

# CEQA INITIAL STUDY FOR PROPOSED PATEL COMMERCIAL CULTIVATION DEVELOPMENT PROJECT U.S. HIGHWAY 395 & CALLEJA ROAD

APN 0460-171-24  
ADELANTO, SAN BERNADINO COUNTY, CALIFORNIA



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## 1.0 INTRODUCTION

This document constitutes an Initial Study designed to meet the requirements of the California Environmental Quality Act (CEQA) for the City of Adelanto, California. The City of Adelanto is the lead agency for CEQA compliance for the Proposed Project (see below for Project Description).

The analysis included in this document appears to meet requirements of the City of Adelanto in support of a Mitigated Negative Declaration by the Lead Agency. The City of Adelanto is expected to circulate this document to the public and relevant agencies prior to adopting permit conditions for issuing a Mitigated Negative Declaration. The City contacts are Ms. Mary Blais and Mr. James Hirsch at the City of Adelanto Planning Division, 11600 Air Expressway, Adelanto, California. The review period and timing will be determined by the City of Adelanto.

### 1.1 PROJECT LOCATION

The Proposed Project is the construction of eight light industrial buildings (Buildings A-H) with a total footprint of 200,000 square feet) on a 11.26 acre parcel of land in the City of Adelanto, California (see Figures 1-4). The Site lies at U.S. Highway 395 and Calleja Road roughly 3.0 miles north of downtown Adelanto. The Assessor Parcel Number (APN) is #0460-171-24 in San Bernardino County California. The Site lies in Section 8, Township 6 North, Range 5 West, San Bernardino Base and Meridian (SBB&M).

The Site is currently undeveloped land. The Site consists of bare land with vegetation typical of the southern California high desert. The Site has nearly level topography with a slight rise in elevation in the southern section of the property. Topographical variations across the Site are, generally only 1-2 feet in height.

The Site is lightly vegetated by high desert scrub vegetation including a few Joshua Trees. There are several informal paths present where unauthorized off-road vehicles have used the Site. Calleja Road (gravel access road) lies north of the Site and U.S. 395 lies along the western boundary. Alden Road lies two properties to the south and provides access to the eastern portion of the Site. There are no significant drainages on or adjacent to the site.

The Project Site (Site) lies in an area of the City of Adelanto, roughly three (3.0) miles north of the main commercial area of Adelanto and adjacent to and east of Highway 395 (Figures 1-4). The Site is within an area which includes a large metal recycling commercial business (to the east) and a Buddhist Temple (to the north). The area is zoned as Airport Development District (ADD) in the City's General Plan (City of Adelanto 2021).

Undeveloped parcels lie adjacent to the north and south of the Site. These undeveloped parcels can presently be considered as open-space parcels within the high desert ecosystem present in Adelanto. A Buddhist Temple lies two properties to the north and a scrap metal recycling yard lies to the east and southeast. A residential property lies to the northeast. A gravel road (Alden Road) lies to the south and provides access to the Site.

## **1.2 PROPOSED PROJECT DESCRIPTION**

The Project is expected to consist of development of eight warehouse/greenhouse buildings and associated parking. A retention basin will also be developed as per City requirements. The Site is currently high desert open space. The property owner is proposing to establish indoor commercial Cannabis cultivation facilities on the property.

The proposed Site Plan is shown in Figure 5. The warehouse/greenhouse buildings will include eight, 25,000 square foot buildings (total 200,000 square feet). There is also a guardhouse at the north gate of 529 square feet. There will be 154,404 square feet of pavement and 15,649 square feet of concrete hardscape and curbing. A computer simulated aerial and elevation drawings of the development are shown in Figure 6. The proposed phasing plan is also shown in Figure 5.

Parking spaces will be provided at approximately one space per 1,000 square feet for a total of 204 parking spaces for employee and service/delivery vehicles (including nine (9) Accessible parking stalls). There will be 47,772 square feet of landscaped areas. Building height will be one story and less than 40 feet.

Fire lanes will be established around the perimeter of the central buildings as required by City Code and shown in Figure 5. There will be gravel areas totaling 59,804 square feet on the west end of the site, adjacent to Highway 395, and on the east end near the proposed Retention Basin. A Stormwater Retention Basin will be provided along the north-eastern portion of the property (12,328 square feet). The parking areas will be paved with asphalt, with concrete curbing and sidewalks as required by the City of Adelanto.

Small strips of irrigated landscaping will be installed on the perimeter of the project. This will include a landscaped setback from U.S. Highway 395 on the west side of the Site. The Project will be fully fenced and will include security gates and guardhouse. A fire hydrant will be provided as shown in the Site Plans (Figures 5 and 6). A storm drain will connect the overflow of the detention pond with adjacent storm drains as they are developed near the northeast corner of the Site. Initially, the discharge will go to an existing roadside ditch.

The Project will require a Conditional Use Permit from the City of Adelanto (CUP 20-05) as well as a Location Development Plan (LDP 20-06) specified as “High Desert Adult and Medical Use Cultivation Facilities”. The Tentative Parcel Map (TPM 20245) will also need to be approved by the City of Adelanto.

Construction of the Project is anticipated to take approximately six months following issuance of permits by the City of Adelanto. A small crew will be involved in grading (grader, backhoe or excavator and dump truck) to initial grading and construction of foundations (concrete) and parking areas (asphalt). Other trucks and vehicle operators will periodically be involved in these construction activities (concrete mixing trucks, asphalt trucks, materials delivery trucks, etc.)

The Project buildings are expected to be pre-manufactured, pre-machined metal and plastic building components with translucent roof panels. Roof panels will transmit approximately 90 percent of natural sunlight, which will be a major energy saving component of the Project. The outer perimeter of the Project will be fenced with an eight-foot (8') security fence possibly topped with barbed or concertina wire. Automatic metal gates will be located at the main entrance (northeast corner of Site) and on the exit (southeast corner of Site) off of Highway 395.

### **1.3 ALTERNATIVES TO THE PROPOSED PROJECT**

The California Environmental Quality Act (CEQA) requires analysis of potential Alternatives to the Project, including the "No Action" alternative. In the event that the Project was found to have significant environmental impact, a detailed analysis of these alternatives in an Environmental Impact Report (EIR) would be required. Potential Alternatives considered for this Project were:

- 1) No Action Alternative – this would be to not construct the Project on the Site, but to retain existing conditions of an undeveloped property. Existing vegetation and habitat would be retained similar to current conditions.

This Alternative would result in no changes from the current conditions for biological, cultural and hydrologic resources. Air quality, greenhouse gases, traffic, utilities and other key environmental factors would also remain as in present conditions.

- 2) Location Alternatives – other locations may be considered under CEQA if feasible and which may result in lower levels of impact. Since the Project Applicant owns this parcel but does not own other suitable parcels in the area, other locations do not appear to be feasible and were not further considered in this Initial Study.

- 3) Density Alternatives – The Project could be constructed with either smaller buildings, fewer buildings or another less dense alternatives.

This would be proportional to the selected density of the Project (for instance, a project utilizing half of the Site could preserve roughly half of the existing biological resources. The Applicable portions of the Environmental Checklist (Chapter 2.0) and the Summary of the Affected Environment and Impacts in Chapters 2.0 and 3.0 below indicate that the loss of or impact to biological and other resources and the increases in air quality, greenhouse gases, traffic and

utilities are less than significant, so further discussion of this alternative is not necessary for this relatively small Project. In addition, the City of Adelanto presumably considered these impacts when zoning the Project Site as Airport Development District, which envisions light industrial uses such as the project.

This Initial Study document therefore analyzes the proposed Project, the No Project Alternative, and where applicable, changes in environmental impact which may occur under a reduced density scenario. A smaller facility of approximately 150,000 square feet of space has been selected, where relevant, for the comparison of density alternatives. While this selection is somewhat arbitrary, it has been chosen to provide a comparison of impacts for the Proposed Project with a project with a reduced footprint and less required parking.

#### Reduced Density Alternative

The analysis of potential Project Impacts indicates that the Project as designed will not result in potentially significant impacts, except potentially for biological impacts and possibly traffic (or VMT) impacts. Thus, the reduced density/footprint Alternative has been evaluated in terms of effects on biological resources (see Biological Resources, Section 3.4 and Transportation, Section 3.17).

#### No Action Alternative

For all environmental issues listed by CEQA regulations, the No Action Alternative will result in continuance of the current site conditions and will not result in any ongoing impact other than ongoing impacts from unauthorized dirt bike use, and potentially unauthorized dumping.

### **1.4 PURPOSE AND NEED FOR PROJECT**

The City of Adelanto has been historically expanding in population and in light industrial and commercial need and demand. In particular, facilities which provide warehouse/greenhouse space for Cannabis cultivation have been expanding in recent years.

This Project will provide commercial space for Cannabis cultivation. The Project will help fulfill the need for these types of commercial cultivation facilities.

## **2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED (ENVIRONMENTAL CHECKLIST SUMMARY)**

### **2.1 DETERMINATION OF SIGNIFICANCE**

This Chapter provides a general assessment of Environmental Issues which may be affected by the proposed Project. The discussions focus on each issue in order to make a determination whether the Project can be categorized in one of four categories for each subject area of potential impact as follows:

- 1) Potentially significant
- 2) Less Than Significant with properly implemented Mitigation Measures
- 3) No significant impacts anticipated (with the Project as proposed)
- 4) No Impact

In some cases, Mitigation Measures may have already been incorporated into the Project planning process. These are reflected in the Project Site Plan in Figure 5 or described more fully in this Chapter (2.0) and in Chapter 3.0 of this Initial Study document.

The environmental factors checked in Table 1 below (see Page 76) would be potentially affected by this Project. The unchecked boxes indicate environmental issues that are either non-significant or would generate No Impact. Those issues are discussed briefly in this Chapter below to show the rationale for those determinations.

Chapter 3.0 contains more detailed analysis for issues which are considered to be Significant or which are considered Less Than Significant with Mitigation Incorporated. The Mitigation Measures for these issues are discussed in that Chapter and should be tied to a Mitigation Monitoring and Reporting Program (MMRP) for the Project (see Chapter 4.0) in order to be effective in reducing those areas to be “Less than Significant with Mitigation”. In some cases, those Mitigation Measures have already been incorporated into plans for the Proposed Project.

### **2.2 SUMMARY OF ENVIRONMENTAL ISSUES**

Table 1 summarizes the issues which are of potential significance for the proposed Project. A brief discussion of issues is listed below. Issues which are not potentially significant or which have been determined to have no impact are not further discussed, although the CEQA questions and brief answers for those issues are shown in Chapter 3.0. These issues are briefly discussed to provide a context for determinations of No Impact or Less Than Significant Impact.

That Chapter (3.0) also contains discussions of issues which are “Non-significant with Mitigation Incorporated” or those which are Potentially Significant. Mitigation Measures are also listed for each issue which are intended to reduce impacts below the level of significance.

The Proposed Project is the main frame of reference for discussions of impacts resulting from each of the issues. Where applicable, any impacts from the No-Project Alternative or a Reduced Density Alternative (assume about ½ - 2/3 of the Project Density) are also discussed. Below are brief summary discussions of each major environmental issue as specified by CEQA.

Aesthetics – This issue is expected to be **Less Than Significant with Mitigation Measures Incorporated**, many of which have already been incorporated into the plans for the Proposed Project. These are more fully discussed in Chapter 3.0.

Agriculture and Forestry – There is expected to be **No Impact** on Agriculture or Forestry. There is no agriculture or potential for agriculture on the Site and no forestry resources (Joshua Trees which are a protected species are a non-forestry tree species which are discussed in the section on Biological Resources). RCA & Associates, LLC (hereafter RCA) has completed a General Biological Resources Assessment of the Project Site (RCA 2020).

#### Air Quality

Air Quality impacts are anticipated to be **Less Than-Significant with Mitigation**. This is further discussed in Chapter 3.0. Air quality modeling has been conducted by Urban Crossroads (UC 2021). Their report findings are discussed in Chapter 3.0.

#### Biological Resources

Potential Project impacts on Biological Resources are expected to be **Less Than-Significant with Mitigation**. This is discussed in detail in Chapter 3.0 along with summary discussions of the Biological Reports completed to date and additional biological work which will be necessary to properly mitigate impacts of the Project. RCA & Associates, LLC has prepared a General Biological Resources Assessment (RCA 2020) and a Protected Plant Preservation Plan (RCA 2021) for Joshua Trees. Proposed mitigation will be implemented contingent on approval and securing an Incidental Take Permit (ITP) by the California Department of Fish and Wildlife.

#### Cultural Resources

Cultural Resources (including Historic Resources) as well as Tribal Cultural Resources (see Section below) are anticipated to be **Less Than-Significant with Mitigation**. These resources were studied by CRM Tech Archaeological Consultants (CRMT 2021) (see Chapter 3.0).

#### Energy

This will be **Less than Significant with Mitigation Incorporated** as per design plans. If solar energy is incorporated into Project Design, this would further reduce environmental impact and provide energy savings for the Project.

### Geology/Soils

Geology and Soils are anticipated to be **Less Than-Significant with Mitigation**. Reports including a Soils Engineering Investigation (Patel & Associates, Inc. (PAI) 2020) have been completed for the Project. These are discussed in Chapter 3.0.

### Greenhouse Gas Emissions

Greenhouse gas emissions are anticipated to be **Less Than-Significant with Mitigation**. This is further discussed in Chapter 3.0. These potential pollutants have also been studied and air quality and greenhouse gas modeling by Urban Crossroads (UC 2021).

### Hazards and Hazardous Materials

Hazards and hazardous materials are expected to be **Less Than-Significant with Mitigation**. This is discussed in more detail in Chapter 3.0. A report has been prepared by Allard Engineering (AE 2020) regarding water quality management and hazardous materials issues.

### Hydrology/Water Quality

Hydrology and Water Quality are expected to be **Less Than-Significant with Mitigation**. A Preliminary Hydrology Report and a Preliminary Water Quality Management Plan have been prepared by Allard Engineering (hereafter AE 2020 a,b) and submitted to the City of Adelanto. These reports (AE 2020a,b) and site conditions pertinent to hydrology and water quality are further discussed in Chapter 3.0.

### Land Use Planning

Land Use issues are expected to be **Less Than Significant Impact**. The Site fits with the City's zoning, but will require a Conditional Use Permit and Location Development Plan. This is discussed briefly in Chapter 3.0.

### Mineral Resources

The effect of the Project on mineral resources is expected to be **No Impact**. No mineral resources are known to exist on the site, and any extraction of resources in such a developed area zoned for Airport Development may not be allowed by the City of Adelanto.

### Noise

Noise effects of the Project are expected to be **Less Than Significant with Mitigation**. This is further discussed in Chapter 3.0.

