

Applicant Guide for Mitigation Monitoring and Reporting Program (MMRP) Annual inspection



Purpose: This guide is designed to assist applicants in preparing for annual MMRP inspections and completing the Annual MMRP checklist. Initial MMRP inspections will be a cooperative effort aimed to verify implementation of mitigation measures outlined in the Mitigation Monitoring Applicability Table (MMAT) and to make recommendations to project applicants to ensure compliance. Environmental Compliance staff will review the MMAT within licensees approved Appendix C, and will use that as the foundation of the annual inspections. Staff will recommend methods and processes that allow project applicants to track appropriate time-lines for verification of applicable mitigation measures for the upcoming years.

Scheduling: Environmental Compliance staff will email or call the project applicant and/or consultant contact information provided. Please note, it is the Applicant's responsibility to provide the County up to date contact information. Per [TCC § 17.43.030B](#) the County will attempt to provide at least a 24-hour notice for inspection requests. Staff is willing to work with applicants in terms of seasonal availability; however, if staff have a limited time frame to complete inspections, mandatory inspection requests will be sent via email with a 24-hour notice.

MMRP Inspection Process and Report: Environmental Compliance staff will schedule and perform the MMRP inspection using the MMAT included in the approved Appendix C. MMRP inspection reports will be sent to the applicant and the respected agent upon inspection completion via email. The site inspection will document the implementation of applicable mitigation measures on-site identified on the MMAT and document additional mitigation measures that should be implemented. The MMRP inspection report will detail Corrective Actions Required as well as a general discussion of Observations. Instructions for submitting follow-up photos and formal referrals directly with other agencies will be described in this report and in the post-inspection email. If Environmental Compliance staff deems necessary for MMAT and Appendix C to be updated, they will make "Tracked Change" edits to the documents as well as a red-line site map for any updates to the premises diagram.

The MMRP report will function as a tool for defensibility of the approved Appendix C. It will be used as a record of ongoing compliance with the County Cannabis Program, demonstrating the project's effort to perform Best Management Practices (BMP's).

Applicant Guide Summary: Each mitigation measure will be categorized into **Applicability** and **Verification** sections. The Applicability section will pose questions to determine whether the mitigation measure is relevant to your cultivation operation. Mitigation measures that are applicable to ALL cultivation projects will be clearly labeled. The applicability of an individual mitigation measure may change over time and appropriate updates to the MMAT will be made as necessary. The Verification section aims to provide clarification on what Environmental Compliance will document during site visits.

In the event that staff has recommendations to strengthen the mitigation measure implementation, a **Recommendation** category will be added. This category offers suggestions on how a cultivation can build a more defensible case and remain in compliance. It's important to note that these recommendations are not mandatory for licensure; rather, they serve as a tool to create a defensible project.

More information about the requirements and applicability of individual mitigation measures can be found in the [Trinity County Programmatic Environmental Impact Report](#) or email County Environmental Compliance Staff [@Cannabis_CEQA](#).

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Aesthetics

3.1-1a: Screen Cultivation Sites from County Scenic Roadways:

Applicability: Is the project visible or within 0.5 mile to any scenic roadway? (*Trinity Dam Road, Rush Creek Road, Canyon Creek Road, and Sky Ranch Road. State Route (SR) 299, SR 3 (Weaverville north), Rainier Road, Trinity Dam Boulevard, Wildwood Road, and Guy Covington Drive*). Can a scenic roadway be seen anywhere from within the premises area?

Verification: County staff will take photo documentation of surrounding landscape to verify if scenic roadways are visible. If Scenic Roadways are documented within 0.5 mile, County staff will verify if applicable mitigation measures are in place.

3.1-1b: Maintain Cultivation Parcel:

Applicable to ALL Projects: Does the project remove all trash and debris from the premises every 2 weeks? How often does the project make trash dump runs? Does the project store wooden debris?

Verification: County staff will document the presence or absence of trash, debris, uncontained soil piles, or loose tarps within the premises area. If the premises is not maintained, post inspection report will require photo submissions of site clean-up within an appropriate time frame for completion.

