Fuego Farms Cannabis Cultivation

Public Review Draft
Initial Study/Mitigated Negative Declaration

Prepared for:

County of Riverside Planning Department
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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily trip
AFY	acre-feet per year
amsl	above mean sea level
APN	Assessor's Parcel Number
AQ	Air Quality
AQMP	Air Quality Management Plan
BA	Biological Assessment
BMP	Best Management Practices
CAL FIRE	California Department of Forestry and Fire Protection
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CCUP	Cannabis Conditional Use Permit
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CY	Cubic Yards
DPM	diesel particulate matter
EIC	Eastern Information Center
EIR	Environmental Impact Report
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
GHG	Greenhouse Gas
GIS	Geographic Information System
GPS	Global Positioning System

ACRONYMS AND ABBREVIATIONS (cont.)

kW	kilowatt
kWh	kilowatt-hours
LACM	Los Angeles County Natural History Museum
LRA	Local Responsibility Area
LST	localized significance threshold
LU	Land Use
MDAQMD	Mojave Desert Air Quality Management District
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric ton
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
N_2O	nitrous oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	Noise Sensitive Land Use
OMRI	Organic Materials Review Institute
OS	Open Space
RM	Rural Mountainous
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCM	San Bernardino County Museum
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SF_6	sulfur hexafluoride
SLF	Sacred Lands File
SRA	State Responsibility Area
SSRE	source reduction and recycling element
SWAP	Southwest Area Plan
SWPPP	Stormwater Pollution Prevention Program
SWRCB	State Water Resources Control Board
TA	Transportation Analysis
TAC	toxic air contaminant

ACRONYMS AND ABBREVIATIONS (cont.)

UCMP	University of California Museum of Paleontology in Berkeley
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	Vehicle Miles Travelled
VOC	Volatile Organic Compound

COUNTY OF RIVERSIDE
ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number: CEQ190129
Project Case Type (s) and Number(s): CUP190038
Lead Agency Name: Riverside County Planning Department
Address: 4080 Lemon Street, P.O. Box 1409, Riverside, CA 92502-1409
Contact Person: Gabriel Villalobos, Project Planner
Telephone Number**:** (951) 955-6184
Applicant's Name: Fuego Farms, LLC
Applicant's Address: 12130 Millennium Drive, Suite 300
Los Angeles, CA 90094

I. PROJECT INFORMATION

A. Type of Project: Site Specific ☒; Countywide ☐; Community ☐; Policy ☐.

B. Total Project Area: Approximately 4.3 acres

Residential Acres: N/A	**Lots:** N/A	**Units:** N/A	**Projected No. of Residents:** N/A
Commercial Acres: N/A	**Lots:** N/A	**Sq. Ft. of Bldg. Area:** N/A	**Est. No. of Employees:** N/A
Industrial Acres: N/A	**Lots:** N/A	**Sq. Ft. of Bldg. Area:** N/A	**Est. No. of Employees:** N/A
Other: 4.3 acres total (agriculture)	**Lots:** 1	**Sq. Ft. of Bldg. Area:** 63,744 sf (greenhouses), 4,800-sf (support)	**Est. No. of Employees:** up to 10

C. Assessor's Parcel No(s): 933-020-005-6

Street References: 22750 Carancho Road, Temecula, CA 92590. North and west of intersection of Carancho Road and De Luz Road. East of intersection of Los Gatos Road and Carancho Road.

D. Section, Township & Range Description or reference/attach a Legal Description: Section 1, Township 8 South, Range 4 West, of the U.S. Geological Survey (USGS) 7.5-minute Temecula, Fallbrook, Wildomar, and Murrieta quadrangle maps.

E. Brief description of the existing environmental setting of the project site and its surroundings: The site is located approximately four miles west of the City of Temecula in unincorporated Riverside County. To the north of the site is the Santa Rosa Plateau Ecological Preserve. Most of the lands west, south, and east of the site are used for agricultural and rural residential uses. The parcel on which the project site located is currently used for agricultural production and for private open space. The project site is currently used as an avocado orchard.

Introduction

This Initial Study addresses a project proposed by Fuego Farms, LLC on property within unincorporated Riverside County (County) and whether it may cause significant effects on the environment. The Initial Study has been prepared to satisfy the requirements of the California Environmental Quality Act (CEQA; Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). CEQA requires that all State and local government agencies consider the environmental consequences of projects over which they have discretionary authority before they approve or implement those projects.

The Initial Study is a public document used by the decision-making lead agency to determine whether a project may have a significant effect on the environment. In the case of the proposed project, Riverside

County is the lead agency and will use the Initial Study to determine whether the proposed project would have a significant effect on the environment.

This Initial Study relies on State CEQA Guidelines Sections 15064 and 15064.4 in its determination of the significance of the environmental impacts. Per Section 15064, the finding as to whether a project may have one or more significant impacts shall be based on substantial evidence in the record, and that controversy alone, without substantial evidence of a significant impact, does not trigger the need for an Environmental Impact Report (EIR).

Project Background

In 2016 and subsequent years, California voters and the State legislature created a legal framework to allow for the cannabis industry to operate in a regulated commercial market. In response to these changes, the Riverside County Board of Supervisors voted to initiate the process to establish a cannabis ordinance to create a comprehensive local program to permit and regulate medical and adult-use cannabis businesses and cannabis activities. On October 23, 2018, the County Board of Supervisors approved an ordinance (Ordinance No. 348.4898) establishing the permitting process and regulations for commercial cannabis operations. Ordinance No. 348.4898 establishes the permitting process and regulations for commercial cannabis operations in the unincorporated areas of the County and became effective December 23, 2018 (Riverside County 2021).

The project applicant filed an initial application with the Riverside County Planning Department on April 9, 2019 seeking a Conditional Use Permit (CUP) for a new cannabis cultivation operation that would include 38,000 square feet (sf) of mixed light cannabis cultivation (22,000 sf of flowering canopy and 16,000 sf of vegetative canopy) in greenhouses and a 4,800-sf steel building for processing and packaging.

Project Setting

Project Location

The project site is located in unincorporated Riverside County on the property known as 22750 Carancho Road, approximately 4 miles west of the City of Temecula. The proposed project site is located on Assessor's Parcel Number (APN) 933-020-005-6, and the proposed project would develop approximately 4.3 acres of the 72.3-acre parcel. The remainder of the property would continue to be used for avocado farming and unmanaged open space. Refer to Figure 1 for a regional location map and Figure 2 for an aerial map of the project site parcel.

Environmental Setting

As noted above, the project site is located on a 72.3-acre parcel, but only 4.3 acres of the parcel would be developed as part of the proposed project evaluated in this Initial Study. Approximately 51.3 acres of the parcel would remain unmanaged open space and are not a part of the proposed project. The remaining 21 acres of the parcel are actively used as an avocado orchard and include a water storage pond on the lower level of the parcel that is not within the project site boundary for this project nor proposed to be used in support of the construction or operation of the proposed project. About 16.7 acres of the existing 21-acre avocado orchard would remain an active avocado orchard and would not be developed as part of the proposed project. The other 4.3 acres of the existing avocado orchard would be developed as part of the proposed project and is referred to as the "project site" throughout this Initial Study.

The parcel on which the project site is located is in rural, unincorporated Riverside County and has a diverse topographical profile. The topography of the parcel on which the project site is located is

characterized by very steep vegetated hills to the north with an avocado orchard on gently undulating hills in the southern portion of the parcel near Carancho Road. The parcel on which the project site is located contains a main ridge line running from west to east and has a few water courses that transect the parcel trending north to south. The parcel is generally bordered by undeveloped mountain range to the north, rural residential and agricultural uses to the east and south, and agricultural uses to the west.

The topography of the 4.3-acre project site is characterized by an avocado orchard on gently undulating hills near Carancho Road. The project site is bordered by agricultural uses to the north, east, and west, and rural residential uses to the south across Carancho Road. All proposed project components are setback at least 50 feet from all existing watercourses on the parcel on which the project site is located.

The General Plan land use designation for the project site is Rural Mountainous (RM) 10 acre minimum, and the project site is zoned as Light Agriculture 10 acre minimum (A-1-10). See below for a detailed description of the proposed project.

Project Description

The project applicant is seeking a CUP for the construction and operation of a medium mixed light cannabis cultivation facility that would include 17 flowering and nursery greenhouses, a steel building and ancillary infrastructure (i.e access driveway, internal circulation road for fire lane, etc.) totaling 4.3 acres (or 187,308 sf). The proposed project would involve the conversion of 4.3 acres of avocado trees to become the proposed mixed light cannabis cultivation operation. All components of the proposed project would be located in the southwest corner of the existing parcel as described below and depicted on Figure 3, Site Plan. See Appendix A for detailed site plans of the proposed project components.

Two (2) of the proposed greenhouses would be 96 feet long and 32 feet wide (3,072 sf per greenhouse), and 15 greenhouses would be 120 feet long and 32 feet wide (3,840 sf per greenhouse), for a combined total of 63,744 sf of greenhouse space. Each greenhouse would be 14.7 feet tall. Eleven (11) of the 120-foot-long by 32-foot-wide greenhouses would host a total of 33 rows of 6-foot-wide and 111-foot-long grow beds with a combined total canopy size of 21,978 sf, which is below the maximum allowable canopy size of 22,000 sf as per the Ordinance no. 348, Section 19.510. The remaining 6 greenhouses would be used as nursery for germination and vegetation process. See Drawing Sheet A202 in Appendix A for detailed plans of the greenhouses and Table 1 below for a detailed summary of the proposed greenhouses.

Table 1
SUMMARY OF PROPOSED GREENHOUSES

		Gross Size			Canopy (Bed) Size		
Greenhouses	**Qty.**	**Width (ft)**	**Length (ft)**	**Area (sf)**	**Width (ft)**	**Length (ft)**	**Area (sf)**
Mature Flower	11	32	120	42,240	18	111	21,978
Total Mature Flower	**11**			**42,240**			**21,978**
Nursery	4	32	120	15,360	n/a	n/a	n/a
	2	32	96	6,144	n/a	n/a	n/a
Total Nursery	**6**			**21,504**	n/a	n/a	n/a
Grand Total	**17**			**63,744**			**21,978**

The steel building would be a 4,800-sf “gable” type structure with 14-foot side walls and 19-foot peak height at the center, and include designated areas for office, drying, trimming, packaging, storage, shipping and receiving. The steel building would also include restrooms, conference room, lobby/reception and security room. See Drawing Sheet A201 in Appendix A for detailed plans of the support structure.

The start-up phase of cultivation would involve germinating cannabis seeds and transplanting starter plants to support the vegetative stage. Once the vegetative plants are mature, clones would be preserved for future vegetation, and mature vegetative plants would be transplanted in the flowering greenhouses where they can continue to grow until they are ready for harvest. The day-to-day operations for the mixed light cultivation would include: cloning, vegetation, flowering, nutrient application, irrigation, harvesting, drying, trimming, and packaging. All data required by the State, including amount of production, distribution and destinations of product, and disposal of waste products, would be input into the State required Metrc track-and-trace software system.

Water Supply and Demand

The project site is located within the Rancho California Water District, which currently provides water service to the site through an existing 24-inch diameter pipeline that follows Carancho Road and an existing 8-inch diameter pipeline that follows Big Oaks Drive (along the eastern boundary of the parcel) to support the existing avocado farming operation. Rancho Water District currently provides up to 288 acre-feet of water per year (AFY) to the project parcel (4 AFY of water per acre [72]), and the proposed project would convert 4.3 acres of avocado trees to the proposed mixed light cannabis cultivation operation.

The proposed project water demands include water for irrigation of the mixed light cannabis cultivation, the proposed on-site fire hydrant, the proposed landscaping, and for the steel building. Water usage for the operation of the proposed project is estimated to be approximately 14.5 AFY to be supplied by Rancho Water District.

The proposed irrigation system for the cannabis cultivation facility would be designed to minimize water usage and irrigation runoff as each plant would be fed a mixture of water and fertilizer at a low rate to allow for the plant to metabolize all of the nutrient mix that it receives each hour. Any wastewater generated from the proposed project would be held in a proposed septic tank system and removed routinely. No septic leach system is proposed for on-site wastewater treatment.

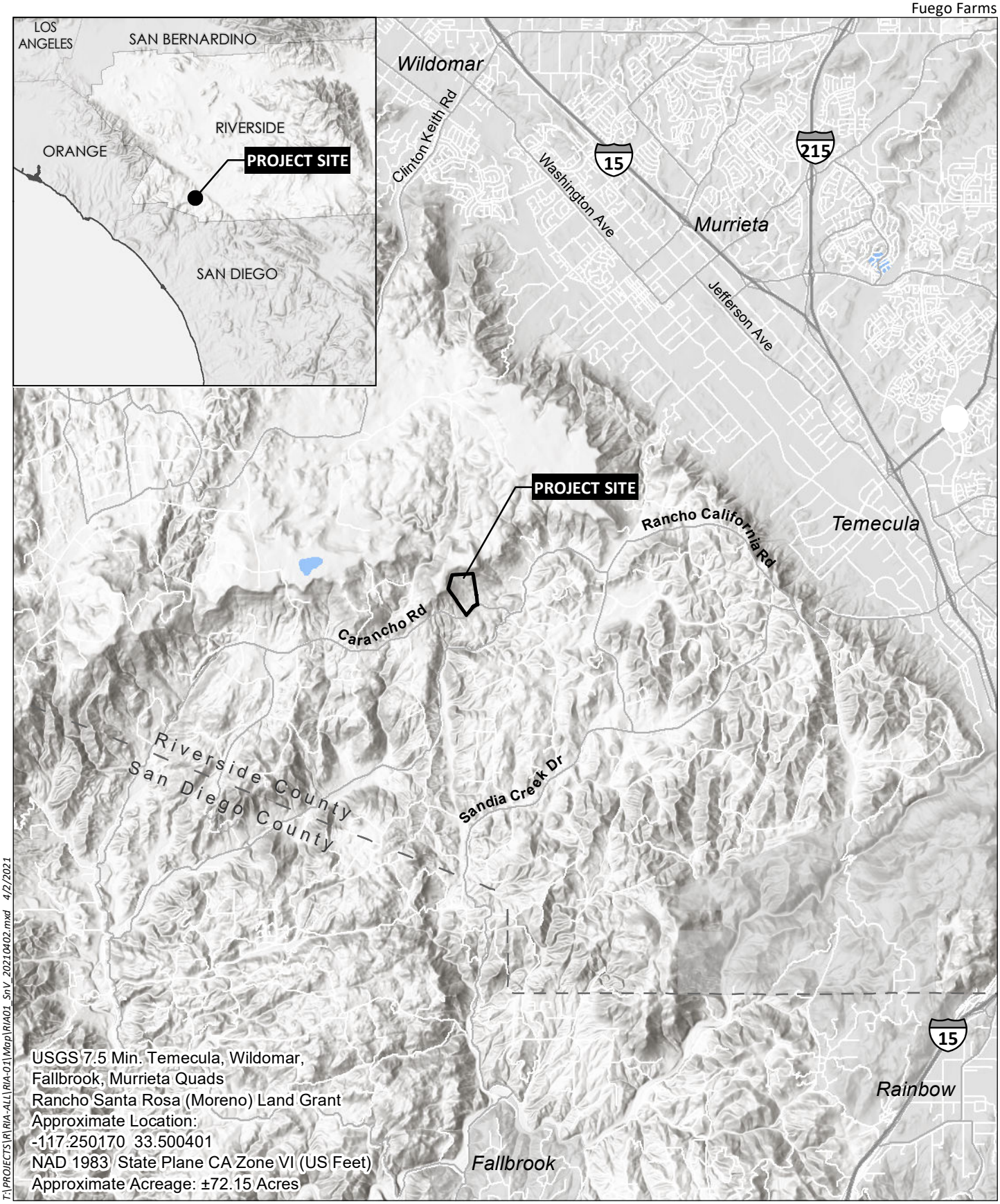
Lighting Plan

The proposed greenhouses would provide supplemental lighting during nighttime hours and would have light exclusion black cloth curtains to contain light from within 30 minutes before sunset to 30 minutes after the sun rises to prevent light spillover.

The proposed project would include 35 exterior flood lights on poles adjacent to the proposed 14-foot-tall greenhouses and 8 exterior wall sconces around steel building. Exterior lighting would meet the building ordinance requirements of Section 19.511(I)(1) of Riverside County's Land Use Ordinance. Lights would be installed with the specified fixtures, wattage, illumination levels, glare prevention, and shielding to prevent hazards to motorists along Carancho Road. Security lighting would also be installed on the exterior of the premises and the main entrance walkway. Security lighting would be shielded and downward facing and would not trespass onto neighboring properties. Some lighting may be motion activated or dimmed to save energy and to alert security personnel when a motion activates them.

Energy Source

The proposed project would use a combination of on-grid power through Southern California Edison (SoCal Edison), rooftop commercial solar power, and generators for emergency use only. Energy efficiency from the cannabis cultivation operation would be maximized by reducing the number of grow lights needed and using a passive cooling system that relies on a smaller number of fans.



USGS 7.5 Min. Temecula, Wildomar, Fallbrook, Murrieta Quads
Rancho Santa Rosa (Moreno) Land Grant
Approximate Location:
-117.250170 33.500401
NAD 1983 State Plane CA Zone VI (US Feet)
Approximate Acreage: ±72.15 Acres

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0 1.5 Miles

Source: Base Map Layers (Esri, USGS, NGA, NASA)

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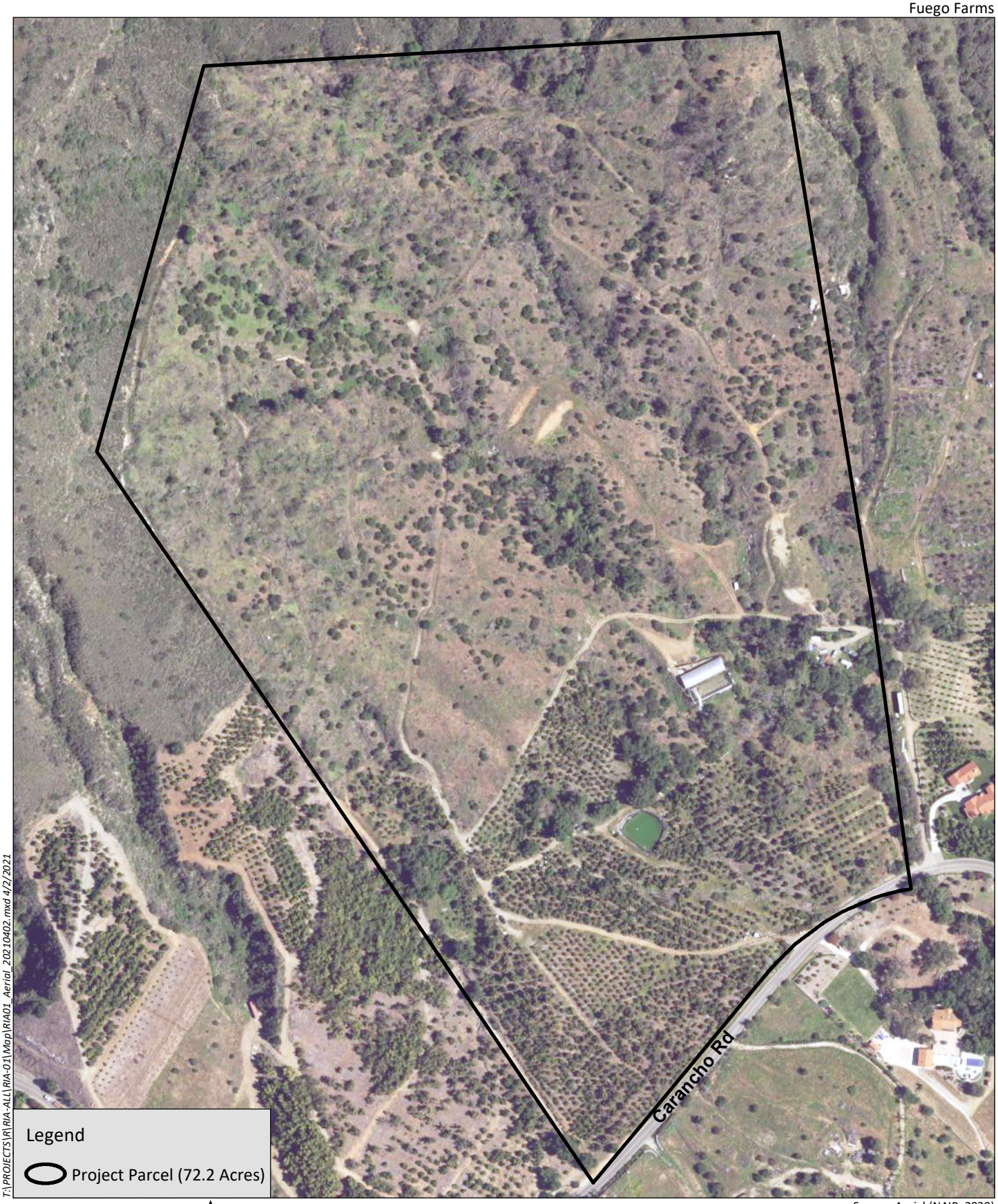
Regional Location Map

Figure 1



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Source: Aerial (NAIP, 2020)

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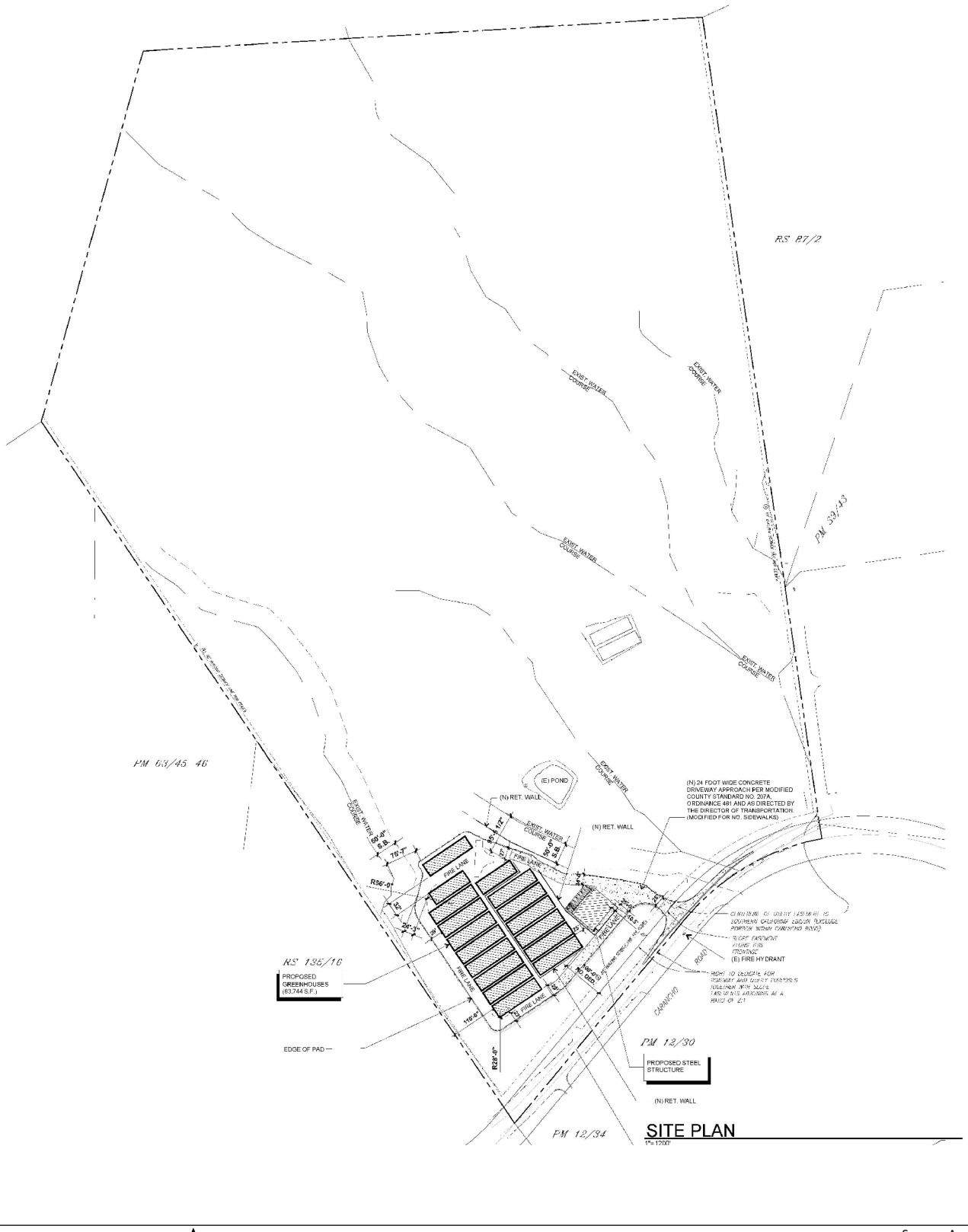
Aerial Map

Figure 2



T:\PROJECTS\R\RIA-ALL\RIA-01\Map\RIA01_SitePlan_20210402.mxd 4/2/2021

0 300 Feet

Source: Aerial (NAIP, 2020)

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Site Plan

Figure 3

Employment

The owner would manage and oversee day to day operations of the proposed project. Five additional full-time employees and five part-time employees would be hired to support the cannabis cultivation operation. If needed, during periods of high activity, such as harvesting, processing, trimming, and packaging, additional part-time employees would be hired. It is anticipated that most, if not all, employees would be sourced from local communities within Riverside County.

