INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

MORRIS MU & PARTNERS AUBURN AVENUE, ADELANTO, CALIFORNIA CONDITIONAL USE PERMIT (CUP) 21-04 LAND DEVELOPMENT PLAN (LDP) 21-03 TENTATIVE PARCEL MAP 20437

LEAD AGENCY:

CITY OF ADELANTO
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION
11600 AIR EXPRESSWAY BOULEVARD
ADELANTO, CALIFORNIA 92301

REPORT PREPARED BY:

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
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HACIENDA HEIGHTS, CALIFORNIA 92240

OCTOBER 18, 2021

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Morris Mu & Partners. CUP 21-04; LDP 21-03

PROJECT APPLICANT: The Applicant for the proposed project is Michael Pontious, AIA Pontious Architecture. 17995 Hwy. S. 18, Suite 4 Apple Valley, California 92307.

PROJECT LOCATION: The proposed project site is located in the east-central portion of the City of Adelanto. The corresponding Assessor Parcel Number (APN) is 0459-053-70, 0459-053-71, 0459-053-72, 0459-053-74. The proposed 15.40-acre project site is located south of Auburn Avenue, east of Montezuma Street, west of Jonathan Street, and north of Vintage Road.

CITY AND COUNTY: City of Adelanto, San Bernardino County.

PROJECT: The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. Each building would also be provided with 22 parking spaces. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15.40-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution. Access to the proposed project site would be provided by three new driveway connections with Jonathan Street, a new driveway connection with Auburn Avenue, and a new driveway connection with Montezuma Street. The project site is zoned as Airport Development District (ADD).

FINDINGS: The environmental analysis provided in the attached Initial Study indicates that the proposed project would not result in any significant adverse unmitigable impacts. For this reason, the City of Adelanto determined that a *Mitigated Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may be made based on the analysis contained in the attached Initial Study:

- The proposed project *will not* 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 proposed project *will not* have impacts that are individually limited, but cumulatively considerable.

- The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The environmental analysis is provided in the attached Initial Study prepared for the proposed project. The project is also described in greater detail in the attached Initial Study.

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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. Each building would also be provided with 22 parking spaces. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15.40-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution. Access to the proposed project site would be provided by three new driveway connections with Jonathan Street, a new driveway connection with Auburn Avenue, and a new driveway connection with Montezuma Street. The project site is zoned as Airport Development District (ADD).[1]

The City of Adelanto is the designated *Lead Agency* and as such, the City will be responsible for the proposed project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.[2] As part of the proposed project's environmental review, the City of Adelanto has authorized the preparation of this Initial Study. The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Adelanto with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration for a project;
- To facilitate the project's environmental assessment early in the design and development of the proposed project;
- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any impacts associated the proposed project.

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Adelanto, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as Responsible Agencies and Trustee Agencies, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.[3] This Initial Study and the Notice of Intent to

[1] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. February 9, 2021.

[2] California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions*. as Amended 2018. §21067. 2019

[3] California, State of. *California Public Resources Code. Division 13, Guidelines for the Implementation of the California Environmental Quality Act*. §15050. 2019

Adopt (NOIA) a Mitigated Negative Declaration will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.[4] Questions and/or comments should be submitted to the following contact person:

Mary Blais, Contract Planner to the City
City of Adelanto, Planning Division
11600 Air Expressway Boulevard
Adelanto, California 92301

1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description* provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and the subsequent operation of the proposed project.
- *Section 4 Conclusions* summarizes the findings of the analysis.
- *Section 5 References* identifies the sources used in the preparation of this Initial Study.

[4] California, State of. *California Public Resources Code. Division 13, Guidelines for the Implementation of the California Environmental Quality Act. Article 8 Time Limits.* § 15105 Public Review Period for a Draft EIR, or a Proposed Negative Declaration or Mitigated Negative Declaration. 2019.

SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution. Access to the proposed project site would be provided by three new driveway connections with Jonathan Street, a new driveway connection with Auburn Avenue, and a new driveway connection with Montezuma Street. The project site is zoned as Airport Development District (ADD).[5]

2.2 PROJECT LOCATION

The City of Adelanto is located approximately 60 miles northeast of Downtown Los Angeles and 30 miles north of the City of San Bernardino. Adelanto is bounded on the north by unincorporated San Bernardino County; on the east by Victorville and unincorporated San Bernardino County; on the south by Hesperia and unincorporated San Bernardino County; and on the west by unincorporated San Bernardino County.[6] Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15), which extends in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395, which traverses the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), which traverse the southern portion of the City in an east to west orientation.[7] The location of Adelanto, in a regional context, is shown in Exhibit 2-1.

The proposed project site is located on 15-acre parcel that is located on the southeast corner of Auburn Avenue and Montezuma Street. The property is located between Montezuma Street, on the west, and Jonathan Street, on the east. Vintage Road extends along the site's south side. No legal address has been assigned to the property at this time. The corresponding Assessor Parcel Number (APN) is 0459-053-70, 0459-053-71, 0459-053-72, 0459-053-74. The proposed project site is located approximately 2.5 miles west of the Adelanto City Hall and State Highway 395. City. A citywide map is provided in Exhibit 2-2. A vicinity map is provided in Exhibit 2-3.

2.3 ENVIRONMENTAL SETTING

The proposed project site is located on 15-acre parcel that is located on the southeast corner of Auburn Avenue and Montezuma Street. The site in its entirety consists of vacant and undeveloped land. The project site has a General Plan and Zoning land use designation of Airport Development District (ADD). The Aquarian Services water treatment facility (19101 Jonathan Street) is located northeast of the project approximately 350 feet. The Southern California Logistics Airport (SCLA) is located approximately 3,500 feet east of the project site. An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4.

[5] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* February 9, 2021.

[6] Blodgett Baylosis Environmental Planning. 2020.

[7] Google Earth. Website accessed September 29, 2020.

