agreement with Yolo County to develop a 40-acre parcel. The development includes two mixed-light cannabis cultivation facilities, one facility, and one distribution facility. The project requires demolition of two existing outdoor cultivation facilities and installation of drainage basins for runoff, solar panels, and water wells for irrigation and fire protection. Ascent prepared a mitigated negative declaration for the project.

### Stockton Cannabis Ordinance CEQA Review, San Joaquin County

City of Stockton

#### Project Manager

Ascent was selected to provide recommendations on the proper CEQA review process and streamlining opportunities to the City for the proposed development of its cannabis ordinance.

### Yolo County Cannabis Project Environmental Review

County of Yolo

#### Project Manager

Ascent has been retained to prepare project-level environmental reviews for a series of cannabis cultivation, processing, and nursery facilities proposed in the county that would enter into a special development agreement process in advance of the County's new Cannabis Land Use Ordinance.

### Cannabis Regulation Ordinance Development, Northern California

#### Project Director

Pat provided senior oversight in the development of cannabis dispensary ordinances for several Northern California cities and the associated environmental review prior to joining Ascent.



# Marianne Lowenthal

## PROJECT MANAGER

**YEARS OF EXPERIENCE** 14

### EDUCATION

BS, Environmental Toxicology, University of California, Davis

### WORKSHOPS/SPECIAL TRAINING

Making Effective Use of Mitigated Negative Declarations, Land Use and Environmental Planning in the Era of Climate Change, University of California, Davis Extension, 2008

Wetland Delineation Classroom and Field Training, Richard Chinn Environmental Training, Inc., 2008

### RELEVANT EXPERIENCE

CEQA/NEPA Compliance

Environmental Planning

Water Resources

### AWARD-WINNING PROJECTS

Lake Tahoe Sustainability Action Plan, Tahoe Regional Planning Agency (2014 Award for Innovative Green Community Planning from Sacramento Valley Section and California Chapter APA, 2015 National Planning Achievement Award for Environmental Planning from APA)

Road and Trail Change-in-Use Program EIR, California State Parks (2014 Award for Outstanding Environmental Analysis Document from AEP)

Sacramento County Regional Sanitation District EchoWater Project EIR, Sacramento Regional County Sanitation District (2016 Award for Outstanding Environmental Analysis Document from AEP)

Plan Bay Area: the Regional Transportation Plan/Sustainable Communities Strategies EIR; Metropolitan Transportation Commission (2018 Award of Merit for Environmental Analysis Document from AEP)

Ventura County 2040 General Plan, County of Ventura (2021 Award of Excellence for Comprehensive Planning from Central Coast Section and California Chapter of APA)

Marianne Lowenthal is an environmental planner with extensive experience analyzing projects pursuant to CEQA and NEPA requirements. She has experience working with a broad range of projects and environmental issues, participating in community outreach, conducting legal research, and preparing environmental analyses for CEQA and NEPA documents. She has managed or helped manage environmental compliance documents for flood control, water resources, wastewater treatment, public facilities, land use planning, mixed-use development projects, and regulations. She understands the regulatory guidelines and legal requirements, as well as the nuts and bolts, of preparing and delivering environmental documents.

Marianne has experience in the preparation of environmental documents for cannabis projects, including for the Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities, Calaveras County Medical Cannabis Cultivation Ordinance EIR, Trinity County Cannabis Program EIR, and Yolo County Cannabis Land Use Ordinance Program EIR.

## PROJECT EXPERIENCE

### Amendments to the Humboldt County Code Regulating Commercial Cannabis Activities, Humboldt County

County of Humboldt

#### Assistant Project Manager

The project involves the repeal of the County's existing Commercial Medical Marijuana Land Use Ordinance (Sections 313-55.4 and 314-55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repeal of the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations would be replaced by the provisions of the proposed ordinance, which would establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county. The changes would allow and regulate commercial cannabis facilities for both medical and adult recreational uses. Ascent prepared the EIR for the proposed ordinance. Key environmental issues addressed in the EIR include disclosure of existing illegal cannabis operations, nighttime lighting, air quality impacts associated with roadway dust and odors, biological resources, hydrology and water quality, noise from cultivation and harvesting operations, and groundwater resources. Marianne served as assistant project manager authoring the aesthetics, utilities (including water supply), and public services section of the Draft EIR and responding to comments addressed in the Final EIR. The ordinance was adopted in 2018.

### Green Coast Industries Environmental Review, Yolo County

County of Yolo

#### Project Manager

Green Coast Industries is proposing to enter into a Development Agreement with Yolo County to develop a 40-acre parcel. The development includes two mixed-light cannabis cultivation facilities, one facility, and one distribution facility. The project requires demolition of two existing outdoor cultivation facilities and installation of drainage basins for runoff, solar panels, and water wells for irrigation and fire protection. Ascent prepared a mitigated negative declaration for the project.



# Marianne Lowenthal

## Medical Cannabis Cultivation and Commerce Ordinance EIR, Calaveras County

County of Calaveras

### Environmental Analyst

Calaveras County has become a center of cannabis cultivation over the last several years. The County adopted an interim ordinance in early 2016 and included a variety of provisions aimed at environmental protection, including water quality, odors, and land use compatibility. Ascent was retained to prepare an EIR on the ordinance (as modified) and conducted scoping (including scoping meetings) and field visits (including to grow sites), prepared the project description, and other activities. Ascent analyzed the implications of regulatory changes and the technical issues pertinent to cannabis cultivation and distribution. Ascent evaluated the application of pesticides to non-native plants in sensitive watersheds, as well as examined impacts from hand and mechanized weed management, which is directly analogous to increased cultivation and processing of cannabis. Ascent's air quality group called upon its experience evaluating odors from sources/facilities considering wastewater treatment plants, where distance, wind direction, and odor control play major roles. During preparation of the EIR, the Board of Supervisors also requested consideration of a ban instead of a managed industry. This request required careful crafting of the project objectives and alternatives section of the EIR to provide the County with maximum flexibility when considering their options for countywide regulation of medical cannabis cultivation and commerce. As the environmental analyst, Marianne assisted with the preparation of the Medical Cannabis Cultivation and Commerce Ordinance EIR.

## Trinity County Cannabis Program EIR and Environmental Checklist

County of Trinity

### Environmental Planner

Trinity County initially adopted its first cannabis cultivation ordinance in 2016 and prepared subsequent updates to this ordinance as well as additional ordinances to allow other cannabis uses in the county between 2016 and 2018. Due to litigation and application processing concerns, the County retained Ascent to prepare an EIR for these ordinances (collectively referred to as the Cannabis Program). This work included preparation of required notices, coordination with responsible and trustee agencies during the entire environmental review process (e.g., California Department of Food and Agriculture [now the Department of Cannabis Control], California Department of Fish and Wildlife), public outreach meetings in each of the five Board of Supervisor districts, and maintenance of the administrative record. Ascent also provided advanced input on the extent that this environmental review process can be streamlined/tiered using the EIR for subsequent application for cannabis uses that resulted in the preparation of a customized environmental checklist. Marianne prepared the hydrology and water quality, utilities and service systems, and public services sections of the EIR. The Cannabis Program was re-adopted with amendments in December 2020.