### Population/Housing

The effect of the Project on population or housing is expected to be **Less Than-Significant**. The Project will not create any housing or increase population. The creation of a small number of permanent jobs following construction of the facility could have a minor and indirect effect upon demand for additional housing in the area over a period of time.

### Public Services

Public Services will not likely be significantly affected. Some extensions of existing water/sewer lines and other infrastructure will need to be extended to the Project Site. With Mitigation, the effects are expected to be **Less Than-Significant with Mitigation Incorporated**. This is further discussed in Chapter 3.0.

### Recreation

The Project effect on recreation is expected to be **No Impact**. The Project will not supply any recreational facilities nor will it increase demand for such facilities.

### Transportation/Traffic

The Project effect on transportation and traffic Level of Service (LOS) is expected to be **Less Than-Significant with Mitigation**. David Evans & Associates (DEA 2021) has produced a Focused Traffic Impact Study for the Project. Findings of that study are further discussed in Chapter 3.0.

A Vehicle Miles Travelled (VMT) Study has indicated that VMT impacts will also be **Less Than-Significant with Mitigation** according to City of Adelanto criteria, and will be less than significant on a regional or County level, if the facility is utilized to its fullest extent with 204 employees. Such a scenario could also increase Air Quality and Greenhouse gas emissions, however, these would also be **Less Than-Significant with Mitigation**.

### Tribal/Cultural Resources

Potential Impacts on Tribal Cultural Resources are expected to be **Less Than-Significant with Mitigation**. The findings of the CRM Tech Archaeological Survey Report (CRMT 2021) are further discussed in Chapter 3.0.

### Utilities/Service Systems

The effect of the Project on Utilities/Service Systems is expected to be **Less Than-Significant with Mitigation Incorporated**. This is further discussed in Chapter 3.0.

## Wildfire

This issue is expected to be **Less Than Significant**.

## Mandatory Findings of Significance

The effect of the Project on the several categories of “Mandatory Findings of Significance” are **Less Than-Significant with Mitigation**. This is further discussed in Chapter 3.0. It should be noted, however, that continuing development in the area could result in a Cumulative Impact in several areas (Biology, Land Use, Hydrology, Aesthetics, Air Quality, Greenhouse Gases, etc.) if many future projects do not set aside any significant open space on commercial and residential sites and limit and mitigate potential transportation impacts.

### 3.0 ENVIRONMENTAL CONDITIONS AND POTENTIAL IMPACTS

This Chapter discusses Environmental Conditions (Affected Environment) and potential Impacts of the proposed Project. This is based on the Environmental Checklist findings (see Chapter 2.0). Only those CEQA questions and issues which received a finding of “Potentially Significant Impact” or a finding of “Less Than Significant Impact with Mitigation Incorporated” are discussed in this Chapter. Findings of “Less than Significant Impact” or “No Impact” are not discussed in detail unless they relate to other issues which do have potential significant impacts.

#### 3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized 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 point). If the Project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a) Have a substantial adverse effect on a scenic vista?

The project site involves the implementation of a 11.21-acre parcel into a cultivation center that will consist of seven greenhouses (175,000 sq ft total), one manufacturing building (25,000 sq ft), a retention basin (12,328 sq ft), and approximately 200 parking spaces (159 sq ft), in the city of Adelanto. The site lies on a relatively flat topography, between 849 and 854 meters above sea level, in an airport development district (ADD) zoned area in the city.

Per the Adelanto North 2035 Comprehensive Sustainable Plan, the city of Adelanto has prominent viewsheds of the San Gabriel Mountains to the south, the San Bernardino mountains to the southeast, the Mojave River to the east, and the surrounding undeveloped land of the Mojave Desert. The site which is located at the directly east of Highway 395 and north of Alden Road, has a view of the San Gabriel Mountains, located 23 miles south of the project area, and has a view of the surrounding Mojave Desert, with undeveloped land to the west and south of the site. North of the site is a Buddhist Center and a car scrapyards center to the north and east of the Site.

Due to the intervening development and their distance and orientation to the Project site, these views can be viewed throughout the city of Adelanto. The Mojave River is located approximately four miles to the east and cannot be viewed from the Project site. Therefore, implementation of the proposed Project would have **Less Than Significant Impact**.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

The Project site is not located within or adjacent to a scenic highway corridor and does not contain scenic resources, such as trees of scenic value, rock outcroppings, or historic buildings. There are no State-designated or eligible scenic highways within the vicinity of the Project site. The nearest State-eligible scenic highway from the Project site is a segment of Route 138 approximately 17 miles southeast of the Project site.

Accordingly, the Project site is not located within a state scenic highway corridor and implementation of the proposed Project would not have a substantial effect on scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor. Therefore, **No Impact** would occur, and no further analysis is required on this subject.

**c) In nonurbanized 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 point). If the Project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

The proposed project, located along Highway will not obstruct the surrounding views, the San Bernardino Mountains, San Gabriel, Mountains, and Mojave Desert, and is not located in a scenic corridor. The project site is already bordered to the north by a Buddhist center and a car scrapyards to the east. Therefore, the project will have **Less Than Significant Impacts**. Design Plan include a color palette which will blend with the existing high desert environment.

**d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

With Section 17.15.050(E)(5) – Lighting of the City of Adelanto Municipal Code includes design standards for outdoor lighting that apply to industrial development in the city. Development of the proposed project will require installation of outdoor lighting necessary for public safety and maintenance, as well as to accommodate nighttime business operations. All lighting will comply with the development standards contained in the City’s Zoning Code. The commercial development located north of the Project does contain lighting on the outsides of the buildings that are visible from the project site.

The proposed project would involve the introduction of new lighting typically associated with industrial manufacturing. This lighting would be similar to that which exists in the

similar facilities in the surrounding area (Buddhist Temple and recycling facility) and would not be considered significant. The Municipal code lighting standards govern the placement and design of outdoor lighting fixtures to ensure adequate lighting for public safety while also minimizing light pollution and glare and precluding nuisance (e.g., blinking/flashing lights, unusually high intensity or needlessly bright lighting). Therefore, **Less Than Significant Impacts with Mitigation Incorporated** will occur.

**Mitigation Measure**

**AES-1** Implement features of current design as specified in the Steeno Design Site Plans and specifications and Conley’s specifications (or similar specifications) and comply with Project design and requirements for light and glare by the City of Adelanto.

**3.2 AGRICULTURE AND FORESTRY RESOURCES**

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?**

The project site is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to California Department of Conservation. The project site is labeled as Nonagricultural or Natural Vegetation. The City of Adelanto has the land use zoned for Airport Development District (ADD); therefore, **No Impact** would occur. The added CEQA initial study is consistent with the previously approved IS in regards to agricultural and forestry resources.

*(Source: City of Adelanto General Plan, 2020; California Department of Conservation; General Plan Zoning Map Updated 2019)*

**b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

The project site is zoned for “Airport Development District” land uses according to the City of Adelanto Zoning Map. There are no properties zoned for agricultural land uses in the Project vicinity. Therefore, the project has no potential to conflict with existing zoning for agricultural use. According to the City of Adelanto General Plan and the California Department of Conservation, no land within the City is under a Williamson Act Contract. **No Impact** would occur.

*(Source: City of Adelanto General Plan, 2020; California Department of Conservation; General Plan Zoning Map Updated 2019)*

**c) 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 Government Code section 51104(g))?**

The project site is not zoned as forest land, timberland, or Timberland Production, nor is it surrounded by forest land, timberland, or Timberland Production land. There are no lands located within the City of Adelanto that are zoned for forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project has no potential to conflict with any areas currently zoned as forest, timberland, or Timberland Production and would not result in the rezoning of any such lands. **No Impact** would occur.

*(Source: City of Adelanto General Plan, 2020; California Department of Conservation; General Plan Zoning Map Updated 2019)*

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

The Project site does not contain any forest areas and is not designated as forest land. Therefore, the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use (California Department of Conservation, 2016). **No Impact** would occur.

*(Source: City of Adelanto General Plan, 2020; California Department of Conservation; General Plan Zoning Map Updated 2019)*

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

The project site is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to California Department of Conservation, 2016. The project site has a General Plan land use designation by the City of Adelanto for Airport Development District (ADD). The project site is undeveloped and does not support any forest habitat nor are any forest lands near the Project Site; therefore, **No Impact** would occur.

*(Source: City of Adelanto General Plan, 2020; California Department of Conservation; General Plan Zoning Map Updated 2019)*

**Mitigation Measures**

No significant impacts were identified, and no mitigation measures are required.

**3.3 AIR QUALITY**

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Project Site is located within the Mojave Desert Air Quality Management District (MDAQMD), comprised of San Bernardino County’s High Desert and Riverside County’s Palo Verde Valley. Air monitoring staff operates and maintains six monitoring stations (Barstow,

Hesperia, Phelan, Trona, Twentynine Palms, & Victorville) within the District's 20,000 + square mile jurisdiction.

The High Desert's proximity to SCAB and the prevailing southwest winds that transport pollutants from more congested urban areas south of the Cajon Pass into the region causes concern over ground-level ozone impacting ambient air. Violations of the federal ozone standard occur several times each summer, as do violations of the state standard for particulate matter (PM<sub>10</sub>), usually in the fall and winter.

The MDAQMD has a high potential for air pollution at certain times of the year. This is due to its proximity to the heavily populated South Coast Air Basin (SCAB), which houses the highly polluted Los Angeles region and the San Bernardino Valley, as well as the regional climate (warm with little precipitation). Another significant pollutant combination, more recently studied and legislated in California, are Greenhouse Gases (GHG) which are believed to contribute to global climate change. GHGs will be discussed in a separate section below.

### Air Quality & Criteria Pollutants

Air quality is the measured concentration of pollutants in the atmosphere. Concentrations are expressed in parts per million (ppm) or micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). Both National and State standards have been promulgated for six criteria pollutants (National Ambient Air Quality Standards and California Ambient Air Quality Standards) and are managed by the U.S. Environmental Protection Agency (EPA) and the California Air Resource Board (CARB) respectively. The six criteria pollutants are Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>), Sulfur dioxide (SO<sub>2</sub>), Carbon Monoxide (CO), Ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>) and lead (Pb). PM<sub>10</sub> and PM<sub>2.5</sub> refer to particulate matter smaller than 10 and 2.5 microns (micro-meters) respectively.

Air quality control districts are classified as “attainment” or “non-attainment” areas depending on whether they meet the respective state and federal air quality standards. The Project Site is located in the southwest section of the MDAQMD. The high desert area of this air district is currently designated “non-attainment” for Ozone and PM<sub>10</sub> according to the most recent Mojave Desert Air Quality Management Plan (MDAQMD 2016) (Table 2).

CARB also set significance thresholds for four additional pollutants: Visibility reducing particles, sulfates, Hydrogen sulfide (H<sub>2</sub>S) and Vinyl chloride. CARB also identifies other air pollutants as toxic air contaminants (TACs) which are pollutants that may cause serious, long-term effects, such as cancer, even at low levels (CARB 2016). These standards can be found in Table 3.

### Criteria Pollutants from Project Construction

Construction activities produce many types of the emissions and pollutants listed above. However, the pollutants of greatest concern are PM<sub>10</sub> and PM<sub>2.5</sub> in fugitive dust and diesel engine exhaust. Fugitive dust emissions can result from a variety of construction activities such as excavation, grading, vehicle exhaust, vehicle travel to and from the site, and demolition. These

emissions can greatly increase localized concentrations of PM<sub>10</sub> and PM<sub>2.5</sub>, as well as affecting compliance with ambient air quality standards on a regional level.

Particulate emissions can lead to adverse health effects as well as limiting visibility and contaminating exposed surfaces. Gas and diesel engines can also contribute to increased levels of nitrogen dioxide, carbon monoxide, reactive organic gases (ROC) and diesel particulate matter (DPM). DPM is a composite of TACs which also cause significant negative health effects. Use of architectural coatings and other materials during the finishing phases of the project may also emit ROG and TACs.

The MDAQMD's approach to CEQA analysis of fugitive dust impacts is to require implementation of effective and comprehensive dust control measures rather than to require detailed quantification. This is because fugitive dust emissions can vary dramatically depending on the level of activity and equipment, and the length of time construction occurs.

Despite the varied emission levels from project to project, there are several feasible control measures that are considered reasonable to implement to significantly reduce fugitive dust emissions from construction. These control measures are comprised of Best Management Practices (BMPs) such as frequent water application to the site and a reduction of vehicle idling while not in use. It has been determined that most projects that implement these practices constitute sufficient mitigation to reduce PM<sub>10</sub> and PM<sub>2.5</sub> impacts to a level as less than significant (MDAQMD 2020).

#### Criteria Pollutants from Project Operation

The project operation phase refers to activities that occur after the completion of project construction and when the project is functioning in its intended use. These activities are varied and are dependent on the type of daily operations that may generate criteria pollutants. For most commercial and residential projects, motor vehicle traveling to and from the site represents the primary source of air pollutant emissions. For industrial and some commercial projects, activities of greatest concern are typically manufacturing processes and equipment operation. CEQA significance thresholds address the impacts of operation emission sources on local and regional air quality. Thresholds are also provided for other potential impacts related to project operations, such as odors.

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

The Project, as designed, will not interfere with implementation of the MDAQMD Management Plans. A study by Urban Crossroads (2021) determined that air quality levels as modeled by the California Emissions Model (CalEEMod) will not cause significant effects on criteria pollutants identified by the MDAQMD Plans. The effects of the Project will be **Non-Significant with Mitigation** (compliance with current Project design and calculated maximum traffic levels (Level of Service or LOS) and Vehicle Miles Travelled (VMT) calculations).

**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?**

A traffic study was conducted by David Evans & Associates, Inc. (DEA 2021) which estimates that as many as 281 vehicle trips per day could occur as a result of this project. While most of the vehicles will be employee passenger vehicles, a small percentage of these vehicle trips will be by diesel powered delivery and service trucks.

Additional data has been provided by the applicant, indicating that actual usage of the facility will be lower in traffic, due to the proposed Project being used primarily for cultivation of non-native Cannabis plants. This will likely utilize a smaller workforce than that indicated by the Site Plan (showing 204 parking spaces for passenger vehicles). This will likely reduce air quality impacts significantly from those which would normally be associated with a facility of this size. Therefore, the project impacts are anticipated to be **Less Than Significant with Mitigation** for Air Quality impacts on criteria pollutants.

Additional discussion of potential impacts from the Project on Traffic and Transportation Area discussed in Section 3.17 below. The number of actual employees, and therefore vehicle trips and Vehicle Miles Travelled could further lower the degree of impact on Air Quality and Greenhouse Gas emissions. At full use, the facility could possibly generate sufficient air pollutants to require modeling. A modeling study has been conducted by Urban Crossroads (2021) using approved emissions models (CalEEMod). Those model runs showed that both construction and operational emissions for the Project will be below thresholds of the MDAQMD (see Table 4).