Recommendation: Staff recommends that the project keep a log of all site maintenance performed as well as any equipment used in the premises area. Keep a written record of receipts of trash disposal that pertains to maintaining your premises area.

3.1-1c: Fence Cultivation Site:

Applicability: Does the project maintain any fencing for aesthetic or wildlife exclusionary purposes?

Verification: Staff will verify the presence or absence of fencing, the fencing material, and if the fencing “aesthetically” blends into the surrounding landscape. If fencing is present, County staff will verify if applicable mitigation measures are in place.

Recommendation: Staff recommends the applicant to keep a log of all maintenance performed on fencing.

Air Quality

3.3-1a: Prohibit Burning Vegetation:

Applicable to ALL Projects: Did the project require removal of vegetation for commercial cannabis development; if so, was the vegetation properly disposed of or composted without burning? Does the project have a cannabis waste area?

Verification: Staff will verify if any proposed development required removal of vegetation. If vegetation is removed from commercial cannabis development, staff will verify the disposal of slash cuttings and vegetation. If burn piles or remnant of previous burns are observed, staff will document the findings. Staff may follow up in order to verify if the previous burn was for domestic or cultivation reasons.

Recommendation: Keep a log and document vegetation removal for cultivation or domestic purposes. If vegetation is removed for domestic purposes, and will require burning, document the burn and keep all appropriate burn permits. Please note that burning of cannabis waste is strictly prohibited; burning of any vegetation removed in association with commercial cannabis activities is NOT allowed. All residential and commercial burn permits can be acquired through the NCAQMD. Please note that chipping resources are available through the [Fire Safe Council](#).

3.3-1b: Implement Diesel Engine Exhaust Control Measures and Dust Control:

Applicability: Does the project propose construction? Has the project implemented dust control mitigation measures for construction activities? Did the project require the use of diesel equipment for commercial cannabis development, if so, does the equipment meet EPA's Tier 3 or 4 emission standards?

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Standard: Dust control measures: Construction activities will implement measures to control dust such as:

1. Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) two times per day.
2. Cover all haul trucks transporting soil, sand, or other loose material off-site.
3. Remove all visible mud or dirt track-out onto adjacent roads.
4. Limit all construction vehicle speeds on unpaved roads to 15 miles per hour.

Verification: Staff will review the MMAT in order to verify if diesel engine equipment will be used. If the use of diesel engine equipment is identified, staff will verify if appropriate mitigation measures were applied. If the project includes the use of dirt roads or construction, staff will verify if appropriate mitigation measures were applied.

Recommendation: Keep a log of the make a model of diesel construction equipment used. Document when the equipment was used, and if applicable, keep a mileage log for the equipment. This mitigation measure can also be achieved by using battery-electric off-road equipment as it becomes available.

3.3-1c: Use Alternative Fuels:

Applicability: If your cannabis cultivation requires diesel usage, is renewable diesel (RD) commercially available?

Verification: Currently, RD is not available in Trinity County. If and when RD becomes available within “*reasonable proximity*” and a project is proposing the use of diesel powered equipment, staff will verify the use of renewable diesel.

3.3-2a: Limit the Use of Fossil Fuel–Powered Outdoor Power Equipment at All Commercial Cannabis Cultivation and Noncultivation Sites:

Applicability: Does the project’s cultivation operations include the operation of any off-highway vehicles (OHV)?

Verification: Staff will verify and document the presence or absence of OHVs in the premises. If OHVs are present, post inspection report may request additional information such as how often the vehicle is used, and the approximate miles of travel.

Recommendation: Maintain a mileage log and fuel usage log for any OHV that is used for project related activities.

3.3-2b: Require Use of Low Emission Diesel Back-Up Generators at All Commercial Cannabis Cultivation and Noncultivation Sites:

Applicability: Does the operation use a diesel or gasoline generator? If so, does each generator meet EPA’s Tier 3 or 4 emission standards?

Verification: Staff will verify and document the presence or absence of generators on site. If generators are present, staff will review MMAT and verify if appropriate mitigation measures has been applied.

Recommendation: Keep an equipment log that identifies all generators used on site. Keep a record of how often and how long the generators are being used. Keep a fuel log and document how often the equipment requires re-fueling. This mitigation measure can also be achieved by using battery-electric off-road equipment as it becomes available.