## Yolo County Cannabis Land Use Ordinance Program EIR

County of Yolo

### Environmental Analyst

On March 22, 2016, in response to the Medical Marijuana Regulation and Safety Act and to effect greater local control, the Yolo County Board of Supervisors adopted Ordinance Number 1467 adding Chapter 20 to Title 5 of the Yolo County Code regulating medical cannabis cultivation in the county. The Board structured this ordinance as an interim measure to limit harmful environmental impacts while protecting patient access to medical cannabis. This "interim ordinance" would be in effect while state and County staff developed more comprehensive regulatory programs. The interim ordinance, since renamed the Marijuana Cultivation Ordinance, has been amended several times since it was first enacted. The Yolo County-proposed Cannabis Land Use Ordinance (CLUO) would add Article 14 to Title 8, Chapter 2, of the Zoning Regulations within the Yolo County Code. It would regulate all cannabis operations in the unincorporated area of the county. Specific land use requirements and development performance standards are included in the CLUO that address, among many topics, a range of social and environmental issues. Marianne prepared the hydrology and water quality section. The Final EIR was released in September 2020.



# Lara Rachowicz, PhD

## SENIOR ECOLOGIST

YEARS OF EXPERIENCE 24

### EDUCATION

PhD, Ecology, Department of Integrative Biology, University of California, Berkeley

MPH, Biostatistics/Epidemiology, University of California, Berkeley

BS, Geography, University of Wisconsin, Madison

### SELECTED PUBLICATIONS

Fuller, A., L. Rachowicz, and H. Blair, 2020, "The California Vegetation Treatment Program: integrating biological resource protection into wildfire risk reduction." *California Fish and Wildlife Journal*, Fire Special Issue.

Adams, M. J., N. Chelgren, D. Reinitz, R. Cole, L. Rachowicz, S. Galvan, B. McCreary, C. Pearl, L. Bailey, J. Bettaso, E. Bull, and M. Leu, 2010, "Using Occupancy Models to Understand the Distribution of an Amphibian Pathogen, *Batrachochytrium dendrobatidis*." *Ecological Applications* 20: 289–302.

Rachowicz, L. J., S. Beissinger, and A. Hubbard, 2006, "Evaluating At-Sea Sampling Designs for Marbled Murrelets using a Spatially Explicit Model." *Ecological Modelling* 196: 329–344.

Rachowicz, L. J., J. Hero, R. Alford, J. Morgan, V. Vredenburg, J. Collins, J. Taylor, and C. Briggs, 2005, "The Novel and Endemic Pathogen Hypotheses: Competing Explanations for the Origin of Emerging Diseases of Wildlife." *Conservation Biology* 19: 1441–1448.

Rachowicz, L. J., R. Knapp, J. Parker, M. Stice, J. Morgan, V. Vredenburg, and C. Briggs, 2006, "Emerging Infectious Disease as a Proximate Cause of Amphibian Mass Mortality in California's Sierra Nevada." *Ecology* 87: 1671–1683.

### SELECTED PRESENTATIONS

CEQA Streamlining to Reduce Wildfire Risk: California Vegetation Treatment Program, a presentation at The Western Section of The Wildlife Society annual meeting (February 7, 2020)

Lara Rachowicz, PhD, is an ecologist with 24 years of technical and project management experience throughout California, with a focus on special-status species. She supports environmental review by providing senior technical expertise and quality assurance of environmental documents required under CEQA and NEPA. She focuses on CEQA and regulatory streamlining strategies for ecosystem resilience and wildfire risk reduction projects. Lara also has experience preparing CEQA documents for highly controversial energy and infrastructure projects (e.g., electrical transmission systems, pipeline facilities, renewable energy facilities, rail facilities). She evaluates environmental impacts and plans mitigation programs; supports project permitting and the negotiation of mitigation agreements; and manages construction, compliance, and mitigation activities. Lara's ecological research and federal land and resource management experience has focused on threats to vulnerable wildlife populations, primarily amphibian and avian species.

## PROJECT EXPERIENCE

### California Vegetation Treatment Program: Program EIR, Training, and Implementation, Statewide

California Board of Forestry and Fire Protection

#### Senior Biologist/Task Manager

In response to the state's wildfire crisis, the Board of Forestry and Fire Protection developed the CalVTP to implement vegetation treatments to reduce wildfire risk and promote landscape resiliency on over 20 million acres of the State Responsibility Area. Ascent led preparation of the Program EIR, which is designed to streamline CEQA review of later vegetation treatment projects consistent with the CalVTP. Lara co-led the biological resources CEQA analysis for the Program EIR. She provided senior review for the biological resources section. Lara coordinated with the Board, CAL FIRE, and CDFW to help draft and finalize the biological impact analysis, CEQA compliance strategies, and mitigation measures for the Program EIR.

The Board certified the CalVTP Program EIR in December 2019 and retained Ascent to support its implementation. Ascent designed, prepared the curriculum for, and conducted a CalVTP training program. The program's primary objective was to educate participants on how to complete a Project-Specific Analysis (PSA) and how to use the Program EIR to maximize CEQA streamlining and expedite delivery of wildfire risk reduction projects throughout California. Ascent is providing technical assistance to the Board by preparing a library of example PSAs for multiple project proponents to assist with increasing the pace and scale of wildfire resilience projects in the state. Lara prepared the curriculum related to biological resources for the statewide CalVTP training program and participated in the statewide training events as a panelist. She prepares efficiency tools to expedite implementation of the Program EIR, manages the preparation of multiple PSAs, leads consultation with CDFW and USFWS, and provides QA/QC for the biological resources aspects of the program.

# Lara Rachowicz, PhD

## Last Chance Road and Skylark Ranch Forest Health Project PSAs and Coastal Vegetation Treatment Standards, Santa Cruz County

Resource Conservation District of Santa Cruz County

### Senior Biologist

The 2020 CZU Lightning Complex burned extensive portions of the Santa Cruz Mountains, leaving behind large amounts of dead and dying vegetation and degraded habitat conditions. The Resource Conservation District of Santa Cruz County (RCD) proposed two vegetation treatment projects to remove dead and dying vegetation and improve habitat conditions and ecological resilience. Treatments are proposed within the Coastal Zone in areas with an approved Public Works Plan (PWP). The RCD used the CalVTP Program EIR to accelerate CEQA compliance and implementation of these vegetation treatment projects. Ascent prepared two Project-Specific Analyses and associated Coastal Vegetation Treatment Standards (CVTS) for the RCD's projects. Lara provided senior review of the biological resource sections of the PSAs and Mitigation Monitoring and Reporting Program (MMRP). Pursuant to the CalVTP Program EIR, she led consultation with CDFW and USFWS for ringtonail, mountain lion, and California red-legged frog.