Access and Parking

The project site is accessible via Carancho Road. The proposed project would include the construction of a new 24-foot-wide concrete driveway approach to replace the existing driveway approach along Carancho Road. The driveway approach would be constructed in accordance with County Standard No. 207A, Ordinance 461 and as directed by the County Director of Transportation.

In accordance with County Ordinance No. 348 Section 18.12, Off-Street Vehicle Parking, the proposed project would require 2 parking spaces per 3 employees. Because the proposed project would employ 10 employees, at least 7 parking spaces are required. The proposed project would provide 7 parking spaces, including one Americans with Disabilities Act (ADA) accessible parking space, adjacent to the west of the proposed 4,800-sf support structure.

Fire Access

Primary site access would be directly from Carancho Road via a short driveway leading to the proposed facility. A knox box would be installed on the entry gate for emergency personnel access in the case of an emergency. A fire lane with a proposed width of at least 24 feet would surround the project facilities. A hammerhead turnaround would be constructed along the northern edge of the site to allow sufficient space for fire engine turnaround. Refer to Drawing Sheet A102 of the Project Site Plans provided in Appendix A for more detailed information about the fire access lane and turnaround.

Security and Hours of Operation

A new six-foot-tall chain link fence with slats for privacy screening and security gate would be installed to enclose the project site and prevent unauthorized entry. In addition, a landscaping screen would be planted parallel to the six-foot-tall fence's southern portion facing Carancho Rd in order to block the greenhouses and steel building visibility from public right-of-way.

A Security Plan has been prepared for the project site and is attached as Appendix B to this Initial Study. Security measures would include, but are not limited to, on-site armed security during business hours and after hours, if applicable. The project applicant may also utilize an electronic security system to be monitored off-site after hours by security personnel. Keyless entry would be utilized to secure and monitor all entrances and exits along with video surveillance. All employees would be trained on site security procedures. Site visitors would be limited to authorized individuals, inspectors, and law enforcement only; any visitors or vendors would be escorted through the site by an employee at all times.

Daily hours of operation would be from 6:00 a.m. to 8:00 p.m. Initially, most work on-site would be conducted between 6:00 a.m. and 3:00 p.m. Once the entire cultivation facility is constructed and fully operational, a shift from 3:00 p.m. to 8:00 p.m. would be added to facilitate processing/trimming and packaging.

Landscaping Plan

The project proposes a landscaping plan that includes 24-inch box compact strawberry trees (*Arbutus unedo compacta*), pink muhly grass (*Muhlenbergia capillaris*), silver bush lupine (*Lupinus albifrons*) and buffalo grass (*Bouteloua dactyloides*) for groundcover. The landscaping plan concentrates plantings along the southern boundary of the project site near the Carancho Road frontage, along the north, south, and west boundaries of the proposed steel building, and around the proposed parking spaces. The proposed landscaping areas by the steel support building would be irrigated with a drip system while the 5-foot-wide landscaping corridor proposed along the edge of slope near the southern boundary of the project site would be irrigated with a pop-up sprinkler system. The proposed project includes a total of 3,765 sf of landscaped areas. Refer to Drawing Sheet L101 of the Project Site Plans provided in Appendix A for more detailed information about the landscaping plan.

Grading Plan

The entire approximately 4.3-acre project site would be disturbed during site preparation, which includes removal of existing avocado trees and grading. In preparing the site for construction, approximately 22,761 cubic yards of cut-and-fill would be required and balanced on-site. No import or export of fill material is anticipated. Any remaining debris and vegetation within the area to be disturbed would be cleared, and the site would be graded.

The project site would be graded to achieve 2 to 4.8 percent slope. Manufactured slopes would be constructed with a maximum 2:1 gradient. See Appendix C for the Conceptual Grading Plan for the proposed project.

Off-Site Improvements

The proposed project includes off-site roadway improvements within the existing Carancho Road right-of-way, including acceleration and deceleration lanes to facilitate access to the site. Off-site improvements would impact approximately 0.18 acre of disturbed/developed areas within the existing road right-of-way. Existing culverts and drainage facilities beneath the existing Carancho Road would remain in place.

Stormwater Management

Regarding stormwater disposal, runoff from upper greenhouse areas would drain to self-retaining decomposed granite areas that would be constructed as part of the proposed project. Paved areas and lower portions of the site would drain to a cistern tank and modular wetlands for flow mitigation and treatment before being discharged to adjacent permeable areas.

The project would include measures to reduce the use of water inside and outside the facility. Water for landscaping would be conserved by utilizing drought tolerant plants, rain collection, and other water-conserving techniques. Implementing low-flow devices, spray irrigation system, and sensors and other devices to track and monitor water use throughout the facility would reduce water consumption relative to a conventional operation of this size.

A Preliminary Water Quality Management Plan has been prepared for this project, which includes information on the local watershed, descriptions of proposed erosion control measures, and a site map with associated stormwater best management practices (BMPs). This plan has been prepared to comply with the requirements of Riverside County Ordinance 754 and is included as Appendix D to this Initial Study. A Site Management Plan was also prepared for this project to comply with State Water Resources Control Board (SWRCB) Order WQ 2019-0001-DWQ. This plan includes information regarding erosion control and water quality control BMPs to be implemented on-site, as well as

procedures for preventing water contamination, controlling waste and hazardous materials, and responding to any spills. This plan is included as Appendix E to this Initial Study.

Waste Management

Waste bins and containers would be located at the entrance to the cultivation facility and inside the support structure. Waste would be hauled to an appropriate licensed facility by a private waste hauling contractor, such as Waste Management, Inc., or by cultivation operation staff. Recyclables would be segregated from other solid waste and deposited in an appropriate recycling facility. Recyclables such as scrap metal, cardboard, glass, metal and plastic containers, and newspaper can be unloaded at a recycling drop-off center. Yard waste, green waste, and other compostable materials would be segregated from other solid waste and shredded and composted on-site for reuse as mulch or as a soil amendment, or deposited at an appropriate transfer facility. Any potentially toxic materials, such as paints, solvents, or lubricants, would be segregated from the solid waste and disposed of at a County facility.

Growing media waste would be reduced or eliminated by composting and blending old growing media with new media and amendments. No growing media is expected to be disposed off-site. Growing media (that is biodegradable) can be reduced in volume yearly because it is partially absorbed by the plants and metabolized by soil organisms (bacteria, fungi, invertebrates). Green waste, primarily cannabis root balls and stems, can be chipped and mulched and blended back into the planting soil. Vegetative waste staging areas and compost piles would be located inside the secured, fenced cultivation compound. BMPs would be employed to ensure that these piles do not contaminate stormwater or cause nuisance dust or odor issues. Any growing media that cannot be composted or reused would need to hauled off-site and disposed in a licensed facility.

Hazardous Materials and Waste

To meet or exceed the standards of the California Department of Food and Agriculture (CDFA), the project applicant would adopt operational practices designed to efficiently produce safe cannabis for the consuming public. At harvest, the project applicant would ensure that all industry best practices are observed to safely harvest, trim, and store the cannabis free of allergens or other possible contaminants. The project applicant would adopt strict cleanliness, sanitation, and pest management policies and maintain completely separate storage areas for the fertilizers and pesticides used in the lifecycle of the organic matter. Further, the project applicant would cultivate with only OMRI (Organic Materials Review Institute) listed nutrients, fertilizers, pesticides, and fungicides.

Additional hazardous materials proposed for on-site use would include small amounts of fuels and lubricants to operate machinery. Chemicals would be used according to the instructions on the label or Material Safety Data Sheet. Chemicals would be stored in a secured storage area of the proposed steel building within the cannabis facility to avoid stormwater contamination. Chemicals would be properly labeled, and open containers would be sealed when stored. Personal protective equipment such as safety glasses, gloves, respiratory masks, boots, long pants, and long-sleeved shirts would be used by staff when handling fertilizers and other chemicals. Liquid or granular fertilizers would be mixed with water in mixing tanks; plastic tubing and driplines would then be used to gravity-feed the water/fertilizer mixture to the planting stations. Fertilizers and soil amendments would also be applied directly to the planting stations by shovel or by using a spray tank mounted to a backpack, all-terrain vehicle, golf cart, or a garden cart. Appropriate spill and leak prevention and response measures would be implemented, and cleanup materials, Material Safety Data Sheets, and emergency contact information would be kept readily available.

Odor Control and Air Circulation

The project applicant would implement odor reduction measures to ensure compliance with County Ordinance No. 348 Section 19.505, Permit Requirements for all Commercial Cannabis Activities. Reduction measures would include multiple filtration systems, odor absorption, and carbon "scrubbers" to rid system exhaust of any odors. Activated carbon is an extremely effective absorptive odor control substance. An ozone generator would be placed upstream of the carbon filters to help control out-going airstream odors and recharge the activated carbon filter media.

Air filtration and circulation systems are also proposed to control heat buildup and eliminate exhaust odors. The air circulation system would be designed in conjunction with the grow lights in order to ensure the specifications can handle the large amount of heat generated by the proposed lighting system. Dehumidifiers would also be utilized to optimize the growing environment.

Construction Schedule and Equipment

Project construction would be completed in one phase. Project construction is anticipated to begin in Fall 2021 and be completed in Spring 2022 for a total construction period of 6 months (180 days). Construction of the proposed project is anticipated to require the use of two D-8 bulldozers, two water trucks, and two haul trucks (10 cubic yard capacity).

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. Land Use: The Riverside County General Plan Land Use Element (Riverside County 2020a) identifies five "foundation" land designations, which are further refined in applicable area plans (see below). The foundation land designation for the project site is Rural.

The following General Plan Land Use Element policies are applicable to the proposed project:

LU 7.1 Require land uses to develop in accordance with the General Plan and area plans to ensure compatibility and minimize impacts.

LU 7.4 Retain and enhance the integrity of existing residential, employment, agricultural, and open space areas by protecting them from encroachment of land uses that would result in impacts from noise, noxious fumes, glare, shadowing, and traffic.

LU 7.8 Require new developments in Fire Hazard Severity Zones to provide for a fuel clearance/modification zone, as required by the Fire Department.

LU 8.2 Promote and market the development of a variety of stable employment and business uses that provide a diversity of employment opportunities.

LU 12.1 Apply the following policies to areas where development is allowed and that contain natural slopes, canyons, or other significant elevation changes, regardless of land use designation:

a. Require that hillside development minimize alteration of the natural landforms and natural vegetation.

c. Require that areas with slope be developed in a manner to minimize the hazards from erosion and slope failures.

LU 21.1 Require that grading be designed to blend with undeveloped natural contours of the site and avoid an unvaried, unnatural, or manufactured appearance.

LU 21.2 Require that adequate and available circulation facilities, water resources, sewer facilities and/or septic capacity exist to meet the demands of the proposed land use.

LU 21.3 Ensure that development does not adversely impact the open space and rural character of the surrounding area.

The project site is located within the Southwest Area Plan (SWAP) of the County's General Plan. The SWAP designates the site as Rural Mountainous (RM) 10 acre minimum, which allows for a single family residence with a minimum lot size of 10 acres, along with limited animal keeping, agricultural, and recreational uses, along with compatible resource development and associated uses and governmental uses (Riverside County 2020b). The proposed project would comply with the limited agricultural and supporting uses allowed under the Area Plan designation, and the area proposed for development is currently used as an active avocado farming operation.

The following SWAP Land Use policies would apply to the proposed project:

SWAP 15.1: Protect farmland and agricultural resources in the Southwest planning area through adherence to the Agricultural Resources section of the General Plan Multipurpose Open Space Element and the Agriculture section of the General Plan Land Use Element, as well as the provisions of the Citrus/Vineyard Policy Area.

The project site is located within the Santa Rosa Plateau/De Luz Policy Area of the SWAP. There are no policy area-specific policies that would apply to this project as proposed. The project would be implemented in accordance with the goals of the Santa Rosa Plateau/De Luz Policy Area, which include maintaining the rural and natural character of the area, including rural residential and agricultural uses, and maintaining the long term stability of the Santa Rosa Plateau Ecological Reserve (located north of the project parcel). The SWAP also aims to limit grading in this policy area as much as possible to maintain the existing topographic profile and seeks to limit impacts to the ecological reserve.

2. **Circulation:** The following General Plan Circulation Element policy would apply to the proposed project (Riverside County 2020c):

C 16.1 Implement the Riverside County trail system as depicted in the Bikeways and Trails Plan, Figure C-6.

The following SWAP Circulation policy would apply to the proposed project (Riverside County 2020b):

SWAP 18.1 Implement the Trails and Bikeway System, Figure 8, as discussed in the Non-Motorized Transportation section of the General Plan Circulation Element.

3. **Multipurpose Open Space:** The following General Plan Multipurpose Open Space Element policies would apply to the proposed project (Riverside County 2015a):

OS 2.2 Encourage the installation of water-conserving systems such as dry wells and graywater systems, where feasible, especially in new developments. The installation of cisterns or infiltrators shall also be encouraged to capture rainwater from roofs for irrigation in the dry season and flood control during heavy storms.

OS 3.4 Review proposed projects to ensure compliance with the National Pollutant Discharge Elimination System (NPDES) Permits and require them to prepare the necessary Stormwater Pollution Prevention Program (SWPPP).

OS 16.1 Continue to implement Title 24 of the California Code of Regulations (the "California Building Standards Code") particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of within CCR Title 24.

OS 17.2 Enforce the provisions of applicable Multiple Species Habitat Conservation Plan's and implement related Riverside County policies when conducting review of development applications.

OS 19.3 Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.

OS 19.5 Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.

OS 19.7 Whenever existing information indicates that a site proposed for development has low paleontological sensitivity as shown on Figure OS-8, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the County Geologist shall be notified and a paleontologist shall be retained by the project proponent. The paleontologist shall document the extent and potential significance of the paleontological resources on the site and establish appropriate mitigation measures for further site development.

OS 19.8 Whenever existing information indicates that a site proposed for development has undetermined paleontological sensitivity as shown on Figure OS-8, a report shall be filed with the County Geologist documenting the extent and potential significance of the paleontological resources on site and identifying mitigation measures for the fossil and for impacts to significant paleontological resources prior to approval of that department.

OS 19.9 Whenever paleontological resources are found, the County Geologist shall direct them to a facility within Riverside County for their curation, including the Western Science Center in the City of Hemet.

The following SWAP Multipurpose Open Space policies would apply to the proposed project (Riverside County 2020b):

SWAP 21.1 Protect the Santa Margarita watershed and habitat and provide recreational opportunities and flood protection through adherence to the applicable policies found within the Multiple Species Habitat Conservation Plans, Wetlands and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element, as well as use of Best Management Practice policies.

SWAP 23.1 Provide stepping-stone habitat linkages for the California gnatcatcher as well as other species through the preservation of land from the Santa Rosa Plateau to the Santa Margarita Reserve in San Diego County.

SWAP 23.2 Conserve the Tenaja corridor, which promotes large mammal movement between the Cleveland National Forest and the Santa Rosa Plateau.

SWAP 23.7 Consider the movement of larger mammals such as the mountain lion, bobcat, and mule deer between the Santa Ana and Mount Palomar Mountains.

SWAP 23.8 Protect sensitive biological resources in SWAP through adherence to policies found in the Multiple Species Habitat Conservation Plans, Environmentally Sensitive Lands, Wetlands, and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element.

4. **Safety:** The following General Plan Safety Element policies would apply to the proposed project (Riverside County 2019a):

S 1.1 Mitigate hazard impacts through adoption and strict enforcement of current building codes, which will be amended as necessary when local deficiencies are identified.

S 2.2 Require geological and geotechnical investigations in areas with potential for earthquake-induced liquefaction, landsliding or settlement, for any building proposed for human occupancy and any structure whose damage would cause harm, except for accessory buildings.

S 2.5 Require that engineered slopes be designed to resist seismically- induced failure. For lower-risk projects, slope design could be based on pseudo-static stability analyses using soil engineering parameters that are established on a site-specific basis. For higher-risk projects, the stability analyses should factor in the intensity of expected ground shaking, using a Newmark-type deformation analysis.

S 2.6 Require that cut and fill transition lots be over-excavated to mitigate the potential of seismically-induced differential settlement.

S 2.7 Require a 100 percent maximum variation of fill depths beneath structures to mitigate the potential of seismically-induced differential settlement.

S 3.1 Require the following in landslide potential hazard management zones, or when deemed necessary by the CEQA:

a. Preliminary geotechnical and geologic investigations.

b. Evaluations of site stability, including any possible impact on adjacent properties, before final project design is approved.

c. Consultant reports, investigations, and design recommendations required for grading permits, building permits, and subdivision applications be prepared by state-licensed professionals.

S 3.3 Before issuance of building permits, require certification regarding the stability of the site against adverse effects of rain, earthquakes, and subsidence.

S 3.4 Require adequate mitigation of potential impacts from erosion, slope instability, or other hazardous slope conditions, or from loss of aesthetic resources for development occurring on slope and hillside areas.

S 3.5 During permit review, identify and encourage mitigation of onsite and offsite slope instability, debris flow, and erosion hazards on lots undergoing substantial improvements.

S 3.6 Require grading plans, environmental assessments, engineering and geologic technical reports, irrigation and landscaping plans, including ecological restoration and revegetation plans, as appropriate, in order to assure the adequate demonstration of a project's ability to mitigate the

potential impacts of slope and erosion hazards and loss of native vegetation.

S 3.13 Require buildings to be designed to resist wind loads.

S 5.1 Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:

a. All proposed development and construction within Fire Hazard Severity Zones shall be reviewed by the Riverside County Fire and Building and Safety departments.

b. All proposed development and construction shall meet minimum standards for fire safety as defined in the Riverside County Building or County Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy, and use.

d. Proposed development and construction in Fire Hazard Severity Zones shall provide secondary public access, in accordance with Riverside County Ordinances.

e. Proposed development and construction in Fire Hazard Severity Zones shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the Riverside County Fire Chief.

f. Proposed development and construction in Fire Hazard Severity Zones shall provide a defensible space or fuel modification zones to be located, designed, and constructed that provide adequate defensibility from wildfires.

S 5.5 Encourage proposed development in Fire Hazard Severity Zones to develop where fire and emergency services are available or planned.

S 5.6 Demonstrate that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.

S 5.7 Minimize pockets of flammable vegetation that increase likelihood of fire spread through conceptual landscaping plans to be reviewed by Planning and Fire Departments in the Fire Hazard Severity Zones. The conceptual landscaping plan of the proposed development shall at a minimum include:

a. Plant palette suitable for high fire hazard areas to reduce the risk of fire hazards.

b. Retention of existing natural vegetation to the maximum extent feasible.

c. Removal of onsite combustible plants.

S 6.1 Enforce the land use policies and siting criteria related to hazardous materials and wastes through continued implementation of the programs identified in the County of Riverside Hazardous Waste Management Plan including the following:

a. Ensure county businesses comply with federal, state and local laws pertaining to the management of hazardous wastes and materials including all Certified Unified Program Agency (CUPA) programs.

c. Encourage and promote the programs, practices, and recommendations contained in the Riverside County Hazardous Waste Management Plan, giving the highest waste management priority to the reduction of hazardous waste at its source.

The following SWAP Hazards policies would apply to the proposed project (Riverside County 2020b):

SWAP 25.1 Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the Safety Element of the General Plan.

SWAP 26.1 Protect life and property from seismic-related incidents through adherence to the Seismic Hazards section of the General Plan Safety Element.

SWAP 27.2 Protect life and property and maintain the character of the Southwest planning area through adherence to the Hillside Development and Slope section of the General Plan Land Use Element, the policies within the Rural Mountainous and Open Space land use designations of the General Plan Land Use Element, and policies in the Slope and Soil Instability Hazards section of the General Plan Safety Element.

5. Noise: The following General Plan Noise Element policies would apply to the proposed project (Riverside County 2015b):

N 1.1 Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls shall be used.

N 1.4 Determine if existing land uses will present noise compatibility issues with proposed projects by undertaking site surveys.

N 1.5 Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.

N 1.8 Limit the maximum permitted noise levels that cross property lines and impact adjacent land uses, except when dealing with noise emissions from wind turbines. Please see the Wind Energy Conversion Systems section for more information.

N 4.1 Prohibit facility-related noise received by any sensitive use from exceeding the following worst-case noise levels:

a. 45 dBA-10-minute Leq between 10:00 p.m. and 7:00 a.m.

b. 65 dBA-10-minute Leq between 7:00 a.m. and 10:00 p.m.

N 4.5 Encourage major stationary noise-generating sources throughout the County of Riverside to install additional noise buffering or reduction mechanisms within their facilities to reduce noise generation levels to the lowest extent practicable prior to the renewal of conditional use permits or business licenses or prior to the approval and/or issuance of new conditional use permits for said facilities.

N 12.1 Utilize natural barriers such as hills, berms, boulders, and dense vegetation to assist in noise reduction.

N 12.2 Utilize dense landscaping to effectively reduce noise. However, when there is a long initial period where the immaturity of new landscaping makes this approach only marginally effective, utilize a large number of highly dense species planted in a fairly mature state, at close intervals, in conjunction with earthen berms, setbacks, or block walls.