3.3-3: Implement Odor Control Plan for the Growing, Cultivating, Processing, Handling of Cannabis:

Applicable to Most: Has the project submitted an Odor Control Plan (OCP)? Has the project implemented your OCP?

Verification: Staff will verify the presence or absence of mitigation measures proposed in the OCP. Future odor verification may include the use of an Olfactometer to verify the project’s proposed numeric odor detection threshold.

Recommendation: Keep a log of filter replacements or other mitigation measures implemented for odor control purposes.

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Biological Resources

3.4-1a: Conduct Preapproval Biological Reconnaissance Surveys:

Applicable to ALL Projects: Biological Reconnaissance Survey is a requirement for approval of an Appendix C Checklist and issuance of a Commercial Cannabis License.

3.4-1b: Conduct Special-Status Plant Surveys and Implement Avoidance Measures and Mitigation:

Applicable to ALL Projects: As a part of Biological Reconnaissance Survey, special-status plant survey must be completed during blooming season. If special-status plants are identified, the project must implement mitigation measures that avoid species disturbance.

Verification: If special-status plants are identified, staff will verify that the mitigation measures on the MMAT have been implemented.

Recommendation: Become knowledgeable of special-status plants identified in the Biological Reconnaissance Survey. Know the habitat, bloom period, and physical features to effectively create a no disturbance buffer around the species.

3.4-1c: Implement Measures to Avoid Introduction or Spread of Invasive Plant Species:

Applicable to ALL Projects: Have Invasive species or noxious weeds been identified onsite?

Verification: Staff will verify and document the presence or absence of invasive species and verify that mitigation measures have been put in place for invasive species control.

Recommendation: Keep a log of maintenance performed to control invasive species. Keep photo documentation to document population growth or decline. To learn more about invasive species and management, visit [California Invasive Plant Council](#).

3.4-2a: Conduct Preconstruction Surveys for Special-Status Amphibians:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for special status amphibians present? Were special status amphibians or their habitat identified from the Biological Reconnaissance Survey?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the Biological Reconnaissance Survey in order to verify if suitable habitat is present; and verify that mitigation measures identified in the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2b: Conduct Surveys for Western Pond Turtle and Relocate Individuals:

Applicability: Is suitable habitat for Western Pond Turtle present? Was Western Pond Turtle habitat identified from the biological survey report?

Verification: Staff will review the Biological Reconnaissance Survey in order to verify if suitable habitat is present; staff will verify that mitigation measures identified on the Appendix C have been implemented.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2c: Conduct Preconstruction Nesting Raptor Surveys and Establish Protective Buffers:

Applicability: Does the project propose construction? Will the construction be performed during nesting raptor season (February 01 to August 31)? Does the project agree to perform nesting raptor preconstruction survey, if construction activities will occur during nesting season? Was nesting raptor habitat identified from the biological survey report?

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Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the BRA/MMAT in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2d: Conduct Northern Spotted Owl Preconstruction Habitat Suitability Surveys and Determine Presence or Absence of the Species:

Applicability: Does the project propose construction? Will development activities occur within 1.3-miles of suitable habitat of Northern Spotted Owl?

Standard: If Northern Spotted Owl habitat is identified within a 1.3-mile of cannabis cultivation development activities, prior to vegetation removal or ground disturbance, three complete occupancy surveys must be completed at least 7 days apart between March 1 and August 31. If northern spotted owls are determined to be absent 1.3 miles from the site, then further mitigation is not required. If northern spotted owls are determined to be present within 1.3 miles of the site proposed cultivation activities, proposed cultivation activities, including expansion of an existing Designated Area, will not be permitted.

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the Biological Reconnaissance Survey in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development. Note, removal of old-growth habitat is strictly prohibited for cannabis cultivation development.