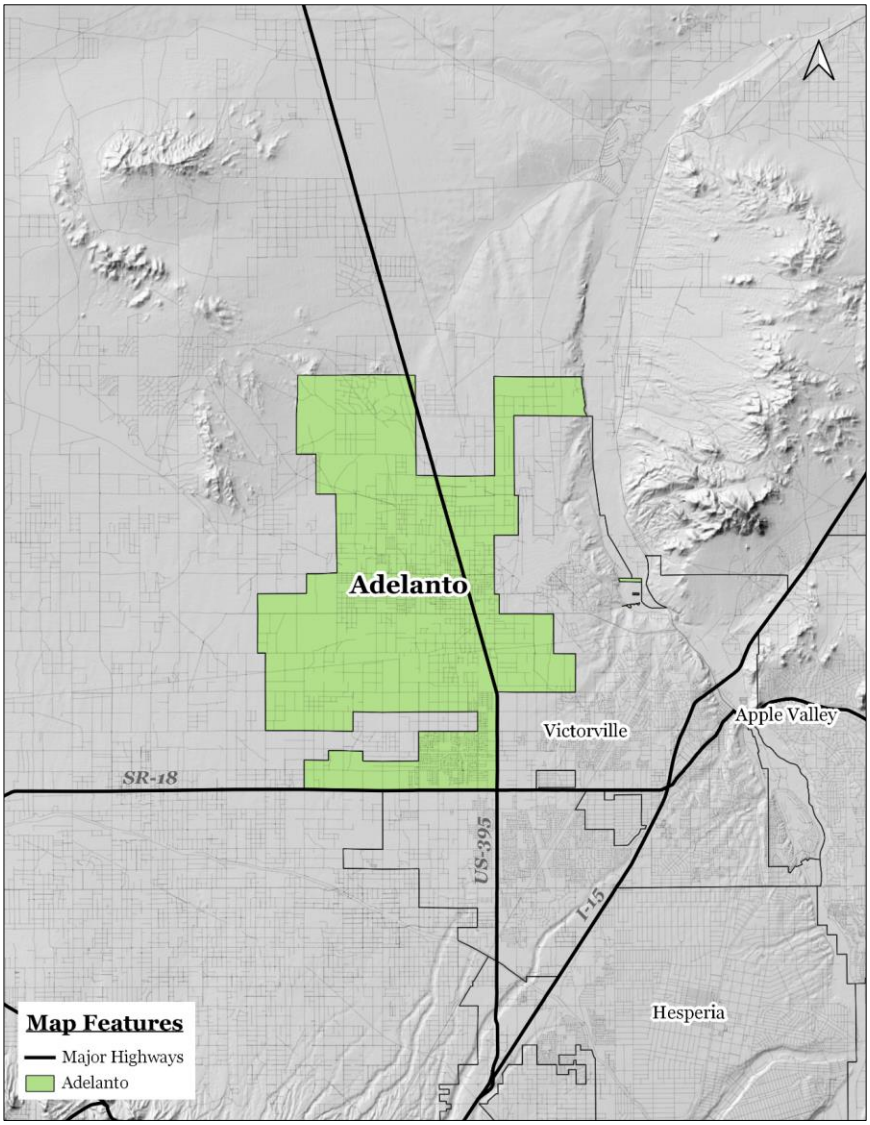

EXHIBIT 2-1
REGIONAL MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

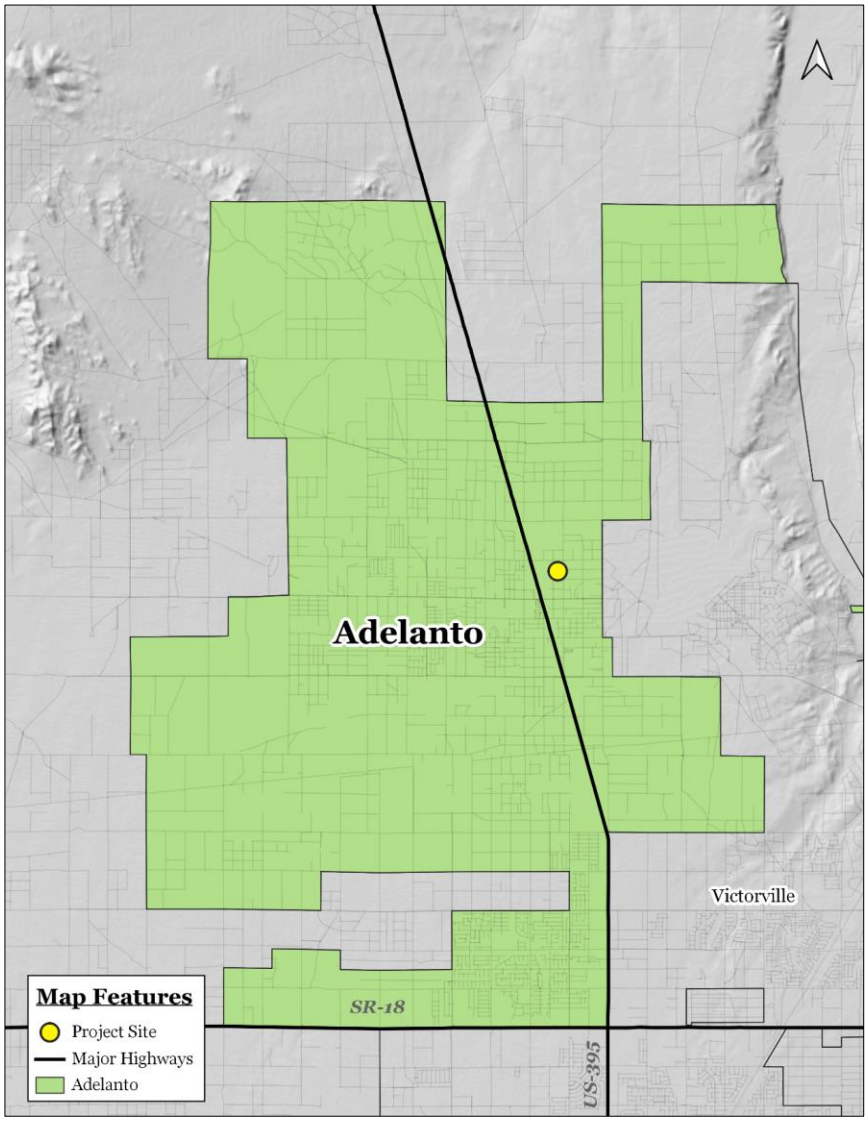

EXHIBIT 2-2
CITYWIDE MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

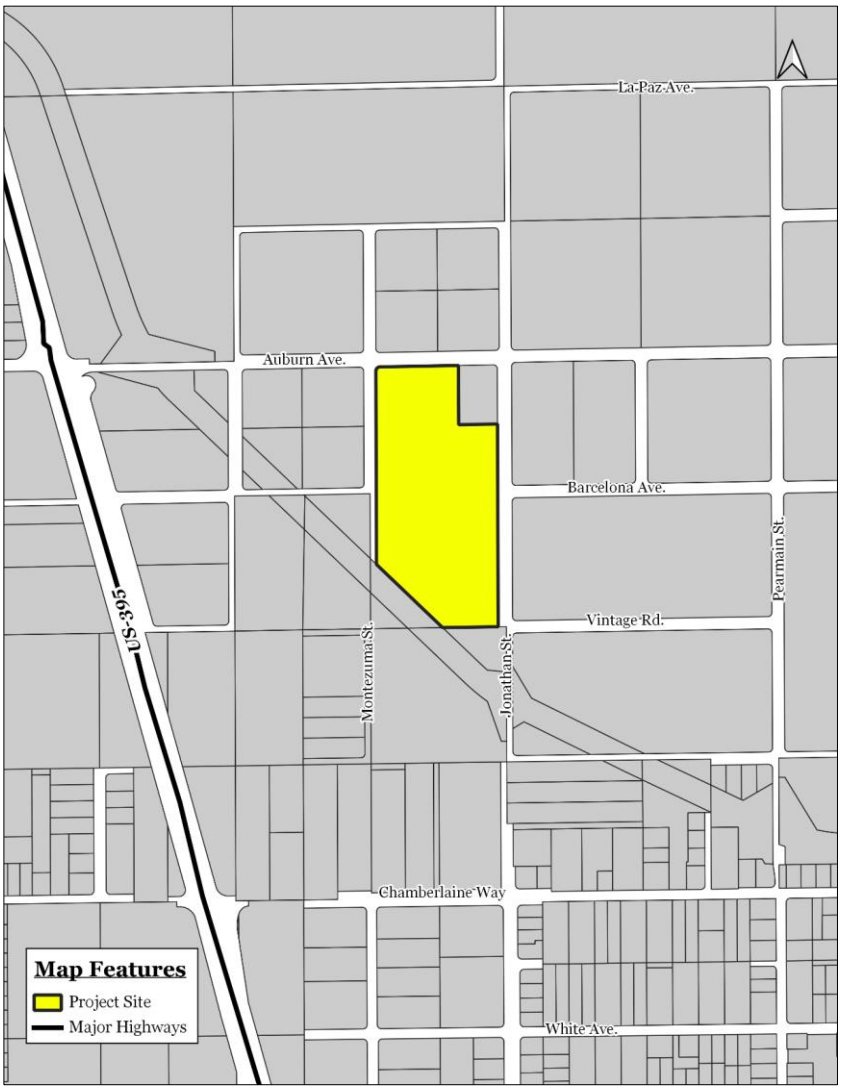

EXHIBIT 2-3
LOCAL MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

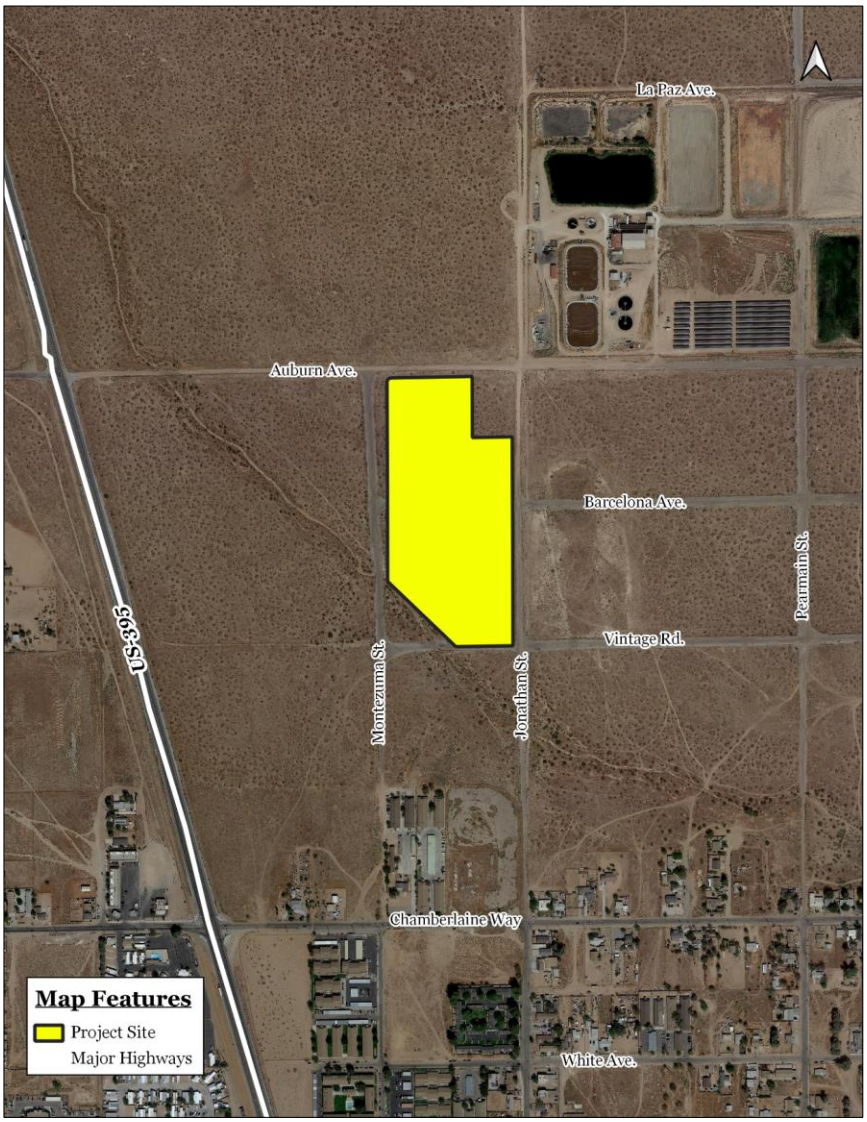

EXHIBIT 2-4
AERIAL IMAGE OF PROJECT SITE
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

Other land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* Auburn Avenue extends along the project site's north side. The property located to the north of this roadway is undeveloped. These parcels are zoned as Airport Development District (ADD).[8]

- *West of the project site:* Montezuma Street extends along the project site's west side. Vacant, undeveloped properties are located further west on the east side of Montezuma Street. These parcels are zoned as Airport Development District (ADD).[9]

- *South of the project site:* Vintage Road extends along the site's south side. Vacant, undeveloped land is located further south on the south side of this roadway. These parcels are also zoned as Airport Development District (ADD).[10]

- *East of the project site:* Jonathan Street extends along the project site's east side. Vacant, undeveloped land is located west of the project site. This area is zoned as Airport Development District (ADD).[11]

2.4 PROJECT DESCRIPTION

Key elements of the proposed project are summarized below and on the following page.

- *Proposed Site Plan.* A total of twelve buildings would be constructed within the project site. Each building would consist of 30,625 square feet of floor area and would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet. The project would be constructed in four phases within the 15-acre site. All nine buildings would have the same architectural design and floor plans. The dimensions of each building would be 200 feet in length by 125 feet in width.

- *Proposed Building Floor Plan-First Level.* The lower level would include the main entrances, the security room, the electrical room, and the cultivation rooms, packaging rooms, and shipping rooms. In addition, a roll up door a main floor consisting of 24,375 square feet Other areas are reserved for employee break rooms and dressing rooms.12

- *Proposed Building Floor Plan-Second Level.* The upper level would include other floor area that would be used for cultivation. The main level and mezzanine level would be connected by two stairways and a freight elevator.[13]