N 13.1 Minimize the impacts of construction noise on adjacent uses within acceptable practices.

N 13.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse noise impacts on surrounding areas.

N 13.4 Require that all construction equipment utilizes noise reduction features (e.g. mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.

N 14.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.

N 14.8 Review all development applications for consistency with the standards and policies of the Noise Element of the General Plan.

N 19.5 Require new developments that have the potential to generate significant noise impacts to inform impacted users on the effects of these impacts during the environmental review process.

There are no policies specifically addressing noise in the SWAP (Riverside County 2020b).

6. Housing: There are no policies in the General Plan Housing Element that would apply to the proposed project (Riverside County 2017).

There are no policies specifically addressing housing in the SWAP (Riverside County 2020b).

7. Air Quality: The following General Plan Air Quality Element policies would be applicable to the proposed project (Riverside County 2018a):

AQ 2.1 The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.

AQ 2.2 Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.

AQ 2.3 Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

AQ 3.2 Seek new cooperative relationships between employers and employees to reduce vehicle miles traveled.

AQ 4.1 Require the use of all feasible building materials/methods which reduce emissions.

AQ 4.2 Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces, and boiler units.

AQ 4.3 Require centrally heated facilities to utilize automated time clocks or occupant sensors to control heating where feasible.

AQ 4.5 Require stationary pollution sources to minimize the release of toxic pollutants through:

- Design features;
- Operating procedures;
- Preventive maintenance;
- Operator training; and
- Emergency response planning.

AQ 4.6 Require stationary air pollution sources to comply with applicable air district rules and control measures.

AQ 4.7 To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the South Coast Air Quality Management District (SCAQMD), Mojave Desert Air Quality Management District (MDAQMD), South Coast Air Basin (SCAB), the Environmental Protection Agency and the California Air Resources Board.

AQ 4.9 Require compliance with SCAQMD Rules 403 and 403.1 and support appropriate future measures to reduce fugitive dust emanating from construction sites.

AQ 4.10 Coordinate with the SCAQMD and MDAQMD to create a communications plan to alert those conducting grading operations in the County of first,

second, and third stage smog alerts, and when wind speeds exceed 25 miles per hour. During these instances all grading operations should be suspended.

AQ 5.1 Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

AQ 20.11 Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment.

AQ 20.13 Reduce water use and wastewater generation in both new and existing housing, commercial and industrial uses. Encourage increased efficiency of water use for agricultural activities.

AQ 20.20 Reduce the amount of solid waste generation by increasing solid waste recycle, maximizing waste diversion, and composting for residential and commercial generators. Reduction in decomposable organic solid waste will reduce the methane emissions at County landfills.

There are no policies specifically addressing air quality in the SWAP (Riverside County 2020b).

8. **Healthy Communities:** There are no policies in the General Plan Healthy Communities Element that relate to the proposed project (Riverside County 2015c).

   There are no policies specifically addressing healthy communities in the SWAP (Riverside County 2020b).

9. **Environmental Justice (After Element is Adopted):** As of preparation of this document, the Environmental Justice Element had not yet been adopted.

   There are no policies specifically addressing environmental justice in the SWAP (Riverside County 2020b).

B. General Plan Area Plan: Southwest Area Plan

C. Foundation Component: Rural

D. Land Use Designation: Rural Mountainous (RM) 10 acre minimum

E. Overlay, if any: n/a

F. Policy Area, if any: Santa Rosa Plateau/De Luz Policy Area

G. Adjacent and Surrounding:

1. **General Plan Area Plan:** Southwest Area Plan

2. **Foundation Component(s):** Rural (west, south, east), Open Space (north)

3. **Land Use Designation(s):** Rural Mountainous (RM) 10 acre minimum (west, south, east); Conservation Habitat (north)

4. **Overlay, if any:** n/a

5. **Policy Area(s), if any:** Santa Rosa Plateau/De Luz Policy Area (surrounding), Walker Basin Policy Area (south but not immediately adjacent to project parcel)

H. Adopted Specific Plan Information

1. **Name and Number of Specific Plan, if any:** n/a

2. **Specific Plan Planning Area, and Policies, if any:** n/a

I. Existing Zoning: Light Agriculture 10 acre minimum (A-1-10)

J. Proposed Zoning, if any: n/a

K. Adjacent and Surrounding Zoning: Rural Residential (R-R) (north), Residential Agriculture 5 acre minimum (R-A-5) (east), Residential Agriculture 10 acre minimum (R-A-10) (south), Light Agriculture 10 acre minimum (A-1-10) (west)

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Agriculture & Forest Resources	☒ Hydrology / Water Quality	☐ Transportation
☐ Air Quality	☐ Land Use / Planning	☒ Tribal Cultural Resources
☒ Biological Resources	☐ Mineral Resources	☐ Utilities / Service Systems
☒ Cultural Resources	☐ Noise	☐ Wildfire
☐ Energy	☐ Paleontological Resources	☐ Mandatory Findings of Significance
☐ Geology / Soils	☐ Population / Housing	
☐ Greenhouse Gas Emissions	☐ Public Services	

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. **A MITIGATED NEGATIVE DECLARATION** will be prepared.
☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

Signature

Date

For: John Hildebrand

Planning Director

Printed Name

V. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the CEQA (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction and implementation of the project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
1. Scenic Resources a) Have a substantial effect upon a scenic highway corridor within which it is located?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

Source(s): Project Application Materials, Riverside County General Plan Circulation Element Figure C-8 "Scenic Highways" (Riverside County 2020c), Riverside County General Plan Land Use Element (Riverside county 2020a), Riverside County Southwest Area Plan (Riverside County 2020b)

Findings of Fact:

a) Have a substantial effect upon a scenic highway corridor within which it is located?

No Impact. According to the Riverside County Southwest Area Plan Figure 9, Scenic Highways, the closest highway to the project site is Interstate 15, which is State Eligible for listing and located 7.8 driving miles east of the project. Due to terrain, elevation change, and distance from the project site to Interstate 15, the proposed project would not be visible from the State Eligible highway. Therefore, the project site is not located near any State or county designated or eligible scenic highway (Riverside County 2020c), and no impact would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?

Less Than Significant Impact. The proposed project would be located in a non-urbanized area. Much of the project site is visible when looking north from Carancho Road. Current views include avocado trees that are part of the existing orchard, chain link fencing, dirt stockpiles, and overgrown roadside vegetation. Views of the ridgeline behind the project site are visible at a few points, although they are partly or completely obstructed by fencing, orchard trees, and other vegetation in most locations. The existing public viewpoints when looking north from Carancho Road are not considered to have high scenic quality, given the lack of harmony within the view, frequent obstructions, and the relatively poor condition of many of the trees and much of the fencing that dominate the existing view. See Photos 1 and 2 below for existing viewpoints of the project site from Carancho Road.

Photo 1. View of existing driveway approach looking northwest from Carancho Road.

Photo 2. View of existing avocado orchard looking northeast from Carancho Road.

Following project approval, a new 6-foot-high chain link fence with slats and landscaping would be installed around the proposed project components, which would include 14-foot-tall greenhouses, a steel building, and new driveway approach that would be publicly visible from Carancho Road. The project proposes a landscaping plan that concentrates plantings along the southern boundary of the project site near the Carancho Road frontage, along the north, south, and west boundaries of the proposed steel building, and around the proposed parking spaces. The proposed landscaping would screen visibility of the proposed project components from Carancho Road. In compliance with the Riverside County Land Use Ordinance, in no case would live cannabis plants be visible from a public or private road, sidewalk, park, or common public viewing area.

Given the poor quality of the existing view, construction of the proposed project, including the proposed improvements to the existing driveway and perimeter fencing and installation of landscaping along the Carancho Road frontage, would not substantially degrade the existing visual character or quality of public views of the project site or its surroundings. Further, because the proposed project would be developed on 4.3 acres of the 72-acre property and the existing orchard partly or completely obstructs views of the ridgeline at various viewpoints along Carancho Road, construction of the proposed project would not substantially damage scenic resources, including obstruct any prominent scenic vista or view open to the public. Therefore, aesthetic impacts resulting from the construction of the proposed project would be less than significant for questions b) and c).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

2. Mt. Palomar Observatory a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	☐	☐	☒	☐

Source(s): GIS database, Ord. No. 655 (Regulating Light Pollution), Southwest Area Plan (Riverside County 2020b)

Findings of Fact:

a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

No Impact. The project site is located approximately 25 linear miles northwest of the Mt. Palomar Observatory. The SWAP is divided into two zones regarding the Mt. Palomar Observatory: Zone A is closer to the observatory and subject to additional light restriction policies, whereas Zone B is further away and is not considered as potentially sensitive to the observatory. The project site is located in Zone B (Riverside County 2020b). The project would consist of an approximately 4.3-acre commercial cannabis operation that would include the minimum amount of growth lights and security lights necessary to conduct safe and effective operations. The proposed greenhouses would be constructed using 2-inch galvanized steel pipes for the frame and covered with 8 mil polyethylene film with a 100 percent blackout curtain to cover the side walls and roof of the greenhouses to contain light from within 30 minutes before sunset to 30 minutes after the sun rises to prevent nighttime light spillover.

Exterior lighting would be shielded and downward facing and would not trespass off the property. Security lighting would be dimmed and motion activated wherever feasible. Any light from the property would not interfere with use of the Mt. Palomar Observatory because of the mandatory requirement to comply with the provisions for Zone B in Ordinance No. 655. Therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

3. Other Lighting Issues a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
b) Expose residential property to unacceptable light levels?	☐	☐	☒	☐

Source(s): On-site Inspection, Project Application Description

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Findings of Fact:

a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
b) Expose residential property to unacceptable light levels?

Less Than Significant Impact. The proposed greenhouses would provide supplemental lighting and would have light exclusion black cloth curtains to contain light from within 30 minutes before sunset to 30 minutes after the sun rises to prevent light spillover at nighttime.

The proposed project would include 35 exterior flood lights on poles adjacent to the proposed 14-foot-tall greenhouses and 8 exterior wall sconces around steel building. Lights would be installed with specified fixtures, wattage, illumination levels, glare prevention, and shielding to prevent hazards to motorists along Carancho Road and nuisance to neighbors. Security lighting would also be installed on the exterior of the premises and the main entrance walkway. Some lighting may be motion activated or dimmed to save energy and to alert security personnel when a motion activates them. Although the proposed project would introduce a new source of light, the exterior lighting would be shielded and downward facing, would not trespass onto neighboring properties, and would meet the building and lighting ordinance requirements of Riverside County. Therefore, impacts would be less than significant for questions a) and b).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE & FOREST RESOURCES Would the project:				
4. Agriculture a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	☐	☐	☒	☐
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	☐	☐	☒	☐
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☒	☐

Source(s): California Department of Conservation Important Farmland Finder (CDC 2021a), GIS database, Project Application Materials, Riverside County Southwest Area Plan (Riverside County 2020b)

Findings of Fact:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Less Than Significant Impact. The majority of the project site is designated as Unique Farmland, with a small area in the southern portion of the project site designated for Farmland of Local Importance (CDC 2021a). Section 19.502(B) of the Riverside County Land Use Ordinance states that cannabis is not an agricultural commodity with respect to Ordinance No. 625, the Right-to-Farm ordinance, and is not considered Farmland or Agriculture as those terms are defined in the Riverside County General Plan or Ordinance No. 625. The proposed project would convert 4.3 acres of an existing avocado orchard to a cannabis cultivation operation, which would convert Unique Farmland and Farmland of Local Importance to non-agricultural use. However, the proposed project would not affect the California Resources Agency designation of the project site, and implementation of the proposed project would not result in an irreversible change to the existing agricultural capability of the land or surrounding lands as the remaining approximately 17 acres of the project parcel that is being actively farmed would not be impacted by the proposed project and would remain an active avocado orchard farming operation. Therefore, impacts would be less than significant.

b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?

Less Than Significant Impact. The project parcel is not under Williamson Act contract and is not part of an agricultural preserve (Riverside County GIS database). The project site is currently zoned as Light Agriculture 10 acre minimum (A-1-10) which allows the cultivation of cannabis with the approval of a cannabis conditional use permit (CUP) in accordance with the Riverside County Land Use Ordinance.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

With County approval of a CUP, the proposed project would be in conformance with zoning regulations, and impacts would be less than significant.

c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Less Than Significant Impact. Section 19.502(B) of the Riverside County Land Use Ordinance states that cannabis is not an agricultural commodity with respect to Ordinance No. 625, the Right-to-Farm ordinance, and is not considered Farmland or Agriculture as those terms are defined in the Riverside County General Plan or Ordinance No. 625. The project would involve the conversion of 4.3 acres of an active avocado orchard to a cannabis cultivation facility. The remaining approximately 17 acres of the project parcel that is being actively farmed would not be impacted by the proposed project and would remain an active avocado orchard farming operation. Operation of the proposed project would not adversely impact the viability of agricultural uses or zoning on neighboring parcels as impacts from the proposed project would be contained within the 4.3-acre project site and would not result in off-site impacts that would affect the viability of agricultural uses or zoning off-site. Additionally, the project site would remain zoned for Light Agriculture 10 acre minimum (A-1-10) which allows for the cultivation of cannabis with the approval of a CUP and would not introduce an incompatible land use that would affect nearby properties zoned for agricultural use or within agricultural preserves. Therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5. Forest	☐	☐	☐	☒
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	☐	☐	☐	☒
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): Project Application Materials, Riverside County Southwest Area Plan (Riverside County 2020b), Hernandez Environmental Services 2021

Findings of Fact:

a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?
b) Result in the loss of forest land or conversion of forest land to non-forest use?

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

No Impact. The project site is designated Rural Mountainous (RM) 10 acre minimum by the SWAP (Riverside County 2020b). Compatible uses include single family residences with 10 acre minimum lots, limited agriculture and recreation, and uses for government facilities. There is no zoning in the SWAP for forest land, timberland, or timber production zone. Therefore, the project would not conflict with any zoning regarding forest land or timber production.

A General Biological Assessment and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis was prepared for the proposed project (Hernandez Environmental Services 2021). The 72.3-acre parcel on which the project site is located contains a mix of sumac series chaparral laurel sumac dominant, upland ruderal, agricultural orchards, coast live oak woodland, disturbed/developed, and ephemeral drainages. The approximately 4.3-acre project site is comprised of agricultural orchards and disturbed/developed areas, as described below.

Agricultural Orchards

The project site contains approximately 3.91 acres of agricultural orchards. These areas are located within the southern portion of the site and are characterized by agricultural orchards and access roads. Vegetation found in these areas consists of non-native plant species and scattered ornamental trees. Common plant species observed include Peruvian pepper tree (Schinus mole), avocado tree (Persea americana), fig tree (Ficus carica), Century plant (Agave americana), and prickly pear cactus (Opuntia littoralis).

Disturbed/Developed

The project site contains approximately 0.37 acre of disturbed/developed areas. These areas are located throughout the site and are characterized by existing structures, trailers, and access roads. Vegetation found in these areas consists of non-native plant species and scattered ornamental trees. Common plant species observed include tumbleweed (Amaranthus albus), oats (Avena spp.), brome spp. (Bromus spp.), mustard (Hirschfeldia incana), stinknet (Oncosiphon piluliferum), common phacelia (Phacelia distans), Russian thistle (Salsola tragus), Peruvian pepper tree.

Trees present on-site include avocado trees along with scattered ornamental trees. Any trees to be removed would be agricultural or ornamental and would not be subject to any local or State tree protection ordinance, regulation, or statute (Hernandez Environmental Services 2021). Therefore, no impacts would occur for questions a), b), and c).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY Would the project:				
6. Air Quality Impacts a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Source(s): Riverside County General Plan Air Quality Element (Riverside County 2018a), Riverside County Climate Action Plan ("CAP"), SCAQMD CEQA Air Quality Handbook

Findings of Fact:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project is located within the South Coast Air Basin (SCAB). Air quality in the SCAB is regulated by the South Coast Air Quality Management District (SCAQMD). As a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), County transportation commissions, and local governments, as well as cooperates actively with all federal and state government agencies. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, economy, community development, and environment. Regarding air quality planning, SCAG has prepared the 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), *Connect SoCal*, a long-range transportation plan that uses growth forecasts to project trends over a 20-year period to identify regional transportation strategies to address mobility needs (SCAG 2020). These growth forecasts form the basis for the land use and transportation control portions of the Air Quality Management Plan (AQMP). These documents are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RTP/SCS and AQMP are based, in part, on projections originating with County and City General Plans.

The two principal criteria for determining conformance to the AQMP are (1) whether a project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards and (2) whether a project would exceed the assumptions in the AQMP (SCAQMD 1993).

With respect to the first criterion, the analyses described under the response to question 6b), below, demonstrate that the project would not generate short-term or long-term emissions that could potentially cause an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of air quality standards.

With respect to the second criterion, the proposed project would construct and operate a commercial cannabis cultivation facility. The project is zoned as Light Agriculture 10 acre minimum (A-1-10) which allows for the cultivation of cannabis with the approval of a CUP. The project would result in employment growth in Riverside County of up to 10 employees. It is anticipated that most or all employees would be existing residents of Riverside County and the project would not result in population growth in Riverside County. According to the Land Use/Planning analysis in response to question 24a) in the Land Use and Planning section below, the project site has a land use designation of Rural Mountainous (RM) 10 acre minimum and the project's proposed use would be consistent with the land use designation. No General Plan amendments would be required. Accordingly, the Project would not exceed the growth projections in the Riverside County General Plan and the project would be consistent with the growth assumptions used in the AQMP and the RTP/SCS.

Therefore, the project would not conflict with or obstruct implementation of the SCAQMD's 2016 AQMP, and impacts would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The project would generate criteria air pollutants and air pollutant precursors during construction and operation. The project site is located within the Riverside County portion of the SCAB. The SCAB is designated as a non-attainment area for the National Ambient Air Quality Standards (NAAQS) for 8-hour ozone (O3) and fine particulate matter (PM2.5); and as a non-attainment area for the California Ambient Air Quality Standards (CAAQS) for 1-hour ozone, 8-hour ozone, coarse particulate matter (PM10), and PM2.5 (SCAQMD 2016). The SCAQMD has established screening thresholds which a lead agency can use to determine the significance of criteria pollutant and precursor emissions for both construction and operation of a development project (SCAQMD 2015).

Criteria pollutant and precursor emissions were calculated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. CalEEMod is a computer model used to estimate criteria air pollutant and GHG emissions resulting from construction and operation of land development projects throughout the state of California. CalEEMod was developed by the SCAQMD with the input of several air quality management and pollution control districts.

Construction Emissions

Construction of the project is anticipated to commence in October 2021 and be completed in April 2022 for a total construction duration of 6 months. Construction would result in emissions of air pollutants from the use of off-road equipment and from vehicles traveling to and from the project site. Construction activities would include site preparation (e.g., clearing, grubbing), grading, building construction, and paving. The project greenhouses and steel building are assumed to be prefabricated and would not require painting on-site. During site preparation an estimated 4,000 cubic yards (CY) of vegetation/dirt would be hauled from the site. During grading cut/fill, approximately 22,761 CY of soil would be moved and balanced on site (no import or export of soil). The modeling assumes incorporation of fugitive dust control measures to meet the requirements of SCAQMD Rule 402, *Nuisance*, and Rule 403, *Fugitive Dust*, specifically watering all exposed areas a twice per day. The SCAQMD has established screening thresholds which a lead agency can use to determine the significance of a project's criteria pollutant and precursor emissions (SCAQMD 2015). The estimated daily construction emissions are compared to the SCAQMD screening thresholds in Table 2, *Construction Emissions*. As shown in Table 2, the maximum daily emissions of criteria pollutants and precursors during construction of the project would not exceed the SCAQMD screening thresholds. Therefore, construction of the project would not result

in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and the impact would be less than significant.

Table 2
CONSTRUCTION EMISSIONS

Construction Activity	VOC (lbs/day)	NO_X (lbs/day)	CO (lbs/day)	SO_2 (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Site Preparation	3.2	41.0	17.9	<0.1	2.8	1.4
Grading	4.3	42.3	25.7	<0.1	2.4	1.6
Building Construction	2.3	17.6	16.4	<0.1	1.5	1.0
Paving	1.2	9.4	12.2	<0.1	0.7	0.5
Maximum Daily Emissions[1]	**4.3**	**42.3**	**25.7**	**<0.1**	**2.8**	**1.6**
Screening-Level Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Thresholds SCAQMD 2015; CalEEMod (model output is included in Appendix F).
[1] Fugitive dust measures (watering twice daily) were applied to control PM_{10} and $PM_{2.5}$ dust emissions.
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide;
PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
lbs/day = pounds per day

Operational Emissions

Long term operation of the project would result in air pollutant emissions from area sources (the use of landscape equipment and the application of paint for maintenance), from mobile sources (employee vehicles and transport trucks traveling to and from the project site), and from stationary sources (operation of backup generators for testing and maintenance). According to the Transportation analysis provided in response to question 37b) below, the project would result in 28 daily trips from employees plus occasional truck trips to deliver supplies, remove waste, and transport finished products. This analysis assumes two additional truck trips per day (30 total average daily trips). Specifications for the size and type of emergency backup generator(s) had not been determined as of this analysis. The modeling assumes one 500 horsepower diesel generator capable of supplying all of the project's electrical needs during a power outage emergency (approximately 350 kilowatts [kW]). The generator was assumed to be operated once per month for 15 minutes for testing and maintenance.

The estimated daily operational emissions are shown in Table 3, *Operational Emissions*. As shown in Table 3, the maximum daily emissions of criteria pollutants and precursors during long-term operation of the project would not exceed the SCAQMD screening thresholds. Therefore, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and the impact would be less than significant.

Table 3
OPERATIONAL EMISSIONS

Source	VOC (lbs/day)	NO_X (lbs/day)	CO (lbs/day)	SO_2 (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Area	1.4	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile	<0.1	0.3	0.7	<0.1	0.3	<0.1
Stationary	0.4	1.1	1.0	<0.1	<0.1	<0.1
Total Daily Emissions[1]	**1.8**	**1.5**	**1.8**	**<0.1**	**0.4**	**0.1**
Screening-Level Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Thresholds SCAQMD 2015; CalEEMod (model output is included in Appendix F).

[1] Totals may not sum due to rounding.

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter lbs/day = pounds per day

c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?

Less Than Significant Impact. Pollutant concentrations of concern from development projects in the SCAB include: localized concentrations of criteria pollutants and precursors (NO_X, CO, PM_{10}, and $PM_{2.5}$) emitted on the project site during construction or operations; localized concentrations of toxic air contaminants (TACs); and localized concentrations of CO (hot spots) from vehicular traffic.