## Marine Aquaculture Program EIR, Statewide

California Department of Fish and Wildlife

### Senior Biologist

Pursuant to the Sustainable Oceans Act, also known as SB 201 (2006), Ascent prepared a Program EIR to streamline CEQA review of lease applications for offshore marine aquaculture in state waters along the California coast. The EIR assesses potential future leases and operations statewide, although optimal conditions for such operations would likely occur between Point Conception and the US/Mexico border. Lara led preparation of the biological resources section of the EIR.

## Cambria Reserves Restoration and Vegetation Treatment Project, San Luis Obispo County

Upper Salinas-Las Tablas Resource Conservation District

### Project Manager

The Upper Salinas-Las Tablas Resource Conservation District is proposing vegetation treatments in the Cambria Pines Ecological Reserve, which is owned and managed by the California Department of Fish and Wildlife, and the Kenneth S. Norris Rancho Marino Reserve, managed by the University of California Natural Reserve System. Project objectives include restoring the sensitive native Monterey pine forests in the reserves and minimizing conditions that lead to catastrophic fire. The two reserves are within the Coastal Zone in areas with an approved Public Works Plan (PWP). Lara is currently serving as the project manager for the preparation of the PSA and associated CVTS.

## Hill Campus Wildland Vegetative Fuel Management Plan EIR, Alameda and Contra Costa Counties

University of California, Berkeley

### Senior Biologist

UC Berkeley's Hill Campus Wildland Vegetative Fuel Management Plan describes vegetation management activities it would implement to prevent and protect against wildfire and promote sustainable forest management on its 800-acre Hill Campus. The Hill Campus is located in a Very High Fire Hazard Severity Zone, as identified by CAL FIRE, and is located near residences and University assets at risk. Much of the Hill Campus is habitat for the Alameda whipsnake (*Masticophis lateralis euryxanthus*), which is listed as threatened under both the California and federal endangered species acts. Ascent prepared an EIR with a dual function as a program EIR to streamline later activities and as a project-level EIR to support approval of specific vegetation treatment projects to meet the schedule requirements of a CAL FIRE grant. Lara led the biological resources section of the EIR and wrote robust mitigation measures to protect Alameda whipsnake.

## Lake Tahoe Program Timberland EIR, Tahoe Basin

Lake Valley Fire Protection District/California Department of Forestry and Fire Protection

### Project Manager

The Lake Tahoe Program Timberland EIR (PTEIR) evaluates the effects of vegetation management actions across private, local, and state lands throughout the wildland-urban interface on the California side of the Lake Tahoe Basin consistent with CEQA and the Forest Practice Act. The effort included strategy development to identify the most efficient and effective approaches to conduct the programmatic environmental review, comply with CEQA and Forest Practice Act requirements, and streamline the approval and delivery of vegetation management projects. Following development of the environmental review strategy, Ascent led a team that worked cooperatively with CAL FIRE, local fire protection districts, the California Tahoe Conservancy, and the US Forest Service Pacific Southwest Research Station to prepare a PTEIR that is legally defensible and streamlines subsequent project approvals through a tiered, checklist-based approach. Lara prepared written responses to public and agency comments on the biological resources section of the Draft PTEIR and prepared associated changes to the Final PTEIR.



# Dimitri Antoniou, AICP

## SENIOR AIR QUALITY AND NOISE SPECIALIST

YEARS OF EXPERIENCE 12

### EDUCATION

MS, City and Regional Planning,  
California Polytechnic State University,  
San Luis Obispo

BS, Environmental Management and  
Protection, California Polytechnic State  
University, San Luis Obispo

### CERTIFICATIONS

American Institute of Certified Planners  
(No. 02817)

### TRAINING

Lakes Environmental AERMOD Air  
Dispersion Modeling Course

GIS Mapping and Disaster Planning  
Contractor: Cal Fire San Luis Obispo

### SOFTWARE CAPABILITIES

ArcGIS, CalEEMod, AERMOD, HARP,  
Google Earth, Microsoft Office Suite,  
Adobe Design Suite

### PROFESSIONAL AFFILIATIONS

American Planning Association  
California (APACA)

### PUBLICATIONS

Antoniou, Dimitri Theodore. (2010).  
Background Report for the Water  
Conservation Handbook. MS of City and  
Regional Planning. California Polytechnic  
University, San Luis Obispo, CA.

### REPRESENTATIVE PROFESSIONAL PRESENTATIONS

September 2017. "Community Risk  
Reduction Strategy: A Hayward Case  
Study," Session Speaker, Sacramento  
Valley Section APACA Speaker Series,  
Sacramento

Dimitri Antoniou, AICP, is a senior air quality/greenhouse gas, energy, and noise specialist with 12 years of experience conducting, reviewing, and overseeing the preparation of technical analyses for CEQA compliance. His technical proficiency and understanding of the modeling tools and methods used in CEQA analyses position him as a leader in Ascent's air quality, GHG, and noise technical practice. He provides technical assistance to Ascent's staff, clients, and regulatory agencies regarding appropriate methods of analysis for consistency with local (e.g., air districts, noise ordinances), state (e.g., CEQA case law, CARB Scoping Plan), and federal (NEPA, HUD) laws. In addition, Dimitri oversees the preparation of HRAs, ranging from small construction to large university campus projects, and reviews all technical modeling for accuracy and compliance with CEQA. He also trains technical staff on the use of air dispersion models, mass emissions models, noise monitoring and noise modeling (e.g., traffic noise, stationary noise sources). Dimitri regularly conducts peer reviews of other consultants' work for CEQA compliance and technical adequacy, including reviews of model inputs and assumptions. He has a deep understanding of the various types of CEQA documents and associated different levels of technical analysis needed for each, always applying this extensive knowledge when preparing scopes of work, developing technical approaches to analyses, and conducting quality control reviews.

## PROJECT EXPERIENCE

### Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR

County of Humboldt

#### Air Quality and Noise Analyst

The project involves the repeal of the County's existing Commercial Medical Marijuana Land Use Ordinance (Sections 313-55.4 and 314-55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repeal of the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations would be replaced by the provisions of the proposed ordinance, which would establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county. The changes would allow and regulate commercial cannabis facilities for both medical and adult recreational uses. Ascent prepared the EIR for the proposed ordinance. Key environmental issues addressed in the EIR include disclosure of existing illegal cannabis operations, nighttime lighting, air quality impacts associated with roadway dust and odors, biological resources, hydrology and water quality, noise from cultivation and harvesting operations, and groundwater resources. The ordinance was adopted in 2018.