For construction, the highest modeled emission rate was 103.29 pounds per day of VOC (Volatile Organic Carbon) compared to the MDAQMD regional threshold of 137 pounds per day. Emissions during construction of nitrogen oxide (NOx) was found to be 46.18 pounds per day compared to the threshold of 137. Other compounds including sulfur oxides, carbon monoxide, particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) were all found to be below 25 percent of the standards during construction. Operational emissions were all found to be below five percent of the standards during both summer and winter scenarios. Therefore, the impact is expected to be **Less Than Significant**, provided the following basic mitigation measures which were assumed in the modelling are followed.

### **Mitigation Measures**

**AQ-1** During Project Construction, comply with an accepted Dust Control Plan to be prepared and submitted to the MDAQMD for approval.

**AQ-2** During Project construction and operation, limit idling of diesel vehicles to less than 10 minutes.

**AQ-3** The employees should be encouraged to ride-share to the extent feasible. Local employees should be encouraged to utilize public transportation when available.

The above data and studies, combined with the project size and baseline air quality of the area, leads to the conclusion that the potential impacts are likely to be **Less Than Significant with Mitigation Incorporated**. This conclusion is based upon general data and project assumptions coupled with specific air modeling results (Urban Crossroads 2021).

**c) Expose sensitive receptors to substantial pollutant concentrations?**

The Project is near one residential air quality receptors but is in a commercial area. No schools, hospitals or other sensitive receptors are in the vicinity and zoning near the Project is Airport Development District. Therefore, the Project will have **Less Than Significant Impact** on such receptors.

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

Cannabis facilities do produce odors at certain stages of growth and development of the plants. No residential receptors are near the Project Site and zoning is consistent for light industrial usage as per the Adelanto General Plan. During Project operation, the owners should work with the City of Adelanto and with neighbors to mitigate and address any specific concerns regarding odors or other related air quality issues. The Project is expected to be **Less Than Significant with Mitigation** (compliance with City of Adelanto regulations for Cannabis facilities and use of Best Management Practices for the facility).

**AQ-4** While the facility is comprised of indoor grow chambers within greenhouses, there is the possibility of odors from the plants at certain stages of growth. The Project shall comply with state of California requirements for odor control plans, or any such plans promulgated by the City of Adelanto.

### 3.4 BIOLOGICAL RESOURCES

Would the Project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) 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. Fish and Wildlife Service?**

The California Department of Fish and Wildlife (CDFW), United States Fish and Wildlife Services (USFWS), California Native Plant Society (CNPS), and other local agencies, maintains a list of special status species, legally protected or considered sensitive by CDFW, USFWS, CNPS, and other local agencies. To be considered a special status, a species must be listed as either rare, endangered, or threatened under the federal or state endangered species act, listed as a candidate under either state or federal law, considered a species of special concern, protected by the Migratory Bird Treaty Act, or protected under local planning documents.

A literature search was performed on the CDFW’s Natural Diversity Data Base (CNDDDB) for the Adelanto, California USGS 7.5 minute quadrangle to determine the special-status

species recorded in the area. Currently, there are five wildlife species considered special status in the Adelanto USGS quadrangle. These species include burrowing owl (*Athene cunicularia*), Swainson's hawk (*Buteo swainsoni*), desert tortoise (*Gopherus agassizii*), Leconte's thrasher (*Toxostoma lecontei*). Implementing Mitigations 1,2 and 3 would reduce impacts to candidate special-status species and special status species to be less than significant with mitigations incorporated.

A biological assessment was conducted on the property on August 17, 2020 by Lisa Cardoso and Ryan Hunter, biologists from RCA Associates, Inc to assess for special status species. The site contains a relatively undisturbed creosote bush community that supports vegetation such as Nevada jointfir (*Ephedra nevadensis*), silver cholla (*Cylindropuntia echinocarpa*), Joshua tree (*Yucca brevifolia*), rubber rabbitbrush (*Ericameria nauseosus*), California buckwheat (*Eriogonum fasciculatum*), and Stork's Bill (*Erodium cicutarium*).

On September 22, 2020, CDFW listed the western Joshua Tree as a temporary endangered candidate for one year until a final decision is made and is therefore illegal to remove or transplant a tree without an approved Incidental Take Permit (ITP) provided by CDFW. The Joshua Tree is also a protected plant in the County of San Bernardino under the Native Desert Plant Protection Plan (Ordinance Chapter 88.01.060). A Joshua Tree Protection Plan was completed on January 27, 2021 by RCA Associates, Inc. There are a total of thirteen Joshua trees on the property with eight being transplantable. The Protected Plant Plan is a means of managing the preservation of trees and native desert flora, where necessary. Construction activities, including grading, vehicle access, equipment staging area, development of access roads and construction-related activities have the potential to result in temporary impacts to desert flora within the project. Following Mitigations BIO-4 would reduce impacts to the Joshua Trees as **Less Than Significant Impacts with Mitigations Incorporated**.

A focused survey was also conducted on the site to determine the presence or absence of burrowing owls, desert tortoise, and Mojave ground squirrel. Based on the findings of the survey, there are no suitable burrows or other signs (scat, feathers, footprints) to suggest desert tortoises or burrowing owls are occupying the area, and the species are not expected to occur on site due to urbanization expansion. Mitigations BIO-1, 2, and 3 would reduce the impact to species as a candidate sensitive, or special status to **Less Than Significant Impacts with Mitigations Incorporated**.

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

The site does not contain a riparian habitat that is subject to CDFW, USFWS, United States Army Corps of Engineers (Corps), nor the Regional Water Quality Control Board (RWQCB). Therefore, the Project will have **No Significant Impact** on riparian habitats.

- c) **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?**

A review of the USFWS National Wetlands Inventory, Wetlands Mapper confirmed that there are no wetlands or riparian habitat present within in the site. The nearest wetland lies approximately 0.6 miles east of the site, where a drainage channel, that is dry majority of the year, is located. Therefore, the proposed project will have **No Impact** on federally protected wetlands as defined by Section 404 of the CWA. No impact would occur.

- 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?**

Habitat fragmentation occurs when a single, contiguous habitat area is divided into two or more areas, or where an action isolates two or more new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or to/from one habitat type to another. Habitat fragmentation may occur when a portion of one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning. Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging. Examples of migration corridors may include areas of unobstructed movement for deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and between roosting and feeding areas for birds.

The project site does not provide for regional wildlife movement or serve as a regional wildlife corridor. Additionally, the site does not contain nursery sites, such as bat colony roosting sites or colonial bird nesting areas. Although the project does have potential to affect migratory birds, through implementation of Mitigation Measures BIO-1,2 and 3, impacts to species nesting within the property would be reduced to **Less Than Significant Impacts with Mitigation Incorporated**.

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

There are no local ordinances regarding biological resources, although the City's General Plan does require biological assessments to protect those resources. Biological resources are protected at the state level by CDFW regulations. A Joshua Tree Preservation Protection Plan has been prepared for the Site (RCA 2021). If the provisions of that plan are adhered to, the Project should result in **Less Than Significant Impacts with Mitigation Incorporated**.

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

Pursuant to Section 10 of the Federal Endangered Species Act, the City, along with Bureau of Land Management (BLM), County of San Bernardino, and other local jurisdictions, is in the process of approving the WMP. The WMP would provide protection for the desert tortoise, Mohave ground squirrel, and over 100 other sensitive plants and animals for which they are a part of within the Mojave Desert. The final Environmental Impact Report/ Environmental Impact Statement (EIR/EIS) for the WMP was disseminated to the public in 2005, the BLM issued a Record of Decision for the WMP in 2006, and the WMP has been challenged numerous times by various conservation groups and off-highway vehicle (OHV) organizations since then. The BLM released a Supplemental EIS for the WMP in 2015, but as of September 2020, the WMP has not been adopted, so the project will not conflict with the WMP.

The proposed project would not conflict with an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan applicable to the project. **No Impact** would occur, and no mitigation is required.

**Mitigation Measures:**

**BIO-1** If project activities are planned during bird nesting season (February 1 to August 31), a nesting bird survey shall be conducted within thirty days prior to any ground-disturbing activities, including, but not limited to clearing, grubbing, and/or rough grading to ensure birds protected under the Migratory Bird Treaty Act (MBTA) are not disturbed by on-site activities. The survey will be conducted by a qualified biologist. If nesting bird activity is present, based on the species, a no disturbance buffer zone shall be established around each nest. If there is no nesting activity, then no further action is need for this measure.

**BIO-2** Prior to the issuance of a grading permit, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation , State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 14 days prior to the beginning of project construction, and a secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains suitable burrowing habitat and to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present, no additional actions related to this measure are required. If occupied burrows are found within the development footprint during the pre-construction clearance survey, Mitigation Measure BIO-3 shall apply.

**BIO-3** If occupied burrows are found within the development footprint during the pre-construction clearance surveys, site-specific buffer zones shall be established by the qualified biologist through consultation with the California Department of Fish and Wildlife (CDFW). The buffer zones may vary depending on burrow location and burrowing owl sensitivity to human activity, and no construction activity shall occur within a buffer zone(s) until appropriate avoidance and minimization measures are determined through consultation with CDFW.

**BIO-4** Prior to any on site construction activities, the project proponent shall retain a qualified biologist to assess the amount of Joshua trees on the site and their conditions (size, bark damage, location, etc.). A permit will need to be acquired by CDFW before relocating any Joshua Trees.

Following approval of relocating, the project proponent shall retain a qualified Transplantation contractor with a successful track record of Joshua tree transplantation. Transplanted trees shall be watered a week before with a metal tag placed on the north facing to orient the tree during relocation.

To ensure that the transplanted Joshua trees are kept in compliance with the Joshua Tree Relocation Plan, the transplanted Joshua trees will be evaluated quarterly prior to final landscape planting. A “Special Inspector” is required to monitor all Joshua tree transplantation activities. The Special Inspector shall be an International Society of Arboriculture-certified arborist or registered botanist qualified to assess the progress and success of the transplantation effort and to recommend corrective measures, if needed.

- Monitoring for survival, appearance, and function of all transplanted Joshua trees will be completed quarterly. General compliance with this Plan will also be monitored.
- As part of the quarterly inspections, the Special Inspector will make note of the general health of the transplanted Joshua trees and will make maintenance recommendations, if necessary

**Alternatives:** Biological resources will be impacted by removal of all resources from the Site. Mitigation measures are intended to reduce impacts in the vicinity by removing burrowing owls if necessary and replanting some Joshua Trees. Resources on the Site would be protected by the No Project Alternative and a proportional part of the biological resource present on the Site would be protected by the reduced density alternative. While this 11.26 acre site development will not be a significant impact on biological resources, the cumulative impact of many of these site developments could result in such impact. It is recommended that the City of Adelanto devise recommendations for setting aside biological open space areas as further development of the City occurs.

### 3.5 CULTURAL RESOURCES

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of the historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature? <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) Cause a substantial adverse change in the significance of a historical resource as pursuant to § 15064.5?**

Pursuant to CEQA requirements, a comprehensive cultural paleontological resource assessment was conducted on the site by CRM TECH personnel. As part of the study, both a California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC), located at California State University, Fullerton, on February 5, 2021, and a paleontological records search was requested from the San Bernardino County Museum (SBCM) Decision of Earth Science and the Natural History Museum of Los Angeles County (NHMLAC). The cultural study is part of the environmental review process for the proposed project as per CEQA, Section 21000 et. seq. Following the completion of the data search, an intensive field survey was conducted by CRM TECH on February 9, 2021.

According to SCCIC records, the project area was included in the scope of a large-scale cultural resources study for a community plan in 2013, which covered a total of 27 square miles but that did not include a systematic field survey. No cultural resources were discovered within the project area during that study, nor as the result of any other studies in the vicinity (see App. 2). Within the half-mile scope of the records search, SCCIC records identified five other previous studies, including a 2008 linear survey along U.S. Highway 395, adjacent to the western project boundary.

These and other similar studies in the vicinity resulted in the identification of three historical/archaeological sites and four isolates -"i.e., localities with fewer than three artifacts- within the half-mile radius, as listed in Table 1. All of these localities dated to the historic period, and no cultural resources of prehistoric -i.e., Native American -origin were previously recorded within the scope of the records search.

<b>Site Number</b>	<b>Description</b>
36-010316	Kramer-Victorville 115kV transmission line
36-013352	Isolate: two sun-colored amethyst glass fragments
36-023227	Historic-period refuse scatter
36-023255	Historic-period refuse scatter
36-023336	Isolate: glass bottle
36-023337	Isolate: bottle base and associated glass fragments
36-061264	Isolate: rectangular sun-colored amethyst glass bottle

The nearest site to the project location is 36-010316 (CA-SBR-10316H), which consists of several segments of the Southern California Edison’s Kramer-Victorville 115kV power transmission line, including one running along U.S. Highway 395. Recorded and updated several times between 1995 and 2018, Site 36-010316 has been evaluated in the past and found not to be eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, due in large part to a lack of integrity (Taniguchi 2007).

Both of the other sites represented historic-period refuse deposits, while the four isolates all consisted of glass bottles or glass bottle fragments. With the exception of 36-010316, none of these sites or isolates were found in the immediate vicinity of the project area. Therefore, none of them require further consideration during this study. Therefore, the proposed project will have **no impact** on adverse changes to historical resources.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 ?**

In order to identify such resources, CRM TECH initiated a historical/archaeological resources records search and a Native American Sacred Lands File search, pursued historical background research, and carried out an intensive-level field survey. Through the various avenues of research, this study did not encounter any “historical resources” within the project boundaries. Therefore, CRM TECH recommends to the City of Adelanto a finding of **No Impact** regarding “historical resources.”

Based on the results of this study, no further cultural resources investigation is recommended for the project unless development plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are encountered during any earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

**c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?**

The Proposed Project's potential to impact significant, nonrenewable paleontological resources appears to be low in the surface soil, but high in the older native alluvium beneath the surface soils. Therefore, CRM TECH recommends that a paleontological resource impact mitigation program be developed and implemented during the project to prevent impacts on such resources or reduce them to a level less than significant.

As part of the mitigation program, periodic monitoring, or "spot-checking", should be carried out upon commencement of any earth-moving operations associated with the project to ensure timely identification of any undisturbed, potentially fossiliferous sediments when they are encountered. Once such sediments are exposed, all further earth moving operations will need to be monitored continuously. Under these conditions, the proposed project may be cleared to proceed in compliance with CEQA provisions on paleontological resources. Therefore, the project is expected to result in **Less Than Significant Impacts with Mitigation Incorporated.**

**d) Disturb any human remains, including those interred outdoors of formal cemeteries?**

There are no known human remains on the Site. Implementation of the Mitigation Measures below should result in **Less Than Significant Impacts with Mitigation Incorporated.** CR-1, CR-2, CR-3, CR-4.