The localized effects from the on-site portion of daily construction emissions were evaluated at sensitive receptor locations potentially impacted by the project according to the SCAQMD's localized significance threshold (LST) methodology and mass-rate threshold lookup tables (S0CAQMD 2009; SCAQMD 2008). The proposed project is within source receptor area 26, Temecula Valley. Consistent with the LST guidelines, when quantifying mass emissions for localized analysis, only emissions that occur on site are considered. Emissions related to off-site delivery/haul truck activity and construction worker trips are not considered in the evaluation of construction-related localized impacts, as these do not contribute to emissions generated on a project site. The closest sensitive receptors are the single-family residences approximately 200 feet (61 meters) southeast of the project site across Carancho Road. Site preparation and grading would require two dozers in use each day. In accordance with the SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*, the maximum daily disturbed area would be 1 acre and the 1-acre LST lookup tables would apply (SCAQMD 2021). Therefore, the LSTs in source receptor area 26 for receptors located at 164 feet (50 meters) for maximum daily disturbed area of 1 acre are applicable to the project. The on-site construction emissions are compared to the applicable SCAQMD LSTs in Table 4, *Localized Construction Emissions*. As shown in Table 4, localized emissions for all criteria pollutants would remain below their respective SCAQMD LSTs. Once operational, only monthly testing of the backup generator would be a substantial source for on-site criteria pollutants. As shown in Table 3, above, stationary source emissions of NO_X and CO would be less than 2 pounds per day and stationary source emissions of PM_{10} and $PM_{2.5}$ would be less than 0.5 pounds per day. Therefore, localized emissions of criteria pollutants from project construction or operational activities would not expose sensitive receptors to substantial concentrations of pollutants, and the impact would be less than significant.

Table 4
LOCALIZED CONSTRUCTION EMISSIONS

Construction Activity	NO_X (lbs/day)	CO (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Site Preparation	30.0	15.7	1.6	1.1
Grading	42.2	24.8	2.1	1.5
Paving	16.0	14.6	0.8	0.8
Building Construction	9.3	11.7	0.5	0.5
Maximum Daily Emissions[1]	**42.2**	**24.8**	**2.1**	**1.5**
Localized Significance Threshold	*203*	*2,176*	*30*	*4*
Exceed Threshold?	***No***	***No***	***No***	***No***

Source: Thresholds SCAQMD 2009; CalEEMod (model output is included in Appendix F).
[1] Fugitive dust measures (watering twice daily) were applied to control PM_{10} and $PM_{2.5}$ dust emissions.
NO_X = nitrogen oxides; CO = carbon monoxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
lbs/day = pounds per day.

Toxic Air Contaminants

The Health and Safety Code (§39655, subd. (a).) defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health."

The only anticipated TAC emitted as a result of project construction or operation activities would be components of diesel exhaust. Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is less than 2.5 microns in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, the CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects.

Construction of the project would result in the use of heavy-duty construction equipment, delivery trucks, and construction worker vehicles which could generate DPM. Generation of DPM from construction projects typically occurs in a localized area (e.g., near locations with multiple pieces of heavy construction equipment working in close proximity) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction, the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. The dose of TACs to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a source of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime. Once operational, the only significant source of DPM on the project site would be from the backup generator which would only run

during power outage emergencies and for short monthly tests. Considering this information, the fact that any concentrated use of heavy construction equipment would occur at various locations throughout the project site only for short durations, construction and operation of the project would not expose sensitive receptors to substantial DPM concentrations, and the impact would be less than significant.

Carbon Monoxide Hotspots

Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found within close proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increase. Project-generated traffic has the potential of contributing to localized "hot spots" of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections. The project site is located in a rural area in the hills west of Temecula where there are no heavily congested roadways or intersections. Therefore, the project would not expose sensitive receptors to CO hotspots from project construction or operation and the impact would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact.

Construction Odors

The Air Quality Section of the County's General Plan Update's Environmental Impact Report (Riverside County 2015d) provides guidance for defining objectionable odors and "substantial numbers of people." For construction activities, the EIR determined that a substantial number of people would not be impacted, as construction odors are limited to the number of people living and working near the source. The nearest residences are located approximately 200 feet (61 meters) southeast of the project and across Carancho Road. While some components of asphalt and diesel emissions emit odors, construction activities would not cause significant odor impacts due to the short-term duration of exposure. Odor impacts from construction of the project would be less than significant.

Operational Odors

Commercial cannabis growing and processing facilities are known to be a potential source of objectionable odors due to the strong fragrance of the plants. The project would be required to comply with the Riverside County ordinances for commercial cannabis activities as well as Rule 402 under SCAQMD. County Code Section 17.302.060, *Permit requirements for all commercial cannabis activities*, requires the following for odor control (Riverside County 2018b):

F. Nuisance odors. All commercial cannabis activities shall be sited and operated in a manner that prevents cannabis nuisance odors from being detected offsite. All commercial cannabis activities shall provide a sufficient odor absorbing ventilation and exhaust system so that odor generated inside the commercial cannabis activity that is distinctive to its operation is not detected outside of the operation's facility, anywhere on adjacent lots or public rights-of-way, on or about the exterior or interior common area walkways, hallways, breezeways, foyers, lobby areas, or any other areas available for use by common tenants or the visiting public, or within any other unit located inside the same building as the commercial cannabis activity. In order to

control nuisances such as odors, humidity and mold, commercial cannabis activities shall install and maintain at the minimum, the following equipment, or any other equipment that can be proven to be an equally or more effective method or technology to control these nuisances:

1. An exhaust air filtration system with odor control that prevents internal odors from being emitted externally;

2. An air system that creates negative air pressure between the commercial cannabis activities' interior and exterior, so that the odors generated by the commercial cannabis activity are not detectable on the outside of the commercial cannabis activity.

SCAQMD Rule 402, *Nuisance*, requires the following for odor control:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

With adherence to the Riverside County ordinances for commercial cannabis activities and Rule 402 under SCAQMD, long-term operation of the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and the impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES Would the project:				
7. Wildlife & Vegetation a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	☐	☒	☐	☐
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	☐	☒	☐	☐
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☐	☒	☐
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Source(s): GIS database, Western Riverside County MSHCP, On-site Inspection, Hernandez Environmental Services 2021a, 2021b

Findings of Fact: Hernandez Environmental Services prepared a General Biological Assessment and Western Riverside County HCP Consistency Analysis (BA) and Jurisdictional Delineation for the proposed project (Hernandez Environmental Services 2021a, 2021b). The discussion of biological resources in this section is based on those reports, which are included as Appendix G to this Initial Study.

Project Relationship to the Western Riverside County MSHCP

The project area is located within the Western Riverside County MSHCP boundaries. The County of Riverside, acting as the lead agency for the proposed project, is a permittee under the Western Riverside County MSHCP and, therefore, is afforded coverage under the State or federal ESAs for impacts to listed species covered by the plan. The County is required to document consistency with the Western Riverside County MSHCP in conjunction with any discretionary approvals for the project. As such, the biological resources report (Hernandez Environmental Services 2021a, see Appendix G) was

prepared to provide all necessary information required to determine project consistency with the Western Riverside County MSHCP.

The project site is located within the SWAP of the Western Riverside County MSHCP. The southwestern portion of APN 933-020-005 is located within the SWAP, in the Santa Rosa Plateau Subunit (SU6), in Criteria Cell 7051. Conservation within Criteria Cell 7051 contributes to assembly of Proposed Constrained Linkage 12, and focuses on chaparral, woodland and forest habitat along Sandia Canyon and adjacent agricultural land. Areas conserved within Criteria Cell 7051 are to be connected to woodland and forest habitat and agricultural land proposed for conservation in Cell Group M to the south and to chaparral, woodland and forest habitat and agricultural land proposed for conservation in Criteria Cell 7053 to the east. Conservation within Criteria Cell 7051 is to range from 10 to 20 percent, focused in the eastern portion of the Cell. The parcel was previously approved under HANS01835/JPR 09-07-15-01. HAN210004 will also apply to the parcel.

The project site is located within a plan-defined area requiring surveys for narrow endemic plant species, criteria area plant species, and amphibian species, including many-stemmed dudleya (*Dudleya multicaulis*), California Orcutt grass (*Orcuttia californica*), spreading navarretia (*Navarretia fossalis*), San Miguel savory (*Clinopodium chandleri*), Hammitt's clay-cress (*Sibaropsis hammittii*), Wright's trichocoronis (*Trichocoronis wrightii*), Parish's brittlescale (Atriplex parishii), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), round-leaved filaree (*California macrophylla*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), heart-leaved pitcher sage (*Lepechinia cardiophylla*), Prostarte navarretia (*Navarretia prostrata*), and California red-legged frog (*Rana draytonii*). In addition, the project site is within the Western Riverside County MSHCP burrowing owl (*Athene cunicularia*) survey area. APN 933-020-005 contains potentially suitable habitat for San Miguel savory, Round-leaved filaree, and Heartleaved pitcher sage within the chaparral and coast live oak woodlands located within the central and northern portions of the parcel. Further potentially suitable habitat for burrowing owl is present within the ruderal habitat located within the central portion of the parcel. However, the proposed project would be confined to approximately 4.3 acres of the southwest portion of APN 933-020-005 consisting of existing avocado orchards.

Field Survey

On January 8, 2021, Hernandez Environmental Services biologists conducted a field survey of the project site. The purpose of the field survey was to document the existing habitat conditions, obtain plant and animal species information, view the surrounding land uses, assess the potential for state and federal jurisdictional waters, assess the potential for wildlife movement corridors, and assess the presence of constituent elements for protected habitat, if present.

Linear transects spaced approximately 50 to 100 feet apart were walked across the project site and areas that were inaccessible were surveyed with binoculars for 100 percent coverage. All species observed were recorded. Global Positioning System (GPS) waypoints were taken to delineate specific habitat types, species locations, state or federal waters, and any other information that would be useful for the assessment of the project site. A comprehensive list of all plant and wildlife species that were detected during the field survey within the project site, sensitive plant, and wildlife species with the potential to occur within the project area, and representative site photographs are included in Appendix G.

Existing Conditions

The project site consists of approximately 4.3 acres of the southwest portion of APN 933-020-005, which is an existing 72-acre agricultural facility. The project site is currently disturbed and utilized for agriculture consisting of an avocado orchard with associated irrigation infrastructure. Site topography consists of terrain that slopes gently from the north towards the southern site boundary, with elevations ranging from 1,365 feet above mean sea level (amsl) to 1,290 feet amsl. The approximately 4.3-acre project site is highly disturbed by agricultural use and is dominated by avocado trees. Immediately surrounding the project site to the north and east is the existing agricultural facility located within the remainder of APN 933-020-005. Several drainages cross through APN 933-020-005 to the north and east of the project site. Land uses surrounding APN 933-020-005 include Carancho Road and residential uses to the south, vacant lands and the Santa Rosa Plateau to the north, vacant lands and agricultural uses to the west, and a mix of agricultural and residential uses to the east.

Plant and Habitat Communities

APN 933-020-005 is characterized by a mix of habitat types including: sumac series chaparral laurel sumac dominant, upland ruderal, agricultural orchards, coast live oak woodland, disturbed/developed, and ephemeral drainages. The approximately 4.3-acre project site is comprised of agricultural orchards and disturbed/developed areas, as described below.

Agricultural Orchards

The project site contains approximately 3.91 acres of agricultural orchards. These areas are located within the southern portion of the site and are characterized by agricultural orchards and access roads. Vegetation found in these areas consists of non-native plant species and scattered ornamental trees. Common plant species observed include Peruvian pepper tree (*Schinus mole*), avocado tree (*Persea americana*), fig tree (*Ficus carica*), Century plant (*Agave americana*), and prickly pear cactus (*Opuntia littoralis*).

Disturbed/Developed

The project site contains approximately 0.37 acre of disturbed/developed areas. These areas are located throughout the site and are characterized by an existing single-family residence, structures, trailers, and access roads. Vegetation found in these areas consists of non-native plant species and scattered ornamental trees. Common plant species observed include tumbleweed (*Amaranthus albus*), oats (*Avena* spp.), brome spp. (*Bromus* spp.), mustard (*Hirschfeldia incana*), stinknet (*Oncosiphon piluliferum*), common phacelia (*Phacelia distans*), Russian thistle (*Salsola tragus*), and Peruvian pepper tree (*Schinus mole*).

Wildlife

General wildlife species documented on the project site or within the vicinity of the site include mourning dove *(Zenaida macroura*), common raven (*Corvus corax*), Anna's hummingbird (*Calypte anna*), California scrub jay (*Aphelocoma californica*), pocket gopher (*Thomomys bottae*), white-crowned sparrow (*Zonotrichia leucophrys*), red-tailed hawk (*Buteo jamaicensis*) and a house cat (*Felis catus*). The complete list of species observed is included in Appendix G.

Regional Connectivity/Wildlife Movement

Wildlife movement corridors can be local or regional in scale; their functions may vary temporally and spatially based on conditions and species present. Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Local corridors provide access to resources such as food, water, and shelter. Animals use these corridors, which are often hillsides or riparian areas, to move between different habitats. Regional corridors provide these functions and link two or more large habitat areas. They provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations.

Sensitive Biological Resources

According to the CNDDB, 49 sensitive species of plants and 47 sensitive species of animals have the potential to occur on or within the vicinity of the project site. These include those species listed or candidates for listing by the U. S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) and California Native Plant Society (CNPS). All habitats with the potential to be used by sensitive species were evaluated during the site visit and a determination has been made for the presence or probability of presence in the analysis section below. Sensitive species which have a potential to occur in the project site are discussed in detail in the analysis section below. Other special status species with little or no potential to occur are addressed in Appendix G.

Sensitive Plant Species

A total of 18 plant species are listed as state and/or federal Threatened, Endangered, or Candidate species; are required to be reviewed under the Narrow Endemic Plant section of the Western Riverside MSHCP; or are 1B.1 listed plants on the CNPS Rare Plan Inventory. None of these species are present on the project site. See Appendix G for a list and detailed discussion of each plant species evaluated.

Sensitive Animal Species

A total of 13 animal species listed as State and/or federal Threatened, Endangered, or Candidate were evaluated. CDFW Species of Special Concern with potential to occur in the project area were also evaluated. All sensitive species occurrences recorded within a 5-mile radius of project area were reviewed and a complete list of those species, along with evaluations of presence or absence, are provided in Appendix G.

Burrowing Owl

Burrowing owl (*Athene cunicularia*) is a CDFW Species of Special Concern. Its habitat includes coastal prairie, coastal scrub, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, Sonoran desert scrub, and valley and foothill grassland. This species is typically found in open and dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. It is a subterranean nester and is dependent upon burrowing mammals, most notably the California ground squirrel (*Spermophilus beecheyi*). No burrowing owl has been recorded within 5 miles of the site. A habitat assessment for this species was conducted due to the fact that the site is within the Western Riverside County MSHCP burrowing owl survey area. Although signs of ground squirrels were identified on APN 933-020-005, the approximately 4.3-acre project area is highly disturbed by ongoing agricultural uses and no small mammal burrows were observed. The habitat assessment determined that no suitable habitat for burrowing owl exists within the project site. The avocado orchards do not provide the open fields necessary for burrowing owl habitat.

Nesting Birds

Migratory non-game native bird species are protected under the federal Migratory Bird Treaty Act. Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, with limited exceptions. The project site contains trees and shrubs that could be utilized by nesting birds during the nesting season of February 1 through September 15.

Jurisdictional Waters

APN 933-020-005 contains approximately 7.03 acres (8,310 linear feet) of ephemeral drainages and associated riparian areas that would be considered CDFW jurisdictional and Waters of the State. The ephemeral drainages are dominated by a mix of coast live oak woodland and other upland plant species. The approximately 4.3-acre project area does not contain jurisdictional drainages; however, the proposed roadway improvement areas cross over an existing culvert that conveys flows from ephemeral drainages located within APN 933-020-005 beneath Carancho Road to the south. The existing culvert and drainage facilities beneath Carancho Road would remain in place. The project site also does not contain any wetlands or vernal pools.

a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?

Less than Significant with Mitigation Incorporated. The site-specific BA prepared for the proposed project (Hernandez Environmental Services 2021; Appendix G of this Initial Study) assessed the consistency of the proposed project with the Western Riverside County MSHCP in detail. In summary, the project site would be confined to approximately 4.3 acres of the southwest portion of APN 933-020-005. The remainder of the parcel is not part of the project and was not evaluated for consistency with the MSHCP. The County would include as a condition of approval that on all Final Maps and Exhibits, the remaining portion of the parcel will be mapped as "NOT A PART". The 4.3-acre project area consists of disturbed land characterized by agricultural orchards and disturbed/developed areas. The proposed project site does not contain the chaparral, woodland, and forest habitats described for conservation within Criteria Cell 7051. Further, the project site does not contain lands along or adjacent to Sandia Canyon and would not provide a connection to Proposed Constrained Linkage 12 or habitat within Criteria Cell 7053 to the east. Therefore, the 4.3-acre project area would not contribute to the conservation goals described for Criteria Cell 7051. Surveys for sensitive species, habitats, and other provisions required for analysis under the MSHCP were conducted as part of the biological resources evaluation for this project.

The BA determined that APN 933-020-005 is located adjacent to the Santa Rosa Plateau to the north, and several ephemeral drainages cross through APN 933-020-005 to the north and east of the 4.3-acre project site. Therefore, Urban/Wildlands Interface Guidelines (Section 6.14 of the MSHCP) are required to be applied to the project. The proposed project was found to be in conflict with provisions of the MSHCP, unless appropriate mitigation measures are incorporated, which is a potentially significant impact. Therefore, **Mitigation Measures BIO-03, -04, and -05** shall be incorporated into the project to be in compliance with the MSHCP and reduce potential impacts to the adjacent offsite drainages to a less-than-significant level.

A burrowing owl habitat assessment was conducted on the 4.3-acre project area. Due to the fact that the site is highly disturbed by existing avocado orchard agricultural uses and no small mammal burrows were observed, the habitat assessment determined that no suitable habitat for burrowing owl exists

within the project area. The avocado orchards are trees that do not provide the open fields necessary for burrowing owl habitat.

However, because the project site is located within the Western Riverside County MSHCP burrowing owl survey area, a 30-day preconstruction survey is required prior to the commencement of project activities (e.g. vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding project activities. **Mitigation Measure BIO-01** shall be incorporated to confirm the presence or absence of burrowing owl on the project site prior to ground-disturbing activities and reduce potential impacts to burrowing owl in accordance with the Western Riverside County MSHCP to a less-than-significant level.

Implementation of **Mitigation Measures BIO-01**, **BIO-03**, **BIO-04**, and **BIO-05** would reduce any conflicts with the Western Riverside County MSHCP to a less-than-significant level.

b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?

c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?

Less than Significant with Mitigation Incorporated. The project site does not contain suitable habitat for any of the sensitive species that according to CNDDB have the potential to occur on or in the vicinity of the project site. The 4.3-acre project area is highly disturbed by ongoing agricultural uses. If the project would remove shrubs or trees between February 1 and September 15, the project would have a potentially significant impact to nesting birds. Implementation of **Mitigation Measure BIO-02** would confirm the presence or absence of nesting birds within or adjacent to the project site prior to construction activities and reduce any potential impacts to nesting birds to less than significant. Impacts would be less than significant with mitigation incorporated for questions b) and c).

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Wildlife movement corridors connect areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. The project site was evaluated for its function as a wildlife corridor that species would use to move between wildlife habitat zones. Typically, mountain canyons or riparian corridors are used by wildlife as corridors; the project site does not contain these features. The project site consists of approximately 4.3 acres in the southwest portion of APN 933-020-005. The project site consists of disturbed land characterized by agricultural orchards and disturbed/developed areas. Immediately surrounding the project site to the north and east is an existing agricultural facility located within the remainder of APN 933-020-005. Several drainages cross through APN 933-020-005 to the north and east of the project site. Land uses surrounding APN 933-020-005 include Carancho Road and residential and agricultural uses. Although the ephemeral drainages to the north and east of the project site could be utilized for local wildlife movement, no wildlife movement corridors were found to be present on the project site. Any impacts would be less than significant.

e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?

Less Than Significant Impact. The project site is not located within designated critical habitat for any special-status species and does not contain jurisdictional drainages. Implementation of the proposed project would impact the entire approximately 4.3-acre project site, consisting of approximately 3.91 acres of agricultural orchards and 0.37 acre of disturbed/developed habitat. Approximately 0.2 acre of the proposed project impact area is located within the boundaries of MSHCP Criteria Cell 7051. Project impacts to habitats located within Criteria Cell 7051 include 0.03 acre of disturbed/developed area and 0.17 acre of agricultural orchards. In addition, the proposed offsite road improvements are located within Criteria Cell 7051 and would impact approximately 0.18 acre of disturbed/developed areas within the existing Carancho Road right-of-way. Therefore, potential impacts to riparian habitat or other sensitive natural communities would be less than significant.

f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant with Mitigation Incorporated. APN 933-020-005 contains approximately 7.03 acres (8,310 linear feet) of ephemeral drainages and associated riparian areas that would be considered CDFW jurisdictional and Waters of the State. The approximately 4.3-acre project area does not contain jurisdictional drainages; however, the proposed roadway improvement areas cross over an existing culvert that conveys flows from ephemeral drainages located within APN 933-020-005 beneath Carancho Road to the south. The existing culvert/drainage facilities beneath the existing Carancho Road would remain in place. As discussed above under question a), because the project site is located adjacent to the Santa Rosa Plateau to the north, and several ephemeral drainages cross through APN 933-020-005 to the north and east, the Urban/Wildlands Interface Guidelines (Section 6.14 of the MSHCP) are required to be applied to the project. Therefore, **Mitigation Measures BIO-03, -04, and -05** shall be incorporated into the project to mitigate erosion control concerns, toxic runoff, and establishment of non-native, invasive plant species and reduce potential impacts to the adjacent offsite drainages to a less-than-significant level.

g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. Though the Riverside County Ordinance 559.7 functions as a tree preservation ordinance, it only applies to lands above 5,000 feet in elevation (Riverside County Municipal Code Chapter 12.24 - TREE REMOVAL). The project site is not above 5,000 feet in elevation, and no other local policies or ordinances protecting biological resources would apply to the project site. Therefore, there would be no impact to a local tree preservation policy or ordinance.

Mitigation:

BIO-01 Burrowing Owl:

- A 30-day preconstruction survey is required prior to the commencement of project activities (e.g. vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding project activities.

- If burrowing owl are found to have colonized the project site prior to the initiation of construction, the project proponent will immediately inform Western Riverside County Regional Conservation Authority (RCA) and the Wildlife Agencies and will need to prepare a Burrowing Owl Protection and Relocation Plan for approval by RCA and the Wildlife Agencies prior to initiating ground disturbance.

- If ground-disturbing activities occur but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrow owl is found, the same coordination described above will be necessary.

BIO-02 Nesting Birds:

- Project ground disturbing and vegetation clearing activities should occur outside of the bird nesting season of February 1 through September 15;

- If avoidance of ground disturbing and vegetation clearing activities cannot be implemented and these activities will occur during the bird nesting season, a qualified biologist shall conduct pre-construction nesting bird surveys during the nesting bird season within 3 days prior to vegetation removal and/or construction activities; and,

- If active nests are found during nesting bird surveys, they will be flagged and a 500-foot buffer for raptors and a 250-foot buffer for migratory songbirds shall be installed around the nests. The buffers must remain in place until the young have fledged and the nest becomes unoccupied as determined by a qualified biologist.

BIO-03 Drainage: Water Quality Best Management Practices shall be incorporated, including the National Pollutant Discharge Elimination Systems and erosion control requirements from the Regional Water Quality Control Board, to ensure that the quantity and quality of surface water runoff discharged into the offsite drainages is not altered in an adverse way when compared with existing conditions. These BMPs will be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) in order to ensure that water quality is not degraded.