- *Access and Internal Circulation.* Access to the proposed project site would be served by five new driveway connections. Three new driveways would connect with Jonathan Street, a single new

[8] Google Maps and City of Adelanto Zoning Map. Website accessed on April 1, 2021.

[9] Ibid.

[10] Ibid.

[11] Ibid.

[12] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. February 9, 2021.

[13] Ibid.

driveway would connect with Auburn Avenue, and a single new driveway would connect with Montezuma Street. All five new driveways would have a curb-to-curb width ranging between of 30 to 35 feet. The internal drive aisles would ill have a width of 30-feet.[14]

- *Parking*. Each of the twelve buildings would provide 22 parking spaces including 1 ADA-accessible stalls. A total of 264 parking spaces would be provided for the entire project. In addition, each building would be equipped with a single ground level truck loading dock.[15]

- *On-Site Improvements*. Landscaping will be provided around the site and along the street frontages. Power (electrical) will be provided by generators that will be powered by liquefied natural gas (LNG). A new sewer line and water line will be extended from existing lines that run to the north of the project site on Auburn Avenue.[16]

- *Security*. On-site security will be provided twenty-four hours a day, seven days a week by licensed security guards. In addition, CCTV's and shielded security lighting that would conform with all municipal lighting regulations, will be installed on the premises.

The overall site plan, as revised, is shown in Exhibit 2-5 and a typical floor plan of the individual buildings are shown in in Exhibit 2-6. The new facility is projected to employ up to 204 persons per day, at full build-out. The potential employment is summarized in Table 2-1 provided below.

Table 2-1
Potential Employment Breakdown

Employment Position	Each Business	All 12 Bldgs.
Onsite Manager	1	12
Maintenance Technician	1	12
Office/Vault	1	12
Security (Bldg.)	1	12
Grow/Cultivator Staff	3	36
Cannabis Trimmer	2	24
Extraction Technician	2	24
Packaging Associate	2	24
Shipping/Distribution	2	24
Drivers	2	24
Total	17	204

Notes: 1. Each building contains two businesses.
Source: Blodgett Baylosis Environmental Planning

[14] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. February 9, 2021.

[15] Ibid.

[16] Ibid.