**Mitigation Measures**

**CR-1** Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to the City of Adelanto that a qualified paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

**CR-2** The paleontological monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.

**CR-3** Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

**CR-4** A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately

### 3.6 ENERGY

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

With Mitigation Measures listed below, the Project will not result in wasteful, inefficient or unnecessary consumption of energy resources during construction or operation. The impact will be **Less Than Significant with Mitigation Incorporated**.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

The Project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Use of Mitigation Measures below, including investigation of feasibility for renewable solar energy use will result in **Less Than Significant Impacts with Mitigation Incorporated**.

## **Mitigation Measures:**

The Project Applicant has indicated that several Mitigation Measures to reduce energy consumption have already been incorporated into the Project. These include:

### **Mitigation Measures (Incorporated into current Project Design)**

**ENGY-1** Use of glass or translucent plastic (corrugated polycarbonate – 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural daylight in work areas and for plant growth (Conley’s 2021).

**ENGY-2** Use of 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.

In addition, since some operations and security functions may be carried out during non-daylight hours, an additional mitigation measure is suggested to reduce energy consumption during those times.

**ENGY-3** Use of motion activated lighting in the greenhouse areas to reduce energy use at night.

These measures will substantially reduce energy use by the Project and are sufficient to allow a finding of **Less Than Significant with Mitigation Incorporated**.

Cannabis cultivation is often energy intensive in terms of additional fans or grow lights to achieve optimal growth and development of the plants. The Project has the potential for renewable energy generation (e.g., solar) to serve its own needs but has not been proposed for such use.

Solar cells on the building roofs or other locations could be designed into the Project. Since even without this design, the project will consume substantially reduced amounts of energy for a structure of this type and usage the following measure (ENGY-4) could reduce the Project to **No Impact**.

**ENGY-4** Coordinate with local utility whether solar power generation would be feasible at the facility and make a decision of the Project proponent (in coordination with the City of Adelanto) as to the feasibility of incorporating into the design, either during or following project construction and operation.

### 3.7 GEOLOGY AND SOILS

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? Seismic-related ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial director indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste-water disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

**i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

The Project site is not located in an Alquist-Priolo Earthquake Fault Zone. The nearest significant active fault zones are the San Andreas fault zone, Mirage Valley fault zone, and Helendale-South Lockhart fault zone, which are approximately 21.52, 10.53, and 12.84 miles away from the subject site, respectively. There are no known faults located directly on the Project site; therefore, the potential that the proposed Project could expose people or structures to adverse effects related to ground rupture is **Less Than Significant**.

(Source: City of Adelanto, 2020; Patel & Associates Inc Geotechnical report 2020; California Department of Conservation Map Server, 2016, USGSmaps.arcgis.com)

**ii) Strong seismic ground shaking?**

The site is located in a seismically active area of Southern California. Due to its location in the region, the Project Site is expected to experience severe ground shaking should an earthquake occur, however, that risk is not substantially different than other similar sites in the region. The nearest significant active faults are the San Andreas, Mirage valley, and Helendale faults, which are approximately 21.52, 10.53, and 12.84 miles away from the subject site, respectively. The area in consideration shows no mapped faults on-site according to maps prepared by the California Geologic Survey and published by the International Conference of Building Officials (ICBO). Buildings proposed for the site will be required to be constructed in accordance with the most recent edition of Title 24 of the California Building Code (CBC) and applicable building code requirements of the City of Adelanto to provide collapse-resistant design. Therefore, impacts are expected to be **Less Than Significant**.

(Source: City of Adelanto, 2020; Patel & Associates Inc Geotechnical Report 2020; California Department of Conservation Map Server, 2021, USGSmaps.arcgis.com)

**iii) Seismic-related ground shaking?**

Liquefaction is a phenomenon where water-saturated granular soil loses shear strength during strong ground shaking produced by earthquakes. The loss of soil strength occurs when cyclic pore water pressure increases below the groundwater surface. Potential hazards due to liquefaction include the loss of bearing strength beneath structures, possibly causing foundation failure and/or significant settlements. The soils encountered within a depth of 26.5 feet at the project site predominately consist of medium to very dense silty sand that is slightly moist. Groundwater was not encountered in any of the borings drilled at the subject site. In addition, a Liquefaction Hazard Map has not been prepared for the subject site. The project site is not located within a “State of California Liquefaction Seismic Hazard Zone”. Through compliance with the 2019 California Building Code and implementation of standard engineering and construction protocols, impacts associated with seismic-related ground failure, including liquefaction, will be reduced; therefore, **No Impacts** would occur.

(Source: City of Adelanto, 2020; Patel & Associates Inc Geotechnical report; California Department of Conservation Map Server, 2016.); USDA, NRCS Soils map.)

**iv) Landslides?**

The Project site is relatively flat and contains no hillside or steep slopes nor are any hills or slopes in the vicinity. The Project site is located in an area with a low potential for landslides since there are no substantial natural or man-made slopes in the vicinity, and grading associated with the Project is not anticipated to result in the creation of any new

substantial slopes on-site that could be subject to landslide. Grading of the site would not pose a landslide threat to adjacent properties, future site workers, or the proposed buildings. The proposed Project would not create and would not be exposed to any risk of a landslide and **No Impacts** would occur.

(Source: City of Adelanto, 2020; Patel & Associates Inc Geotechnical report.)

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

The Geotechnical Report determines that there would be no long-term soil erosion as the proposed project would involve the development of structures, paving (i.e., hardscape), and landscape. Short-term construction-related erosion potential would be addressed through compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements, and impacts would be **Less Than Significant**.

(Source: City of Adelanto, 2020; Patel & Associates Inc., 2020)

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? Seismic-related ground shaking?**

The subject site is relatively flat and level and there are no significant slopes proposed as part of the proposed development. The soils encountered within a depth of 26.5 feet at the project site predominately consist of medium to very dense silty sand that is slightly moist. Groundwater was not encountered in any of the borings drilled at the subject site. Based on the encountered site conditions, liquefaction induced settlement is not considered a significant concern for the subject site. It is recommended that following site clearing, fill removal, and demolition activities, is a minimum. The upper three to five feet of on-site soils should be cleared of debris and removed then placed back as compacted fill, the removal cleaning, compaction and reintroduction of fill should extend at least 5 feet beyond the building lines in each direction after the soils have been moisture-conditioned to at least optimum moisture-content, and recompacted to a minimum of 90 percent of the maximum dry density based on ASTM Test Method D1557. In addition, remedial grading should be performed to a minimum of two (2) feet below proposed foundation bearing grades. Within the pavement and exterior flatwork areas, the exposed fill subgrade should be moisture-conditioned to at least optimum moisture-content and recompacted to a minimum of 90 percent of the maximum dry density based on ASTM Test Method D1557. Prior to backfilling, the bottom of the excavation should be proof-rolled and observed by a soil specialist to verify stability. This compaction effort should stabilize the upper soils and locate any unsuitable or pliant areas not found during our field investigation. Implementation of the recommendations in the geotechnical report in regards to the design and construction of the anticipated development will prevent off-site landslides, lateral spreading, liquefaction, or collapse from occurring during construction activities. Therefore, with the recommendations implemented **No Impacts** would occur.

(Source: City of Adelanto, 2020; Patel & Associates Inc Geotechnical report.)

- d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial director indirect risks to life or property?**

Patel and Associates (2020) have studied geotechnical aspects of the Site and concluded that the Project Site will experience subsidence which is negligible (less than 0.01 foot)

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

The Project would not install any septic tanks or alternative wastewater disposal systems. **No Impact** would occur.

(Source: City of Adelanto, 2020; Patel & Associates Inc Geotechnical report.)

- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

CRM TECH has studied the Site and vicinity and concluded that with implementation of Mitigation Measures CR-1 to CR-4, impacts to paleontological resources will be **Less Than Significant with Mitigation Incorporated**.

(Source: CRM TECH Paleontological Report 2020)

## **Mitigation Measures**

**GEO-1** Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:

- 1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42).
- 2) Strong seismic ground shaking.
- 3) Seismically related ground failure, including liquefaction.
- 4) Landslides.

**GEO-2** Result in substantial soil erosion or the loss of topsoil. Use Best Management Pesticides (BMPs).

**GEO-3** Treatment of Previously Unidentified Paleontological Resources. Prior to the issuance of a grading permit, the following note shall be placed on the grading plans:

“If previously unidentified paleontological resources are unearthed during construction activities, construction work in the immediate area of the find shall be halted and directed away from the discovery until a qualified Paleontologist assesses the significance of the resource. The County of San Bernardino Land Use Services Department shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the finds are found to be historically significant according to CEQA (CEQA Guidelines Section 15064.5 (a)). The plan shall include, but not be limited to:

- 1) Preparation of recovered specimens to a point of identification and permanent preservation including washing of sediments to recover small invertebrates and vertebrates.
- 2) Identification and curation of specimens into an established, accredited museum repository with permanent retrievable paleontologic storage. The paleontologist must have a written repository agreement in hand prior to the initiation of mitigation activities. Mitigation of adverse impact to significant paleontological resources is not complete until such curation into an established repository has been fully completed and documented.
- 3) Preparation of a report of findings with an appended itemized inventory of specimens. The report and inventory, when submitted to the County Land Use Services Department Current Planning along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will signify completion of the program to mitigate impacts to paleontological resources.”

### 3.8 GREENHOUSE GAS EMISSIONS

Would the Project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Greenhouse gases (GHGs) are primarily made up of carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous (N<sub>2</sub>O) oxide and are collectively reported as carbon dioxide equivalents (CO<sub>2</sub>e). These gases are directly emitted from several sources including natural gas in equipment (water heaters, boilers, process heaters etc.), on-road vehicles and off-road construction equipment burning fuel such as gasoline, diesel, biodiesel, propane or natural gas. Indirect GHG emissions result from electric power used to operate process equipment (power plants), lighting and utilities at a facility. Electric power used to pump the water supply (e.g., wells, pipelines, aqueducts) and disposal and decomposition of landfill waste are also indirect sources of GHG emissions (CARB 2017).

GHGs have not been subject to comprehensive legislation from the U.S. Congress, however, federal policy was pushed forward in the 2007 Supreme Court decision in Massachusetts et al. vs. Environmental Protection Agency (EPA). The Court’s ruling held that the GHGs fit the Clean Air Act’s (CAA) definition of pollutants and that the agency was responsible for their regulation.

Following Massachusetts vs. EPA, the EPA issued in April 2009 a “Finding of Endangerment” holding that six GHGs pose a threat to human health under the CAA. In October 2009, the agency issued a Final Rule (effective December 29, 2009) requiring annual reporting by major GHG emitters (specific types of entities emitting 25,000 or more metric tons per year) (Federal Register 2009).

The President’s Council on Environmental Quality issued Guidance for Federal Greenhouse Gas Accounting and reporting in October of 2010. That Guidance was revised in 2012 (CEQ Revision 1: June 4, 2012). That Guidance required federal agencies to report both direct and indirect emissions of Greenhouse Gases. This project would constitute a very minor and temporary emission of GHGs during construction (about 1,026 metric tons CO<sub>2</sub>e (Urban Crossroads 2021).

In 2006, California adopted the Global Warming Solutions Act (SB32) into law. This legislation directed the CARB to direct the reduction of GHG emissions to 1990 levels by 2020 and establish regulatory and market mechanisms to achieve this goal. This limit is an aggregated statewide limit and is not sector or facility specific. The 2020 GHG emissions limit is 431 metric tons of carbon dioxide equivalent (MMTCO<sub>2</sub>e).

Calculations of the original 1990 limit was approved in 2007 and was revised in 2014 using the scientifically updated Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4). The IPCC Board approved 431 MMTCO<sub>2</sub>e as the 2020 emission limit with the approval of the First Update to the Scoping Plan on May 22, 2014.

In 2016, Senate Bill 32, California Global Warming Solutions Act of 2006: Emissions Limit (SB 32) further requires California to reduce statewide GHG emissions to 40% below the 1990 level by 2030 (CARB 2020).

California's Building Energy Efficiency Standards are updated on an approximately three year cycle. The most recent update was completed in 2019, which improved upon the previous 2016 standards for new construction of, and additions and alterations to, residential, commercial and industrial buildings. These 2019 standards went into effect on January 1, 2020 (CEC 2019).

Since the Title 24 standards require energy conservation features in new construction (e.g., high efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double glazed windows, water conserving plumbing fixtures, etc.), they indirectly regulate and reduce GHG emissions (Yorke 2020).

## **Mitigation Measures**

**GHG-1** Greenhouse gases can be reduced during construction by not allowing diesel engines on construction equipment to idle more than 10 minutes at a time. During operation, this applies to diesel trucks during unloading and loading activities.

**GHG-2** During operations, fewer daily trips are anticipated than would be normal for this size of warehouse/cultivation facility. The applicant has indicated that the facility will require a smaller workforce than the required 204 parking spaces would indicate.

Modeling has been completed for this project indicating that 961.48 MTCO<sub>2</sub>e will be emitted compared to the MDAQMD threshold of 100,000 MTCO<sub>2</sub>e (Urban Crossroads 2021). Based upon the size and predicted emissions for the project, the CEQA determination for greenhouse gas emissions is expected to be **Less than Significant with Mitigation Incorporated**.

### 3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the Project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project will be a warehouse/greenhouse cultivation facility for Cannabis cultivation. A Preliminary Water Quality Management Plan (Allard Engineering 2020) has been prepared for the facility. That plan indicates that no regulated quantities of hazardous materials will be manufactured or stored at the Site. The site will grow Cannabis for commercial shipment off-site. The operations will include growth of plant materials, sunlamps and water. The Site may require some use of fertilizer or herbicides. Such materials should be limited to amounts for current use and should be stored in secure locations within the greenhouses.

**a) Create a significant hazard to the public or the environment through the transport, use or disposal of hazardous materials?**

It is possible that fuel or other materials (oil, hydraulic fluid etc.) associated with construction vehicles may be spilled on the site during construction. Any such spills should be immediately contained and cleaned up in accordance with local, state and federal regulations and requirements. Best Management Practices (BMPs) should be used on the Site for any necessary temporary storage of fuel, oil or other material related to construction vehicles. Preferably no such materials should be utilized on the site during construction.

Any storage of hazardous materials or waste on-site, including herbicides or pesticides or other hazardous chemicals used by Cannabis facilities, must comply with all Title 22, CCR Regulations. BMPs should be used during construction and operation. With these limitations, the Project is expected to result in **Less Than Significant Impact with Mitigation Incorporated**.

## Mitigation Measures

**HHM-1** Comply with federal and state hazardous materials regulations regarding use, storage and transport of Hazardous Materials used during both construction and operation. Utilize Best Management Practices (BMPs) during Project construction. Conduct any vehicle maintenance or fueling operations (including vehicle washing) off-site during construction and operation.