BIO-04 Toxics: Measures such as those employed to address drainage issues will be implemented for toxics. Land uses proposed in proximity to the offsite drainages that use chemicals or generate bioproducts that are potentially toxic or may adversely affect wildlife species, habitat or water quality must incorporate measures to ensure that application of such chemicals does not result in discharge to the drainage.

BIO-05 Invasives: Invasive, non-native plant species must not be used as landscaping materials for development that is proposed adjacent to the offsite drainage areas. Table 6-2 of Volume 1 of the MSHCP lists the plants that should be avoided.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES Would the project:				
8. Historic Resources a) Alter or destroy a historic site?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☒	☐

Source(s): On-site Inspection, Phase I Cultural Resources Survey (BFSA 2021b), Project Application Materials, Riverside County General Plan Multipurpose Open Space Element (Riverside County 2015a)

Findings of Fact:

BFSA was retained by the project applicant to conduct a cultural resources survey of the project site (BFSA 2021b), and the survey report is included as Appendix H to this Initial Study. The archaeological survey was conducted in compliance with CEQA and County of Riverside Cultural Resource Guidelines (Draft) with regards to development-generated impacts to cultural resources. Sensitivity for cultural resources in a given area is usually indicated by known settlement patterns, which in Riverside County are focused around environments with accessible food and water.

The records search for the property was requested from the Eastern Information Center (EIC) at UCR on August 26, 2020. The search results indicated that five cultural resource sites are mapped within one mile of the project, none of which are located within the project boundaries. Three of these sites are prehistoric bedrock milling feature sites with no associated artifacts or deposits; one is a prehistoric isolated artifact; and one is a multicomponent site consisting of a prehistoric village site overlain by a historic building complex, including adobe structures (BFSA 2021b). The results of the EIC records search also indicated that 29 previous cultural resource studies have been conducted within one mile of the subject property, two of which (Drover 1990; Tsunoda 2007b) overlap portions of the project. The Drover (1990) study was an archaeological survey of Parcel Map 25367, which covered only a small portion within the southeast corner of the current project area. The Tsunoda (2007b) report was an extremely narrowly focused study on two power poles, one of which is located on the subject property; however, the study only addressed the immediate vicinity surrounding the power pole and, therefore, did not directly address the project area as a whole. No cultural resources were recorded within or directly adjacent to the project as a result of either study (BFSA 2021b).

BFSA reviewed the National Register of Historic Places (NRHP) index, historic USGS data, and historic aerial photographs (1938, 1947, 1967, 1978, and 1990) for the project area, which did not indicate the presence of any historic or prehistoric cultural resources within the project. Analysis of the historic aerial photographs did indicate that the property has been modified by the development of avocado orchards since the late 1970s. In addition, land patent records, held by the Bureau of Land Management (BLM) and accessible through the BLM General Land Office website, were reviewed for pertinent project information and the BFSA research library was consulted for any relevant historical information.

BFSA requested a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) on August 26, 2020 to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the project. The NAHC SLF search did indicate the presence of sacred sites or locations of religious or ceremonial importance within the search radius. In accordance with the recommendations of the NAHC, BFSA contacted all Native American consultants listed in the NAHC response letter at least two weeks prior to the initiation of the field survey. This request is not part of any Assembly Bill (AB) 52 Native American consultation. See

the Tribal Cultural Resources section of this Initial Study for a discussion of formal AB 52 consultation related to this project.

Responses were received during the two-week interim period, none of which requested participation in the survey. The Agua Caliente Band of Cahuilla Indians deferred to other tribes in the area, and the Santa Rosa Band of Cahuilla Indians indicated that no response was needed at this time. The NAHC specifically urged BFSA to contact the Pechanga Band of Luiseño Mission Indians. Based upon the comments from the NAHC, BFSA directly contacted Ebru Ozdil, Cultural Analyst for the Pechanga Band by phone on September 8, 2020. Ms. Ozdil indicated that the area was part of a larger Traditional Cultural Property. A representative from Pechanga was invited to voluntarily participate in the survey of the property but declined.

Principal Investigator Tracy A. Stropes, M.A., RPA directed the cultural resources study for the project. Director of Field Operations Clarence Hoff and staff archaeologist Andrew Garrison conducted the pedestrian survey of the project on September 9 and 10, 2020. The survey was conducted in five- to 15-meter interval transects. Visibility of the natural ground surface was fair to poor, with just 20 percent of the ground surface visible.

Over 80 percent of the project parcel has been disturbed by previous periodic plowing and disking and the development of orchards sometime during the late 1970s. A small frequency of exposed bedrock outcrops is present in the northeast corner of the property. Currently, the southern portion of the property, including the project site, is still an active orchard.

a) Alter or destroy a historic site?
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?

Less Than Significant Impact. An archaeological records search for the project and the surrounding area within a one-mile radius was requested from the EIC at UCR on August 26, 2020. As noted above, the records search results indicated that five cultural resource sites are mapped within one mile of the project, none of which are located within the project boundaries. The results of the EIC records search also indicated that 29 previous cultural resource studies have been conducted within one mile of the subject property, two of which (Drover 1990; Tsunoda 2007b) overlap portions of the project. No cultural resources were recorded within or directly adjacent to the project as a result of either study (BFSA 2021b).

BFSA reviewed the following sources to help facilitate a better understanding of the historic use of the property:

- The NRHP index
- Historic USGS data
- Historic aerial photographs (1938, 1947, 1967, 1978, and 1990)

These sources did not indicate the presence of archaeological resources within the project. However, for background research, the absence of positive results does not necessarily indicate the absence of historic resources. Given the historic settlement of the region and the steep slopes of the project area, there is a low to moderate potential for historic resources discoveries.

Nearly the entire property has been disturbed by the grading of dirt roads and terracing for avocado orchards. This characterization of the property as highly surficially disturbed is relevant to the

consideration of cultural resources being present within the project. When parcels are cleared, disked, or otherwise disturbed, evidence of surface artifact scatters is lost. Whether or not cultural resources have ever existed in this parcel, the current status of the property appears to have affected the potential to discover any surface scatters of artifacts. The survey did not result in the identification of any historic or prehistoric cultural resources.

Given that historic resources were not identified on site through either site reconnaissance or records review and that historic use of the site does not suggest that any such resources would be present, potential impacts to historic resources would be less than significant for questions a) and b).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

9. Archaeological Resources a) Alter or destroy an archaeological site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Source(s): On-Site Inspection, Phase I Cultural Resources Survey (BESA 2020b), Project Application Materials, Riverside County General Plan Multipurpose Open Space Element (Riverside County 2015a)

Findings of Fact:

See the discussion of Historic Resources, above, for a summary of the Phase I Cultural Resources Survey (BESA 2020b) for this site. See the Tribal Cultural Resources section for a summary of AB 52 consultation conducted by the County with local Native American tribes.

a) Alter or destroy an archaeological site?
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?

Less than Significant with Mitigation Incorporated. An archaeological records search for the project and the surrounding area within a one-mile radius was requested from the EIC at UCR on August 26, 2020. As noted above, the records search results indicated that five cultural resource sites are mapped within one mile of the project, none of which are located within the project boundaries. The results of the EIC records search also indicated that 29 previous cultural resource studies have been conducted within one mile of the subject property, two of which (Drover 1990; Tsunoda 2007b) overlap portions of the project. No cultural resources were recorded within or directly adjacent to the project as a result of either study (BFSA 2021b).

BFSA reviewed the following sources to help facilitate a better understanding of the historic use of the property:

- The NRHP index
- Historic USGS data

- Historic aerial photographs (1938, 1947, 1967, 1978, and 1990)

These sources did not indicate the presence of archaeological resources within the project. However, for background research, the absence of positive results does not necessarily indicate the absence of historic resources. Given the historic settlement of the region and the steep slopes of the project area, there is a low to moderate potential for archaeological discoveries.

Nearly the entire property has been disturbed by the grading of dirt roads and terracing for avocado orchards. This characterization of the property as highly surficially disturbed is relevant to the consideration of cultural resources being present within the project. When parcels are cleared, disked, or otherwise disturbed, evidence of surface artifact scatters is lost. Whether or not cultural resources have ever existed on the 22750 Carancho Road Project parcel is unclear. The current status of the property appears to have affected the potential to discover any surface scatters of artifacts, and cultural materials that may have been on-site could have been masked by both disking and prior grading across the property.

Therefore, it is recommended that the project be allowed to proceed with the implementation of a cultural resources monitoring program conducted by an archaeologist and Native American representative during grading of the property.

The survey did not result in the identification of any archaeological resources. However, given that the presence of yet undiscovered archaeological resources cannot be ruled out, a potentially significant impact could occur. **Mitigation Measure CUL-01** would be implemented to reduce any impacts.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant with Mitigation Incorporated. Based on an analysis of records and archaeological survey of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. Nonetheless, the project will be required to adhere to State Health and Safety Code Section 7050.5 if in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. **Mitigation Measure CUL-02** would be implemented to reduce any impacts to less than significant.

CUL-01 Cultural Resources Monitoring Program: Prior to issuance of grading permits, the applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CRMP shall be developed in coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit. The CRMP shall contain at a minimum the following:

Archaeological Monitor – An adequate number of qualified archaeological monitors shall be onsite to ensure all earth moving activities are observed for areas being monitored.

This includes all grubbing, grading, and trenching onsite and for all offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined sand directed by the Project Archaeologist.

Cultural Sensitivity Training – The Project Archaeologist and if required, a representative designated by the Tribe shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training, and all construction personnel must attend prior to beginning work on the project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

Unanticipated Resources – In the event that previously unidentified potentially significant cultural resources are discovered, the Archaeological and/or Tribal Monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with the Tribal monitor, shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. Further, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits shall be minimally documented in the field and the monitored grading can proceed.

Artifact Disposition – the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. The Professional Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

CUL-02 Human Remains: If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make

recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

Monitoring: Monitoring in accordance with Mitigation Measures CUL-1 and CUL-2 will be required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ENERGY Would the project:				
10. Energy Impacts a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Source(s): Riverside County General Plan Air Quality Element (Riverside County 2018a), Riverside County Climate Action Plan ("CAP"), Project Application Materials

Findings of Fact:

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The project would involve the construction of a cannabis cultivation facility. Construction activities would result in the temporary consumption of energy resources in the form of vehicle and equipment fuels (gasoline and diesel fuel) and electricity. Consumption of energy during construction would be short-term and temporary, typical of land use development projects in California, and would not have the potential to result in wasteful, inefficient, or unnecessary consumption of energy resources. During long-term operation, the project would require an average of 320 kW of power. A portion of the power would be supplied by photovoltaic (solar) panels and the remaining electricity needs would be provided by Southern California Edison. The use of on-site generators would be limited to power outage events and testing/maintenance. The project would be subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations and Title 24, Part 11, which contains additional energy measures that are applicable to the project under CALGreen. Prior to project approval, the project applicant would be required to ensure that the project would meet Title 24 requirements applicable at that time, as required by State regulations through their plan review process. Due to its greenhouse design, the proposed mixed light cultivation would be substantially more energy efficient than standard indoor cultivation. The efficiency of the cultivation space would be maximized by the reduction in grow lights used, and the use of a passive cooling system which decreases the number of fans. Furthermore, advances in commercial solar panels and smart technology would allow significantly reduced energy consumption. LED lighting would be used throughout the cultivation and processing space and, where appropriate, for exterior lighting due to its greenhouse design. In addition, all pipes and ducts would be insulated for energy efficiency. Therefore, with the implementation of a renewable energy source (solar panels) and the inherent increase in efficiency of building code regulations, the project would not result in a wasteful use of energy, and the impact would be less than significant.

b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically (approximately every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. Title 24 also includes Part 11, CALGreen. CALGreen institutes mandatory minimum environmental performance standards

for all ground-up, new construction of commercial, low-rise residential, and State-owned buildings, as well as schools and hospitals. The proposed project would meet Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency. In addition, the project would be required to comply with California Cannabis Cultivation Program regulations:

Title 3 of the California Code of Regulations § 8102(s) states:

> Each application for a cultivation license shall include the following, if applicable: For indoor and mixed-light license types, identification of all power sources for cultivation activities, including but not limited to, illumination, heating, cooling, and ventilation.

§ 8305 provides requirements for certain mixed-light cannabis cultivator licensees to ensure that, by 2023, their electrical power meets the average electricity greenhouse gas emissions intensity required by their local utility provider. That section includes options for the purchase of carbon offset credits if such standards are not met.

§ 8306 provides requirements for stationary and portable generators greater than 50 horsepower. It requires these to comply with the appropriate Airborne Toxic Control Measure for stationary or portable generators and includes certificates or permits that are acceptable to prove compliance. Additional compliance options are provided for generators below 50 horsepower by 2023, including limiting hours of operation, meeting certain emergency use requirements, or filter and engine requirements.

Therefore, the project would not conflict with or obstruct a State or Local plan for renewable energy or energy efficiency, and the impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS Would the project directly or indirectly:				
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☒	☐

Source(s): Riverside County General Plan (Riverside County 2019a) Figure S-2 "Earthquake Fault Study Zones," Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Less Than Significant Impact. The project site is not located on or near an Alquist-Priolo Earthquake Fault Zone or a County-designated fault (Riverside County 2019a). According to the site-specific Preliminary Geotechnical Interpretive Report (ESGS 2021, page 6) prepared for the proposed project and included as Appendix I to this Initial Study, no active faults are known to occur on the project site, and the site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on the geotechnical mapping of the subject site, review of current and historical aerial imagery, lack of lineaments indicative of active faulting, and the data compiled during the preparation of this report, it has been determined that the potential for surface rupture is very low to remote, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

12. Liquefaction Potential Zone a) Be subject to seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Source(s): Southwest Area Plan (Riverside County 2020b) Figure 12, Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Be subject to seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The project parcel is not in a zone of liquefaction susceptibility (Riverside County 2020b). According to the Preliminary Geotechnical Interpretive Report (ESGS 2021, page 13) prepared for the proposed project and included as Appendix I to this Initial Study, liquefaction occurs as a result of a substantial loss of shear strength or shearing resistance in loose, saturated, cohesionless earth materials subjected to earthquake induced ground shaking. Potential impacts from liquefaction include loss of bearing capacity, liquefaction related settlement, lateral movements, and surface manifestation such as sand boils. Seismically induced settlement occurs when loose sandy

soils become denser when subjected to shaking during an earthquake. The three factors determining whether a site is likely to be subject to liquefaction include seismic shaking, type and consistency of earth materials, and groundwater level. The proposed structures would be supported by compacted fill and competent bedrock, with no shallow groundwater. As such, the potential for earthquake induced liquefaction and lateral spreading beneath the proposed structures is considered very low to remote due to the recommended compacted fill, relatively low groundwater level, and the dense nature of the deeper onsite earth materials. Therefore, potential liquefaction impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

13. Ground-shaking Zone a) Be subject to strong seismic ground shaking?	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element (Riverside County 2019a) Figure S-16," Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Be subject to strong seismic ground shaking?

Less Than Significant Impact. The project site is rated as having Very High general ground shaking risk (30-40% g) (Riverside County 2019a). According to the Preliminary Geotechnical Interpretive Report (ESGS 2021 page 6) prepared for the proposed project and included as Appendix I to this Initial Study, the project is located in a seismically active region and as a result, significant ground shaking would likely impact the site within the design life of the proposed project. The geologic structure of the entire southern California area is dominated by northwest-trending faults associated with the San Andreas Fault system, which accommodates for most of the right lateral movement associated with the relative motion between the Pacific and North American tectonic plates. Known active faults within this system include the Newport-Inglewood, Whittier-Elsinore, San Jacinto, and San Andreas Faults.

Based on our review of regional geologic maps and applicable computer programs (USGS Seismic Design Maps, Caltrans ARS online, and USGS Earthquake Hazard Programs), the Elsinore Fault with an approximate source to site distance of 7.67 kilometers is the closest known active fault anticipated to produce the highest ground accelerations, with an anticipated maximum modal magnitude of 7.7.

The project would be required to incorporate all relevant requirements of the 2019 California Building Code to reduce risks from seismic ground shaking and comply with any additional requirements of Riverside County to reduce risk from seismic ground shaking. Therefore, potential ground-shaking impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
14. Landslide Risk a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?	☐	☐	☒	☐

Source(s): On-site Inspection, Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?

Less Than Significant Impact. According to the Preliminary Geotechnical Interpretive Report (ESGS 2021 page 6; Appendix I), landslide debris was not observed during subsurface exploration and no ancient landslides are known to exist on the site. No landslides are known to exist, or have been mapped, in the vicinity of the site. Geologic mapping of the site conducted during our investigation, and review of aerial imagery of the site, reveal no geomorphic expressions indicative of landsliding. The materials encountered in the pad area were found to be very hard, and no oversteepened slopes exist on the site or are proposed. Therefore, potential landslide impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

15. Ground Subsidence a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	☐	☐	☒	☐

Source(s): Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?

Less Than Significant Impact. According to the Preliminary Geotechnical Interpretive Report (ESGS 2021 page 10; Appendix I):

> Volumetric changes in earth material quantities occur when poorly consolidated earth materials are replaced with properly compacted fill. Estimates of the percent shrinkage/bulking factors for the various geologic units observed on the subject property are below and based on in-place densities and the estimated average percent of relative compaction achieved during grading.

Geologic Unit	Shrinkage (%)
Topsoil	10 to 15
Bedrock	0 to 5 (Bulking)

Subsidence from scarification and recompaction of exposed bottom surfaces is expected to be negligible to approximately 0.01 foot.

Additionally, based on the settlement characteristics of the earth materials that underlie the building sites and the anticipated loading, it is estimated that the maximum total settlement of the footings would be less than approximately 0.75-inch. Differential settlement is expected to be about 0.5-inch over a horizontal distance of approximately 20 feet, for an angular distortion ratio of 1:480. It is anticipated that the majority of the settlement would occur during construction or shortly after the initial application of loading.

Therefore, potential ground subsidence impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

16. Other Geologic Hazards a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	☐	☐	☒	☐

Source(s): On-site Inspection, Project Application Materials, Preliminary Geotechnical Interpretive Report (ESGS 2021), General Biological Assessment (Hernandez Environmental Services 2021)

Findings of Fact:

a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

Less Than Significant Impact. The project site is not located near a large body of water nor an active volcanic area, so the project site would not be at risk from seiches or volcanoes. No significant watercourses occur in the project site, although some ephemeral drainages occur elsewhere on the 72-acre parcel. Given that the project site is largely flat to gently sloping and is located away from areas of steeper relief that are located farther north on the parcel, risk of mudflow is expected to be low. Therefore, potential impacts from other geologic hazards would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Slopes a) Change topography or ground surface relief features?	☐	☐	☒	☐
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	☐	☐	☒	☐
c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☐	☒

Source(s): Project Application Materials, Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Change topography or ground surface relief features?
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?

Less Than Significant Impact. The project site plans propose 2:1 cut slopes on the order of 15 feet high and 2:1 fill slopes on the order of 46 feet high. Cuts and fills up to 18 and 28 feet, respectively, are proposed to reach design grades. Retaining walls up to 15 feet high are planned to support level backslope conditions. The provisions of the 2019 California Building Code, including the General Earthwork and Grading Specifications in the Preliminary Geotechnical Interpretive Report (ESGS 2021), would be applied to all earthwork and grading operations. Operations would also be in accordance with all applicable grading codes and requirements of the appropriate reviewing agency. Unless specifically revised or amended, grading operations would also be performed in accordance with applicable provisions of General Earthwork and Grading Specifications provided within the Preliminary Geotechnical Interpretive Report (ESGS 2021). Therefore, impacts would be less than significant for questions a) and b).

c) Result in grading that affects or negates subsurface sewage disposal systems?

No Impact. The project applicant is proposing to dispose of sanitary waste using a septic tank that would store waste and be periodically emptied by a waste disposal contractor. The project would not dispose of sewage using a leach field or other subsurface disposal method. Further, no existing leach fields or similar infrastructure exist on the project site. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Soils a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

Source(s): Project Application Materials, On-site Inspection, Soils Report, Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The proposed project would be required to implement a SWPPP during construction to protect water quality and minimize erosion. The project would be required to comply with the plan's conditions and implement BMPs including, but not limited to, minimizing the area of disturbance; using water and/or dust suppressants to minimize windblown soil particles; using straw, matting, or other devices to cover disturbed areas as soon as possible following disturbance; placement of wattles and other devices to intercept runoff; and regular inspections to ensure compliance with these conditions. During project operation, site driveways and access roads would be paved and areas immediately surrounding site facilities would be landscaped with water-efficient landscaping. These measures would minimize bare soil and minimize the potential for soil erosion or the loss of topsoil, and impacts would be less than significant.

b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. According to the Preliminary Geotechnical Interpretive Report (ESGS 2021, page 16):

> Preliminary laboratory test results indicate onsite earth materials exhibit an expansion potential of MEDIUM as classified in accordance with 2019 CBC Section 1803.5.3 and ASTM D 4829. Additional, testing for expansive soil conditions should be conducted upon completion of rough grading…. [T]he CBC specifies that slab on ground foundations (floor slabs) resting on earth materials with expansion indices greater than 20, require special design considerations in accordance with 2019 CBC Sections 1808.6.1 and 1808.6.2. The design procedures are based on the thickness and plasticity index of the various earth materials within the upper 15 feet of the proposed structure. For preliminary design purposes, we have assumed an effective plasticity index of 16.

The report further makes recommendations regarding the depths of footings, type of reinforcements for footings, floor slab thickness, watering of subgrade materials, and other measures. Those recommendations are presented in full in Appendix I. With incorporation of the recommendations made in the Preliminary Geotechnical Interpretive Report, impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Less Than Significant Impact. Construction of the proposed project would include the installation of a septic system for waste discharge. The septic system would be constructed and installed in adherence to all federal, State, and local building and plumbing codes. Therefore, the proposed project would not install a septic system on soils incapable of adequately supporting the use of septic tanks, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

19. Wind Erosion and Blowsand from project either on or off site. a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element (Riverside County 2019a) Figure S-8 "Wind Erosion Susceptibility Map," Ord. No. 460, Article XV & Ord. No. 484

Findings of Fact:

a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?

Less Than Significant Impact. The project site has a Wind Erodibility Rating of Moderate (Riverside County 2019a). In compliance with the General Permit Order 2009-0009 DWQ to be obtained by the project applicant, the project applicant would be required to implement a SWPPP during construction to minimize erosion. The project would be required to comply with the plan's conditions and implement BMPs including, but not limited to, minimizing the area of disturbance, using water and/or dust suppressants to minimize windblown soil particles, and using straw, matting, or other devices to cover disturbed areas as soon as possible following disturbance. During project operation, site driveways and access roads would be paved and areas immediately surrounding site facilities would be landscaped with water-efficient landscaping. These measures would minimize bare soil and the potential for wind erosion and blowsand, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS Would the project:				
20. Greenhouse Gas Emissions a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Source(s): Riverside County General Plan Air Quality Element (Riverside County 2018a), Riverside County Climate Action Plan (CAP 2019b), Project Application Materials

Findings of Fact:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Project GHG emissions were calculated using CalEEMod Version 2016.3.2, as described in the Air Quality analysis in response 6.b), above. The complete CalEEMod output files are included in Appendix F.