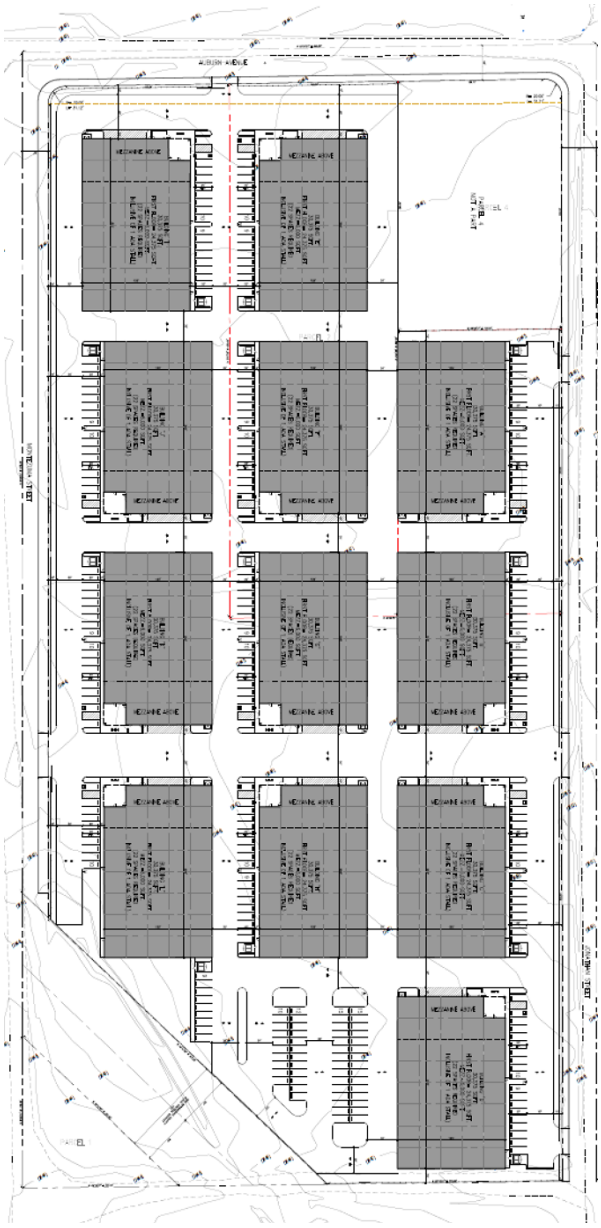

EXHIBIT 2-5
SITE PLAN OF PROJECT
SOURCE: AIA PONTIOUS ARCHITECTURE

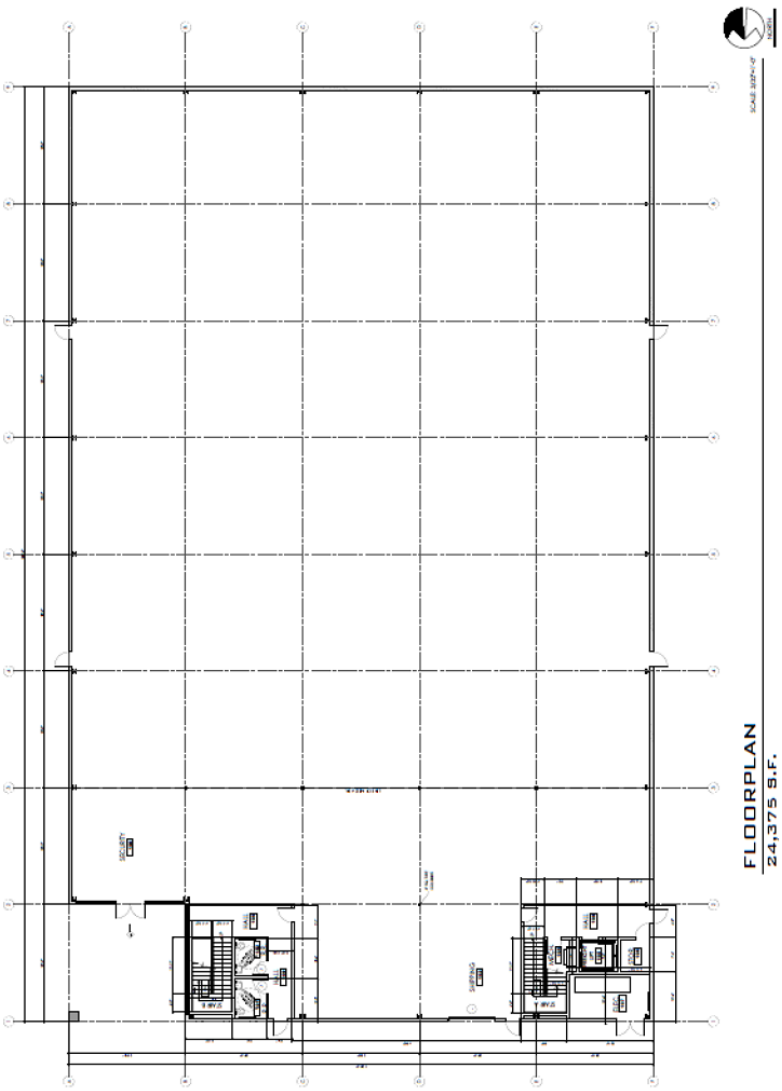

EXHIBIT 2-6
TYPICAL BUILDING FLOOR PLAN
SOURCE: AIA PONTIOUS ARCHITECTURE

As indicated previously, the proposed development will be involved in the manufacturing, cultivation, and distribution of adult and medical cannabis within the City of Adelanto. The facility will be operational 24-hours a day though the primary hours of hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.[17]

The construction for the proposed project will occur over four phases with four of the twelve buildings constructed during each of the phases. The first phase will commence in 2021. For purposes of the analysis the second phase will commence in 2022. Finally, the third phase will commence in 2023. The fourth phase will commence in 2024. Each phase will take approximately 12 months to complete. None of the phases will overlap or occur concurrently.[18] The key construction elements for each of the four phases are outlined below.

- *Grading*. The portion of the project site that would be developed during the particular phase would be graded and readied for the construction. The site would undergo rough grading. This phase would require approximately one month to complete.

- *Site Preparation.* During this phase, the building footings, utility lines, and other underground infrastructure would be installed. This element would require approximately one month to complete.

- *Building Construction*. The four new buildings would be constructed during this phase. This phase would take approximately four months to complete.

- *Paving and Finishing*. This concluding phase would involve the paving and finishing. The completion of the paving and finishing of the buildings and the site would take approximately three months to complete.

2.5 CUMULATIVE (RELATED) PROJECTS

Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. As set forth in the *CEQA Guidelines* Section 15355,

> "Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may include changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."

The identified related projects include the following:

- *Cannabis Warehouse, CUP 19-06 & LDP 19-05*. This project was an application to develop a 14,235 square foot lot located at the southeast corner of Rancho Road and Adelanto Road for the purpose of a warehouse for the cultivation, manufacturing, and distribution of cannabis. The property has

[17] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

[18] Ibid.

a General Plan land use designation of Light Manufacturing (LM). The project will also include a general office, consultant offices, and other elements. The proposed project site is located at 16917 Adelanto Road.

- *Ikanik Farms, MLDP 19-12 & MLDP 19-14.* The proposed project would involve the construction of tenant improvements to existing buildings and the construction of building additions for the purpose of operating cannabis cultivation and manufacturing uses within the property at 9365 Cassia Road. The new construction will include a 6,100 square-foot building addition to the southwestern portion of the existing 27,000 square-foot building and the construction of a 12,100 square-foot building addition to the eastern portion of the existing 27,000 square-foot building.

- *CRA Investments LLC. Project, MLDP 19-17.* This related project involves the development of a 40-acre parcel located at the southeast corner of Pansy Road and Raccoon Avenue. The proposed project would involve the sale and short-term storage of used, undamaged or damaged, operable or inoperable vehicles, trailers, watercraft, power sports equipment, industrial and construction machinery, and other equipment. The Applicant may also use the site for the temporary storage of truck trailers. The proposed project would also include a small modular office building (approximately 1,440 square feet), a customer and employee parking lot, and a loading and unloading area.

- *Columbus Street Cannabis Warehouse, CUP 19-13 & LDP 19-09.* This related project would involve the development of two separate parcels (the APNs include 3128-051-11 and 3128-051-12) with a total land area of 189,922 square feet or 4.36 acres. The proposed project involves the construction of a 25,000 square-foot warehouse building on each of the two parcels. The total floor area for the two new buildings will be 50,000 square feet. The proposed use will involve the cultivation, manufacturing, and distribution of cannabis. The project site is located to the south of Rancho Road and approximately 300 feet east of Raccoon Avenue.

- *Copart 61-Acre Project, LDP 19-15.* This related project involves the development of a 61-acre parcel located in the southern portion of the City for the purpose of the short-term storage and sale of operable and inoperable used vehicles, various types of equipment and machinery. The project will also include an office/sales building (approximately 12,800 square feet), a customer and employee parking lot, a loading and unloading area, and a secured, short-term storage lot for the vehicles, equipment, and machinery.

- *Genex Trading, Inc., CUP 16-01.* The applicant, Pontious Architecture, has already constructed a new building consisting of 12,020 square feet within a 0.78-acre site. The future uses within this existing building will include a comprehensive medical cannabis facility consisting of a 7,700 square foot cultivation facility and a medical cannabis manufacturing facility consisting of 2,200 square feet. The project involved the approval of the application for this proposed use.