**HHM-2** Store any fertilizer or herbicides used within the greenhouse facilities. Use such materials sparingly as needed and do not dispose of any such materials into outside areas where it may reach detention areas or runoff as stormwater. Properly dispose of such materials for transport and disposal off-site. Utilize a licensed applicator for pesticide use in landscaped areas.

**b) Create a significant hazard to the public or the environment through reasonably foreseeable accident conditions resulting in the release of hazardous materials into the environment.**

As discussed in subsection a) above, use of BMPs and conformance with State and Federal regulations for any temporary storage or use of hazardous substances on the Site should reduce the risk of spills and reasonably foreseeable accidents with such materials. Any storage of use of materials during construction or operation which may exceed federal and state requirements for temporary storage of Hazardous Materials should be subject to the prior preparation of a Hazardous Materials Management Plan for the Project. If these requirements are complied with, the Project should result in **Less Than Significant Impact with Mitigation Incorporated**.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

The Site is more than 0.25 miles from any school. There will be **No Impact** from the Project relating to hazardous materials effects on schools.

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

The Project is not known to be on any list of hazardous sites. Therefore, the Project will result in **Less Than Significant Impact** from Hazards or Hazardous Materials.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

The site is not near any public airport facility; however, it does lie two (2.0) miles west of a commercial freight airport and is within the City of Adelanto Airport Development Zone. Airport noise at the commercial airport is not expected to impact operations on the Cannabis facility. The facility will generate no exterior noise with the exception of a small amount of employee traffic and possibly exhaust fans. Therefore, the Project has been rated as **Less Than Significant Impact** with regard to safety hazards including excess noise.

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

It will not interfere with any emergency plan. The Project will result in **No Impact** regarding that issue.

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

The current sparse desert vegetation will be removed from the Site. Desert vegetation in the area is moderate to sparse. Adjacent commercial facilities are located immediately east of the Site (metal recycling facility). One residential property and a Buddhist Temple lie a few hundred feet to the northwest and north. There is no expected risk from wildland fire and the Project will result in **Less Than Significant Impact**.

### 3.10 HYDROLOGY AND WATER QUALITY

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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, in a manner which would?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) 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; or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The Water Quality Management Plan prepared for the Site (Allard Engineering 2020b) and the Preliminary Drainage Report (Allard Engineering 2020a) indicate that the proposed Project would result in runoff increase, which will be offset by construction of an aboveground retention area in the northeastern corner of the Site. That detention system is expected to accommodate the increase in runoff and satisfy the WQMP Requirements of the City of Adelanto (Allard Engineering 2020a). Flow will be routed on the site through on-site gutters flowing eastward and through a ditch to be installed on the south property line. Flow will be routed through a filtered insert prior to discharge into the retention basin. Any overflow from that detention system will be discharged to an existing ditch flowing northward, which will be improved as necessary on the Site (Allard Engineering 2020a,b).

With the implementation of the findings of the Preliminary Hydrology Report (AE 2020a) and the Water Quality Management Plan (AE 2020b) and the Mitigation Measure HYD-1 below, the Project impacts on hydrology and storm-water are expected to be **Less Than Significant with Mitigation Incorporated**.

## Mitigation Measures

**HYD-1** Implement the Water Quality Management Plan (AE 2020b) in accordance with the Preliminary Hydrology Report (AE 2020a) and subsequent detailed engineering calculations and design plans.

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

The Preliminary Hydrology Report and the WQMP (AE 2020b,a) indicate that site soils are well drained (Hydrologic Group B) and will adequately infiltrate on-site runoff. The groundwater table is below 26.5 feet below ground surface, which was the extent of borings taken during the geotechnical study of the Site (Patel & Assoc. 2020). The aboveground retention system will adequately filter and infiltrate stormwater back to the groundwater system in accordance with design plans. Provided the retention system works as specified, the Project will result in **Less Than Significant Impacts with Mitigation Incorporated**.

**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, in a manner which would?**

There is currently a low-gradient drainage pattern (less than 0.5 percent grade) to the northeast. The property currently discharges to the adjacent undeveloped property to the north (AE 2020a,b). The flow from the completed project will be directed to the WQMP infiltration basin, and overflow will then flow to property to the northeast. (AE 2020a,b). Due to infiltration, any excess flows are expected to have **Less Than Significant Impact** on the area to the north.

**i) result in a substantial erosion or siltation on- or off-site;**

The Hydrology Report (AE 2020b) specifies a curb and gutter and v-gutter system to direct on-site flows. There will be an infiltration basin on the northeastern portion of the Site. These modifications are anticipated to maintain runoff conditions and stormwater flows. This should reduce erosion and siltation on and off-site flows following implementation of the infiltration-retention system (AE 2020a,b). This will result in impacts which are **Less Than Significant with Mitigation Incorporated**.

- ii) **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**

The Preliminary Drainage Report indicates that impervious surface will increase flows, but that flood flows will be slowed and reduced by implementation of the infiltration/detention system. This will result in flooding impacts which are **Less Than Significant with Mitigation Incorporated**.

### **Mitigation Measure**

**HYD-1** Implement all relevant measures identified for the Project in the Preliminary Water Quality Management Plan (AE 2020b) and the Preliminary Drainage Report (AE 2020a). These measures will include erosion control during construction and control of stormwater via appropriate retention facilities following Project construction.

- iii) **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; or**

The Preliminary Drainage Report (AE 2020a) and the Water Quality Management Plan (AE 2020b) indicate that any stormwater exceeding the capacity of the infiltration/detention system will be discharged at the northeast and eastern boundary of the property in accordance with requirements of the City of Adelanto. While final reports have not yet been completed, no substantial additional sources of polluted runoff are expected with installation of the infiltration and detention system at the Site, which will include a filtered catch basin. Impacts of excess drainage or stormwater are expected to be **Less Than Significant with Mitigation Incorporated** (see Mitigation Measure HYD-1).

- iv) **impede or redirect flood flows?**

Flood flows on the aqueduct underpass will be slowed by an infiltration/detention basin. If properly designed, this system should result in impacts from flood flows which are **Less Than Significant with Mitigation Incorporated**.

- d) **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

The Project is not expected to generate significant pollutants. Parking lots will accumulate some hazardous substances (metals from brake linings, leakage of oil etc.). These compounds will be filtered through the infiltration/retention system prior to discharge as per requirements of the WQMP (AE 2020b). No significant concentrations of these compounds is expected. The Project is expected to cause impacts which are **Less than Significant**.

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

The Preliminary Drainage Report (Drainage Study and Hydraulic Calculations) (AE 2020a) and a Water Quality Management Plan (AE 2020b) have been developed for the Project. With the implementation of these plans, project effects are expected to be **Less Than Significant**.

**3.11 LAND USE AND PLANNING**

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				

**a) Physically divide an established community?**

The Project site consists of approximately 11.26 acres of vacant, undeveloped land that is routinely disturbed and does not contain any structures. The Project site does not provide access to established communities and would not isolate any established communities or residences from neighboring communities. The sites that border the project to the north, south, and east are zoned as Airport Development District (ADD) while the west is zoned for Desert Living (DL-2.5). Development and operation of the Project would not physically disrupt or divide the arrangement of an established community. **No Impact** would occur, and no further analysis of this subject is required.

*(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)*

**b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.**

The project site has a General Plan land use designation of Airport Development District and a zoning designation of (ADD). The Proposed Project is the construction of a cannabis

facility. The proposed use of the project site would be compatible with the project site’s land use and zoning designations. **No Impact** would occur.

*(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)*

**c) Conflict with any applicable habitat conservation plan or natural community conservation plan?**

The project site was reviewed to determine consistency with other applicable habitat conservation plans and natural community conservation plans. Based on this analysis the project will have **No Impact**.

*(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)*

**Mitigation Measures**

No significant impacts were identified, and no mitigation measures are required.

**3.12 MINERAL RESOURCES**

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?**

No regionally or statewide significant mineral resources are located within the City of Adelanto. The Adelanto General Plan does not identify any locally-significant mineral resources on the proposed site or within its vicinity. **No impact** would occur.

*(Source: City of Adelanto General Plan, 2020; California Department of Conservation Mineral Lands classification.)*

**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 locally-important mineral resources have been delineated on the project site. **No Impact** would occur.

(Source: City of Adelanto General Plan, 2020; California Department of Conservation Mineral Lands classification.)

**Mitigation Measures**

No significant impacts were identified, and no mitigation measures are required.

**3.13 NOISE**

Would the project result in?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Two sets of non-rush hour noise readings were taken on the Project site to characterize current levels of ambient noise. The readings were taken with a Type II EPA approved noise meter. A-weighted decibel readings were recorded, which are characteristic of human noise perception. Typical residential daytime requirements are that noise levels be below 65 dBA (A-weighted decibels). Commercial levels are generally less stringent (generally 70 dBA). There is one residential receptor near the Project Site at a distance of approximately 300 feet to the north.

Distributions of two sets of 30 readings were made at two locations to characterize typical noise levels. One location (Station A) was near the proposed Site entrance on the northwest corner of the property, about 50 feet from Highway 395 (edge of pavement). The second location (Station B) was at the east end of the Project Site, roughly 1,250 feet from Highway 395. Noise levels at the 10 percent exceedance (designated as L<sub>10</sub>) were found to be 74.6 dBA for Station A and 50.2 dBA for Station B. Both sets of readings were taken between 9:30 and 10:30 AM on a weekday.

The L<sub>50</sub> or median level was found to be 64.3 dBA for Station A and 45.6 dBA for the Station B. This median level is often characteristic of the Community Equivalent Noise Level (CNEL) which is generally the basis for residential and commercial noise regulatory standards. The L<sub>90</sub> or background levels were found to be 47.9 (Station A) and 41.2 for Station B readings.

Based on the L<sub>50</sub> levels, the Project is currently below noise standards near the entrance and will have lower highway noise levels further from Highway 395. Construction activities are generally exempt from noise regulation in California, except during nighttime hours (after 8:00 PM and before 7:00 AM) See Adelanto Code 15.02.120. The Project is therefore not expected to exceed state regulatory standards. Following construction, the Project will not generate any significant amount of outside noise (Adelanto Code Section 9.20).

The City of Adelanto General Plan includes a “Noise Element” (City of Adelanto 1993/2020). That noise element identifies important noise issues to include: 1) airport noise, 2) industrial noise, and 3) motor vehicle noise. Airport noise is focused on the previous George Air Force Base, which is now an air freight facility. That facility is more than two (2.0) miles east of the Site. A small light plane airport which is used by a few aircraft is located about five (5.0) miles southwest of the Site. Highway 395 is located adjacent to the western boundary of the Site. The Site lies in an area of mixed residential and commercial uses and is zoned for such use (Airport Development Zone).

**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 or noise ordinance, or applicable standards of other agencies?**

The Project will not result in generation of substantial or permanent increase of noise levels in excess of local or state noise standards. Some noise is expected from construction machinery during construction. However, there is only one residential receptor near the Site which could be affected by such increases. That residence lies over 300 feet north of the Site. The adjacent commercial recycling facilities are not expected to be affected in excess of required commercial noise standards. The Buddhist Temple is about 400-500 feet north of the Site. The new warehouse/cultivation facility will not significantly impact those sites during operation. Therefore, if construction is limited to normal construction hours (daytime period), no other Mitigation Measures should be necessary. The Project will be **Non-Significant with Mitigation Incorporated**.

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

No pile driving or other ground-vibrating methods are expected to be used during construction. The Project will result in **No Impact**.

- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two 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?**

The Project is not within 2.0 miles of any commercial public airport, although it is 2.0 miles west of a commercial air-freight facility. The Site lies within the Airport Development Zone of the City of Adelanto.

The Project would not expose people residing in or working in the Project Area to excessive noise levels from that airport which supports periodic air-freight use. The result of Project construction and operation would be **Less Than Significant Impact**.

### Mitigation Measures

**NS-1** Limit construction hours to between 7:00 AM and 8:00 PM as per City of Adelanto requirements. Comply with Cal-OSHA standards for worker protection as applicable during construction.

### 3.14 POPULATIONS AND HOUSING

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **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)?**

The Project proposes to develop the subject property in accordance with the “Airport Development District” land use designation applied to the site by the City of Adelanto General Plan Land Use Map. Accordingly, the proposed Project would not result in growth that was not already anticipated by the City of Adelanto General Plan and evaluated in the City of Adelanto General Plan FEIR. Furthermore, the Project site is served by existing public roadways, and utility infrastructure is already installed beneath public rights of way

that abut the property. Accordingly, the Project and its required improvements would not induce direct or indirect substantial growth in the area. Impacts would be **Less Than Significant**. The addended CEQA initial study is consistent with the previously approved IS in regards to agricultural and forestry resources.

(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)

**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The Project site does not contain any residential structures under existing conditions. Accordingly, implementation of the Project would not displace substantial numbers of existing housing and would not necessitate the construction of replacement housing elsewhere. **No impact** would occur, and no further analysis of this subject is required.

(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)

**c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

The Proposed Project does not include the removal of housing; therefore, it would not displace people. **No Impact** would occur.

(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)

### **Mitigation Measures**

No significant impacts were identified, and no mitigation measures are required.

### 3.15 PUBLIC SERVICES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

#### **Fire protection?**

The City of Adelanto currently contracts the San Bernardino County Fire Department (SBCFD) for fire related issues within proximity of the Project site. The closest station to the Project is the San Bernardino Fire **Station** (Station No. 322), located at 10370 Rancho Road, approximately 4.4 miles to the southwest. The Project would be adequately served by fire protection services, and no new or expanded unplanned facilities would be required. The Project will be required to comply with the City of Adelanto’s Development Impact Fee (DIF), which requires payment of a fee that provides funding for public facilities such as fire protection services.

Based on the fire protection facilities close proximity and the Project complying with California Building Code the Project will be adequately protected against fire. The impacts are **Less Than Significant**.

(Source: City of Adelanto, 2020; City of Adelanto Building and Safety Department.); City of Adelanto Municipal Code.)

### **Police protection?**

The Project will be required to comply with the City of Adelanto's Development Impact Fee (DIF) Ordinance (Chapter 14.36), which requires payment of a fee that provides funding for public facilities such as police protection services. Based on the foregoing, the proposed Project would receive adequate police protection service, and would not result in the need for new or physically altered police protection facilities. Impacts to police protection facilities would therefore be **Less Than Significant**.

(Source: City of Adelanto General Plan, 2020; City of Adelanto Building and Safety Department.); City of Adelanto Municipal Code.)

### **Schools?**

The proposed Project will consist of eight commercial buildings and not supply any residential housing thus not creating a direct demand for public school services. The Project would not cause or contribute to a need to construct new or physically altered public school facilities. The proposed Project would be responsible to contribute development impact fees to the Victor Valley Union High School District (VVUHSD). Impacts to public schools would be **Less Than Significant** and no further analysis of this subject is required.