### As-Needed Air Quality and Climate Change Services, San Diego County

County of San Diego, Planning and Development Services

#### Air Quality and Climate Change Specialist

Dimitri serves as an air quality and climate change specialist adjunct staff at the County of San Diego's Department of Planning and Development Services (PDS). In this role, he is responsible for review of applicant-submitted air quality and climate change technical studies and environmental document sections (e.g., EIRs, 15168 Checklists), for technical accuracy and

## Dimitri Antoniou, AICP

compliance with County and CEQA guidelines. Dimitri provides input and reviews at various stages of a project, including scoping letters, initial reviews, iteration reviews, County Counsel (I-119 reviews), conditions of approval, and Planning Commission and Board of Supervisors hearings. His expertise includes extensive experience in the preparation of such studies and use of emissions models such as CalEEMod, EMFAC, and OFFROAD, as well as models used to conduct health risk assessments, including AERMOD and HARP. His work includes detailed reviews of the modeling input parameters and modeling results. He also guides the applicant team in the preparation of HRAs to ensure compliance with local and state laws. His work involves close coordination with project managers in the PDS Project Planning Division and local agencies such as the San Diego County Air Pollution Control District. During the project review process, he leads CEQA strategy discussions that may involve County staff, project applicants, and other technical consultants, where he provides technical methodology recommendations and oversight to ensure the preparation of legally defensible CEQA analyses. As the on-call specialist, Dimitri also provides ongoing strategic advice on the implementation and monitoring of the County's adopted Climate Action Plan.

### Carlsbad EA/FONSI for the HUD Environmental Assessment, San Diego County

City of Carlsbad

#### Project Manager

Ascent assisted the City of Carlsbad, as the Responsible Entity under NEPA and HUD, with preparation of an EA/FONSI for the proposed Windsor Pointe Project, a 50-unit affordable multifamily housing project. Affirmed Housing Group sought tax credit bonds, Housing and Community Development Multifamily Housing Program, and No Place Like Home funds, administered by HUD, to construct the project. The project proposes to construct 50 affordable housing units on scattered sites, targeting low-income and homeless veterans. Ascent prepared an EA/FONSI for HUD approval, pursuant to NEPA and HUD regulations (24 CFR Part 58). The EA/FONSI includes a discussion of the proposed project and compliance with applicable laws and authorities required by 24 CFR 58.5 and 58.6 and will include an analysis of all Environmental Assessment Factors required by 24 CFR 58.40; Ref 40 CFR 1508.8 and 1508.27. Specific topic areas include detailed analysis include a quantitative air quality conformity applicability assessment, consistent with Clean Air Act (Title 40 CFR Subpart B), include emissions modeling and comparison to de minimis levels, historic preservation analysis, consistent with Sections 106 and 110 of 36 CFR Part 800, and a noise assessment, meeting requirements of 24 CFR Part 51 Subpart B, that include site acceptability noise standards. Dimitri was the project manager who led the preparation of the environmental document, coordinated staff and subconsultants, and led the City through the HUD and NEPA compliance process. The EA/FONSI was approved, and the City was issued the authority to use grant funds by HUD in August 2020.

### Rancho Cucamonga Peer Review Services, San Bernardino County

City of Rancho Cucamonga

#### Senior Air Quality, Climate Change, and Noise Specialist

Ascent was retained by the City to assist with CEQA reviews of a car wash and an industrial warehouse. The Ascent team conducted a technical review of both IS/MNDs. Dimitri conducted a technical CEQA review for the air quality, GHG, and noise analyses in the IS/MNDs. He provided comments to the City's consultant to improve overall defensibility of the documents, including refining and improving mitigation measures, as well as ensuring appropriate thresholds of significance were used.

### Road and Trail Change-in-Use Evaluation Process Program EIR, Statewide

California Department of Parks and Recreation

#### Air Quality, Climate Change, and Noise Analyst

The California Department of Parks and Recreation proposes to implement the program on a statewide scale to facilitate the review of proposals to change uses of existing recreational roads and trails throughout the State Park system. Potential project actions that may result from a change-in-use include reconstruction of an existing road or trail; installation of speed control or use separation devices; minor rerouting of trail alignments to correct an existing environmental problem; installation of hardened surfaces; closure, decommissioning, and restoration of existing roads and trails; or conversion of roads to trails. Ascent prepared the program EIR for the Road and Trail Change-in-Use Evaluation Process Program. Key issues addressed in the EIR were erosion, stream sedimentation and water quality, cultural resources, sensitive species and habitats, and scenic impacts. Dimitri prepared the air quality and noise sections for this document. The air quality analysis was conducted using URBEMIS software and determined acceptable air quality mass emission limits that all change-in-use projects occurring throughout the state must comply with to meet all California air districts' recommended air quality thresholds. The noise analysis required the development of specific project requirements that all change-in-use projects would be required to follow so that excessive noise would not adversely impact any residence in close proximity to any of the California State Parks.



# Alta Cunningham

SENIOR CULTURAL RESOURCES SPECIALIST

YEARS OF EXPERIENCE 22

## EDUCATION

MA, Historic Preservation, Savannah College of Art and Design

BS, History, University of California, Davis

## PROFESSIONAL AFFILIATIONS

California Preservation Foundation

## AWARDS

Midpeninsula Regional Open Space District Bear Creek Redwoods Preserve Plan and EIR (2017 Award for Outstanding Planning Document from AEP)

Plan Bay Area: Regional Transportation Plan/Sustainable Communities Strategies EIR (2018 Award of Merit for Environmental Analysis Document from AEP)

Alta Cunningham has 22 years of experience in the environmental consulting field. Her experience as an architectural historian includes archival research, historic building and structure surveys and evaluations, and cultural resources documentation for NEPA and CEQA projects ranging from single building evaluations to district-wide surveys for CEQA, PRC Section 5024, and Section 106 compliance documents. She has completed evaluations for higher education facilities, pre- and post-World War II residential and commercial buildings, agricultural properties, and water conveyance systems. Alta meets the Secretary of the Interior's Professional Qualification Standards for architectural history and history. She also serves as a skilled deputy project manager for EIRs and has coordinated multiple environmental projects. Alta provides technical expertise for CEQA documents and has prepared numerous technical sections, covering aesthetics, agricultural resources, cultural resources, geology and soils, land use and planning, and public services.