- *Daewon Foods, TPM 20097 & LDP 19-12.* The proposed project involved an application to subdivide, and to develop a portion of, a 20-acre site. The Applicant is proposing to subdivide a 20-acre parcel into seven separate parcels and to construct two 30,000 square-foot industrial buildings on a newly created 190,431 square-foot parcel. The two buildings would be used for the manufacturing of Korean food products such as kimchi and juice. The 20-acre parcel has a Zoning and General Plan Use Designation of *Light Manufacturing (LM)*.

- *Topekoms Manufacturing Project, CUP 19-17 & LDP 19-13*. The proposed project would involve the development of a 0.89-acre portion of a larger 9.11-acre land parcel including the construction of a new one-story 5,586 square-foot cannabis extraction laboratory. The proposed development will require a CUP to allow for the Adult Use Distribution and Volatile Manufacturing cannabis use and a LDP for the physical development. The remainder of the site, consisting of just over eight acres in land area and including three dilapidated building structures, will not be improved, or further developed in the near term, though future development is permitted under the current general plan and zoning designations.

- *Best Western Plus Hotel and Restaurant Project, CUP 20-1 and LDP 20-1*. The proposed project would involve the development of a 4.54-acre land parcel including the construction of a new four-story 50,231 square-foot hotel and adjacent 5,293 square-foot restaurant. The proposed development will require a Conditional Use Permit and a Land Development Plan. The property has a General Plan and Zoning Land Use Designation of *Commercial*.

- *Koala Road Greenhouse and Commercial Center*. The proposed project would involve the development of an 18.24-acre (794,534 square-foot) parcel. The proposed development would involve the construction of two structures including a 3,400 square-foot (volatile and nonvolatile) manufacturing building, and a 42,856 square-foot greenhouse facility. The proposed greenhouse facility would be divided into twelve (2,640 square-foot) grow areas with two centralized corridors, along with 7,000 square feet of additional administrative office space. The total floor area of the two-building site plan would be 46,256 square feet.

- *HD Biotech Cannabis Warehouse*. The proposed project would involve the development of a portion of a larger 4.69-acre (204,754 square-foot) parcel within the southern portion of the City. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. The total site area in which the new building would be located consists of 204,754 square feet (4.7 acres).

- *Adelanto South Ecosave Venture Development, TPM 20272 & LDP 20-05*. The proposed project site would consist of 17.48 acres or 761,803 square feet. The first building site would consist of 382,663 square feet (8.78 acres) and would include Building A with 162,298 square feet of floor area with 175 parking stalls and 20 dock high truck doors. The second proposed building site would consist of 379,140 square feet (8.70 acres) and would include Building B with 155,484 square feet of floor area along with 161 parking stalls and 20 dock high truck doors. The project site is located within the Airport Development District (ADD) Zone District.

- *DeSoto Cannabis Cultivation Facility; CUP 20-6 and LDP 20-10*. The proposed project would involve the development of a 9.30-acre (198,149 square-foot) parcel within the northeast portion of the City of Adelanto. The proposed project involves construction consisting of eighty (80) cannabis greenhouses with a total floor area of 165,100 square feet; four (4) steel processing buildings with a total floor area of 20,000 square feet; two (2) mobile office buildings with a total floor area of 4,800 square feet; and seven (7) external utilities and storage warehouses with a combined floor area totaling 8,249 square feet. The proposed development will be used as a cannabis cultivation facility.

- *Tiger Organic Farms Cannabis Facility; CUP 20-07 and LDP 20-11*. The proposed project would involve the development of a 14.74-acre (348,864 square-foot) parcel within the southwest area of the City of Adelanto. Proposal to establish Adult Use Cannabis Cultivation uses and construct cultivation buildings, totaling 189,000 SF, in (3) phases on 14.74 -acres located in the Manufacture Industrial (MI) in the City of Adelanto, California. This zoning permits industrial cannabis land uses with the approval of a Conditional Use Permit (CUP 20-07) Land Development Plan (LDP-20-11).

- *SCCC Group Services, Inc. CUP 19-11 and LDP 19-07*. The proposed project would involve the improvement and use of the 18,917 square foot (0.43-acre) site for the cultivation, manufacturing (non-volatile), distribution, and transportation of medicinal cannabis. The proposed improvements would include the construction of two smaller buildings, referred to as Building A and Building B. Building A would be a two-story development that consists of 10,000 square feet of floor area and Building B, a one-story development, would consist of 2,430 square feet of floor area.

The potential for projects to have a cumulative impact depends on both geographic location as well as the timing of development. The geographic area affected by cumulative projects will vary depending on the environmental topic. For example, construction noise impacts would be limited to areas directly affected by construction noise, whereas the area affected by a project's air emissions generally includes the local air basin. The potential cumulative impacts are discussed for each issue area.

2.6 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Adelanto) that calls for an exercise of judgment in deciding whether to approve a project. The following discretionary approvals are required:

- The approval of a Conditional Use Permit (CUP) 21-04;
- The approval of a Land Development Plan (LDP) 21-03;
- The approval of a Tentative Parcel Map (TPM) 20437;
- The approval of the Mitigated Negative Declaration (MND); and,
- The adoption of the Mitigation Monitoring and Reporting Program.

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SECTION 3 ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

Aesthetics (Section 3.1);
Agricultural &Forestry Resources (Section 3.2);
Air Quality (Section 3.3);
Biological Resources (Section 3.4);
Cultural Resources (Section 3.5);
Energy (Section 3.6)
Geology & Soils (Section 3.7);
Greenhouse Gas Emissions; (Section 3.8);
Hazards & Hazardous Materials (Section 3.9);
Hydrology & Water Quality (Section 3.10);
Land Use & Planning (Section 3.11);
Mineral Resources (Section 3.12);
Noise (Section 3.13);
Population & Housing (Section 3.14).
Public Services (Section 3.15);
Recreation (Section 3.16);
Transportation (Section 3.17);
Tribal Cultural Resources (Section 3.18);
Utilities (Section 3.19);
Wildfire (Section 3.20); and,
Mandatory Findings of Significance (Section 3.21).

The environmental analysis included in this section reflects the Initial Study Checklist format used by the City of Adelanto in its environmental review process (refer to Section 1.3 herein). Under each issue area, an analysis of impacts is provided in the form of questions followed by corresponding detailed responses. For the evaluation of potential impacts, questions are stated, and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

- *No Impact*. The proposed project *will not* have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The proposed project *may have* the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Adelanto or other responsible agencies consider to be significant.

- *Less Than Significant Impact with Mitigation*. The proposed project *may have* the potential to generate impacts that will have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures.

- *Potentially Significant Impact*. The proposed project may result in environmental impacts that are significant.

This Initial Study will assist the City of Adelanto in making a determination as to whether there is a potential for significant adverse impacts on the environment associated with the implementation of the proposed project.

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect on a scenic vista?				✕
B. Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✕
C. In non-urbanized areas, would the project 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 a 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?				✕
D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✕	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect on a scenic vista? ● No Impact*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. Each building would also be provided with 22 parking spaces. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution. Access to the proposed project site would be provided by three new driveway connections with Jonathan Street, a new driveway connection with Auburn Avenue, and a new driveway connection with Montezuma Street. The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. Views from the mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. As a result, no impacts will occur.

B. *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ● No Impact.*

According to the California Department of Transportation, none of the streets located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.[19] There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18),

[19] California Department of Transportation. *Official Designated Scenic Highways.* https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The City of Adelanto 2035 Sustainable Plan identifies prominent view sheds within the City. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.[20] The site would not qualify as undeveloped desert land since the property is currently surrounded by lands designated for future manufacturing and distribution land uses. Lastly, the project site does not contain any buildings listed in the State or National Register. As a result, no impacts will occur.

C. *In non-urbanized areas, would the project 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 a 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? ● No Impact*

There are no protected views in the vicinity of the project site and the City does not contain any scenic vistas. In addition, the City does not have any zoning regulations or other regulations governing scenic quality other that the development standards for which the proposed project will be required to conform to. As a result, no impacts will occur.

D. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ● Less than Significant Impact*

Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.15.050(E)(5) – Lighting of the City of Adelanto Municipal Code. The project site is zoned for Airport Development District land use, with Mixed Use land uses west of the project site. The nearest sensitive receptors to the project site are residential land uses located approximately 660 feet to the south. The Applicant will be required to submit a photometric study to the City for review and approval to ensure the parking area lighting, security lighting, and signage do not impact any light sensitive land uses in the immediate area. Adherence with this City requirement will reduce the potential impacts to levels that are less than significant.

CUMULATIVE IMPACTS

The potential for cumulative aesthetic impacts is typically site specific. There are no know related projects located in the immediate vicinity of the proposed project. As a result, no cumulative aesthetic impacts would result.

MITIGATION MEASURES

The analysis of aesthetics indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

[20] MIG Hogle-Ireland. *Adelanto North 2035 Comprehensive Sustainable Plan*. August 27, 2014.

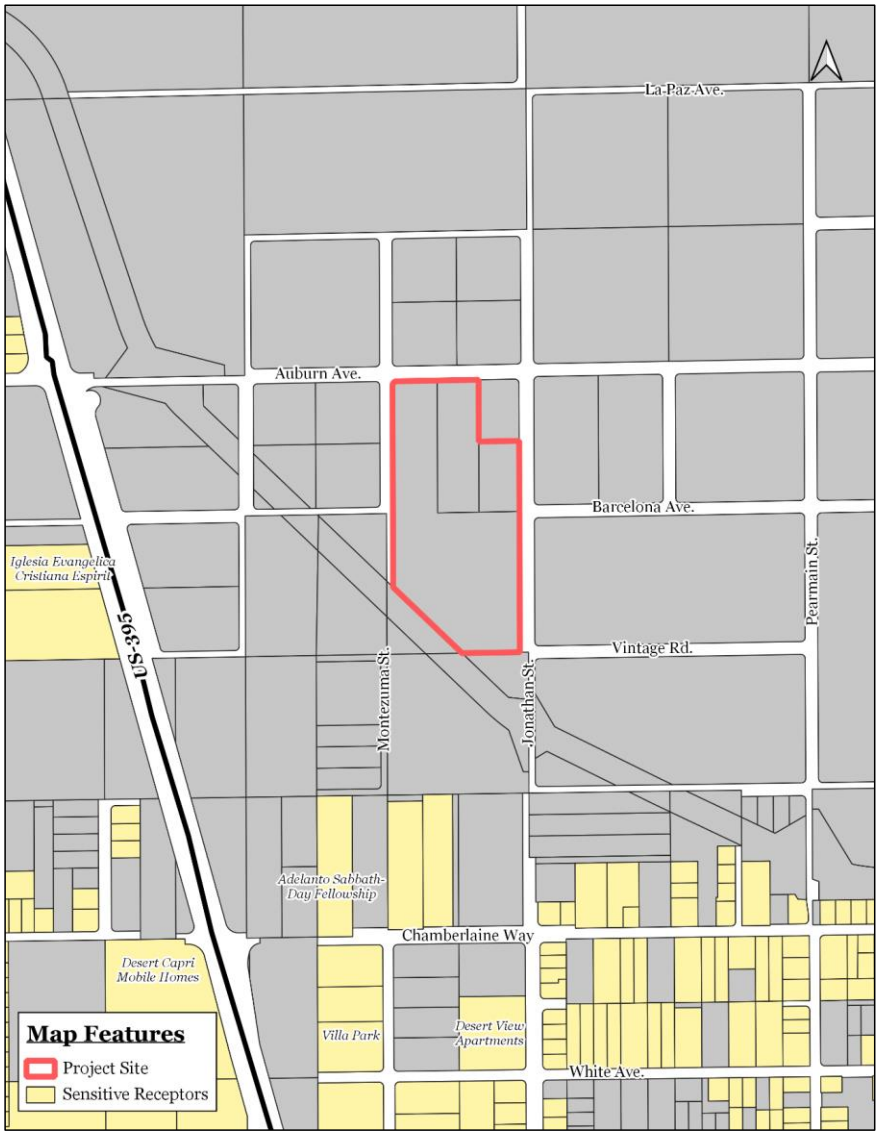

EXHIBIT 3-1
LIGHT SENSITIVE RECEPTORS MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project 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 uses?				✖
B. Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✖
C. Would the project 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))?				✖
D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✖
E. Would the project 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 a non-forest use?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project 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 uses? ● No Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. Each building would also be provided with 22 parking spaces. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution. Access to the proposed project site would be provided by three new driveway connections with Jonathan Street, a new driveway connection with Auburn Avenue, and a new driveway connection with Montezuma Street.[21]

According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. As a result, no impacts will occur.[11]

[21] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

[11] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *California Important Farmland Finder.*

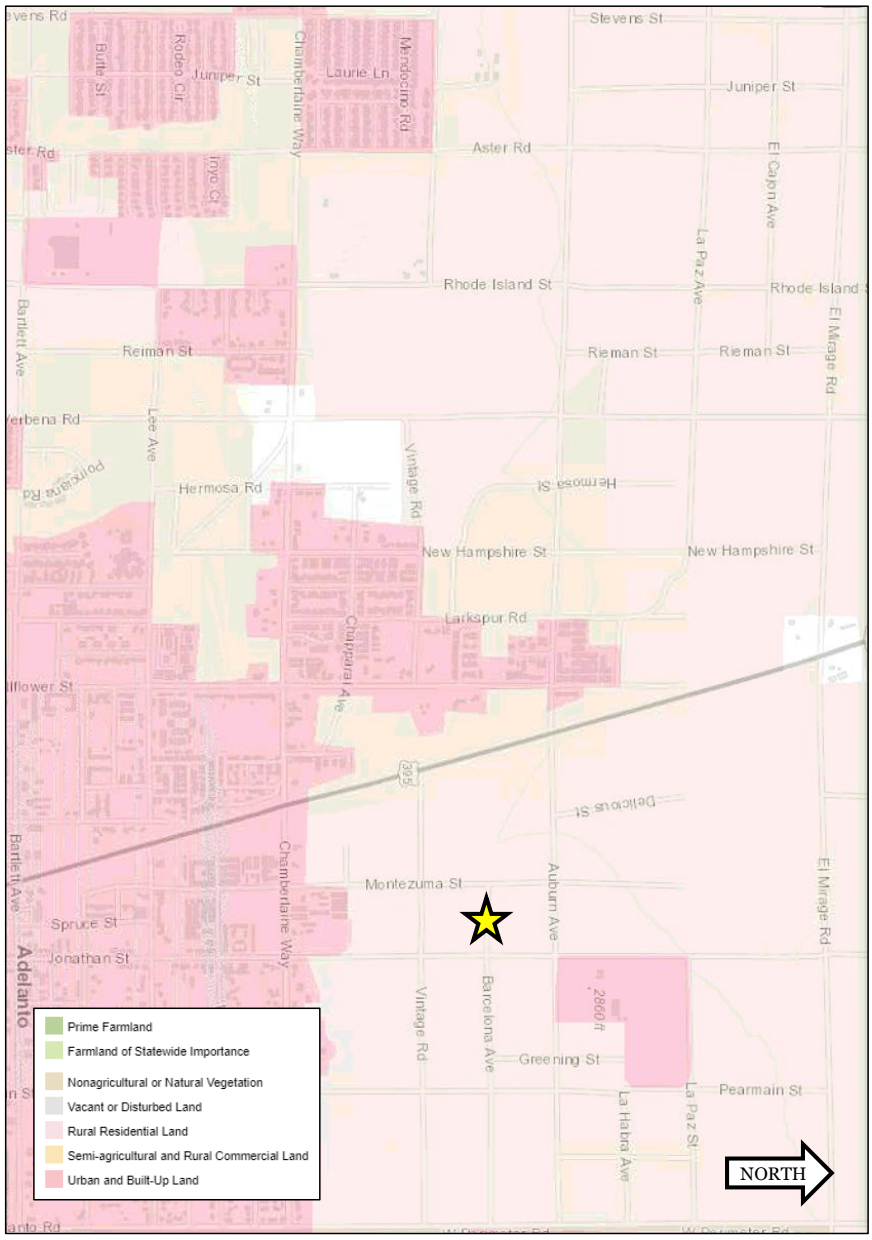

EXHIBIT 3-2
IMPORTANT FARMLAND SOILS MAP
SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

B. *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract? ● No Impact.*

The project site is currently zoned as Airport Development District (ADD), and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.[22] As a result, no impacts on existing Williamson Act Contracts will result from the proposed project's implementation.