(Source: City of Adelanto, 2020; City of Adelanto Building and Safety Department.); City of Adelanto Municipal Code; Victor Valley Union High School District.)

### **Parks?**

The Project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the proposed Project would not adversely affect any park facility and **No Impact** will occur.

(Source: City of Adelanto General Plan, 2020; City of Adelanto Building and Safety Department.); City of Adelanto Municipal Code.)

### **Other public facilities?**

The Project is not expected to result in a demand for other public facilities/services, including libraries, community recreation centers, post offices, and animal shelters. The proposed Project would not create a need for the construction of new public facilities for the existing city facilities will adequately service the Project; therefore, **No Impact** will occur.

(Source: City of Adelanto General Plan, 2020; City of Adelanto Building and Safety Department.); City of Adelanto Municipal Code.)

### **Mitigation Measures**

No significant impacts were identified, and no mitigation measures are required.

### 3.16 RECREATION

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

The Project proposes to develop the Project site with Airport Development District land uses. The Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, thus, **No Impact** would occur, and no further analysis of this subject is required.

(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)

**b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

The Proposed Project would not include recreational facilities nor require the construction or expansion of recreational facilities that might have an adverse effect on the environment. **No Impact** would occur.

(Source: City of Adelanto General Plan, 2020; General Plan Zoning Map Updated 2019)

#### Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

### 3.17 TRANSPORTATION

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

A Traffic Impact Analysis has been prepared for the Project (DEA 2021). That analysis indicates that the Project will generate 281 Average Daily Traffic (ADT) trips (PCE or Passenger Car Equivalent) trips. This includes a few daily delivery truck trips and occasional deliveries by larger (tractor-trailer vehicle) trips as well as daily passenger car trips. The traffic to and from the Project is expected to use separate entrance and exit locations to access Highway 395. The Project is projected to generate 16 AM Peak hour trips and 20 PM Peak Hour Trips on a daily basis during weekdays. The Traffic study utilized Institute of Traffic Engineers (ITE) numbers for “High Cube Warehouse” for the traffic generation numbers since there were no computations for Cannabis Cultivation facilities in the ITE Manual.

The Traffic Study indicates that Level of Service will not fall below the City’s requirements for Level of Service (LOS) D or better. There is no existing intersection, and thus no existing LOS computations were made. Existing plus project projections result in LOS of D or greater, complying with City of Adelanto requirements. Thus, the Project will not require mitigation other than compliance with street improvements required by the City.

DEA recommends an acceleration/deceleration lane adjacent to the facility for northbound traffic entering and exiting and a crossing point at the facility entrance for southbound traffic. Sidewalk, curb and gutter alignments and improvements will also be made as required by the City of Adelanto. This will result in **Less Than Significant Impacts with Mitigation Incorporated** for LOS Traffic Analysis. Since the analysis for future traffic volumes showed LOS E for PM Peak Hour traffic with the Project, additional mitigation may be required at that time.

**TR-1** The City of Adelanto will require street development improvements for the Project including but not limited to an acceleration/deceleration lane on the east side of Highway 395, curb and gutter and other improvements recommended by the

Traffic Study (DEA 2021). Due to projected low VMT within the City's required threshold, VMT is not projected to be a current problem, however, the City should consider transit and other options as this light industrial area continues to develop to help reduce VMT. This would also keep air quality and greenhouse gas emissions at levels likely to be **Less Than Significant with Mitigation Incorporated**.

A screening analysis of Vehicle Miles Travelled (VMT) has been carried out by DEA (2021) for the proposed Project which has also been incorporated into the Traffic Study. That VMT analysis indicates that the Project does not lie in a "low VMT" zone. The baseline conditions "without the Project) were compared to VMT Screening Tool Output showing the Project to fall within the Traffic Analysis Zone (TAZ) with a VMT which is above the threshold level of 35.3 VMT. The Project also appears to be consistent with City of Adelanto Zoning and the City's General Plan for similar projects and DEA found nothing unusual about the Project which would generate a higher VMT level (DEA 2021).

**b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)**

CEQA Guidelines (15064.3(b)) recommend that transportation impacts be evaluated primarily by road capacity and increases or decreases in vehicle miles travelled (VMT) due to the Project. This has been evaluated for the Project (DEA 2021) as discussed above. The Traffic Impact Analysis indicates a probable increase of vehicle miles travelled to be above the VMT Threshold for the City of Adelanto and below the San Bernardino County regional threshold. The Project will be **Less Than Significant with Mitigation** for effects on VMT.

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

The Project lies within a straight section of Highway 395 with good visibility in both directions. An acceleration/deceleration is recommended for northbound traffic using the facility and a crossing point for southbound traffic. Thus, there would be **Less Than Significant Impact with Mitigation** from this configuration.

**d) Result in inadequate emergency access?**

The Project will have one main entrance with a separate exit on Highway 395 to access the Project. This is expected to provide adequate emergency access, however, access by 4-axel trucks and other large emergency vehicles appears to be limited by interior design and lack of turn radius.

Given those access points, it appears that there will be **Less Than Significant Impact** to emergency access.

Alternatives: Since traffic is below regulated thresholds, there is no need to implement the reduced density alternative, which would, however, result in a lower VMT quotient.

### 3.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, 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:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, 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:**

**i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1 (k)?**

a) A Sacred Lands Records Search was submitted to the State of California Native Heritage Commission (NAHC) on December 22, 2020 for a records search in the commission’s Sacred Land File. The NAHC responded on January 8, 2021, that the Sacred Lands File yielded negative results for Native American cultural resources in the project vicinity. Noting that the absence of specific information does not necessarily indicate the absence of cultural resources, the NAHC recommended that local Native American groups be consulted for further information and provided a referral list of 14 individuals associated with eight local Native American groups who may have knowledge of such resources.

Intensive field investigations were conducted by CRM TECH on February 9, 2021 and no historical resources were identified which would be eligible for listing in the California Register of Historical Resources. With the implementation of Mitigation

Measures TCR-1, TCR-2, TCR-3, TCR-4, and TCR-5 the impacts will be considered to be **less than significant with mitigation incorporated**.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

The provisions of Public Resources Code 21074 were established pursuant to Assembly Bill 52 (AB 52). AB 52 applies to all development projects that have a notice of preparation (NOP), or a notice of negative declaration or a mitigated negative declaration which was filed on or after July 1, 2015. The proposed project is subject to the provisions of AB 52; therefore, the City of Adelanto will have sent notifications to all Native American tribes which have traditional or cultural affiliation to the area encompassing the project site. With the implantation of Mitigation Measures TCR-1, TCR-2, TCR-3, TCR-4, TCR-5 and TCR-6 the impacts will be considered to be **less than significant with mitigation incorporated**.

## **Mitigation Measures**

**TCR-1** Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to the City of Adelanto that a professional archaeologist (hereafter “Project Archaeologist”) has been retained to conduct monitoring of all mass grading and trenching activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Native American Tribes, the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) to address the details, timing and responsibility of all archaeological and cultural monitoring activities that will occur on the project site. A Consulting Native American Tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Public Resources Code Section 21080.3.2(b)(1), and includes the Pechanga and Soboba Tribes. Details in the Plan shall include:

- a) Project grading and development scheduling;
- b) The Project archeologist and the Consulting Native American Tribe(s) as defined in TR-1 shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the

requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of 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. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Native American Tribe(s) shall make themselves available to provide the training on an as-needed basis;

- c) The protocols and stipulations that the contractor, City, Consulting Native American Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

**TCR-2** Prior to the issuance of a grading permit, the Project Applicant shall secure agreements for tribal monitoring. The developer is also required to provide a minimum of 30 days advance notice of all mass grading and trenching activities. The Project Applicant also shall provide the City of Adelanto with copies of any monitoring agreement(s) with the Consulting Native American Tribes. During mass grading and trenching activities, the Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed. If the Native American Tribal Representatives suspect that an archaeological resource may have been unearthed, the Project Archaeologist or the Tribal Representatives shall immediately redirect grading operations in a 100-foot radius around the find to allow identification and evaluation of the suspected resource.

**TCR-3** If potential tribal cultural resources are uncovered during mass grading and/or excavation activities, the Project Archaeologist shall evaluate the suspected resource in consultation with the Native American Tribal Representatives and the City of Adelanto and shall: make a determination of significance pursuant to Public Resources Code Section 21083.2; and recommend measures to avoid, minimize or mitigate negative effects on the tribal cultural resource. Determinations and recommendations by the Project Archaeologist shall be immediately submitted to the City of Adelanto Planning Division for consideration and implemented as deemed appropriate by the Community Development Director and all Consulting Native American Tribes, as defined in Mitigation Measure TR-1, before any further work commences in the affected area.

**TCR-4** In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

- a) One or more of the following treatments, in order of preference, shall be employed based on consultation with the City of Adelanto and the Native

American Tribe(s). Evidence of such shall be provided to the City of Adelanto Planning Department:

- i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources.
- ii. Onsite reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure TR-1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Native American Tribe(s) as defined in Mitigation Measure TR-1.
- iii. Donation of the discovered items and associated records to a qualified repository within San Bernardino County that meets federal standards per 36 CFR Part 79.

**TCR-5**The City shall verify that the following note is included on the Grading Plan: “If any suspected archaeological resources are discovered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find.”

**TCR-6**If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant”. The “most likely descendant” shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA).

### 3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Wastewater generated by the proposed project would be treated by an on-site septic system. This system would include a 750 gallon septic tank for each of the eight buildings and an associated seepage pit for each tank. These are located immediately west of Building A and between each pair of Buildings. A 1,200 gallon water storage will also be installed. The water used in the Cannabis cultivation will be discharged to evaporation pads between the buildings, although full design on these has not been completed (Steno Design 2021).

With the regulation and installation of the on-site treatment system and use of BMP's (Best Management Practices) and the projects proposed compliance with City regulations set forth, an impact that is **Less Than Significant Impact** would occur.

(Source: City of Adelanto 2021; Project Application Materials, 2021; City of Adelanto Existing Sewer and Water; City of Adelanto General Plan; PERC, 2021; <https://percwater.com/project/adelanto/>)

**b) Require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The Project would not result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. Therefore, **No Impact** would occur. However, water lines do not currently serve the Project. Construction of such lines from existing lines located to the south (1,500 feet at corner of Desoto and Verbeena) will need to include a Highway Crossing. An alternative extension is from about 7,500 feet from the Site on the east side of Highway 395 near Auburn Road. The City of Adelanto has been considering extension of existing lines to the Airport Development District and the impact of this construction is expected to be **Less Than Significant**.

(Source: City of Adelanto Existing Sewer and Water; City of Adelanto General Plan; PERC, 2021; <https://percwater.com/project/adelanto/>)

**c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The proposed Project would be required to construct stormwater drainage facilities as necessary to serve Project stormwater flows. The required stormwater facilities to serve the project will include the construction of a bioretention basin that will capture the storm water runoff. That basin will be located in the northeast corner of the property as shown in Figure 5. With this basin installed the environmental impacts will be **Less Than Significant**.

(Source: City of Adelanto General Plan, 2020; Patel Development Site Plan)

**d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

The site is in jurisdiction of the Adelanto Water Department (ADW) and contracts the APUA, which is an independent agency responsible for water supply to the proposed project. The Adelanto Water Department, through the Adelanto Public Utility Authority (APUA), is deemed with providing good quality, safe, and uninterrupted water at a sufficient pressure, to meet health, fire protection, and other needs of the city served by the public water system.

The Department must operate and maintain the water utility system in accordance with the City of Adelanto's ordinances and policies and the Environmental Protection Agency's Safe Drinking Water Act. The Department, through the APUA, is also charged by the State of California in providing wastewater treatment actions consistent with requirements set forth in the Waste Discharge Requirements for the residents and businesses of the City of Adelanto.

Cannabis facilities utilize 150 – 450 gallons per plant (or per pound of marijuana produced). This has been calculated as 80 gallons per square foot of greenhouse space during the 150 day growing season (Pawlowski 2019). At roughly 200,000 square feet of greenhouse space,

this will utilize roughly 1,600,000 gallons per growing season or roughly 3.2 million gallons per year for the facility. The applicant will need to obtain a “will serve letter” from the APUA. That letter should include a commitment to extend existing water lines to the proposed Project facility.

Extensive development activities have occurred in the region over the last few decades which has increased demand for water; however, it is determined that the programs and protections that are in place will allow sufficient water supplies to the city’s member agencies in the future, even under a repeat of historic drought scenarios. The AWD’s current water supply as well as the proposed upgrades to water treatment and water supply in the city of Adelanto, are expected to be more than sufficient in meet the water demands of the proposed project. Impacts to existing water supplies are expected to be **Less Than significant**.

(Source: City of Adelanto 2021; City of Adelanto Existing Sewer and Water; City of Adelanto General Plan; PERC, 2021; <https://percwater.com/project/adelanto/>)

**e) Result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?**

As stated above, wastewater generated by the proposed project would be treated by an on-site septic system.

The City of Adelanto is served by a water system consisting of a number of wells and water storage facilities in addition to the APUA water treatment plant. The Project will utilize about 88,000 gallons per day, based on rough calculations of water use in Cannabis greenhouse facilities. Water lines are available on this section of Highway 395 about 1,500 feet away at Verbena and Desoto Roads based on mapping provided by the City of Adelanto (2021a,b). There are possibly closer water availability due to small extension lines, but this will need to be checked with the utility (AWD).

Wastewater will be treated on-site as discussed above. Therefore, the proposed project would have **Less Than Significant Impact** related to wastewater treatment capacity.

(Source: City of Adelanto Existing Sewer and Water; City of Adelanto General Plan; PERC, 2021; <https://percwater.com/project/adelanto/>)

**f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?**

The City of Adelanto provides trash, recycling and special waste handling services to residents and businesses through a contract with AVCO Disposal. The Project will utilize trash pickup by CR&R Wrightwood (Steen Design 2021 – see Figure 5). Cannabis waste is licensed by the California Department of Food and Agriculture (CDFA), which requires on-site composting or off-site disposal at a permitted composting or solid waste facility. The

applicant will be responsible for providing a CalCannabis Cultivation Licensing Waste Management Plan to CDFG and the City of Adelanto.

Regional landfill capacity fluctuates daily and is regularly monitored by the San Bernardino County Department of Waste Resources to ensure there is sufficient landfill space available to dispose of municipal solid wastes throughout the region. Cities must meet the 50 percent landfill diversion mandate required by State law.

Waste is transported to the CR & R transfer facility located on 9828 Buckwheat Rd, in Phelan, approximately 12.5 miles southwest of the site. Solid waste produced on the property would also be transported to the CR & R transfer facility located on 9828 Buckwheat Rd, in Phelan, CA. the solid waste is then transferred to the Victorville landfill located on 18600 Stoddard Wells Road, Victorville, CA, which has a permitted daily capacity of about 3,000 tons per day (tpd). Impacts will be **Less Than Significant**.