Construction GHG Emissions

Emissions of GHGs related to the construction of the project would be temporary. From the project modeling results, the total GHG emissions associated with construction of the project would be 234.3 metric tons of carbon dioxide equivalents (MT CO_2e). SCAQMD and County guidance recommends that construction period emissions be amortized (i.e., averaged) over the anticipated lifespan of the project (30 years) and added to operational emissions. Averaged over 30 years, the proposed construction activities would contribute approximately 7.8 MT CO_2e emissions per year.

Operational GHG Emissions

Long-term operation of the project would result in GHG emissions from:

Area Sources – emissions form the use of gasoline or diesel-powered landscape equipment.

Energy Sources – Indirect emissions produced at the power generation plant(s) that supply electricity to the project. Per the project applicant, the project would require an average of 320 kW of power. Some of the power would be supplied by on-site solar panels. However, as of this analysis, the numbers and capacities of the proposed panels had not been determined. Therefore, this analysis assumes that all project electricity would be supplied from the electrical grid. Assuming 320 kW 24 hours per day, 365 days per year, the total energy requirement would be 2,803,200 kilowatt-hours (kWh).

Mobile Sources – Direct emissions of GHGs would result from operation of employee, vendor and shipping vehicles travelling to and from the project site. According to the Transportation analysis in in response 37.b), below, the project would result in 28 daily trips from employees plus occasional truck trips to deliver supplies, remove waste, and transport finished products. This analysis assumes two additional truck trips per day (30 total average daily trips).

Stationary Sources – The project would result in direct emissions of GHGs through the operation of emergency backup generators. Specifications for the size and type of emergency backup generator(s) had not been determined as of this analysis. The modeling assumes one 500 horsepower diesel generator capable of supplying all of the project's electrical needs during a power outage emergency (approximately 350 kilowatts [kW]). The generator was assumed to be operated once per month for 15 minutes for testing and maintenance.

Solid Waste Sources - Treatment and disposal of solid waste produces emissions of methane. Organic waste produced by the project would be recycled on-site where possible or diverted to County green waste recycling facilities. Other recyclable solid waste would be separated and diverted from landfills in accordance with County and State regulations. Modeling was conducted using CalEEMod defaults for an industrial operation the size of the project support structure, with an additional 25 percent diversion added in accordance with the requirements of Assembly Bill 341.

Water and Wastewater Sources - Water-related GHG emissions are from the electricity required for conveyance and treatment of water. The California Energy Commission's *2006 Refining Estimates of Water-Related Energy Use in California* defines average energy values for water in southern California. These values are used in CalEEMod to establish default water related emission factors. Per the project applicant, operation of the project would require approximately 14.5 acre-feet (4,724,839 gallons) of water per year.

The County of Riverside's Climate Action Plan (CAP; 2019b) establishes a screening level threshold of 3,000 MT CO_2e per year for commercial projects. County guidance also recommends including construction emissions (amortized over a typical duration of 30 years) in the comparison to the screening threshold. For projects that exceed this screening level, compliance with the CAP Screening Tables or a reduction of 25 percent over the business-as-usual scenario must be demonstrated.

The project's calculated GHG emissions are shown in Table 5, *Operational GHG Emissions*. As shown in Table 5, GHG emissions from long term operation of the project (including amortized construction emissions) would be 985.1 MT CO_2e per year and would not exceed the County screening level threshold of 3,000 MT CO_2e per year. Therefore, the project would not generate greenhouse gas emissions that may have a significant impact on the environment, and the impact would be less than significant.

Table 5
OPERATIONAL GHG EMISSIONS

Emission Sources	2020 Emissions (MT CO_2e)
Area Sources	<0.1
Energy Sources	896.4
Vehicular (Mobile) Sources	61.3
Stationary Sources	1.1
Solid Waste Sources	2.3
Water Sources	16.8
Operational Subtotal	**977.9[1]**
Construction (amortized over 30 years)	*7.8*
TOTAL OPERATIONAL EMISSIONS	**985.1[1]**

Source: CalEEMod (model output is included in Appendix F)
[1] Totals may not sum due to rounding.
GHG = greenhouse gas; MT = metric tons; CO_2e = carbon dioxide equivalent

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 requires further reductions of 40 percent below 1990 levels by 2030. Because the project's operational year is post-2020, the project aims to reach the quantitative goals set by SB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project does not conflict with those plans and regulations.

As previously discussed, the County CAP applies a screening threshold of 3,000 MT CO2e per year to comply with the reduction goals of SB 32. The proposed project's increase in GHG emissions would not exceed the County's screening threshold for consistency with the CAP. Therefore, implementation of the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and the impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS Would the project:				
21. Hazards and Hazardous Materials a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	☐	☐	☒	☐
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	☐	☐	☐	☒
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Source(s): Project Application Materials, Riverside County General Plan Safety Element (Riverside County 2019a), Phase 1 Environmental Site Assessment Report (Priority 1 Environmental 2020).

Findings of Fact:

A Phase 1 Environmental Site Assessment was conducted for the project site (Priority 1 Environmental 2020) and is included as Appendix K to this Initial Study. This assessment included a records search, historical imagery review, interviews with individuals knowledgeable of the site's current and past uses, and a site inspection by an Environmental Professional on September 4, 2020. No recognized environmental conditions were identified during the visual site reconnaissance or in records reviewed. The subject property was not listed in the Environmental Records Sources searched. Additional environmental investigations regarding the potential for hazardous materials were not recommended.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. During construction, hazardous materials would be limited to relatively small quantities of fuels and lubricants necessary for equipment operation; paints, solvents, sealants, and similar compounds used in construction of site features; and possibly chemical dust suppressants. The project would be required to implement a SWPPP and would be required to employ BMPs designed to protect water quality, including properly disposing of any hazardous waste and limiting refueling and maintenance operations to designated locations. The site would be subject to regular inspections to ensure that these measures are abided by.

The project applicant would adopt strict cleanliness, sanitation, and pest management policies and maintain separate storage areas for the fertilizers and pesticides used in the lifecycle of the organic

matter. Further, the project applicant would cultivate with only OMRI listed nutrients, fertilizers, pesticides, and fungicides.

Additional hazardous materials proposed for on-site use would include small amounts of fuels and lubricants to operate machinery. Chemicals would be used according to the instructions on the label or Material Safety Data Sheet. Chemicals would be stored in a secured storage area of the proposed steel building within the cannabis facility to avoid stormwater contamination. Chemicals would be properly labeled, and open containers would be sealed when stored. Personal protective equipment such as safety glasses, gloves, respiratory masks, boots, long pants, and long-sleeved shirts would be used by staff when handling fertilizers and other chemicals. Liquid or granular fertilizers would be mixed with water in mixing tanks; plastic tubing and driplines would then be used to gravity-feed the water/fertilizer mixture to the planting stations. Fertilizers and soil amendments would also be applied directly to the planting stations by shovel or by using a spray tank mounted to a backpack, all-terrain vehicle, golf cart, or a garden cart. Appropriate spill and leak prevention and response measures would be implemented, and cleanup materials, Material Safety Data Sheets, and emergency contact information would be kept readily available. Therefore, impacts would be less than significant for questions a) and b).

c) *Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?*

Less Than Significant Impact. Primary site access would be directly from Carancho Road via a short driveway leading to the proposed facility. A fire lane with a proposed width of at least 24 feet would surround the project facilities. A hammerhead turnaround would be constructed along the northern edge of the site to allow sufficient space for fire engine turnaround. Refer to Drawing Sheet A102 of the Project Site Plans provided in Appendix A for more detailed information about the fire access lane and turnaround. Construction and operation of the proposed project would not impair access to any adjacent facilities, properties, or roadways. It is anticipated that up to 10 workers may be on site under most operating conditions. The site could be quickly evacuated if needed by following Carancho Road east or west. Carancho Road intersects with De Luz Road approximately 0.5 mile east of the project site, allowing additional potential evacuation routes if one were to become compromised. The site would be accessible to fire apparatus, sheriff's officers, and any other emergency services that may require access. Therefore, the proposed project would not interfere with an adopted emergency response plan or evacuation plan, and impacts would be less than significant.

d) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?*

No Impact. The nearest schools to the project site are located over five miles to the northeast within the City of Temecula. The project site is not located within 0.25 mile of an existing or proposed school. Therefore, no impact would occur.

e) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. The nearest site listed on the DTSC's Envirostor database is located approximately 5 miles northeast of the project site at 42310 Winchester Road, Temecula, CA 92590. The site is referred to a tiered permit site and its status is inactive; no further information is provided (DTSC 2021). The nearest site listed on the DWR's Geotracker database is located approximately 3.7 miles northeast of the project site at 42451 Guava Street, Murrieta, CA 92562 (DWR 2021). That site included a gasoline spill at a

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

local agency warehouse; cleanup has been completed and the case has been closed since 1996. The project is not located on or near a site included on a list of hazardous materials sites. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

22. Airports a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☐	☒
b) Require review by the Airport Land Use Commission?	☐	☐	☐	☒
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

Source(s): Southwest Area Plan (Riverside County 2020b)

Findings of Fact:

a) Result in an inconsistency with an Airport Master Plan?
b) Require review by the Airport Land Use Commission?
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The only airport in the SWAP is the French Valley Airport (Riverside County 2020b). The airport is located approximately 8 miles due northeast of the project site at 37600 Sky Canyon Dr, Murrieta, CA 92563. The project site is not located within two miles of that airport nor is it located within that airport's influence area. Therefore, no impact would occur for questions a) through d).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY Would the project:				
23. Water Quality Impacts a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	☐	☐	☒	☐
d) Result in substantial erosion or siltation on-site or off-site?	☐	☐	☒	☐
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	☐	☐	☒	☐
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
g) Impede or redirect flood flows?	☐	☐	☒	☐
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	☐	☐	☒	☐
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element (Riverside County 2019a) Figure S-9 "Special Flood Hazard Areas," Figure S-10 "Dam Failure Inundation Zone," Southwest Area Plan (Riverside County 2020b) Figure 10 "Southwest Area Plan Special Flood Hazard Area," Riverside County Flood Control District Flood Hazard Report/ Condition, GIS database, Preliminary Geotechnical Interpretive Report (ESGS 2021)

Findings of Fact:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant with Mitigation Incorporated. The project applicant would be required to implement a SWPPP during construction to protect water quality and minimize erosion. The project would be required to comply with the plan's conditions and implement BMPs including, but not limited to, minimizing the area of disturbance; using water and/or dust suppressants to minimize windblown soil particles; using straw, matting, or other devices to cover disturbed areas as soon as possible following disturbance; placement of wattles and other devices to intercept runoff; and regular inspections to ensure compliance with these conditions. During project operation, site driveways and access roads would be paved and areas immediately surrounding site facilities would be landscaped with water-efficient landscaping. These measures would minimize bare soil and minimize the potential

for soil erosion or siltation. Runoff from upper greenhouse areas would drain to self-retaining decomposed granite areas. Paved areas and lower portions of the site would drain to a cistern tank and modular wetlands for flow mitigation and treatment before being discharged to adjacent permeable areas. The stormwater drainage and retention systems on site would be designed to accommodate any runoff of rainwater expected to be generated from the construction of the proposed project and contained within the project site to avoid offsite drainage impacts to the ephemeral streams that pass through the project parcel. Sanitary sewer waste would be disposed of in an on-site septic tank, which would be emptied periodically by a licensed waste removal contractor. No leach field is proposed.

The site-specific BA prepared for the proposed project determined that APN 933-020-005 is located adjacent to the Santa Rosa Plateau to the north, and several ephemeral drainages cross through APN 933-020-005 to the north and east of the 4.3-acre project site. Therefore, Urban/Wildlands Interface Guidelines (Section 6.14 of the MSHCP) are required to be applied to the project. Therefore, **Mitigation Measures BIO-03 and BIO-04** shall be incorporated into the project to reduce potential impacts to the adjacent offsite drainages to a less-than-significant level.

Impacts to surface or ground water quality would be less than significant during project construction and operation.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The proposed project water demands include water for irrigation of the mixed light cannabis cultivation, the proposed on-site fire hydrant, the proposed landscaping, and for the steel building. Water usage for the operation of the proposed project is estimated to be approximately 14.5 AFY to be supplied by Rancho Water District.

The project site is located within the Rancho California Water District, which currently provides water service to the site through an existing 24-inch diameter pipeline that follows Carancho Road and an existing 8-inch diameter pipeline that follows Big Oaks Drive (along the eastern boundary of the parcel) to support the existing avocado farming operation. Rancho Water District currently supplies up to 288 acre-feet of water per year to the 72-acre project parcel to support the existing avocado orchard operation. The avocado orchard occupies 21 acres of the 72-acre parcel, and the proposed project would convert 4.3 acres of the 21-acre avocado orchard to a cannabis cultivation facility. The water demand needed to support the cannabis cultivation facility would be accommodated within the existing amount of water supplied by Rancho Water District to the project parcel through the existing connections that exist on site. Additionally, water availability to support the proposed project is contingent on the property owner destroying all on-site wells and signing an Agency Agreement that assigns water management rights, if any, to Rancho Water District. Therefore, because the proposed project's water source is via a municipal connection with Rancho Water District and all on-site wells would be abandoned, the proposed project would not substantially decrease groundwater supplies.

Although the proposed project would include pervious surface areas where landscaping is proposed and between the proposed greenhouses, it is conservatively assumed that the proposed project would introduce approximately 4 acres of impervious services. Impervious surfaces would amount to approximately 6 percent of the 72-acre project parcel. This total impervious surface area would consist of small, widely spaced impervious areas, runoff from which would be promptly absorbed by surrounding pervious surfaces. Because 94 percent of the ground surface of the project parcel would remain pervious and the project would not increase stormwater conveyance off the site, the proposed project

would not substantially reduce groundwater recharge in the project site such that sustainable groundwater management of the basin would be impeded.

Therefore, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, and impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?

Less Than Significant Impact. The proposed project would not alter the course of a stream or river. No permanent watercourses exist on the project site, although some small ephemeral drainages exist nearby. These would not be impacted by the development footprint of the proposed project. Runoff from upper greenhouse areas would drain to self-retaining decomposed granite areas to be constructed as part of the proposed project. Paved areas and lower portions of the site would drain to a cistern tank and modular wetlands for flow mitigation and treatment before being discharged to adjacent permeable areas. The stormwater drainage and retention systems on site would be designed to accommodate any runoff of rainwater expected to be generated at the project site. The drainage system would allow most site runoff to infiltrate back into the groundwater in a controlled manner. Impacts would be less than significant.

d) Result in substantial erosion or siltation on-site or off-site?

Less Than Significant Impact. Dischargers whose projects disturb one (1) or more acres of soil are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009 DWQ. The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer. A SWPPP is a sediment and erosion control plan that also describes all the construction site operator's activities to prevent stormwater contamination, control sedimentation and erosion, and comply with the requirements of the Clean Water Act.

Because the proposed project would disturb more than 1 acre of soil, the project applicant would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009 DWQ and implement a SWPPP during construction to protect water quality and minimize erosion. The project would be required to comply with the plan's conditions and implement BMPs including, but not limited to, minimizing the area of disturbance; using water and/or dust suppressants to minimize windblown soil particles; using straw, matting, or other devices to cover disturbed areas as soon as possible following disturbance; placement of wattles and other devices to intercept runoff; and regular inspections to ensure compliance with these conditions. During project operation, site driveways and access roads would be paved and areas immediately surrounding site facilities would be landscaped with water-efficient landscaping. These measures would minimize bare soil and minimize the potential for soil erosion or siltation. Impacts would be less than significant.

e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Runoff from upper greenhouse areas would drain to self-retaining decomposed granite areas to be constructed as part of the proposed project. Paved areas and lower portions of the site would drain to a cistern tank and modular wetlands for flow mitigation and treatment before being discharged to adjacent permeable areas. Fertilizers and soil amendments would be applied directly to the planting stations by shovel or by using a spray tank mounted to a backpack, all-terrain vehicle, golf cart, or a garden cart. Appropriate spill and leak prevention and response measures would be implemented, and cleanup materials, Material Safety Data Sheets, and emergency contact information would be kept readily available. The proposed septic tank, cistern tank, and modular wetlands would not be constructed in environmentally-sensitive areas, and the cut anticipated for the installation of the septic tank, cistern tank, and modular wetlands is included in the approximately 22,761 cubic yards of cut-and-fill estimated to be required for construction of the entire proposed project and would be balanced on-site. The stormwater drainage and retention systems on site would be designed to accommodate any runoff of rainwater expected to be generated at the project site. The project site is not in a Special Flood Hazard Area (Riverside County 2019a, 2020b), and no significant watercourses exist on or immediately adjacent to the project site. Therefore, impacts from the installation of the proposed wastewater and storm water drainage systems would not cause significant environmental impacts, and impacts would be less than significant for questions e) and f).

g) Impede or redirect flood flows?
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?

Less Than Significant Impact. The project site is not in a Special Flood Hazard Area or a Dam Hazard Zone (Riverside County 2019a, 2020b). No significant watercourses exist on or immediately adjacent to the project site, though some ephemeral drainages are found on the project parcel. According to the project-specific Preliminary Geotechnical Interpretive Report (ESGS 2021, pages 12-13):

> Since the site is at an elevation of more than 1600 feet above mean sea level and is located more than 15 miles inland from the nearest coastline of the Pacific Ocean, the potential for seismically induced flooding due to a tsunami is considered nonexistent. Since no enclosed bodies of water lie adjacent to or up gradient of the site, the likelihood for induced flooding due to a dam failure or a seiche overcoming the dam's freeboard is considered nonexistent.

The project would not impede or redirect flood flows, and it is not located in a flood hazard, tsunami, or seiche zone. Therefore, impacts would be less than significant for questions g) and h).

i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Compliance with policies, regulations, and programs in place to protect water quality are assured through conditions of approval issued by the County of Riverside for implementing projects. Therefore, impacts would be less than significant.

Mitigation: See Mitigation Measures BIO-03 and BIO-04 in Biological Resources Section above.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE/PLANNING Would the project:				
24. Land Use a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	☐	☐	☐	☒

Source(s): Riverside County General Plan, GIS database, Project Application Materials, Southwest Area Plan (Riverside County 2020b)

Findings of Fact:

a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. General Plan and Area Plan policies applicable to the proposed project are provided in Section II, Applicable General Plan and Zoning Regulations, of this Initial Study. The project site is located within the SWAP of the County of Riverside's General Plan. The SWAP (Riverside County 2020b) designates the site as Rural Mountainous (RM) 10 acre minimum, which allows for a single family residence with a minimum lot size of 10 acres, along with limited animal keeping, agricultural, and recreational uses, along with compatible resource development and associated uses and governmental uses. The project would comply with the limited agricultural and supporting uses allowed under the Area Plan designation, and the area proposed for development is currently used as an active avocado orchard. The proposed project would comply with all applicable General Plan and Area Plan policies, as demonstrated in the analysis throughout this Initial Study, and would not conflict with a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, the project site is currently zoned as Light Agriculture 10 acre minimum (A-1-10) which allows for the cultivation of cannabis with the approval of a cannabis conditional use permit (CUP) in accordance with the Riverside County Land Use Ordinance. With County approval of a CUP, the proposed project would be in conformance with zoning regulations. Therefore, impacts would be less than significant.

b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

No Impact. The project site is located in a non-urbanized area of unincorporated Riverside County. Lands north of the project parcel are part of a natural preserve. Lands to the west, south, and east are rural residential and agricultural uses. The proposed project would involve the construction of a cannabis cultivation facility on an approximately 4.3-acre area of a 72-acre parcel. The project would not divide an established community, and no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES Would the project:				
25. Mineral Resources a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	☐	☐	☐	☒

Source(s): Project application materials, Riverside County General Plan Multipurpose Open Space Element (Riverside County 2015a) Figure OS-6 "Mineral Resources Area", California Department of Conservation Mines Online (CDC 2021b)

Findings of Fact:

a) *Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?*
b) *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

No Impact. According to the General Plan Multipurpose Open Space Element (Riverside County 2015a), the project site is designated as MRZ-3 (Significance of mineral deposits undetermined). The project is not designated as a Significant nor Proposed as Significant Mineral Resources Zone by the state (Riverside county 2015a). The site does not have a history of mineral exploration or extraction. There would be no impacts for questions a) and b).

c) *Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?*

No Impact. There are no active or abandoned mines within four miles of the project site (CDC 2021b). The site does not have a history of mineral exploration or extraction, and no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE Would the project result in:				
26. Airport Noise a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Source(s): Southwest Area Plan (Riverside County 2020b)

Findings of Fact:

a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The only airport in the SWAP is the French Valley Airport (Riverside County 2020b). The airport is located approximately 8 miles due northeast of the project site at 37600 Sky Canyon Dr, Murrieta, CA 92563. The project site is not located within two miles of that airport nor is it located within that airport's influence area. There would be no impacts for questions a) and b).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

27. Noise Effects by the Project a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Source(s): Riverside County General Plan Noise Element (Riverside County 2015b), Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Yanchar Design & Consulting Group Acoustical Analysis (Appendix L), Project Application Materials

Findings of Fact:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?

Less than Significant Impact.

Construction Noise

Construction of the project would result in noise generated from the use of off-road equipment, including bulldozers and dump trucks.

The County Ordinance No. 847, *Regulating Noise*, exempts private construction from the requirements of the ordinance if the construction project is located one-quarter mile or more from an inhabited dwelling. If the construction project is located within one-quarter mile of an inhabited structure, the construction noise would be exempt if it does not occur between the hours of 6 p.m. and 6 a.m. during the months of June through September, and between the hours of 6 p.m. and 7 a.m. during the months of October through May. Additionally, due to the small scale of the proposed project, construction noise generated from the proposed project would be short-term and temporary and would not violate any typical noise constraints for construction (e.g. NIOSH 85 dBA Leq [8hr] threshold).

Because noise sensitive land uses (NSLUs; i.e. single family residences) would be approximately 200 feet from construction noise sources, the applicant would maintain compliance with the relevant requirements of County Ordinance No. 847 regarding limitations to the hours of construction activity. Construction of the project would not result in the generation of a substantial temporary increase in ambient noise levels in excess of the standards established in the County Noise Ordinance Element. Therefore, construction noise impacts would be less than significant.

Operational Noise

Sources of noise resulting from long-term operation of the project would include worker commute vehicles traveling to and from the project site, trucks used for occasional supply deliveries or product shipments, ventilation fans on the greenhouses and support structure, and occasional noise from testing/maintaining backup generators.

The County Ordinance No. 847, *Regulating Noise*, Section 4, *General sound level standards*, provides the following standard applicable to the project:

> No person shall create any sound, or allow the creation of any sound, on any property that causes the exterior sound level on any other occupied property to exceed the sound level standards set forth in Table 1.

Table 1 of Section 4 contains acceptable maximum noise levels (L_{MAX}) by General Plan land use designation, for noise measured at the receiving property. The closest properties with sensitive reports to the project site have land use designations of Rural Residential, Rural Mountainous, or Agriculture. All of these land use designations have a maximum allowable noise level of 45 dBA at any time of day (Riverside County 2006).