## PROJECT EXPERIENCE

### Calaveras County Medical Cannabis Cultivation and Commerce Ordinance EIR County of Calaveras

#### Environmental Planner

Calaveras County has become a center of cannabis cultivation over the last several years. The County adopted an interim ordinance in early 2016 and included a variety of provisions aimed at environmental protection, including water quality, odors, and land use compatibility. Ascent was retained to prepare an EIR on the ordinance (as modified) and has conducted scoping (including scoping meetings), field visits (including to grow sites), project description preparation, and other activities in preparation of the EIR. Ascent analyzed the implications of regulatory changes and the technical issues pertinent to cannabis cultivation and distribution. Ascent also evaluated the application of pesticides to non-native plants in sensitive watersheds, as well as examined impacts from hand and mechanized weed management, which is directly analogous to increased cultivation and processing of cannabis. Ascent's air quality group called upon its experience evaluating odors from sources/facilities considering wastewater treatment plants, where distance, wind direction, and odor control play major roles. During preparation of the EIR, the Board of Supervisors also requested consideration of a ban instead of a managed industry. This required careful crafting of the project objectives and alternatives section of the EIR to provide the County with maximum flexibility when considering their options for countywide regulation of medical cannabis cultivation and commerce.

### Trinity County Cannabis Program EIR and Environmental Checklist County of Trinity

#### Environmental Planner/Architectural Historian

Trinity County initially adopted its first cannabis cultivation ordinance in 2016 and prepared subsequent updates to this ordinance as well as additional ordinances to allow other cannabis uses in the county between 2016 and 2018. Due to litigation and application processing concerns, the County retained Ascent to prepare an EIR for these ordinances (collectively referred to as the Cannabis Program). This work included preparation of required notices, coordination with

# Alta Cunningham

responsible and trustee agencies during the entire environmental review process (e.g., California Department of Food and Agriculture [now the Department of Cannabis Control], California Department of Fish and Wildlife), public outreach meetings in each of the five Board of Supervisor districts, and maintenance of the administrative record. Ascent also provided advanced input on the extent that this environmental review process can be streamlined/tiered using the EIR for subsequent application for cannabis uses that resulted in the preparation of a customized environmental checklist. The Cannabis Program was re-adopted with amendments in December 2020.

## Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR

County of Humboldt

### Environmental Planner

The project involves the repeal of the County's existing Commercial Medical Marijuana Land Use Ordinance (Sections 313-55.4 and 314 55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repeal of the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations would be replaced by the provisions of the proposed ordinance, which would establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county. The changes would allow and regulate commercial cannabis facilities for both medical and adult recreational uses. Ascent prepared the EIR for the proposed ordinance. Key environmental issues addressed in the EIR include disclosure of existing illegal cannabis operations, nighttime lighting, air quality impacts associated with roadway dust and odors, biological resources, hydrology and water quality, noise from cultivation and harvesting operations, and groundwater resources. The ordinance was adopted in 2018.

## Yolo County Cannabis Land Use Ordinance Program EIR

County of Yolo

### Environmental Planner

On March 22, 2016, in response to the Medical Marijuana Regulation and Safety Act and to effect greater local control, the Yolo County Board of Supervisors adopted Ordinance Number 1467 adding Chapter 20 to Title 5 of the Yolo County Code regulating medical cannabis cultivation in the county. The Board structured this ordinance as an interim measure to limit harmful environmental impacts while protecting patient access to medical cannabis. This "interim ordinance" would be in effect while state and County staff developed more comprehensive regulatory programs. The interim ordinance, since renamed the Marijuana Cultivation Ordinance, has been amended several times since it was first enacted. The Yolo County-proposed Cannabis Land Use Ordinance (CLUO) would add Article 14 to Title 8, Chapter 2, of the Zoning Regulations within the Yolo County Code. It would regulate all cannabis operations in the unincorporated area of the county. Specific land use requirements and development performance standards are included in the CLUO that address, among many topics, a range of social and environmental issues. The Final EIR was released in September 2020. Alta prepared the cultural resources section for the EIR.



## Linda Leeman

### PRINCIPAL/NATURAL RESOURCES PRACTICE LEADER

**YEARS OF EXPERIENCE** 23

#### EDUCATION

MS, Natural Resources, Humboldt State University

BS, Wildlife and Fisheries Biology, University of California, Davis

#### PROFESSIONAL AFFILIATIONS

The Wildlife Society Executive Board Member, 2006–2014

Association of Environmental Professionals

Central Valley Bird Club

#### CERTIFICATIONS

Certified Wildlife Biologist by the Wildlife Society since February 2005

Professional Development Certificate by the Wildlife Society

#### AWARDS AND HONORS

EchoWater Project EIR, Sacramento Regional County Sanitation District (2016 Award for Outstanding Environmental Analysis Document from AEP)

State Wildlife Action Plan 2015 Update, AEP Outstanding Environmental Resource Plan

AEP National Environmental Excellence Award in the category of Environmental Stewardship, April 2013, San Joaquin River Restoration Program, EIR/EIS

#### PRESENTATIONS/PUBLICATIONS

"Major Environmental Regulations: Practical Knowledge for Biologists" Workshop at TWS-WS Annual Meeting, Reno, NV February 8, 2022.

"Climate Change at the Local Level: how climate adaptation can be incorporated into natural resources management decisions." Presentation at TWS-WS Annual Meeting, Pomona, CA February 25, 2016.

Linda Leeman is Ascent's Natural Resources Principal and Practice Leader with 23 years of professional experience. She specializes in habitat assessments, biological resources impact analyses, and endangered species permitting. Linda has extensive experience with CEQA, NEPA, and federal and California ESA compliance for projects throughout Northern California. She is adept at managing teams of technical specialists and providing senior review, quality assurance, and budgetary oversight. She regularly coordinates with local, state, and federal regulatory and resource management agencies, providing reliable, unbiased information to help inform regulatory decisions that allow her clients to achieve their objectives. Linda is a Certified Wildlife Biologist.

### PROJECT EXPERIENCE

#### Medical Cannabis Cultivation and Commerce Ordinance EIR, Calaveras County County of Calaveras

##### Senior Biologist

Calaveras County has become a center of cannabis cultivation over the last several years. The County adopted an interim ordinance in early 2016 and included a variety of provisions aimed at environmental protection, including water quality, odors, and land use compatibility. Ascent has been retained to prepare an EIR on the ordinance (as modified) and has conducted scoping (including scoping meetings), field visits (including to grow sites), project description preparation, and other activities in preparation of the EIR. We analyzed the implications of regulatory changes and the technical issues pertinent to cannabis cultivation and distribution. We evaluated the application of pesticides to non-native plants in sensitive watersheds, as well as examined impacts from hand and mechanized weed management, which is directly analogous to increased cultivation and processing of cannabis. Ascent's air quality group called upon its experience evaluating odors from sources/facilities considering wastewater treatment plants, where distance, wind direction, and odor control play major roles. During preparation of the EIR, the Board of Supervisors also requested consideration of a ban instead of a managed industry. This required careful crafting of the project objectives and alternatives section of the EIR to provide the County with maximum flexibility when considering their options for countywide regulation of medical cannabis cultivation and commerce.