C. *Would the project 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))? ● No Impact.*

There are no forest lands or timber lands located within or adjacent to the site. Furthermore, the site's existing zoning designation of Airport Development District (ADD) does not contemplate forest land or timber land uses. As a result, no impacts will occur.

D. *Would the project result in the loss of forest land or conversion of forest land to a non-forest use? ● No Impact.*

No forest lands are located within the project site. The proposed use will be restricted to the site and will not affect any land under the jurisdiction of the Bureau of Land Management (BLM). As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation.

E. *Would the project 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 a non-forest use? ● No Impact.*

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to non-agricultural use or conversion of forest land to non-forest use because there are no agricultural uses or protected forest lands within the proposed project site. As a result, no farmland or forest area conversion impacts will result from the proposed project's implementation.

CUMULATIVE IMPACTS

According to the California Department of Conservation, the City does not contain any areas that contain soils of Farmland of Statewide Importance. In addition, because of the area's semi-arid nature, there are no conventional farmland or agricultural uses or activities that are located within the City. As a result, no cumulative impacts on agricultural or forestry resources are anticipated.

MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

[22] California Department of Conservation. *State of California Williamson Act Contract Land.* ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf.

3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				✖
B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?			✖	
C. Would the project expose sensitive receptors to substantial pollutant concentrations?				✖
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		✖		

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with or obstruct implementation of the applicable air quality plan? ● No Impact.*

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or off-site area wide (e.g., power plants) sources. The City is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The MDAQMD covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the Southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and on the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.[23] The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).

- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).

[23] Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).

- *Sulfur Dioxide* (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).

- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM_{10} and 65 pounds per day of $PM_{2.5}$.

- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of "smog." The daily threshold is 137 pounds per day of ROG.

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Adelanto is projected to add a total of 38,900 new residents and 3,900 new employees through the year 2040.[24] The proposed project will not introduce new residents and is anticipated to employ an estimated 204 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. In general, a project will have the potential for a significant air quality impact if any of the following are met:

- Generates total emissions (direct and indirect) that exceeds the SCAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3-1 and 3-2);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City's Zoning and General Plan); and,
- Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1 (the proposed project will not expose sensitive receptors to substantial pollutant concentrations nor is the site located near any sensitive receptors).

The project's construction emissions would be below the thresholds of significance established by the MDAQMD (the project's daily construction emissions are summarized in Table 3-1). In addition, the proposed project's long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). As a result, no conformity impacts will occur.

[24] Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

B. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[25] According to the SCAQMD, any project is significant if it triggers or exceeds the SCAQMD daily emissions threshold identified previously and noted at the bottom of Tables 3-1 and 3-2.

The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2020.4.0). For air quality modeling purposes, a 12-month period of construction for each of the project's four phases was assumed. As shown in Table 3-1, daily construction emissions will not exceed the SCAQMD significance thresholds.

Table 3-1
Estimated Daily Construction Emissions

Construction Phase	ROG	NOx	CO	SOx	PM10	PM2.5
Demolition (on-site)	2.64	25.72	20.59	0.04	1.24	1.15
Demolition (off-site)	0.05	0.04	0.57	--	0.17	0.04
Total Demolition	**2.69**	**25.76**	**21.16**	**0.04**	**1.41**	**1.19**
Site Preparation (on-site)	3.17	33.1	19.7	0.04	21.27	11.59
Site Preparation (off-site)	0.06	0.04	0.68	--	0.2	0.05
Total Site Preparation	**3.23**	**33.14**	**20.38**	**0.04**	**21.47**	**11.64**
Grading (on-site)	1.95	20.85	15.27	0.03	15.1	7.71
Grading (off-site)	0.01	0.07	1.14	--	0.63	0.16
Total Grading	**1.96**	**20.92**	**16.41**	**0.03**	**15.73**	**7.87**
Building Construction (on-site)	1.71	15.61	16.36	0.03	0.81	0.76
Building Construction (off-site)	0.63	3.20	6.78	0.02	2.1	0.60
Total Building Construction	**2.34**	**18.81**	**23.14**	**0.05**	**2.91**	**1.36**
Paving (on-site)	1.11	11.12	14.58	0.03	0.57	0.52
Paving (off-site)	0.05	0.04	0.57	--	0.17	0.04
Total Paving	**1.16**	**11.16**	**15.15**	**0.03**	**0.74**	**0.56**
Architectural Coating (on-site)	189.47	1.41	1.81	--	0.09	0.09
Architectural Coating (off-site)	0.11	0.07	1.17	--	0.35	0.09
Total Architectural Coating	**189.58**	**1.48**	**2.98**	**--**	**0.44**	**0.18**
Maximum Daily Emissions	**77.07**	**33.13**	**23.14**	**0.05**	**21.47**	**11.64**
Daily Thresholds	**137**	**137**	**548**	**137**	**82**	**65**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2020.4.0.

[25] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2021.xs

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area-wide emissions. The operational emissions assumed that all of the buildings were occupied and in operation. The analysis of long-term operational impacts summarized in Table 3-2 also used the CalEEMod V.2020.4.0 computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the SCAQMD daily emissions thresholds.

Table 3-2
Estimated Operational Emissions in lbs./day

Emission Source	ROG	NOx	CO	SO2	PM10	PM2.5
Area-wide (lbs./day)	7.86	--	0.04	0.00	--	--
Energy (lbs./day)	0.04	0.34	0.28	--	0.03	0.03
Mobile (lbs./day)	0	0	0	0	8.95	2.19
Total (lbs./day)	**7.90**	**0.34**	**0.32**	**0**	**8.98**	**2.22**
Daily Thresholds	**137**	**137**	**548**	**137**	**82**	**65**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2020.4.0.

The analysis presented in Tables 3-1 and 3-2 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3-1 and 3-2, the impacts are considered to be less than significant. In addition, the MDAQMD Rule Book contains numerous regulations governing various activities undertaken within the District. In addition, the SCAQMD has rules and regulations for controlling fugitive dust during construction. Among these regulations is Rule 403.2 – Fugitive Dust Control for the District for the purpose of controlling fugitive dust. Adherence to Rule 403.2 regulations is required for all projects undertaken within the District. Future construction truck drivers must also adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes.[3] Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant.

C. *Would the project expose sensitive receptors to substantial pollutant concentrations? ● No Impact.*

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project (50,000 or more vehicles per day) within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. The proposed project does not meet any of these criteria. The nearest sensitive receptors to the project site are residential land uses located more than 660 feet directly to the south. As a result, no impacts will occur.

D. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? ● Less than Significant Impact with Mitigation.*

Cannabis cultivation directly impacts air quality in two (2) predominant operations, plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by the generation of strong odors. The majority of the odors of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants and vary widely between plants.[26] Cannabis produces over 140 different terpenes, and these chemicals are found in varying concentrations in different cannabis varieties. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis' psychoactivity, has no odor whatsoever. The type and potency of cannabis odors range widely from variety to variety, as do receptors' opinions regarding whether the odor is pleasant or objectionable.[16] The natural growth of the cannabis plants, and other processes at cultivation facilities, emit terpenes. Terpenes, known for their strong odor, are volatile organic compounds (VOCs). At facilities such as that being considered, the evaporation of solvents, and other processes in the production cycle also result in VOC emissions. The project Applicant will be required to implement certain technologies that will be beneficial in controlling odors including the following:

- *Carbon Filters*. Also known as carbon scrubbers, carbon filters are historically one of the best methods for odor control. This type of filter uses pellets of charcoal to trap the terpenes. Carbon filters are simple to install, effective, and reliable. Carbon filters will be installed at key locations in the facility and will be monitored and replaced by staff on a regular basis.