The proposed project would include two 4.5 ft x 4.5 ft belt driven exhaust fans would be located in the west end of greenhouses 1-7 and the east end of greenhouses 8-17. The manufacturers noise specification is an intensity of ≤ 70 db. An approximately 10-ton air conditioning compressor would be located on the south side of the office building with a manufacturer's noise rating of 87.3 db. A standby generator would also be located on the south side of the office building. The generator would be enclosed in Level 2 sound enclosure with a rating of 71 db. There would be a retaining wall located 10.5 feet from the south side of the office building. Perpendicular to the compressor, the retaining wall is 8 feet high, and perpendicular to the standby generator, the retaining wall is 12 feet high.

Based on the distances of the exhaust fans and distance attenuation factor, the combined sound level at the center of Carancho Road and the closest residence was calculated to be 36.0 dbA and 28.0 dbA, respectively. This calculation is summarized in Tables 3 and 4 of Appendix L.

There would be one air conditioning compressor located on the south side of the office building. In addition to the effect of distance, sound level of this unit would be reduced by the attenuation provided by the retaining wall which is 8 feet high at this location. A calculation was made to determine the predicted sound level at the center of Carancho Road was calculated to be 44.1 dbA and is illustrated in Table 5 of Appendix L.

There would also be a 130-kW standby generator located on the southwest corner of the office building. In addition to the attenuation provide by distance, the retaining wall is 12 feet high at this location. The calculated sound level is 40.0 dbA and is presented in Table 6 of Appendix L. Deliveries would result in a maximum noise similar to noise readings from loading and unloading activities for other projects, which generate a noise level of 75 dBA L_{max} at 50 feet. This range of maximum noise levels would not exceed the typical exterior noise standards of 90 dBA L_{max} but would be potentially higher than the typical 75 dBA L_{15} standard if the noise lasts more than 15 minutes in any hour. Although a typical truck unloading process takes an average of 15-20 minutes, this maximum noise level occurs in a much shorter period of time, in a few minutes. Therefore, noise associated with loading and unloading activities would not result in noise levels exceeding the typical standards. Additionally, given the minor amount of vehicle trips associated with operation of the proposed project, no increase in off-site ambient noise is anticipated. Therefore, noise impacts would be less than significant, and no mitigation measures are required.

b) *Generation of excessive ground-borne vibration or ground-borne noise levels?*

Less Than Significant Impact. Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted to implement the proposed project. A possible source of vibration during general project construction activities would be a vibratory roller used for soil and aggregate compaction. A large vibratory roller would create approximately 0.210 inches per second PPV at a distance of 25 feet (Caltrans 2020). The closest vibration sensitive land use would be approximately 200 feet from the construction activity. At 200 feet, groundbourne vibration from a vibrator roller would be approximately 0.021 inches per second PPV, below the 0.08 inches per second PPV perceptible level. Once operational, the project would not be a source of substantial groundbourne vibration. Therefore, the project would not result in generation of excessive groundborne vibration levels, and the impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: Prior to issuance of a permit to occupy, the County shall inspect the project buildings and equipment installations to confirm that the equipment installed is of the type and in the locations

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

specified in the approved project plans, and all noise reduction features specified in the approved project plans are incorporated.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PALEONTOLOGICAL RESOURCES:				
28. Paleontological Resources a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	☐	☐	☒	☐

Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity," Brian F. Smith and Associates, Inc. 2020a

Findings of Fact:

a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?

Less Than Significant Impact. A project-specific Paleontological Assessment was prepared for this project (Brian F. Smith and Associates, Inc. 2020a) and is attached as Appendix J to this Initial Study. A summary of that report is provided in this section with internal citations omitted.

Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age but may include younger remains (subfossils), for example, when viewed in the context of local extinction of the organism or habitat. Fossils are considered a nonrenewable resource under state, county, and local guidelines. Fossils do not occur in plutonic or volcanic rocks, such as those mapped at the 22750 Carancho Road Project.

An in-house records search was performed for paleontological resources that are known in the vicinity of the project. Sources for records include those held by the Los Angeles County Natural History Museum (LACM), the San Bernardino County Museum (SBCM), the University of California Museum of Paleontology in Berkeley (UCMP), and primary literature. No fossil localities are known within the project boundaries, nor from within a one-mile radius of the project. The closest geologic formation with fossil localities is the Pleistocene Pauba Formation, located approximately four to five miles east of the project, with outcrops occurring near and around Temecula and Murrieta. The Pauba Formation is locally fossiliferous, yielding the bones of various reptiles, rodents, giant ground sloths, horses, camels, mammoths, and mastodons, to name a few.

The Paleontological Assessment covered the entire 72-acre parcel, including the project site in the southwest corner. Based on consultation with the Riverside County Land Information System in August of 2020, the assessment indicated that the majority of the parcel had an Undetermined potential to yield nonrenewable paleontological resources and, therefore, an Undetermined paleontological sensitivity. Small areas in the northern and southern corners of the parcel were assigned a Low potential to yield nonrenewable paleontological resources and, therefore, a Low paleontological sensitivity. Approximately the lower one third of the approximately 4.3-acre project site is classified as Undetermined, and the upper two thirds are Low.

Undetermined Potential areas are defined as: Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment, and that further study is needed to determine the potential of the rock unit. Low Potential areas are defined as: Rock units that are poorly represented by fossil specimens in institutional collections or based upon a general scientific consensus that only preserve fossils in rare circumstances. Despite these coarsely mapped classifications, the Paleontological Assessment (page 8) stated:

The Cretaceous granitic rocks (tonalite) underlying the project are regarded as having a paleontological resource potential of Low to none. The likelihood of discovering fossils in granitic rocks is nil. Based on the presence of granitic rocks below the project, their Low paleontological sensitivity, and their nonfossiliferous nature, a paleontological resource Mitigation Monitoring and Reporting Program for the 22750 Carancho Road project is not warranted.

Therefore, impacts to paleontological resources would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING Would the project:				
29. Housing a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☐	☒
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

Source(s): Project Application Materials

Findings of Fact:

a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The proposed project would take place on an existing avocado orchard. It would not destroy any existing housing nor displace any existing residents. No replacement housing would be required. The project is expected to employ (not including the applicant/manager) a maximum of five full time and five part time employees. The applicant has committed to hiring 90 percent of employees from existing residents of Riverside County. Given the small number of new employees and the anticipation that most would be hired from the existing pool of County residents, the project is not expected to create additional demand for housing. The project would not have any unplanned growth inducement effects, as no improvements to infrastructure or government services are proposed apart from the addition of an acceleration/deceleration lane to accommodate traffic entering and leaving the project site. The project site would be closed to nonessential visitors and would only accommodate authorized employees, government officials, and deliveries. There would be no growth inducing effects, and no impacts for questions a), b), or c).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
30. Fire Services	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element (Riverside County 2019a), CAL FIRE (2021), City of Temecula (2021), Riverside County Fire Department (2021)

Findings of Fact:

Less Than Significant. The project site is located entirely in a state responsibility area (SRA) and is designated as a moderate fire hazard severity zone (FHSZ) (CAL FIRE 2021). Given that the site is located in an SRA, primary fire protection for the project site is provided by CAL FIRE/Riverside County Fire Department. Riverside County, along with most incorporated cities in the county including Temecula, contract with CAL FIRE to cooperatively provide both structure and wildland fire protection (Riverside County Fire Department 2021, City of Temecula 2021). In addition to three CAL FIRE/Riverside County Fire Department stations within and surrounding the City of Temecula, the City of Temecula Fire Department directly owns and operates five additional stations staffed and managed by a combination of CAL FIRE/Riverside County and City employees (City of Temecula 2021). The nearest fire stations to the project site are City of Temecula Fire Station 12, located 8.0 miles east of the project site at 28330 Mercedes Street, Temecula, CA 92592; City of Temecula Fire Station 73, located 9.2 miles east of the project site at 27415 Enterprise Circle W, Temecula, CA 92590; and CAL FIRE/Riverside County Fire Department Station 75, located 9.3 miles north of the project site at 38900 Clinton Keith Road, Murrieta, CA 92562. Resources from all three stations could respond to the project site if needed, along with additional resources from several other stations in the area.

Fire protection in the area is provided through a cooperation of State, county, and other local resources functioning under the umbrella of a single department that is able to share and coordinate resources. As described above, the project site is within 10 miles of at least three fire stations. Existing resources could provide adequate levels of structure fire, wildfire, and emergency medical protection to the project site. Though calls for service may be slightly increased due to potential fire or emergency medical incidents generated through operations of the project site, the potential for such incidents would be reduced as much as possible through the use of defensible space, worker safety training, regular oversight and inspections of site equipment and operations, and other risk reduction techniques. Additionally, only 6 to 10 employees would be regularly working at the project site, which would constitute a negligible change in the population of the local service area. Therefore, potential impacts to fire services would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
31. Sheriff Services	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element (Riverside County 2019a), Riverside County Sheriff's Department (2021), Cannabis Cultivation Security Plan for Fuego Farms (Fuego Farms 2021), Riverside County.

Findings of Fact:

Less Than Significant Impact. The Riverside County Sheriff's Department would provide law enforcement services to the project from their Southwest Station, located at 30755 Auld Road Suite A, Murrieta, CA 92563 (Riverside County Sheriff's Department, 2021). That facility is 12.8 miles northeast of the project site by car. The Riverside County Sheriff's Department provides law enforcement to the unincorporated areas of the county and contracts with several incorporated cities and reservations to provide law enforcement to those communities. The Department operates 11 patrol stations throughout the county. The construction and operation of the proposed facility, and any associated calls it may generate, would not constitute a substantial increase in call volume for a department of this size.

A Cannabis Cultivation Security Plan was prepared for this project (Fuego Farms 2021). This plan involves the presence of onsite armed security during business hours and either onsite armed security or remote monitoring during non-business hours. The plan includes several security measures such as surveillance, checks and balances, controlled access, and employee screening and monitoring. The project applicant would undertake all reasonable precautions and would meet or exceed County and State standards for the operation of cannabis facilities. Call volume would not be significantly increased relative to the area currently served by the Sheriff's Department. The construction of new facilities or additional infrastructure for sheriff services would not be required, and impacts to sheriff services would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32. Schools	☐	☐	☐	☒

Source(s): Project Description

Findings of Fact:

No Impact. The proposed project would be constructed in a rural area of the County and would not induce any population growth. It would draw five full time and five part time employees, with at least 90 percent of employees anticipated to be sourced from the existing Riverside County population. The project would not have any growth inducing effects, would not significantly change the population of the County or any school district, and would not create additional demand for schools. Therefore, there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
33. Libraries	☐	☐	☐	☒

Source(s): Project description

Findings of Fact:

No Impact. The proposed project would be constructed in a rural area of the County and would not induce any population growth. It would draw five full time and five part time employees, with at least 90 percent of employees anticipated to be sourced from the existing Riverside County population. The project would not have any growth inducing effects, would not significantly change the population of the county, and would not create additional demand for libraries. Therefore, there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34. Health Services	☐	☐	☒	☐

Source(s): Project Description, Riverside County General Plan Safety Element (Riverside County 2019a)

Findings of Fact:

Less Than Significant Impact. Several hospitals exist in the project area and include Primecare of Temecula, located 7.6 miles northeast of the project site at 41391 Kalmia St STE 310, Murrieta, CA 92562; Rancho Springs Medical Center, located 7.6 miles northeast of the project site at 25500 Medical Center Dr, Murrieta, CA 92562; and several urgent care centers and specialized facilities in Murrieta and Temecula. The project would not significantly increase demand for health services, in that the work force is expected to be sourced mostly from existing County residents and that an increase of approximately 10 individuals working in such a highly populated area would not constitute a significant increase relative to existing conditions. Any impacts to the healthcare system would result solely from occupational illnesses or injuries, which are expected to be rare. Therefore, impacts to health services facilities would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION Would the project:				
35. Parks and Recreation a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☐	☒

Source(s): Project Description

Findings of Fact:

a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

No Impact. The proposed project would be constructed in a rural area of the County and would not increase the use of existing neighborhood or regional parks as is it anticipated most of employees hired to support construction and operation of the proposed project would be sourced locally and are existing users of existing neighborhood and regional parks. The proposed project also does not include the construction or expansion of recreational facilities and is not located in a Community Service Area. Therefore, there would be no impacts for questions a), b), and c).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

36. Recreational Trails a) Include the construction or expansion of a trail system?	☐	☐	☒	☐

Source(s): Riverside County General Plan Circulation Element (Riverside County 2020c) Figure C-6 "Trails and Bikeway System," Southwest Area Plan (Riverside County 2020b) Figure 8 "Southwest Area Plan Trails and Bikeway System"

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Findings of Fact:

a) Include the construction or expansion of a trail system?

Less Than Significant Impact. A "Regional Trail: Urban/Suburban" is identified on Carancho Road, including the portion adjacent to the project site (Riverside County 2020b,c). The proposed project includes off-site roadway improvements within the existing Carancho Road right-of-way, including acceleration and deceleration lanes to facilitate access to the site. Off-site improvements would impact approximately 0.18 acre of disturbed/developed areas within the existing road right-of-way. Land would be set aside adjacent to the road improvements to allow for future trail construction by a responsible agency. Therefore, impacts to recreational trails would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRANSPORTATION Would the project:				
37. Transportation a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
d) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☐	☒	☐
e) Cause an effect upon circulation during the project's construction?	☐	☐	☒	☐
f) Result in inadequate emergency access or access to nearby uses?	☐	☐	☒	☐

Source(s): Riverside County General Plan Circulation Element (Riverside County 2020c), Southwest Area Plan (Riverside County 2020b), Riverside County Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled (Riverside County 2020d), Project Application Materials

Findings of Fact:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. Local policies regarding transportation that are applicable to the proposed project are included following the project description in this Initial Study. A "Regional Trail: Urban/Suburban" is indicated on Carancho Road, including the portion adjacent to the project site (Riverside County 2020b,c). The proposed project includes off-site roadway improvements within the existing Carancho Road right-of-way, including acceleration and deceleration lanes to facilitate access to the site. Off-site improvements would impact approximately 0.18 acre of disturbed/developed areas within the existing road right-of-way. Land would be set aside adjacent to the road right-of-way to allow for future trail construction by a responsible agency, in accordance with General Plan policy C16.1 and SWAP policy 18.1. The project would not conflict with any programs, plans, ordinances, or policies addressing the circulation system, and impacts would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. In response to Senate Bill 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018, which identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact (State CEQA Guidelines Section 15064.3). In December 2020, the County of Riverside adopted the Transportation Analysis (TA) Guidelines for Level of Service Vehicle Miles Traveled (Riverside County 2020d). In accordance with the TA Guidelines, a project is presumed to have a less than significant impact if project GHG emissions less than 3,000 MT CO_2e as determined by a methodology acceptable to the Transportation Department and/or project trip generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by Riverside County.

As discussed in Section 20(a) of this Initial Study, GHG emissions from long term operation of the project (including amortized construction emissions) would be 985.1 MT CO_2e per year and would not exceed the County screening level threshold of 3,000 MT CO_2e per year. Therefore, GHG emissions from operation of the proposed project is less than 3,000 MT CO_2e, and would not constitute a significant increase in VMT.

Additionally, during normal operations, one owner/overseer and five full time employees would be present onsite, with up to five part time employees during most conditions. Initially, most work on-site would be conducted between 6:00 a.m. and 3:00 p.m. Once the entire cultivation facility is constructed and fully operational, a shift from 3:00 p.m. to 8:00 p.m. would be added to facilitate processing/trimming and packaging. Thus, under the most conservative (i.e., busiest) assumptions, 28 daily trips would be made of employees travelling to and from the project site (assuming that up to seven vehicles were present for both shifts, which would be unlikely during most operating conditions). Occasional trips would also be made to deliver supplies, remove waste, and transport finished products. The trips generated during operation of the proposed project would be less than 110 trips per day and would not constitute a significant increase in VMT, and impacts would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

Less Than Significant Impact. The proposed project includes off-site roadway improvements within the existing Carancho Road right-of-way, including acceleration and deceleration lanes to facilitate access to the site. Off-site improvements would impact approximately 0.18 acre of disturbed/developed areas within the existing road right-of-way. The construction of acceleration and deceleration lanes would help to reduce any potential hazards regarding site access and would help to maintain the existing flow of traffic. No other roadway modifications are proposed, and operation of the site would not involve any slow moving vehicles such as farm tractors or other equipment. Therefore, impacts would be less than significant.

d) Cause an effect upon, or a need for new or altered maintenance of roads?

Less Than Significant Impact. The proposed project includes off-site roadway improvements within the existing Carancho Road right-of-way, including acceleration and deceleration lanes to facilitate access to the site. Off-site improvements would impact approximately 0.18 acre of disturbed/developed areas within the existing and proposed road right-of-way. Existing culverts/drainage facilities beneath the existing Carancho Road would remain in place. The increase in road surface to accommodate acceleration/deceleration lanes would be negligible when considered within the local road network, and any increase in associated road maintenance would also be negligible. Impacts would be less than significant.

e) Cause an effect upon circulation during the project's construction?

Less Than Significant Impact. The project would result in a temporary and short-term increase in construction traffic, including construction vehicles, deliveries of supplies, removal of waste, and travel of workers to and from the site. Project construction is anticipated to begin in Fall 2021 and be completed in Spring 2022 for a total construction period of 6 months (180 days). Construction of the proposed project is anticipated to require the use of two D-8 bulldozers, two water trucks, and two haul trucks (10 cubic yard capacity). The area currently experiences low traffic volume and is not typically subject to traffic delays. Given the short term and temporary nature of this traffic, and the low existing traffic volume in the area, impacts from construction traffic are expected to be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

f) Result in inadequate emergency access or access to nearby uses?

Less Than Significant Impact. Primary site access would be directly from Carancho Road via a short driveway leading to the proposed facility. A fire lane with a proposed width of at least 24 feet would surround the project facilities. A knox box would be installed on the entry gate for emergency personnel access in the case of an emergency. A hammerhead turnaround would be constructed along the northern edge of the site to allow sufficient space for fire engine turnaround. Refer to Drawing Sheet A102 of the Project Site Plans provided in Appendix A for more detailed information about the fire access lane and turnaround. Construction and operation of the proposed project would not impair access to any adjacent facilities, properties, or roadways, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

38. Bike Trails	☐	☐	☒	☐
a) Include the construction or expansion of a bike system or bike lanes?				

Source(s): Riverside County General Plan Circulation Element (Riverside County 2020c), Southwest Area Plan (Riverside County 2020b)

Findings of Fact:

a) Include the construction or expansion of a bike system or bike lanes?

Less Than Significant Impact. A "Regional Trail: Urban/Suburban" is identified on Carancho Road, including the portion adjacent to the project site (Riverside County 2020b,c). The proposed project includes off-site roadway improvements within the existing Carancho Road right-of-way, including acceleration and deceleration lanes to facilitate access to the site. Off-site improvements would impact approximately 0.18 acre of disturbed/developed areas within the existing and proposed road right-of-way. Land would be set aside adjacent to the road right-of-way to allow for future trail construction by a responsible agency. Therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
39. Tribal Cultural Resources a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	☐	☒	☐	☐

Source(s): AB 52 Native American Consultation

Findings of Fact:

This section discusses consultation conducted pursuant to AB 52 and mitigation specific to tribal cultural resources. For a discussion of site surveys and records searches conducted for the proposed project, along with additional relevant mitigation measures, see the discussions of Historic and Archaeological Resources within this Initial Study.

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

Less than Significant with Mitigation Incorporated. Changes in CEQA, effective July 2015, require that the County address a category of cultural resources – tribal cultural resources – not previously included within the law's purview. Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with AB 52, notices regarding this project were mailed to all requesting tribes on March 3, 2020. Consultations were requested by the Pechanga Band of Luiseno Indians (Pechanga), the Pala Band of Mission Indians (Pala), and Rincon Band of Luiseño Indians (Rincon). The Soboba Band of Luiseno Indians deferred to closer tribes, and no responses were received from the Colorado River Indian Tribes, Cahuilla Band of Indians, or Morongo Cultural Heritage Program.

A request to consult was received from Pechanga dated March 30, 2020. Consultation was initiated on May 11, 2020. The cultural report and project conditions of approval were provided to Pechanga on September 28, 2020. After several communications with the tribe, this project was discussed during a meeting on December 2, 2020. Consultation was concluded with Pechanga on December 14, 2020.

A request to consult was received from Rincon dated March 31, 2020. Consultation was initiated on May 11, 2020. The cultural report and project conditions of approval were provided to Rincon on September 28, 2020. A letter agreeing with the conditions of approval and concluding consultation was received from Rincon dated September 30, 2020.

A request to consult was received from Pala dated April 17, 2020. Consultation was initiated on May 11, 2020. The cultural report and conditions of approval were provided to Pala on September 28, 2020. A follow-up meeting was held with Pala on October 9, 2020. Pala agreed with the conditions of approval, and consultation was concluded the same day.

No Tribal Cultural Resources were identified by any of the consulting tribes. However, they all expressed concern that the project area is sensitive for cultural resources and that there is the possibility that previously unidentified resources might be found during ground disturbing activities. As such, the project has been conditioned for a Tribal Monitor from the consulting Tribe(s) to be present during grading activities so that any Tribal Cultural Resources found during project construction activities would be handled in a culturally appropriate manner. In addition, conditions of approval that dictate the procedures to be followed should any unanticipated cultural resources or human remains be identified during ground disturbing activities have been placed on this project. With the inclusion of these Conditions of Approval/Mitigation Measures, impacts to any previously unidentified Tribal Cultural Resources would be less than significant.

Mitigation: See also Mitigation Measures CUL-01 and CUL-02 under the discussion of Archaeological Resources.

CUL-03 Native American Monitoring - Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor.

In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, the Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition.

This agreement shall not modify any condition of approval or mitigation measure.

Monitoring: Monitoring in accordance with Mitigation Measure CUL-3 would be required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS Would the project:				
40. Water a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

Source(s): Project Application Materials, Water Company

Findings of Fact:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

Less Than Significant Impact. The project site is located within the Rancho California Water District (Rancho Water District), which provides water service to the site through an existing 24-inch diameter pipeline that follows Carancho Road and an existing 8-inch diameter pipeline that follows Big Oaks Drive (along the eastern boundary of the parcel). Construction of the proposed project would not require the installation of additional water infrastructure.

Construction of the proposed project would include the installation of a septic system for waste discharge. Any wastewater generated from the proposed project would be held in the proposed septic tank system and removed routinely by a licensed waste removal contractor. The septic system would be constructed and installed in adherence to all federal, State, and local building and plumbing codes, and impacts would be less than significant.

Regarding stormwater disposal, runoff from upper greenhouse areas would drain to self-retaining decomposed granite areas to be constructed as part of the proposed project. Approximately 5,400 cubic feet of underground water storage (cistern tank) would be installed near the project site entrance to collect water run-off from the project site. Run-off water would then be directed to the proposed stormwater biofiltration system (modular wetlands), to be constructed adjacent to the east of the proposed cistern tank, prior to discharge to the existing culvert along Carancho Road. Paved areas and lower portions of the site would drain to a cistern tank and modular wetlands for flow mitigation and treatment before being discharged to adjacent permeable areas.

The proposed septic tank, cistern tank, and modular wetlands would not be constructed in environmentally-sensitive areas, and the cut anticipated for the installation of the septic tank, cistern tank, and modular wetlands is included in the approximately 22,761 cubic yards of cut-and-fill estimated to be required for construction of the entire proposed project and would be balanced on-site. Therefore, impacts from the installation of the proposed wastewater and storm water drainage systems would not cause significant environmental impacts, and impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. The proposed project water demands include water for irrigation of the mixed light cannabis cultivation, the proposed on-site fire hydrant, the proposed landscaping, and for the steel building. Water usage for the operation of the proposed project is estimated to be approximately 14.5 AFY to be supplied by Rancho Water District.