3.4-2e: Conduct Preconstruction Special-Status Nesting Bird Surveys and Establish Protective Buffers:

Applicability: Does the project propose construction? Will the construction be performed during nesting bird season (February 01 to August 31)? Does the project agree to perform nesting bird preconstruction survey, if construction activities will occur during nesting season? Was nesting or migratory bird habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the BRA/MMAT in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2f: Conduct Preconstruction Surveys for Trinity Bristle Snail:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for Trinity Bristle Snail? Was Trinity Bristle Snail habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the BRA/MMAT in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2g: Implement Measures to Avoid Take of Special-Status Bumble Bees or Obtain Incidental Take Coverage:

Applicability: Was Special Status Bumble Bee habitat identified from the biological survey report?

Verification: Staff will verify the MMAT/BRA to verify if special status bee habitat was observed during the biological survey. If special status bees are present, staff will verify Incidental Take Permit (ITP) was granted by CDFW.

Recommendation: Provide County staff a copy of ITP.

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3.4-2h: Conduct Preconstruction American Badger Survey and Establish Protective Buffers:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for American Badger? Was American Badger habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the MMAT/BRA in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2i: Conduct Preconstruction Fisher and Humboldt Marten Survey and Preserve Active Den Sites:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for Fisher or Humboldt Marten? Was Fisher or Humboldt Marten habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the MMAT/BRA in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2j: Conduct Preconstruction Surveys for Ringtail and Implement Avoidance Measures:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for Ringtail? Was Ringtail habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the MMAT/BRA in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2k: Conduct Preconstruction Surveys for Oregon Snowshoe Hare and Implement Avoidance Measures:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for Oregon Snowshoe Hare? Was Oregon Snowshoe Hare habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the MMAT/BRA in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2l: Preconstruction Bat Survey and Exclusion:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for roosting bats? Was roosting bats, pallid bats, or Townsend's big-eared bats habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the MMAT/BRA in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2m: Preconstruction Vole Survey and Relocation:

Applicability: Does the project propose construction that require tree removal or ground disturbance? Are development activities proposed 100-feet of suitable habitat for vole? Was vole habitat identified from the biological survey report?

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Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the MMAT/BRA in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-2n: Implement Generator Noise Reduction:

Applicability: Does the project use generators for cannabis cultivation?

Standards: Noise production levels (decibels/dB): 55 dB from 7:00am to 7:00 pm; 50 dB from 7:00 pm - 7:00 am at property line; 10:00 pm - 7:00 am no generator use for commercial cannabis. sound must not exceed 20-25 dB during nesting season; project generated sound must not exceed 90 dB with ambient conditions.

Verification: Staff will record noise production (dB) using a cellphone application in order to verify generator noise.

Recommendation: Document the approximate time frame generators are being used. Download noise decibel meter applications on a smart-phone or acquire a dB reading device to record and log decibel measurements.

3.4-2o: Implement Measures to Avoid Take of Gray Wolf:

Applicability: Does the project propose construction? Are development activities proposed near suitable habitat for Gray Wolf? Was Gray Wolf habitat identified from the biological survey report?

Verification: Staff will verify if construction is proposed and/or has occurred. Staff will review the MMAT/BRA in order to verify if suitable habitat is present; and verify that mitigation measures identified on the Appendix C have been implemented. Staff will document vegetation removal and additional disturbances within the premises area.

Recommendation: Document when construction activities occur and keep a log of equipment used for development.

3.4-4a: Identify, Avoid, and Protect Sensitive Natural Communities, Riparian Habitat, and Wetland Vegetation or Provide Compensation:

Applicable to ALL Projects: Prior to approval, the biological reconnaissance survey will identify the presence or absence of sensitive natural communities.

Verification: Staff will review the MMAT and verify if any sensitive communities were identified, and measure if the appropriate setback has been met.

Recommendation: Use best management practices (BMP's) as described in the associated Site Management Plan and maintain setback requirements to any sensitive natural communities identified on the property.

3.4-4b: Restore Abandoned Cultivation and Nursery Sites:

Applicable to ALL Projects: Upon revocation of a use permit or abandonment of a licensed cultivation or nursery site, the permittee and/or property owner shall remove all materials, equipment, and improvements on the site that were devoted to cannabis use, including but not limited to concrete foundations and slabs; bags, pots, or other containers; tools; fertilizers; pesticides; fuels; hoop house frames and coverings; irrigation pipes; water bladders or tanks; pond liners; electrical lighting fixtures; wiring and related equipment; fencing; cannabis or cannabis waste products; imported soil or soil amendments not incorporated into native soil; generators; pumps; or structures not adaptable to non-cannabis permitted use of the site. If any of the above described or related material or equipment is to remain, the permittee and/or property owner shall prepare a plan and description of the non-cannabis continued use of such material or equipment on the site. The property owner shall be responsible for execution of the restoration plan that will reestablish the previous natural conditions of the site, subject to monitoring and periodic inspection by the County.