(Source: City of Adelanto General Plan, 2020; City of Adelanto Municipal Code; County of San Bernardino Integrated Waste Management Plan, 2018)

**g) Comply with federal, state, and local statutes and regulations related to solid waste?**

The proposed project would be required to meet all Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal. In addition, the proposed project would be required to coordinate with AVCO Disposal to develop a collection program for recyclables, such as paper, plastics, glass and aluminum, in accordance with local and State programs, including the California Solid Waste Reuse and Recycling Act of 1991. The proposed project would also be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. Therefore, there will be **No Impacts**.

(Source: City of Adelanto General Plan, 2020; City of Adelanto Municipal Code.)

**Mitigation Measures**

**USS-1** The applicant will obtain a “will Serve letter” from the local water utility sufficient to its estimated water needs. That will-serve letter should include provisions for extension of existing water lines to the Project Site.

**USS-2** The applicant shall provide a CalCannabis Cultivation Licensing Waste Management Plan to CDFG and the City of Adelanto outlining planned waste management and disposal.

No other significant impacts were identified, and no other mitigation measures are required.

### 3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Project will not result in any significant risk associated with wildland fires. The California Department of Forestry and Fire Protection (CalFire) does not identify the project site to be in a Very High Fire Hazard Severity Zone. The Site and surrounding area to the north, south, and west are vegetated with sparse desert scrub, a scarpyard center borders the eastern boundaries of the properties, and approximately 400 feet north of the property is a Buddhist Center. Most, if not all, of the vegetation will be removed during site development. Thus, there is a very low risk of wildland fire following development.

The Project will result in **Less Than Significant Impact** to potential for wildland fires and may in fact slightly reduce that risk for items “a-c”. The Project will reduce chances of downstream flooding and there is no risk of landslide, resulting in **No Impact** for item “d”.

<https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>

### 3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) Does the project 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?**

The Project will eliminate the present sparse desert scrub vegetation and habitat from the Site, replacing a small percentage of that vegetation with landscaping in narrow strips along the building perimeter (see Figure 5). The Project will also eliminate the Joshua Trees presently on the Site. The Project will transplant a portion of those Joshua Trees as per the Protected Plan Preservation Plan (PPPP) (RCA 2021).

The California Department of Fish and Wildlife will require an Incidental Take Permit for those trees which cannot be transplanted, since the Joshua Tree is presently a Candidate Species for Threatened (State) status under the Endangered Species Act. The site, with present design may be found to be **Less Than Significant with Mitigation Incorporated**, with mitigation which includes implementation of a Joshua Tree Protection Plan (RCA 2020b) and an Incidental Take Permit acceptable to the City of Adelanto and to State Agencies.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

The Project is likely to create minor Cumulative Impacts in conjunction with further developments within the commercial area near Highway 395 in the Airport Development District, which is zoned for commercial development. This could cause cumulative effects on traffic, air quality, greenhouse gases, and other factors which are area-wide in effect. Cumulative effects on Biological Resources may also be affected, particularly Joshua Trees which have been recently listed as a Candidate Species by the State of California. The effects of the present project are likely to be **Less Than Significant with Mitigation Incorporated**, however, as the City of Adelanto continues to develop Projects within this area, it may be necessary to set aside additional areas for open space to keep these issues from becoming potentially significant.

- c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

The Project is generally expected to have beneficial effects on the area. It will produce a relatively small number of jobs during construction and operation. It will also reduce biological habitat on about 11 acres of high desert. If such habitat reduction becomes cumulatively significant as the City of Adelanto develops, this could potentially cause adverse long-term effects on the biota, and potentially on air quality, climate and traffic. For this Project, the effect is expected to be **Less Than Significant with Mitigation Incorporated**.

Due to the unique features of Cannabis cultivation, there will be a contribution to cumulative impacts of water use. As facilities continue to be permitted in Adelanto for Cannabis cultivation, it is recommended that the impact of the size and number of such facilities be studied by the City and that appropriate mitigation measures be developed.

There may also be cumulative impacts of such facilities on energy use, however, in the high solar desert environment, energy impacts can be mitigated by site requirements for high transmission roof panels, motion detector lighting and potentially incorporation of solar energy generation into Project design.

## 4.0 CONCLUSIONS AND RECOMMENDED MITIGATION

### 4.1 FINDINGS AND CONCLUSIONS

This Initial Study Report indicates that there is a potential for **Less Than Significant** environmental impacts of the Project provided that recommended Mitigation Measures are implemented. These impacts are mainly in the areas of biological resources, potential air quality/greenhouse gas impacts, and possibly hydrologic impacts during significant stormwater events. Traffic impacts may also become more significant over time, based on potential traffic projections for the year 2040.

Additional detailed design should be carried out for stormwater management and discharge and added to the Site Plan documents. Additional technical reports should also be prepared for certain biological species including an Incidental Take Permit for Joshua Trees and a pre-construction survey for burrowing owls. A Dust Control Plan will be required by the Mojave Desert AQMD. The Project will implement and monitor Mitigation Measures and prepare a Mitigation Monitoring Program to mitigate any potentially significant environmental impacts.

This Initial Study document can be conditioned on these reports and Project design, together with a Mitigation Monitoring and Reporting Program (MMRP) based on the City of Adelanto's Permit Conditions, to constitute a Mitigated Negative Declaration. The California Department of Fish and Wildlife (CDFW) will need to approve an Incidental Take Permit for Joshua Trees on the Site to reduce impacts to Biological Resources. CDFW must also be consulted in the event that the Burrowing Owl Survey indicates the presence of these animals.

### 4.2 RECOMMENDED MITIGATION MEASURES

Detailed Mitigation Measures can be developed for potential impacts and incorporated into Permit Conditions by the City of Adelanto as lead agency under CEQA. The City may at its discretion require additional technical reports or plans to determine and mitigate those impacts. A Mitigation Monitoring and Reporting Program (MMRP) should also be put in place by the City of Adelanto and agreed to by the Applicant.

The City of Adelanto may grant a Conditioned Mitigated Negative Declaration under CEQA as described above. With these conditions the Initial Study is expected to be acceptable to other local, federal and state regulatory agencies (including CDFW).

### 4.3 MITIGATION MONITORING PLAN

The recommended general Mitigation Measures discussed above should form the basis of a Mitigation Monitoring and Reporting Program (MMRP), along with the detailed Mitigation Measures identified in the technical reports and this Initial Study document. That MMRP is provided under separate cover.

## 5.0 REFERENCES

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Urban Crossroads. 2021. Patel Commercial Cultivation – Focused Air Quality and Greenhouse Gas Study. Urban Crossroads, Newport Beach, California.

## **6.0 CONTACTS AND PREPARERS**

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Mr. Randy Arnold – President/ Senior Biologist/Project Manager  
Dr. G. Bradford Shea – Ecologist/Senior Environmental Scientist/Assistant Project Manager  
Trevor Shea – Research Scientist  
Ryan Hunter – Research Scientist  
Lisa Cordero – Research Scientist  
Mary Shea – Word Processing, Administration  
Vicky Arnold – Administration

## FIGURES



Figure 1. Location Map

RCA/Westech 2021  
Source: Google Earth 2020



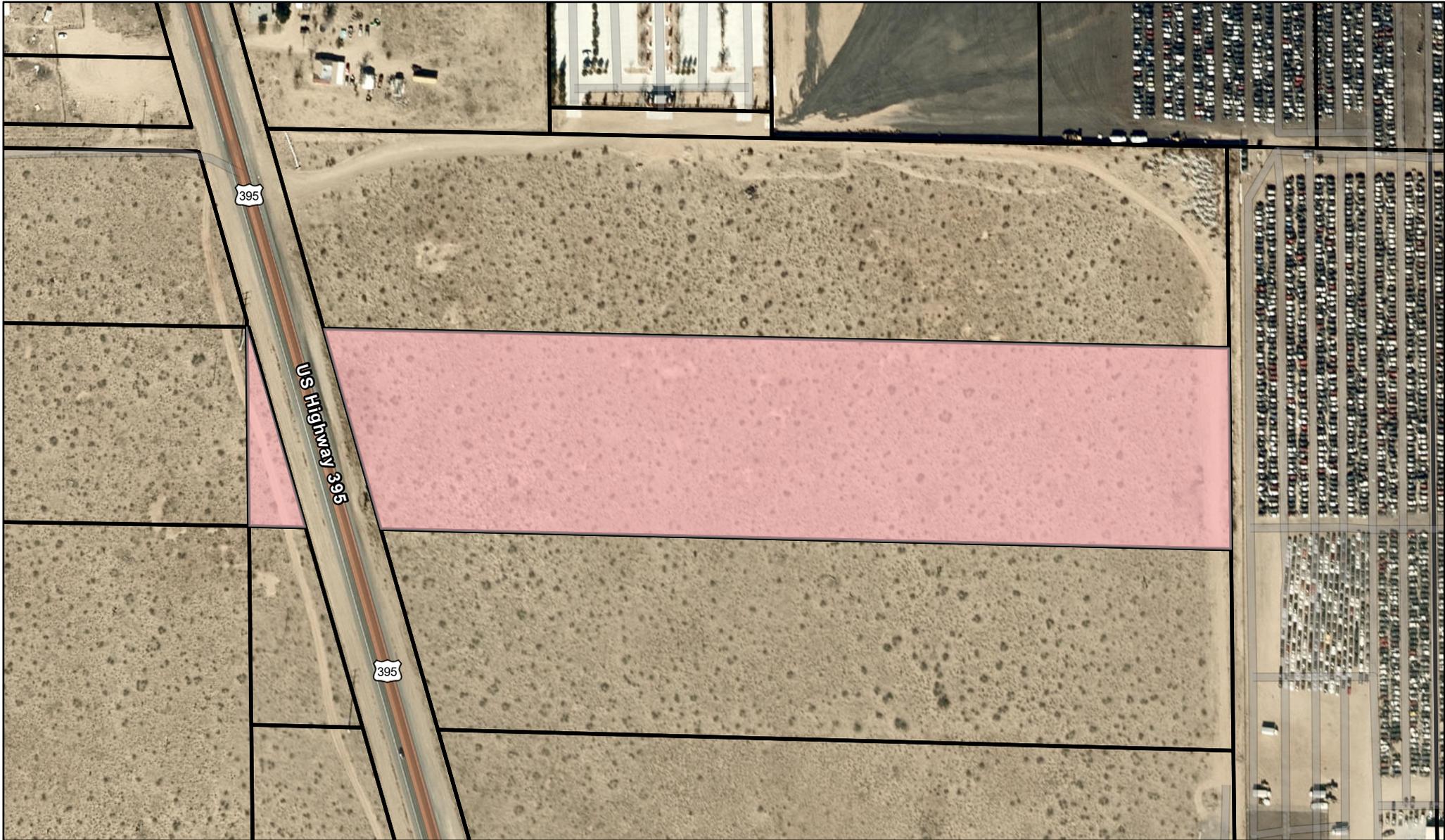
Figure 2. Vicinity Map

RCA/Westech 2021  
Source: Google Earth 2020



Figure 3. Site Map

RCA/Westech 2021  
Source: Google Earth 2020



## Figure 4: Parcel Map

RCA & Associates/Westech

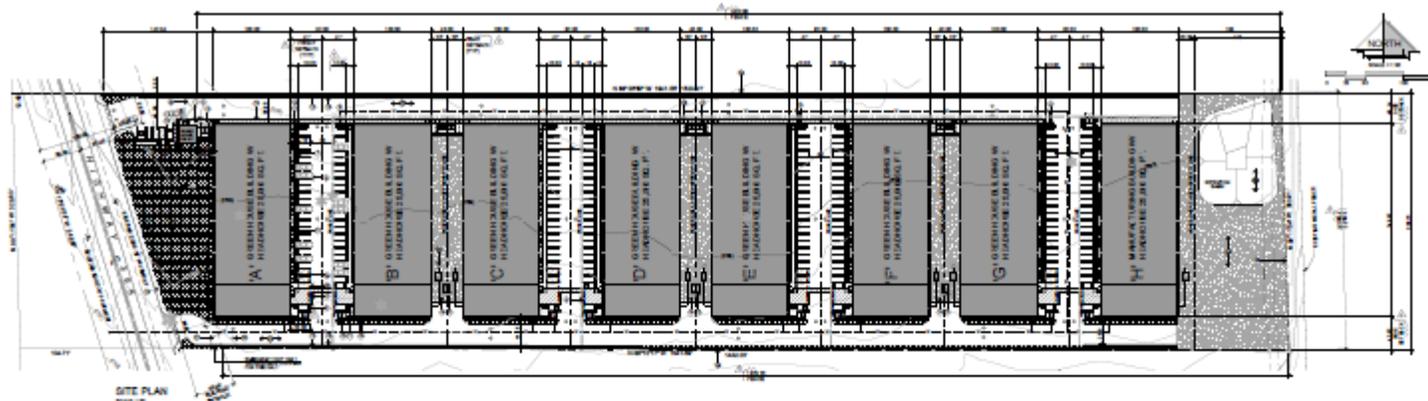
2021

### Legend

-  Property Boundary
-  Parcel Data

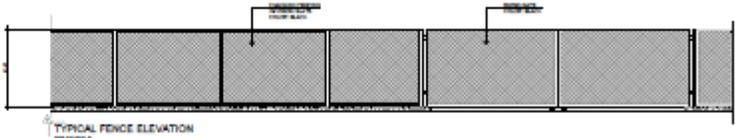
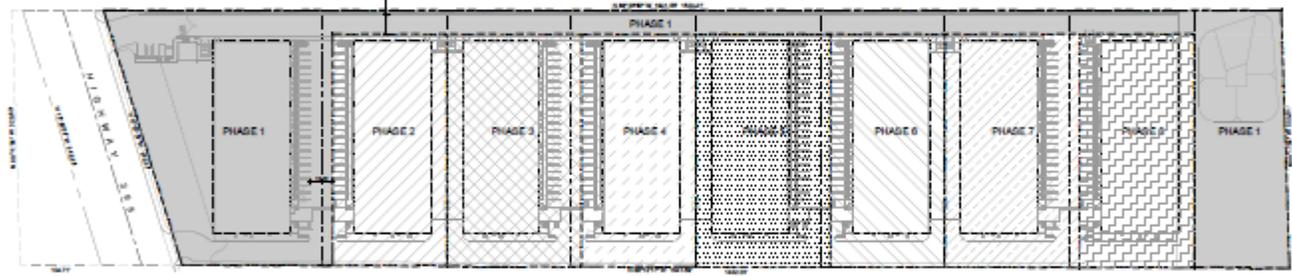
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Source: ArcGIS Pro 2021