#### Humboldt County Cannabis Program EIR County of Humboldt

##### Senior Biologist

Linda oversaw preparation of the biological resources section of the EIR for Humboldt County's proposed Commercial Cannabis Land Use Ordinance. The purpose of the ordinance is to provide a more comprehensive set of regulations for all aspects of commercial cannabis operations, as well as regulate future facilities and operations. Because of the large geographic area and number of sensitive species that could be affected, the analysis was complex and comprehensive. In addition, because cannabis cultivation is not a federally authorized activity, federally protected resources needed to be avoided.

# Linda Leeman

## Trinity County Cannabis Project EIR

County of Trinity

### Senior Biologist

Linda oversaw preparation of the biological resources section of the EIR for Trinity County's Cannabis Program. The project involved a programmatic environmental review for preparing for a series of County ordinances that comprise the County's cannabis licensing program for cultivation, distribution, and retail uses. Because cannabis cultivation is not a federally authorized activity, federally protected resources needed to be avoided.

## \*Wildlife Sanctuary Development, Sonoma County

City of Santa Rosa

### Wildlife Biologist

Linda developed design plans for a wildlife sanctuary to be located adjacent to an urban park and recreation area. The objective of the project was to optimize wildlife habitat and provide opportunities for wildlife education. Constraints to the project include limited land availability, the urban setting, and water storage requirements. Key tasks included an analysis of existing natural vegetation, wildlife habitats, and locations of sensitive species; literature review and consultation with local experts; and identification of appropriate design and uses for the wildlife sanctuary.

## Biological Resources Evaluations, Sonoma County

BSK Associates

### Principal-in-Charge

Ascent has assisted BSK with several constraints-level analyses of biological resources for properties proposed for development in Santa Rosa. Linda has directed biologists to conduct reconnaissance-level surveys for biological resources, evaluation of potential for sensitive species to be present, and mapping of aquatic features. Several properties have been in the Plan Area for the Santa Rosa Plain Conservation Strategy. The constraints analyses have included identifying potential mitigation requirements and costs, with recommendations to avoid and minimize biological impacts.

## \*Garibaldi Ranch Development Project, Solano County

Discovery Builders, Inc.

### Wildlife Biologist

Linda conducted protocol-level surveys for California red-legged frog and prepared a habitat assessment report for USFWS to evaluate potential effects of a 222-acre residential development, public space, and open space project in Fairfield. Several adult California red-legged frogs were documented on the project site. Survey results and the report were used in support of acquiring state and federal permits for the project.

## California Statewide Vegetation Treatment Program EIR, Statewide

Board of Forestry and Fire Protection

### Principal Biologist

In response to the state's wildfire crisis, the Board of Forestry and Fire Protection and the California Department of Forestry and Fire Protection (CAL FIRE) developed the California Vegetation Treatment Program (CalVTP) to implement vegetation treatments to reduce wildfire risk and promote landscape resiliency within 20 million acres of the State Responsibility Area. The CalVTP will increase the pace and scale of vegetation treatment to a target of 250,000 acres per year pursuant to Executive Order B-52-19. Treatments include prescribed burning, manual and mechanical methods, herbicide application, and prescribed herbivory in various combinations to implement fuel breaks, wildland-urban interface treatments and ecological restoration in fire-adapted vegetation communities. Ascent led preparation of the Program EIR (PEIR), which is designed to streamline CEQA review of later vegetation treatment projects consistent with the CalVTP, including using "within the scope" findings according to CEQA Guidelines Section 15168 and speed project approval and implementation. Linda oversaw biological resources CEQA analysis for the PEIR.



# Allison Fuller

## WILDLIFE BIOLOGIST

YEARS OF EXPERIENCE 13

### EDUCATION

MS, Biological Sciences, Humboldt State University, Arcata

BS, Environmental Biology, Humboldt State University, Arcata

### PERMITS

CDFW Scientific Collecting Permit

### CERTIFICATIONS

Yolo HCP/NCCP Qualified Biologist

### PROFESSIONAL AFFILIATIONS

The Wildlife Society, Western Section

Pacific Seabird Group

### SOFTWARE CAPABILITIES

CNDDb, BIOS, Access

### REPRESENTATIVE PROFESSIONAL WORKSHOPS/PRESENTATIONS

Fuller, A. R., G. J. McChesney, and R. T. Golightly. 2016. Aircraft Disturbance to Common Murres (*Uria aalge*) at a Central California Breeding Colony. Presented at the Wildlife Society Western Section Annual Meeting, Pomona, CA. February 25, 2016.

Fuller, A. R., G. J. McChesney, and R. T. Golightly. 2015. Common Murre (*Uria aalge*) Breeding Population Trends in Central California, 2000–2014. Presented at the Pacific Seabird Group annual meeting, San Jose, CA. February 19, 2015.

Fuller, A., L. Rachowicz, S. Henderson, and H. Blair. 2020. Species-Specific Impact Mitigation for the California Vegetation Treatment Program. Presented at the Wildlife Society Western Section Annual Meeting, Redding, CA. February 7, 2020.

Fuller, A.R., L. Leeman, S. Henderson, and T. Beyerl. 2021. Applications for Wildlife Disturbance Studies in California Environmental Quality Act Analyses. Presented at the Wildlife Society Western Section Annual Meeting (Virtual). February 1, 2021.

### PUBLICATIONS

Fuller, Allison, Lara Rachowicz, and Heather Blair. 2020. "The California Vegetation Treatment Program: Integrating Biological Resource Protection into Wildfire Risk Reduction." *California Fish and Wildlife*, Fire Special Issue, 44–49.

Fuller, Allison, Gerard McChesney, and Richard Golightly. 2018. "Aircraft Disturbance to Common Murres (*Uria aalge*) at a Breeding Colony in Central California, USA." *Waterbirds*, 41: 257–267.

Allison Fuller is a wildlife biologist with more than 13 years of experience. She specializes in focused wildlife surveys in terrestrial and marine environments as well as data analysis and interpretation. Her field experience includes work with birds, terrestrial mammals, and marine mammals, including special-status species such as burrowing owl, tricolored blackbird, marbled murrelet, and Steller sea lion. Allison has experience conducting preconstruction nesting bird and burrowing owl surveys, as well as reconnaissance-level wildlife and habitat surveys. She prepares biological resource analyses for various environmental documents, including environmental impact reports, initial studies, biological assessments, and biological evaluations. Using her strong organization and communication skills, Allison is especially adept at managing datasets and providing clear interpretation of the results.