Verification: Staff will require a remediation plan (SWB site closure report) for previously approved CEQA projects upon license revocation, denial or commercial cannabis license abandonment.

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3.4-5: Identify Wetlands and Other Waters of the United States and Avoid These Features:

Applicable to ALL Projects: A qualified biologist shall identify the presence or absence of wetlands and other water of the United States. If wetlands or water of the United States are present, all cultivation activities and future development shall meet minimum Regional Water Board setback requirements.

Setback Requirements: Perennial watercourses, waterbodies (e.g., lakes, ponds), or springs (Class I): 150-feet; Intermittent watercourses or wetlands (Class II): 100-feet; Ephemeral watercourses (Class III): 50-feet.

Resources: Use [Trinity County Water Resources](#) and [Water Board Stream Classification Finder](#) to help identify the stream classification.

Verification: Staff will measure on-site distances of cultivation activities to watercourses (using a standard rangefinder or open reel tape measure device) in order to verify that the minimum setback requirement has been met. Staff will document additional water bodies that were not identified in the Appendix C.

Recommendation: Document all activities performed near watercourses. Use resources available to become knowledgeable of setback requirements.

3.4-6b: Retention of Fisher and Humboldt Marten Habitat Features:

Applicability: Was any Fisher or Humboldt Marten habitat identified from the biological survey report? Does the project propose vegetation removal or maintenance within Fisher or Humboldt Marten habitat?

Verification: Staff will document vegetation removal and disposal areas. If suitable habitat is identified in the BRA, staff will require retention of habitat features such as: old-growth habitat and non-old growth habitat such as large trees, large snags, coarse woody debris, and understory vegetation.

Recommendation: Keep a maintenance log and document any vegetation maintenance or removal performed within your premises area. Note, removal of old-growth habitat is strictly prohibited for cannabis cultivation development.

Archaeological, Historical, and Tribal Cultural Resources

3.5-1a Conduct Historic Evaluations for Existing Operations:

Applicability: Was the premises area evaluated for cultural and historical resources? Were cultural or historical resources identified within your premises area?

Verification: Staff will review the MMAT and document if historic resource protection standards have been implemented.

3.5-1b: Revise Ordinance to Include All Historic Districts and Additional Measures to Protect Historic

Resources:

Applicability: This mitigation measure will remain NOT APPLICABLE to all projects unless ordinance updates are made as described in previous statement.

Verification: Staff will review only if there are any updates to ordinance, including additional Opt-Out zones and/or Resolutions passed.

Geology and Soils

3.7-4: Protect Discovered Paleontological Resources:

Applicability: Does your project propose ground disturbing activities? If ground disturbing activities have occurred and paleontological resources were identified, did you retain a qualified paleontologist to observe ground disturbing activities?

Verification: If paleontological resources were observed during ground disturbing activities, staff will require that all work to stop until a qualified paleontologist is retained to monitor the remainder of the ground disturbing activities.

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Recommendation: Keep a log and document when ground disturbing activities occur. If paleontological resources were observed, stop all activities, contact the county cannabis division and acquire professional consultation to determine the appropriate site-specific procedures required before continuing with ground disturbing activities.

Greenhouse Gas Emissions and Climate Change

3.8-1c: Renewable Electricity Requirements:

Applicable to ALL Projects: All electricity sources used for commercial cannabis cultivation, manufacturing, microbusiness, non-storefront retail, testing, nurseries, and distribution shall be from renewable sources.

Standards: The project must conform to one or more of the following:

- Grid-based electricity supplied from 100 percent renewable sources
- On-site power supplied fully by renewable source (e.g., photovoltaic system)
- On-site power supplied by partial or wholly non-renewable source with purchase of carbon offset credits
- Or some combination of the above.