**STEENO**  
DESIGN STUDIO  
ARCHITECTURAL  
PLANNING  
LANDSCAPE ARCHITECTURE  
INTERIOR DESIGN

401.238  
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<p><b>PHASING DATA</b></p> <table border="1"> <tr><th>PHASE</th><th>START DATE</th><th>END DATE</th></tr> <tr><td>1</td><td>01/01/2021</td><td>03/31/2021</td></tr> <tr><td>2</td><td>04/01/2021</td><td>06/30/2021</td></tr> <tr><td>3</td><td>07/01/2021</td><td>09/30/2021</td></tr> <tr><td>4</td><td>10/01/2021</td><td>12/31/2021</td></tr> <tr><td>5</td><td>01/01/2022</td><td>03/31/2022</td></tr> <tr><td>6</td><td>04/01/2022</td><td>06/30/2022</td></tr> <tr><td>7</td><td>07/01/2022</td><td>09/30/2022</td></tr> <tr><td>8</td><td>10/01/2022</td><td>12/31/2022</td></tr> </table>	PHASE	START DATE	END DATE	1	01/01/2021	03/31/2021	2	04/01/2021	06/30/2021	3	07/01/2021	09/30/2021	4	10/01/2021	12/31/2021	5	01/01/2022	03/31/2022	6	04/01/2022	06/30/2022	7	07/01/2022	09/30/2022	8	10/01/2022	12/31/2022	<p><b>ADDITIONAL UTILITIES</b></p> <p>1. ALL UTILITIES TO BE LOCATED AND DEPTH TO BE VERIFIED BY THE CONTRACTOR PRIOR TO CONSTRUCTION.</p> <p>2. 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ALL DIMENSIONS TO SURFACE UNLESS OTHERWISE NOTED.</p>	<p><b>DEVELOPMENT STANDARDS ADD (TABLE 30-1)</b></p> <table border="1"> <tr><th>STANDARD</th><th>REQUIREMENT</th></tr> <tr><td>1</td><td>...</td></tr> <tr><td>2</td><td>...</td></tr> <tr><td>3</td><td>...</td></tr> <tr><td>4</td><td>...</td></tr> <tr><td>5</td><td>...</td></tr> <tr><td>6</td><td>...</td></tr> <tr><td>7</td><td>...</td></tr> <tr><td>8</td><td>...</td></tr> <tr><td>9</td><td>...</td></tr> <tr><td>10</td><td>...</td></tr> <tr><td>11</td><td>...</td></tr> <tr><td>12</td><td>...</td></tr> <tr><td>13</td><td>...</td></tr> <tr><td>14</td><td>...</td></tr> <tr><td>15</td><td>...</td></tr> <tr><td>16</td><td>...</td></tr> <tr><td>17</td><td>...</td></tr> <tr><td>18</td><td>...</td></tr> <tr><td>19</td><td>...</td></tr> <tr><td>20</td><td>...</td></tr> <tr><td>21</td><td>...</td></tr> <tr><td>22</td><td>...</td></tr> <tr><td>23</td><td>...</td></tr> <tr><td>24</td><td>...</td></tr> <tr><td>25</td><td>...</td></tr> <tr><td>26</td><td>...</td></tr> <tr><td>27</td><td>...</td></tr> <tr><td>28</td><td>...</td></tr> <tr><td>29</td><td>...</td></tr> <tr><td>30</td><td>...</td></tr> <tr><td>31</td><td>...</td></tr> <tr><td>32</td><td>...</td></tr> <tr><td>33</td><td>...</td></tr> <tr><td>34</td><td>...</td></tr> <tr><td>35</td><td>...</td></tr> <tr><td>36</td><td>...</td></tr> <tr><td>37</td><td>...</td></tr> <tr><td>38</td><td>...</td></tr> <tr><td>39</td><td>...</td></tr> <tr><td>40</td><td>...</td></tr> <tr><td>41</td><td>...</td></tr> <tr><td>42</td><td>...</td></tr> <tr><td>43</td><td>...</td></tr> <tr><td>44</td><td>...</td></tr> <tr><td>45</td><td>...</td></tr> <tr><td>46</td><td>...</td></tr> <tr><td>47</td><td>...</td></tr> <tr><td>48</td><td>...</td></tr> <tr><td>49</td><td>...</td></tr> <tr><td>50</td><td>...</td></tr> </table>	STANDARD	REQUIREMENT	1	...	2	...	3	...	4	...	5	...	6	...	7	...	8	...	9	...	10	...	11	...	12	...	13	...	14	...	15	...	16	...	17	...	18	...	19	...	20	...	21	...	22	...	23	...	24	...	25	...	26	...	27	...	28	...	29	...	30	...	31	...	32	...	33	...	34	...	35	...	36	...	37	...	38	...	39	...	40	...	41	...	42	...	43	...	44	...	45	...	46	...	47	...	48	...	49	...	50	...	<p><b>PARKING DATA</b></p> <table border="1"> <tr><th>TYPE</th><th>NO. 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PROJECT OWNER: KENT & RAJAN PATEL

PROJECT ADDRESS: ...

PROJECT CITY: ...

PROJECT STATE: ...

PROJECT ZIP: ...

PROJECT PHONE: ...

PROJECT FAX: ...

PROJECT EMAIL: ...

PROJECT WEBSITE: ...

PROJECT CONTACT: ...

PROJECT DATE: ...

PROJECT SCALE: ...

PROJECT DRAWN BY: ...

PROJECT CHECKED BY: ...

PROJECT APPROVED BY: ...

PROJECT DATE: ...

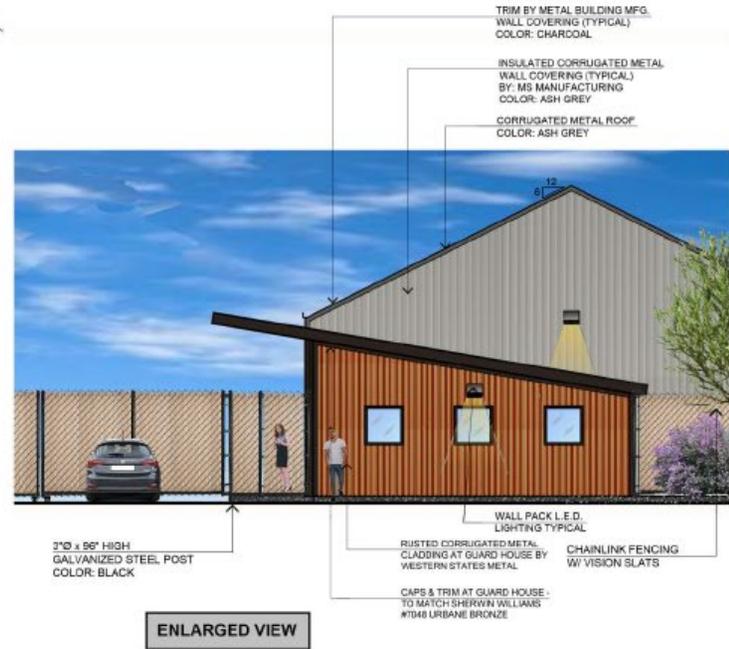
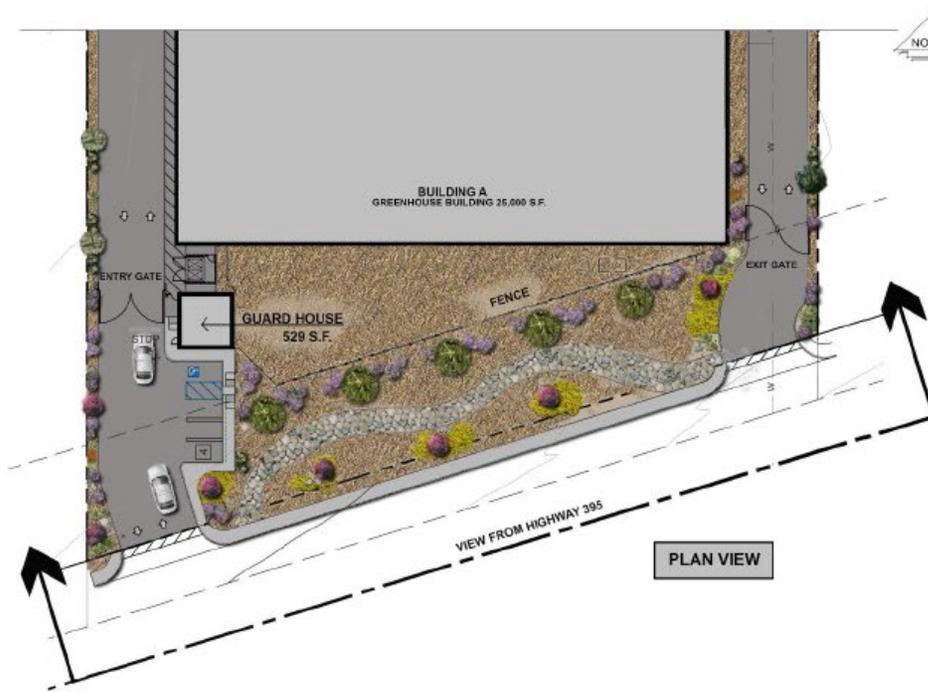
PROJECT SCALE: ...

PROJECT DRAWN BY: ...

PROJECT CHECKED BY: ...

PROJECT APPROVED BY: ...

Figure 5. Site Plan and Project Phasing



PROJECT: COMMERCIAL CULTIVATION DEVELOPMENT  
**KENT & RAJAN PATEL**

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**COLOR STUDY - STREET VIEW**  
 NOT TO SCALE  
 11.05.2020



Figure 6. Project Concept

## TABLES

**TABLE 1. ENVIRONMENTAL CHECKLIST - SUMMARY OF ISSUES POTENTIALLY AFFECTED BY THE PROJECT**

<input checked="" type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry	<input checked="" type="checkbox"/>	Air Quality
<input checked="" type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input checked="" type="checkbox"/>	Geology/Soils
<input checked="" type="checkbox"/>	Greenhouse Gas Emissions	<input checked="" type="checkbox"/>	Hazards& Hazardous Materials	<input checked="" type="checkbox"/>	Hydrology/Water Quality
<input checked="" type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral resources	<input checked="" type="checkbox"/>	Noise
<input type="checkbox"/>	Population/Housing	<input checked="" type="checkbox"/>	Public Services	<input type="checkbox"/>	Recreation
<input checked="" type="checkbox"/>	Transportation/Traffic	<input checked="" type="checkbox"/>	Tribal Cultural Resources	<input checked="" type="checkbox"/>	Utilities/Services Systems
<input type="checkbox"/>	Wild Fire	<input checked="" type="checkbox"/>	Mandatory Findings of Significance		

**TABLE 2. MOJAVE DESERT AQMD ATTAINMENT STATUS**

<b>Mojave Desert AQMD Attainment Status</b>					
<b>Pollutant</b>	<b>Averaging Time</b>	<b>California Standards</b>		<b>Federal Standards</b>	
		<b>Concentration</b>	<b>Attainment Status</b>	<b>Concentration</b>	<b>Attainment Status</b>
<b>Ozone (O<sub>3</sub>)</b>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Non-attainment	-	Non-attainment*
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )	
<b>Respirable Particulate Matter (PM<sub>10</sub>)</b>	24 Hour	50 µg/m <sup>3</sup>	Non-attainment	150 µg/m <sup>3</sup>	Non-attainment***
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		-	
<b>Fine Particulate Matter (PM<sub>2.5</sub>)</b>	24 Hour	No State Standard	Non-attainment*	35 µg/m <sup>3</sup>	Unclassified/Attainment
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>		12 µg/m <sup>3</sup>	
<b>Carbon Monoxide (CO)</b>	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )	Attainment	9 ppm (10 mg/m <sup>3</sup> )	Unclassified/Attainment
	1 Hour	20 ppm (23 mg/m <sup>3</sup> )		35 ppm (40 mg/m <sup>3</sup> )	
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	Annual Arithmetic Mean	0.030 ppb (57 µg/m <sup>3</sup> )	Attainment	0.053 ppm (100 µg/m <sup>3</sup> )	Unclassified/Attainment
	1 Hour	0.18 ppm (330 µg/m <sup>3</sup> )		100 ppm (196 µg/m <sup>3</sup> )	
<b>Sulfur Dioxide (SO<sub>2</sub>)</b>	Annual Arithmetic Mean	-	Attainment	0.030 ppm (80 µg/m <sup>3</sup> )	Unclassified/Attainment
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (365 µg/m <sup>3</sup> )	
	3 Hour	-		0.5 ppm (1300 µg/m <sup>3</sup> )	
	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )		75 ppb (196 µg/m <sup>3</sup> )	
<b>Lead (Pb)</b>	30 Day Average	1.5 µg/m <sup>3</sup>	Attainment	-	Unclassified/Attainment
	Calendar Quarter	-		1.5 µg/m <sup>3</sup>	
	Rolling 3-Month Average	-		0.15 µg/m <sup>3</sup>	
<b>Visibility Reducing Particles</b>	8 Hour	Extinction Coefficient of 0.24 per kilometer - visibility of ten miles or more due to particles when relative humidity is less than 70 percent	Unclassified	No Federal Standards	
<b>Sulfates</b>	24 Hour	25 µg/m <sup>3</sup>	Attainment		
<b>Hydrogen Sulfide</b>	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Non-attainment**		
<b>Vinyl Chloride</b>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Unclassified		

\*Southwest corner of desert portion of San Bernardino County only

\*\*Searles Valley (northwest corner of San Bernardino County) only

\*\*\*San Bernardino County portion only

TABLE 3. AMBIENT AIR QUALITY STANDARDS

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone (O <sub>3</sub> ) <sup>8</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		—		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	24 Hour	—	—	35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12.0 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	100 ppb (188 µg/m <sup>3</sup> )	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>11</sup>	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) <sup>11</sup>	—	
Lead <sup>12,13</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain areas) <sup>12</sup>	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>14</sup>	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>12</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

See footnotes on next page ...

**Table 4. MDAQMD CEQA Thresholds of Significance**

Pollutant	Daily Threshold
	Lbs./day
ROG (VOC)	137
NO <sub>x</sub>	137
CO	548
SO <sub>x</sub>	137
PM <sub>10</sub>	82
PM <sub>2.5</sub>	65
H <sub>2</sub> S	54
Pb	3
Greenhouse Gases	10,000 MT/yr. CO <sub>2</sub> e for industrial facilities
	3,000 MT/yr. CO <sub>2</sub> e for land use projects (draft proposal)

**Sources: MDAQMD 2020**

**APPENDIX A**  
**SITE PHOTOGRAPHS**



1) Looking west across the Site, from the eastern boundary.



2) Looking northwest across the Site with nearby Buddhist Temple and rural property in background.



3) Alden Road which lies to the south of the Site.



4) Rural residential property on Calleja Road to the north of the Site.



5) Buddhist Temple entrance, north of Calleja Road.



6) Entrance LKQ Lakenor, Auto and Truck Salvage to the east of the Site.