## PROJECT EXPERIENCE

### Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR

County of Humboldt

#### Wildlife Biologist

The project involves the repeal of the County's existing Commercial Medical Marijuana Land Use Ordinance (Sections 313-55.4 and 314-55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repeal of the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations would be replaced by the provisions of the proposed ordinance, which would establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county. The changes would allow and regulate commercial cannabis facilities for both medical and adult recreational uses. Ascent prepared the EIR for the proposed ordinance. Key environmental issues addressed in the EIR include disclosure of existing illegal cannabis operations, nighttime lighting, air quality impacts associated with roadway dust and odors, biological resources, hydrology and water quality, noise from cultivation and harvesting operations, and groundwater resources. The ordinance was adopted in 2018. Allison assisted in preparation of the Administrative Draft EIR for the proposed Commercial Cannabis Land Use Ordinance.

### Trinity County Cannabis Project EIR and Environmental Checklist

County of Trinity

#### Wildlife Biologist

Trinity County initially adopted its first cannabis cultivation ordinance in 2016 and prepared subsequent updates to this ordinance as well as additional ordinances to allow other cannabis uses in the county between 2016 and 2018. Due to litigation and application processing concerns, the County retained Ascent to prepare an EIR for these ordinances (collectively referred to as the Cannabis Program). This work included preparation of required notices, coordination with responsible and trustee agencies during the entire environmental review process (e.g., California Department of Food and Agriculture [now the Department of Cannabis Control], California Department of Fish and Wildlife), public outreach meetings in each of the five Board of Supervisor districts, and maintenance of the administrative record. Ascent also provided advanced input on

## Allison Fuller

the extent that this environmental review process can be streamlined/tiered using the EIR for subsequent application for cannabis uses that resulted in the preparation of a customized environmental checklist. The Cannabis Program was re-adopted with amendments in December 2020. Allison prepared the biological resources section of the EIR.

### Yolo County Cannabis Land Use Ordinance Program EIR

County of Yolo

#### Wildlife Biologist

On March 22, 2016, in response to the Medical Marijuana Regulation and Safety Act and to effect greater local control, the Yolo County Board of Supervisors adopted Ordinance Number 1467 adding Chapter 20 to Title 5 of the Yolo County Code regulating medical cannabis cultivation in the county. The Board structured this ordinance as an interim measure to limit harmful environmental impacts while protecting patient access to medical cannabis. This "interim ordinance" would be in effect while state and County staff developed more comprehensive regulatory programs. The interim ordinance, since renamed the Marijuana Cultivation Ordinance, has been amended several times since it was first enacted. The Yolo County-proposed Cannabis Land Use Ordinance (CLUO) would add Article 14 to Title 8, Chapter 2, of the Zoning Regulations within the Yolo County Code. It would regulate all cannabis operations in the unincorporated area of the county. Specific land use requirements and development performance standards are included in the CLUO that address, among many topics, a range of social and environmental issues. The Final EIR was released in September 2020. Allison prepared the biological resources section of this EIR.

### Kind Farms Cannabis, Yolo County

County of Yolo

#### Wildlife Biologist

As part of the On-Call Environmental Review Assistance for Cannabis Projects contract, Yolo County retained Ascent to prepare environmental documents for Early Development Agreement (DA) cannabis projects under the County's Early Implementation Development Agreement program. This program provides a unique environmental review and entitlement process for outdoor cannabis cultivation sites proposing to convert to cultivation in a structure, as well as the opportunity to conduct commercial cannabis nursery and processing operations. Allison prepared the biological resources section of the Kind Farms Cannabis IS/MND.

### Green Coast Industries Cannabis, Yolo County

County of Yolo

#### Wildlife Biologist

Green Coast Industries is proposing to enter into a Development Agreement with Yolo County to develop a 40-acre parcel. The development includes two mixed-light cannabis cultivation facilities, one facility, and one distribution facility. The project requires demolition of two existing outdoor cultivation facilities and installation of drainage basins for runoff, solar panels, and water wells for irrigation and fire protection. Ascent prepared a mitigated negative declaration for the project. Allison conducted a reconnaissance-level survey of the project site, prepared the biological resources section of the IS/MND, participated in meetings and calls with the applicant and County, prepared a planning-level survey report pursuant to the Yolo HCP/NCCP, and prepared Yolo HCP/NCCP application documents for the applicant.



## Zachary Miller, AICP

### TRANSPORTATION PLANNER

YEARS OF EXPERIENCE 14

#### EDUCATION

MS, City and Regional Planning,  
Environmental Planning Emphasis,  
California Polytechnic State University,  
San Luis Obispo

MS, Engineering, Transportation  
Planning, California Polytechnic State  
University, San Luis Obispo

BA, Urban Studies and Planning,  
University of California, San Diego

#### CERTIFICATIONS

American Institute of Certified Planners  
(No. 025880)

#### PROFESSIONAL AFFILIATIONS

American Planning Association (APA)  
member

#### SOFTWARE CAPABILITIES

ArcGIS, Adobe Design Suite, AutoCAD,  
Synchro

Zachary Miller, AICP, is an environmental and transportation planner with 14 years of experience in transportation planning, long-range planning, land use planning, and environmental impact analysis. He is an expert in addressing CEQA's requirement for vehicle miles traveled (VMT) analysis as the basis for transportation impacts. Zachary has worked on a variety of transportation projects throughout the state, ranging from multibillion-dollar public transportation infrastructure and transit projects to small-scale traffic studies. He has reviewed and commented on transportation sections prepared for CEQA environmental documents by transportation subconsultants. He specializes in working with transportation planning and traffic engineering consultants to ensure their technical analysis will adequately support a CEQA section.

Zachary has worked on a variety of CEQA and NEPA environmental documents, including environmental impact reports, initial studies, and technical studies. Prior to joining Ascent, he worked as a transportation planning consultant and received dual master's degrees in city and regional planning and civil engineering at California Polytechnic State University, San Luis Obispo, where his focus was on environmental and transportation planning, respectively.

## PROJECT EXPERIENCE

### Amendments to Humboldt County Code Regulating Commercial Cannabis Activities EIR

County of Humboldt

#### Transportation Planner

The project involves the repeal of the County's existing Commercial Medical Marijuana Land Use Ordinance (Sections 313-55.4 and 314-55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repeal of the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations would be replaced by the provisions of the proposed ordinance, which would establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis in the county. The changes would allow and regulate commercial cannabis facilities for both medical and adult recreational uses. Ascent prepared the EIR for the proposed ordinance. Key environmental issues addressed in the EIR include disclosure of existing illegal cannabis operations, nighttime lighting, air quality impacts associated with roadway dust and odors, biological resources, hydrology and water quality, noise from cultivation and harvesting operations, and groundwater resources. The ordinance was adopted in 2018. Zachary served as the project transportation analyst for the CEQA review of the project. He developed the transportation analysis methodology and performed the analysis for determining whether implementation of the project would result in significant environmental effects related to transportation.