Resources: Voluntary greenhouse gas offset credits purchased from any of the following recognized and reputable voluntary carbon registries:

- A. [American Carbon Registry](#)
- B. [Climate Action Reserve](#)
- C. [Verified Carbon Standard](#)

Verification: Staff will verify the energy source for commercial cannabis activities. If the project is not on 100 percent renewable energy, staff will verify if a transition plan has been proposed and implemented. Staff will document the presence of generators for day to day use as well as generators for emergency use.

Recommendation: If generators are used as the main power source, maintain a fuel log of the approximate fuel usage to purchase carbon offset credits. Keep record of carbon offset purchase as County Staff may require verification. If the project proposes a transition to 100 percent renewable energy, provide a time line for when it will be implemented.

3.8-1d: Lighting Efficiency Requirements:

Applicability: Does the project maintain any lighting, security lighting or external lighting of any kind as it relates to commercial cannabis activities?

Standard:

- Only light-emitting diodes (LEDs) or double-ended high-pressure sodium (HPS) fixtures shall be used in all existing and new mixed-light cultivation operations
- Only high efficacy lighting shall be used in all existing and new noncultivation operations

Verification: Staff will review MMAT and verify if light associated with the project complies with County standards. Staff will document lighting while on site.

Hazards and Hazardous Materials

3.9-2a: Prepare Environmental Site Assessments:

Applicable to ALL Projects on Commercial, business park, industrial properties: Has the project conducted a hazardous search from EnviroStor? Were hazardous materials identified?

Verification: Staff will document any potentially hazardous materials observed on site with formal referral of any concerns sent to Environmental Health; any potential actions will be determined directly by that department.

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3.9-2b: Prepare a Hazardous Materials Contingency Plan for Construction Activities:

Applicability: If an **Environmental Site Assessment (ESA)** has been conducted and hazardous materials identified on site, did the project submit a Hazardous Materials Contingency Plan?

Verification: Staff will document any potentially hazardous materials observed and site and refer observations to Environmental Health.

Hydrology and Water Quality

3.10-1a: Demonstrate Compliance with Water Resource Standards:

Applicable to ALL Projects: All cannabis cultivation sites are required to demonstrate compliance with all applicable the requirements of SWRCB Order WQ 2019-0001-DWQ.

Verification: Staff will verify that the project has an active Water Board Enrollment (Notice of Applicability) and an up to date Site Management Plan. Staff will document the presence of erosion control measures, winterization (November 15- April 01), road conditions, setback requirements, and other standards under the Cannabis Cultivation General Order.

Recommendation: Keep a log of all maintenance performed in the premises area; document winterization implementation during the wet season; keep a copy of your Site Management Plan and make updates when applicable.

3.10-1b: Restrict Prohibit Cultivation Operations in Floodplains:

Applicability: Does the project conduct any commercial cannabis related activities in a FEMA 100-year floodplain? If yes, did you obtain a floodplain development permit?

Verification: If cultivation activities are in a FEMA 100-year floodplain, staff will verify that you have removed all cultivation related equipment from the floodplain for winterization, between November 15 - April 01.

Recommendation: Keep a photo log or maintain records to document the removal of heavy equipment and cultivation related materials from the floodplain before November 15, annually.

3.10-2: Conduct Groundwater Monitoring and Adaptive Management:

Applicability: Does the project utilize a well or surface water diversion as a legal water source? How does the project measure the well's static groundwater levels. Does the project maintain an annual log with monthly measurements recorded?

Verification: Staff will verify that the water source has the required permits. Staff will review all monthly static groundwater level reports submitted annually from the applicant.

Recommendation: Install water level depth measuring equipment in all wells used for cannabis cultivation. Take monthly recordings of the static groundwater level to be submitted to the County annually with this checklist.

3.10-3b: Prohibit Commercial Cannabis Operations in Watersheds under a CDFA Moratorium:

Applicability: Currently, there are no Watersheds that fall under a CDFA Moratorium in Trinity County.

Noise

3.12-1: Implement Construction Noise Mitigation:

Applicability: Does the project propose any noise producing construction? All outdoor construction activity and use of heavy equipment outdoors shall take place between 7:00 a.m. and 7:00 p.m.