Rancho Water District currently supplies up to 288 acre-feet of water per year to the 72-acre project parcel to support the existing avocado orchard operation. The avocado orchard occupies 21 acres of the 72-acre parcel, and the proposed project would convert 4.3 acres of the 21-acre avocado orchard to a cannabis cultivation facility. The water demand needed to support the cannabis cultivation facility would be accommodated within the existing amount of water supplied by Rancho Water District to the project parcel through the existing connections that exist on site. Therefore, sufficient water supplies are available to support the proposed project, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

41. Sewer a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Source(s): Project Application Materials

Findings of Fact:

a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

Less Than Significant Impact. Municipal sewer access is not available at the project site. Construction of the proposed project would include the installation of a septic system for waste discharge. The proposed septic tank would be a 1,500-gallon, precast concrete septic tank with a maximum load of 500 pounds per square foot. The proposed septic tank would not be constructed in environmentally-sensitive areas, and the cut anticipated for the installation of the septic tank is included in the approximately 22,761 cubic yards of cut-and-fill estimated to be required for construction of the entire proposed project and would be balanced on-site. The septic system would be constructed and installed in adherence to all federal, State, and local building and plumbing codes. Additionally, the proposed septic system would be reviewed, permitted, and approved by the County Department of Health's Local Agency Management Program for Onsite Wastewater Treatment Systems as part of the building permit application process. Therefore, construction of a septic tank would not cause significant environmental effects, and impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The applicant would secure the services of a private waste management contractor to remove wastewater from the proposed septic tank. The contractor selected would ensure that there is adequate capacity to remove the waste projected to be created by the proposed project. Stormwater would be allowed to infiltrate on-site in permeable areas, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

42. Solid Waste a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	☐	☐	☒	☐

Source(s): Project Application Materials

Findings of Fact:

a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Waste bins/containers would be located at the entrance to the cultivation facility and inside the support structure. Waste would be hauled to an appropriate licensed facility by a private waste hauling contractor, such as Waste Management, Inc., or by cultivation operation staff. Recyclables would be segregated from other solid waste and deposited in an appropriate recycling facility. Recyclables such as scrap metal, cardboard, glass, metal and plastic containers, and newspaper would be unloaded at a recycling drop-off center. Yard waste, green waste, and other compostable materials would be segregated from other solid waste and shredded and composted on-site for reuse as mulch or as a soil amendment, or deposited at an appropriate transfer facility. Less than 55 gallons of potentially toxic materials, such as paints, solvents, or lubricants, would be used on-site, and any potentially toxic materials would be segregated from the solid waste and disposed of at a County facility.

Growing media waste would be reduced or eliminated by composting and blending old growing media with new media and amendments. No growing media is expected to be disposed off-site. Growing media (that is biodegradable) can be reduced in volume yearly because it is partially absorbed by the plants and metabolized by soil organisms (bacteria, fungi, invertebrates). Green waste, primarily cannabis root balls and stems, can be chipped and mulched and blended back into the planting soil. Vegetative waste staging areas and compost piles would be located inside the secured, fenced cultivation compound. BMPs would be employed to ensure that these piles do not contaminate stormwater or cause nuisance

dust or odor issues. Any growing media that cannot be composted or reused would need to hauled off-site and disposed in a licensed facility. Cannabis cultivators, processors, and nurseries licensed (or to be licensed) under CalCannabis would be required to comply with Section 8108 of the California Code of Regulations, Title 3 – Food and Agriculture, Division – 8 Cannabis Cultivation, Chapter 1 – Cannabis Cultivation Program regarding cannabis waste disposal. Section 8108(c) allows a cultivator to self-haul cannabis waste to any of the following:

1) A manned, fully permitted solid waste landfill or transformation facility;
2) A manned, fully permitted composting facility or manned composting operation;
3) A manned, fully permitted in-vessel digestion facility or manned in-vessel digestion operation;
4) A manned, fully permitted transfer/processing facility or manned transfer/processing operation; or
5) A manned, fully permitted chip and grind operation or facility.
6) A recycling center as defined in Title 14, Section 17402.5(d) of the California Code of Regulations and that meets the following:

    A) The cannabis waste received shall contain at least ninety (90) percent inorganic material;
    B) The inorganic portion of the cannabis waste is recycled into new, reused, or reconstituted products which meet the quality standards necessary to be used in the marketplace; and
    C) The organic portion of the cannabis waste shall be sent to a facility or operation identified in subsection (c)(1) through (5).

The law considers cannabis waste to be a type of organic waste if it is not combined or contains any hazardous or toxic material. The law considers organic waste to be a type of solid waste, and a solid waste facility may handle and manage cannabis waste in accordance with Title 14 and Title 27. Similarly, haulers can transport and recycle cannabis waste like any other organic waste, and no special license or permit is required to transport it (CalRecycle 2021).

Because the proposed project would compost cannabis waste on-site to the maximum extent feasible, and off-site disposal of cannabis waste is treated similar to organic waste and does not require special licensing for disposal or hauling, the proposed project would not generate solid waste in excess of State or local standards, in excess capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant.

b) *Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?*

Less Than Significant Impact. Implementation of the proposed project would be required to comply with all federal, State, and local regulations regarding solid waste disposal. For example, development would be required to demonstrate compliance with the 2013 (or most recent) Green Building Code, which implements design and construction measures that act to reduce construction-related waste through material conservation measures and other efficiency measures. The proposed project would also be required to comply with the California Integrated Waste Management Act (AB 939) which requires each city and county to prepare, adopt, and submit to CalRecycle a source reduction and recycling element (SSRE) that demonstrates how the jurisdiction will meet the Integrated Waste Management Act's mandated diversion goals. Each jurisdiction's SRRE must include specific components, as defined in Public Resources Code Sections 41003 and 41303. Compliance with the 2013 (or most recent) Green Building Code and AB 939 would ensure that construction and operational impacts regarding solid waste disposal are less than significant. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

43. Utilities

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

a) Electricity?	☐	☐	☒	☐
b) Natural gas?	☐	☐	☒	☐
c) Communications systems?	☐	☐	☒	☐
d) Street lighting?	☐	☐	☐	☒
e) Maintenance of public facilities, including roads?	☐	☐	☒	☐
f) Other governmental services?	☐	☐	☒	☐

Source(s): Project Application Materials, Utility Companies

Findings of Fact:

a) Electricity?

Less Than Significant Impact. Electricity to the project stie is provided by Southern California Edison (SCE). The proposed project would use a combination of on-grid power through SCE, rooftop commercial solar power, and generators for emergency use only. Existing infrastructure, coupled with the proposed rooftop solar panels to be constructed as part of the proposed project, would provide sufficient electricity to the project site. Impacts would be less than significant.

b) Natural gas?

Less Than Significant Impact. Natural gas would be needed to support the proposed project. Because Southern California Gas Company does not service the project site, propane tanks are anticipated to be used for all natural gas needs. Propane facilities would be reviewed, permitted, and approved by the County Building and Safety and Fire departments as part of the building permit application process. Impacts would be less than significant.

c) Communications systems?

Less Than Significant Impact. Telephone service to the site is provided by the Southern California Telephone Company. Cable television is provided by Time Warner. The project is not expected to require the construction or expansion of any infrastructure related to communications systems. Impacts would be less than significant.

d) Street lighting?

No Impact. The project is not expected to require any construction or modification of street lighting. There would be no impact.

e) Maintenance of public facilities, including roads?

Less Than Significant Impact. The proposed project includes off-site roadway improvements within the existing Carancho Road right-of-way, including acceleration and deceleration lanes to facilitate access to the site. Off-site improvements would impact approximately 0.18 acre of disturbed/developed areas within the existing road right-of-way. Existing culverts/drainage facilities beneath the existing Carancho Road would remain in place. The increase in road surface to accommodate acceleration/deceleration lanes would be minor, and any increase in associated road maintenance would be negligible. Impacts would be less than significant.

f) Other governmental services?

Less Than Significant Impact. The project would not require construction of expansion of other government facilities or services not considered elsewhere in this Initial Study. Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
44. Wildfire Impacts a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element (Riverside County 2019a), California Fire Hazard Severity Zone Viewer (CAL FIRE 2021), City of Temecula 2021, Riverside County Fire Department 2021 GIS database, Project Application Materials, California Code of Regulations General Biological Assessment (Hernandez Environmental Services 2021), Preliminary Geotechnical Interpretive Report (ESGS 2021).

Findings of Fact:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Primary site access would be directly from Carancho Road via a short driveway leading to the proposed facility. A fire lane with a proposed width of at least 24 feet would surround the project facilities. A hammerhead turnaround would be constructed along the northern edge of the site to allow sufficient space for fire engine turnaround. Refer to Drawing Sheet A102 of the Project Site Plans provided in Appendix A for more detailed information about the fire access lane and turnaround. Construction and operation of the proposed project would not impair access to any adjacent facilities, properties, or roadways. It is anticipated that up to 10 workers may be on site under most operating conditions. The site could be quickly evacuated if needed by following Carancho Road east or west. Carancho Road intersects with De Luz Road approximately 0.5 miles east of the project site, allowing additional potential evacuation routes if one were to become compromised. The site would be accessible to fire apparatus, sheriff's officers, and any other emergency services that may require access. The County of Riverside Emergency Management Department develops and maintains numerous plans for specific hazards or essential service functions. This is a coordinated effort with other Departments and local agencies as needed. Because of the numerous access and evacuation routes available to and from the site, as well as the location and nature of the proposed development,

emergency response plans would not be impaired, and impacts would be considered less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The project site is located within a moderate FHSZ of an SRA. The site has gently sloping topography and would be immediately accessible to Carancho Road via a short driveway. The project would be a commercial facility and would not include any residents; under most conditions, no more than 10 people would be expected on site, and the site could be evacuated quickly if needed, which would reduce the risk of the occupants being exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The site would have adequate ingress and egress and would allow space for emergency vehicle turnaround and emergency vehicle access to all portions of the proposed development. The nearest fire stations to the project site are City of Temecula Fire Station 12, located 8.0 miles east of the project site at 28330 Mercedes Street, Temecula, CA 92592; City of Temecula Fire Station 73, located 9.2 miles east of the project site at 27415 Enterprise Circle W, Temecula, CA 92590; and CAL FIRE/Riverside County Fire Department Station 75, located 9.3 miles north of the project site at 38900 Clinton Keith Road, Murrieta, CA 92562. Resources from all three stations could respond to the project site if needed, along with additional resources from several other stations in the area. Given that the project site is located within SRA, it would be required to comply with SRA fire safe ordinances, including those regarding vegetation clearance and defensible space, contained within 14 CCR Sections 1270 through 1276.04 and 1299 et seq. These requirements include prescriptions for site access and identification, vegetation modification and targeted removal, and the removal of dead and dying plant material near structures. The applicant would comply with all applicable regulations regarding defensible space, site access and identification, water supply, and other measures to reduce risk from wildfire. Compliance with the above regulations would reduce wildfire risks due to slope, prevailing winds or other factors that could potentially exacerbate wildfire risks. Impacts would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. Electricity to the project site is provided by Southern California Edison (SCE). The proposed project would use a combination of on-grid power through existing connections with SCE, rooftop commercial solar power, and generators for emergency use only. The project would not include the installation of additional above ground power lines. The project would include improvements to an existing access road and would concentrate development within an existing avocado orchard. It would not require the construction of additional roads that may exacerbate fire risk or result in additional significant impacts to the environment. Impacts would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. Topography of the project site is relatively flat to gently sloping (Hernandez Environmental Services. 2021). Though steeper topography exists on the project parcel, it is located further north in an area not slated for development as part of this project. No significant watercourses exist on the project site, although some ephemeral drainages are present on portions of the project parcel (Hernandez Environmental Services 2021). The project's Preliminary Geotechnical Interpretive Report (ESGS 2021) found the project site to be at low risk of landslides. The project is not

expected to significantly alter drainage or the channel of any watercourse, and the development site is not within a floodplain. Impacts would be less than significant.

e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less Than Significant Impact. The project site is located entirely in an SRA and is designated as a moderate FHSZ (CAL FIRE 2021). Given that the site is located in an SRA, primary fire protection for the project site is provided by CAL FIRE/Riverside County Fire Department. Riverside County, along with most incorporated cities in the county including Temecula, contract with CAL FIRE to cooperatively provide both structure and wildland fire protection (Riverside County Fire Department 2021, City of Temecula 2021). In addition to three CAL FIRE/Riverside County Fire Department stations within and surrounding the City of Temecula, the City of Temecula Fire Department directly owns and operates five additional stations staffed and managed by a combination of CAL FIRE/Riverside County and City employees (City of Temecula 2021). The nearest fire stations to the project site are City of Temecula Fire Station 12, located 8.0 miles east of the project site at 28330 Mercedes Street, Temecula, CA 92592; City of Temecula Fire Station 73, located 9.2 miles east of the project site at 27415 Enterprise Circle W, Temecula, CA 92590; and CAL FIRE/Riverside County Fire Department Station 75, located 9.3 miles north of the project site at 38900 Clinton Keith Road, Murrieta, CA 92562. Resources from all three stations could respond to the project site if needed, along with additional resources from several other stations in the area.

Fire protection in the area is provided through a cooperation of state, county, and local resources functioning under the umbrella of a single department that is able to share and coordinate resources. As described above, the project site is within 10 miles of at least three fire stations. Existing resources could provide adequate levels of wildfire protection to the project site. The potential for wildfire incidents would be reduced as much as possible through the use of defensible space, worker safety training, regular oversight and inspections of site equipment and operations, and other risk reduction techniques. Additionally, only 6 to 10 employees would be regularly working at the project site, which would constitute a negligible change in the population of the local service area and could be quickly evacuated if needed. Because of the adequate fire facilities that would serve the site and the quick access for employee evacuation off the site and out of the area, risks of exposing people or structures to a significant loss, injury or death involving wildland fires is reduced to less than significant levels.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:				
45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact:

Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant with Mitigation Incorporated. All impacts to the quality of the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this Initial Study. Throughout this Initial Study, where impacts were determined to be potentially significant, mitigation measures have been identified to reduce those impacts to less than significant. Accordingly, with incorporation of the mitigation measures identified throughout this Initial Study, the proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

46. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact:

Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?

Less than Significant with Mitigation Incorporated. Cumulative impacts are defined as two or more individual impacts that, when considered together, are considerable or that compound or increase other

environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. Sections 15130 (a) and (b) of the State CEQA Guidelines state the following:

a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.

b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Cumulative Impact Analysis

Aesthetics

Implementation of the proposed project would not contribute to cumulative visual resource or aesthetic impacts. The project site is located in a rural area in western Riverside County, and any future development nearby would be required to comply with County ordinances related to light pollution, impacts to viewsheds, as well as other potential aesthetic impacts as described in the Aesthetics section of this IS/MND. Therefore, the proposed project would have a less than cumulatively considerable impact relative to aesthetics.

Agricultural and Forestry Resources

The proposed project would convert 4.3 acres of an existing avocado orchard to a cannabis cultivation operation. However, implementation of the proposed project would not result in an irreversible change to the existing agricultural capability of the land or surrounding lands as the remaining approximately 17 acres of the project parcel that is being actively farmed would not be impacted by the proposed project and would remain an active avocado orchard farming operation. Operation of the proposed project would not adversely impact the viability of agricultural uses or zoning on neighboring parcels as impacts from the proposed project would be site-specific and would not result in cumulatively considerable impacts that would affect the viability of agricultural uses or zoning off-site. Therefore, implementation of the proposed project would not contribute to cumulatively considerable impacts to agricultural or forestry resources.

Air Quality

The SCAQMD's approach for assessing cumulative impacts is based on the Air Quality Management Plan forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. The SCAQMD has established screening thresholds which a lead agency can use to determine the significance of a project's criteria pollutant and precursor emissions, and the estimated daily construction emissions are compared to the SCAQMD screening thresholds in Table 2, *Construction Emissions*. As shown in Table 2 in the Air Quality section, the maximum daily emissions of criteria pollutants and precursors during construction of the project would not exceed the SCAQMD screening thresholds. Therefore, construction of the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and the impact would be less than significant. As shown in Table 3 of the Air Quality section, the maximum

daily emissions of criteria pollutants and precursors during long-term operation of the project would not exceed the SCAQMD screening thresholds. Therefore, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and the impact would be less than significant.

Biological Resources

The proposed project, as well as any other projects proposed in western Riverside County, are subject to the requirements of the Western Riverside County MSHCP. Potential impacts to biological resources have been analyzed within the Biological Resources section of this IS/MND. With implementation and adherence to applicable measures in the Western Riverside County MSHCP, and in conjunction with the mitigation provided in the Biological Resources section of this IS/MND, the proposed project would have less than cumulatively considerable impacts.

Cultural Resources

Because previously uncovered and undiscovered significant cultural resources may be uncovered by the proposed project's ground-disturbing construction activities, mitigation measures have been identified to reduce potential impacts to a less-than-significant level. With implementation of Mitigation Measures CUL-1 and CUL-2 identified in the Cultural Resources section to reduce impacts from the inadvertent discovery of cultural resources or human remains, impacts would be reduced to less than significant on a direct and cumulatively considerable basis.

Energy

As discussed in the Energy section of this IS/MND, the proposed project would comply with applicable local, State, and federal energy conservation measures. The increase in energy demand from the proposed project would be insignificant when compared to the overall demand of the service areas associated with electrical and natural gas facilities. Therefore, the proposed project would not contribute to a cumulatively considerable impact under this resource section.

Geology and Soils

Potential impacts related to geology and soils are inherently site-specific; therefore, the proposed project would not contribute to a cumulatively considerable impact for this resource section. Furthermore, all development proposals would be required to comply with applicable federal, State, and local regulations that are in place to preclude adverse geology and soils effects, including effects related to strong seismic ground shaking, fault rupture, soil erosion, and hazardous soil conditions (e.g., liquefaction, expansive soils, landslides).

Greenhouse Gas Emissions

The greenhouse gas analysis provided in the Greenhouse Gas Emissions section of this IS/MND analyzed the proposed project's cumulative contribution to global climate change and determined that the proposed project would not create a cumulatively considerable environmental impact resulting from greenhouse gas emissions.

Hazards and Hazardous Materials

Potential impacts related to hazards and hazardous materials are inherently site-specific; therefore, the proposed project would not contribute to a cumulatively considerable impact for this resource section.

Hydrology and Water Quality

Water quality measures that are required by the Regional Water Quality Control Board through SWPPP compliance, as well as other site-specific regulations would protect the quality of water discharged from the proposed project and any future development projects within the project area during construction and operation activities. In addition, mitigation measures are provided in the Hydrology and Water Quality section of this IS/MND to reduce potentially significant impacts relative to water quality. Similarly, existing regulations related to flooding and hydrology would regulate potential impacts to hydrology. Therefore, the proposed project would have a less than cumulatively considerable impact for this resource section.

Land Use and Planning

The proposed project would not physically divide an established community or conflict with applicable land use planning documents. The proposed project is consistent with the County's land use designation, and cannabis cultivation is allowed within the A-1-10 zone district with County approval of a CUP. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to land use and planning.

Mineral Resources

The proposed project would have no impact on mineral resources. Therefore, the proposed project would not contribute to a cumulatively considerable impact under this resource section.

Noise

Noise levels diminish rapidly with distance; therefore, for a development project to contribute to a noise-related cumulative impact, it must be located in close proximity to another development project or source of substantial noise. There are no construction projects planned adjacent to the project site that would overlap with project-related construction activities. Under long-term operating conditions, the proposed project would comply with the County's Noise Ordinance. Therefore, the proposed project would not result in a cumulatively considerable impact related to noise under long-term conditions.

Paleontological Resources

No paleontological resources have been identified on or near the project site, and the site-specific paleontological report indicated that the project parcel had an undetermined to low potential to yield nonrenewable paleontological resources. Therefore, the proposed project would not contribute to a cumulatively-considerable impact under this resource section.

Population and Housing

The proposed project would not generate new residents or displace any existing housing or people requiring the construction of new housing elsewhere. Therefore, the proposed project would not contribute to a cumulatively-considerable impact under this resource section.

Public Services

Implementation of the proposed project may increase the demand for public services such as fire and police protection over an extended period of time. All development projects in the County, including the proposed project, would be required to pay development impact fees, a portion of which would be used by the County for the provision of public services to offset the incremental increase in demand for public services. Therefore, the proposed project would not contribute to a cumulatively-considerable impact under this resource section.

Recreation

The proposed project would not generate new residents that would increase the use of existing recreational facilities. Therefore, the proposed project would not contribute to a cumulatively-considerable impact under this resource section.

Transportation

Under the most conservative assumptions, the proposed project would generate 28 daily trips during project operation from employees travelling to and from the project site (assuming that up to seven vehicles were present for both work shifts, which would be unlikely during most operating conditions). Occasional trips would also be made to deliver supplies, remove waste, and transport finished products. The trips generated during operation of the proposed project would not constitute a significant increase in vehicle miles travelled at the project level, and therefore, would not contribute to a cumulatively-considerable impact under this resource section.

Tribal Cultural Resources

Development activities on the project site would not impact any known tribal cultural resources. Therefore, the proposed project would not contribute to a cumulatively-considerable impact under this resource section.

Utilities and Service Systems

The proposed project would require the installation of wastewater and stormwater infrastructure. Development of public utility infrastructure is part of an extensive planning process involving service providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of infrastructure plans is intended to ensure that adequate public utility services and resources are available to serve both individual development projects and cumulative growth in the region. Each individual development project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to the project and other developments. The project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because of the utility planning and coordination activities described above, cumulatively considerable impacts to utilities and service systems would not occur.

Wildfire

As discussed in the Wildfire section of this IS/MND, the project site is located within SRA and would be required to comply with SRA fire safe ordinances, including those regarding vegetation clearance and

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

defensible space, contained within 14 CCR Sections 1270 through 1276.04 and 1299 et seq. These requirements include prescriptions for site access and identification, vegetation modification and targeted removal, and the removal of dead and dying plant material near structures. All future discretionary development applications would be sent to the County Fire Department for review and comment on a site-specific basis and to allow for recommendations on fire safety and emergency access. Each site-specific project design would be modified, as needed, prior to approval to ensure compliance with Fire Department requirements to ensure that future development anticipated by the project would not exacerbate wildfire risks. Therefore, the proposed project would not contribute to a cumulatively considerable impact under this resource section.

47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact:

Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Mitigation Incorporated. Incorporation of SWAP design measures and Riverside County policies, standards, guidelines, and proposed mitigation measures as provided in this Initial Study would ensure that the proposed project would not have substantial adverse effects on human beings, either directly or indirectly, or on an individual or cumulative basis. All potential impacts would be reduced to less than significant levels through implementation of required mitigation measures as described in the impact discussions above.

VI. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any:

Location Where Earlier Analyses, if used, are available for review:

Location: County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, CA 92501

Revised: 7/6/2021 12:45 PM
Y:\Planning Master Forms\Templates\CEQA Forms\EA-IS_Template.docx

VII. REFERENCES

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