# Zachary Miller, AICP

## Yolo County Cannabis Land Use Ordinance Program EIR

County of Yolo

### Transportation/Environmental Planner

Ascent prepared a program EIR for the County's proposed Cannabis Land Use Ordinance. The EIR evaluated five alternatives (project plus four alternatives) at an equal level of detail in order to cover a range of options for the proposed ordinance that Yolo County may consider. Zachary worked collaboratively with the transportation planning/traffic subconsultant to ensure the technical analysis adequately supported the CEQA section and the Yolo County Transportation Impact Study Guidelines. He also developed the analytical approach based the recently updated State CEQA Guidelines related to VMT, conducted the associated transportation analysis, and prepared the transportation section of the EIR. The Final EIR was released in September 2020.

## Trinity County Cannabis Program EIR and Environmental Checklist

County of Trinity

### Transportation and Noise Task Lead

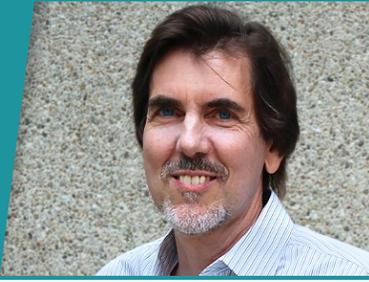
Trinity County initially adopted its first cannabis cultivation ordinance in 2016 and prepared subsequent updates to this ordinance as well as additional ordinances to allow other cannabis uses in the county between 2016 and 2018. Due to litigation and application processing concerns, the County retained Ascent to prepare an EIR for these ordinances (collectively referred to as the Cannabis Program). This work included preparation of required notices, coordination with responsible and trustee agencies during the entire environmental review process (e.g., California Department of Food and Agriculture [now the Department of Cannabis Control], California Department of Fish and Wildlife), public outreach meetings in each of the five Board of Supervisor districts, and maintenance of the administrative record. Ascent also provided advanced input on the extent that this environmental review process can be streamlined/tiered using the EIR for subsequent application for cannabis uses that resulted in the preparation of a customized environmental checklist. The Cannabis Program was re-adopted with amendments in December 2020.

## Calaveras County Medical Cannabis Cultivation and Commerce Ordinance EIR

County of Calaveras

### Transportation Planner

The Calaveras County Board of Supervisors recognized that there were already numerous growers operating in the county and that there would be benefits in permitting and regulating this industry, especially given the new state laws legalizing commercial cultivation. Their primary concern was to protect the health, safety, and welfare of residents and to reduce or eliminate any adverse environmental effects of existing or new cannabis cultivation or commercial activities involving marijuana. Ascent's team of technical experts analyzed the implications of regulatory changes and the technical issues pertinent to cannabis cultivation and distribution. Ascent evaluated the application of pesticides to non-native plants in sensitive watersheds, as well as examined impacts from hand and mechanized weed management, which is directly analogous to increased cultivation and processing of cannabis. Zachary served as the project transportation analyst for the CEQA review of the project. He developed the transportation analysis methodology and performed the analysis for determining whether implementation of the ordinance would result in significant environmental effects related to transportation.



## Jim Merk

### ENVIRONMENTAL PLANNER

YEARS OF EXPERIENCE 34

#### EDUCATION

MA, English, California State University, Sacramento

BA, English, California State University, Sacramento

With more than 30 years of experience, Jim Merk has filled a variety of roles on teams preparing environmental compliance documents. For most of this time, his work has focused on documents prepared to meet the requirements of CEQA, NEPA, and various federal and state regulatory agencies. Deliverables include technical memoranda, biological survey reports, wetland delineations, and initial studies, and multivolume EIRs and EISs. As a project analyst, Jim has prepared technical sections addressing such topics as land use, hazards and hazardous materials, population and housing, and public services. Working closely with project managers and their teams, he also has edited a broad range of documents for clarity and consistency and helped to ensure that they are grammatically and technically correct. On large projects, he has served as coordinator, working with project managers to ensure that the project teams receive the resources, including detailed document-specific guidance, needed to prepare documents accurately and efficiently.

### PROJECT EXPERIENCE

#### Yolo County Cannabis Land Use Ordinance Program EIR

County of Yolo

##### Environmental Planner

On March 22, 2016, in response to the Medical Marijuana Regulation and Safety Act and to effect greater local control, the Yolo County Board of Supervisors adopted Ordinance Number 1467 adding Chapter 20 to Title 5 of the Yolo County Code regulating medical cannabis cultivation in the county. The Board structured this ordinance as an interim measure to limit harmful environmental impacts while protecting patient access to medical cannabis. This "interim ordinance" would be in effect while state and County staff developed more comprehensive regulatory programs. The interim ordinance, since renamed the Marijuana Cultivation Ordinance, has been amended several times since it was first enacted. The Yolo County-proposed Cannabis Land Use Ordinance (CLUO) would add Article 14 to Title 8, Chapter 2, of the Zoning Regulations within the Yolo County Code. It would regulate all cannabis operations in the unincorporated area of the county. Specific land use requirements and development performance standards are included in the CLUO that address, among many topics, a range of social and environmental issues. Ascent prepared a program EIR for the County's proposed Cannabis Land Use Ordinance. The Final EIR was released in September 2020.

#### Green Coast Industries Environmental Review, Yolo County

County of Yolo

##### Environmental Planner

Green Coast Industries is proposing to enter into a Development Agreement with Yolo County to develop a 40-acre parcel. The development includes two mixed-light cannabis cultivation facilities, one facility, and one distribution facility. The project requires demolition of two existing outdoor cultivation facilities and installation of drainage basins for runoff, solar panels, and water wells for irrigation and fire protection. Ascent prepared a mitigated negative declaration for the project.

### Trinity County Cannabis Program EIR and Environmental Checklist

County of Trinity

#### Environmental Planner

Trinity County initially adopted its first cannabis cultivation ordinance in 2016 and prepared subsequent updates to this ordinance as well as additional ordinances to allow other cannabis uses in the county between 2016 and 2018. Due to litigation and application processing concerns, the County retained Ascent to prepare an EIR for these ordinances (collectively referred to as the Cannabis Program). This work included preparation of required notices, coordination with responsible and trustee agencies during the entire environmental review process (e.g., California Department of Food and Agriculture [now the Department of Cannabis Control], California Department of Fish and Wildlife), public outreach meetings in each of the five Board of Supervisor districts, and maintenance of the administrative record. Ascent also provided advanced input on the extent that this environmental review process can be streamlined/tiered using the EIR for subsequent application for cannabis uses that resulted in the preparation of a customized environmental checklist. Marianne prepared the hydrology and water quality, utilities and service systems, and public services sections of the EIR. The Cannabis Program was re-adopted with amendments in December 2020.



OTHER AGENCIES  
PROCUREMENTS

09

## CONTRACT TERMS

Ascent has reviewed the Sample Agreement provided in the RFP and can meet the terms of this agreement.



Ascent Environmental  
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