Verification: Staff will document the presence or absence of construction equipment in the premises area.

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Recommendation: Keep a log of the maintenance performed and document the equipment used. Download a noise meter phone application to measure noise in decibels (dB) including distance from source of noise and time of day the measurements were taken.

Transportation/Traffic

3.14-3: Provide Site Access Free of Hazards Due to Geometric Roadway Design:

Applicable to ALL Projects: Do the roads have adequate drainage features that support peak flow conditions?

Verification: Staff will document road drainage features and the presence of erosion on the roads. If applicable, staff will review the SMP and /or LSA Agreement and verify if any drainage features are proposed for upgrade.

Recommendation: Document any maintenance performed on road drainage features such as culverts, rolling dips, or in-board/out-board ditch. If additional permits are required by other local or state agencies, such as an updated CDFW LSA or 404 Clean Water Act permit, please provide a copy to County staff.

3.14-4: Provide Adequate Emergency Access:

Applicable to ALL Projects: Does your cultivation site have adequate emergency access?

Verification: Staff will review the MMAT and verify that adequate emergency access is discussed. Staff will document that presence of emergency access.

Utilities and Service Systems

3.15-1a: Prepare a Treatment Program for Non-cultivation Activities

Applicability: Have you prepared a materials management plan for your commercial noncultivation cannabis operations?

Verification: Staff will verify if noncultivation activities are scoped within the Appendix C and if a materials management plan was submitted.

Recommendation: Maintain logs for any other commercial cannabis activities that are non-cultivation related.

3.15-1b: Verification of Adequate Wastewater Service and Necessary Improvements for Public Wastewater Systems

Applicability: Is your project's waste water service provider through municipal connection?

Verification: Staff will verify the project's connection to municipal waste water.

Recommendation: Keep record of waste water utility service receipts.

3.15-2: Verify Adequate Water Supply and Service for Municipal Water Service:

Applicability: Does your cultivation site use municipal water as it's legal water source? Have you obtained written verification ("Will Serve Letter") from the municipal water provider?

Verification: Staff will verify the project's connection to municipal water.

Recommendation: Keep record of municipal water service receipts.

3.15-3: Implement a Cannabis Waste Composting Management Plan:

Applicable to ALL Projects: Does the project have a Cannabis Waste Composting Management Plan? Does the project have a designated area for Cannabis Waste?

Verification: Staff will document the cannabis waste area.

Applicant Guide for Mitigation Monitoring and Reporting Program (MMRP) Annual inspection

Recommendation: If the project plans on making dump runs, keep all receipts related to commercial cannabis activities.

Wildfire

3.16-2a: Implement Fire Prevention Measures for New Power Lines and Electrical Facilities:

Applicability: Has the project installed or proposed to install new power lines? If the new power lines are above ground, will a fuel break be installed and will the fuel break be installed in a previously disturbed area? Will installation of the proposed fire break require additional ground disturbance in an area that was not previously disturbed?

Verification: Staff will document the presence of power lines within the parcel. If power lines are present, staff will verify if fuel breaks are present as well as documenting any annual maintenance observed. Staff will if electrical facilities are present including TPUD, PG&E, solar and any temporary or permanent electrical fixtures.

Recommendation: Document any maintenance performed on power lines and electrical facilities within the project parcel.

3.16-2b: Implement Fire Prevention Measures for On-Site Construction and Maintenance Activities:

Applicability: Does the project operate any outdoor equipment associated with on-site construction or general maintenance activities? Does the project have a fire protection plan? Some examples of maintenance equipment include but are not limited to: chainsaw, weed wacker or leaf blower.

Verification: Staff will document all outdoor motorized equipment present in the premises area, and verify the contents of the site-specific proposed fire protection plan including but not limited to the presence of fire suppression equipment such as fire extinguishers, fire safe employee cigarette smoking areas or additional water storage tanks, etc.

Recommendation: Keep a maintenance log of the activities performed. If work is performed during a dry season, use best management practices as described in the project's site-specific fire protection plan, site management plan and all technical reports associated with approved CEQA document. Keep fire suppression equipment accessible.