- *Air Filters*. Standard air filters, also referred to as air purifiers, are typically made of densely woven fiber screens. These filters trap particles as air circulates through the filter, which can either be a stand-alone unit or incorporated into a ventilation system depending on the exact specifications.

- *Negative Ion Generators*. The machines will use a negative charge to attract positively charged particles in the air. This equipment will be installed in areas that do not interfere with the production activities but instead can proactively treat the air in order to meet regulations.

- *Air-tight Seals*. The proposed facility will utilize air-tight seals throughout the facility. Predominately used in the exhaust system, these airtight seals will be used in order to keep the exhaust system efficient and effective.

- *Negative Air Pressure*. The Applicant will make use of negative air pressure in order to retain odor for treatment. This will help to serve as a safeguard of odor escaping into the ambient air until it can be treated using the techniques above. The proper use of both negative air and negative ion generators will efficiently expunge odor before leaving the facilities.

- *Staff Training*. The facility's employees will be trained regarding compliance with the industry's best standards and facility regulations in order to achieve successful odor control. Employees will be trained in the use of odor control methods as well as any new techniques and technologies that may be added in the future.

[16]Cannabis Environmental Best Management Practices Draft Section for Review: Air Quality August 9, 2018.

The project Applicant will also be required to prepare an Odor Management Plan pursuant to San Bernardino County Department of Public Health construction guidelines. The following mitigation measures will be required to control odors and to ensure that the indoor air is safe for the workers:

- The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and the San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.

- Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

The above mitigation will reduce the potential impacts to levels that are less than significant.

CUMULATIVE IMPACTS

For purposes of the cumulative air quality analysis, the following related projects were considered in the cumulative air quality analysis:

- *CUP 19-06 & LDP 19-05 Cannabis Warehouse.* This project was an application to develop a 14,235 square foot lot located at the southeast corner of Rancho Road and Adelanto Road for the purpose of a warehouse for the cultivation, manufacturing, and distribution of cannabis. The CEQA analysis (a categorical exemption) indicated this project's construction and operational emissions would be well below the MDAQMD daily thresholds of significance. This related project would be required to prepare and implement an odor control plan.

- *Ikanik Farms MLDP 19-12 & MLDP 19-14.* The new construction will include a 6,100 square-foot building addition to the southwestern portion of the existing 27,000 square-foot building and the construction of a 12,100 square-foot building addition to the eastern portion of the existing 27,000 square-foot building. The CEQA analysis (a categorical exemption) indicated this project's construction and operational emissions would be well below the MDAQMD daily thresholds of significance. This related project would be required to prepare and implement an odor control plan.

- *MLDP 19-17 CRA Investments LLC. Project.* This related project involves the development of a 40-acre parcel located at the southeast corner of Pansy Road and Raccoon Avenue. The proposed project would involve the sale and short-term storage of used, undamaged or damaged, operable, or inoperable vehicles, trailers, watercraft, power sports equipment, industrial and construction machinery, and other equipment. The Applicant may also use the site for the temporary storage of truck trailers. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be well below the MDAQMD daily thresholds of significance. The operational emissions would be minimal and related to the transport of vehicles to and from the site.

- *Columbus Street Cannabis Warehouse. Project (CUP 19-13 & LDP 19-09).* This related project would involve the development of two separate parcels (the APNs include 3128-051-11 and 3128-051-12) with a total land area of a 189,922 square foot or 4.36 acres. The proposed use will involve the cultivation, manufacturing, and distribution of cannabis. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the MDAQMD daily

thresholds of significance. This related project would be required to prepare and implement an odor control plan.

- *Land Development Plan (LDP) 19-15; Copart 61-Acre Project*. This related project involves the development of a 61-acre parcel located in the southern portion of the City for the purpose of the short-term storage and sale of operable and inoperable used vehicles, various types of equipment and machinery. The project will also include an office/sales building (approximately 12,800 square feet), a customer and employee parking lot, a loading and unloading area, and a secured, short-term storage lot for the vehicles, equipment, and machinery. The CEQA analysis indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance.

- *CUP 16-01 (Genex Trading, Inc.)*. The applicant, Pontious Architecture, has already constructed a new building consisting of 12,020 square feet within a 0.78-acre site. The future uses within this existing building will include a comprehensive medical cannabis facility consisting of a 7,700 square foot cultivation facility and a medical cannabis manufacturing facility consisting of 2,200 square feet. The CEQA analysis (a CE) indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance. This related project would be required to prepare and implement an odor control plan.

- *Daewon Foods (TPM 20097 & LDP 19-12)*. The proposed project involved an application to subdivide, and to develop a portion of, a 20-acre site. The two buildings would be used for the manufacturing of Korean food products such as kimchi and juice. The 20-acre parcel has a Zoning and General Plan Use Designation of *Light Manufacturing (LM)*. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance.

- *Topekoms Manufacturing Project*. The proposed development will require a Conditional Use Permit (CUP 19-17) to allow for the Adult Use Distribution and Volatile Manufacturing cannabis use and a Land Development Plan (LDP 19-13) for the physical development. The remainder of the site, consisting of just over eight acres in land area and including three dilapidated building structures, will not be improved, or further developed. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance. This related project would be required to prepare and implement an odor control plan.

- *Best Western Plus Hotel and Restaurant Project CUP 20-1 and LDP 20-1*. The proposed project would involve the development of a 4.54-acre land parcel including the construction of a new four-story 50,231 square-foot hotel and adjacent 5,293 square-foot restaurant. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance.

- *Koala Road Greenhouse and Commercial Center*. The proposed project would involve the development of an 18.24-acre (794,534 square-foot) parcel. The proposed development would involve the construction of two structures including a 3,400 square-foot (volatile and nonvolatile) manufacturing building, and a 42,856 square-foot greenhouse facility. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the

MDAQMD daily thresholds of significance. This related project would be required to prepare and implement an odor control plan.

- *HD Biotech Cannabis Warehouse*. The proposed project would involve the development of a portion of a larger 4.69-acre (204,754 square-foot) parcel within the southern portion of the City. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The new building will be used for cannabis cultivation and distribution. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance. This related project would be required to prepare and implement an odor control plan.

- *Adelanto South Ecosave Venture Development, TPM 20272 & LDP 20-05*. The proposed project site would consist of 17.48 acres or 761,803 square feet. The first building site would consist of 382,663 square feet (8.78 acres) and would include Building A with 162,298 square feet of floor area and Building B would include 155,484 square feet of floor area. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance.

- *Green Wolf Organic Farms Cannabis Facility; CUP 20-6 and LDP 20-10*. The proposed project would involve the development of a 9.30-acre (198,149 square-foot) parcel within the northeast portion of the City of Adelanto. The proposed project involves construction consisting of eighty (80) cannabis greenhouses with a total floor area of 165,100 square feet. The CEQA analysis (an MND) indicated this project's construction and operational emissions would be below the MDAQMD daily thresholds of significance. The proposed development will be used as a cannabis cultivation facility and would be required to prepare and implement an odor control plan.

- *Tiger Organic Farms Cannabis Facility; CUP 20-07 and LDP 20-11*. The proposed project would involve the development of a 14.74-acre (348,864 square-foot) parcel within the southwest area of the City of Adelanto. Proposal to establish Adult Use Cannabis Cultivation uses and construct cultivation buildings, totaling 189,000 SF, in (3) phases on 14.74 -acres located in the Manufacture Industrial (MI) in the City of Adelanto, California. This related project would be required to prepare and implement an odor control plan.

- *SCCC Group Services, Inc. CUP 19-11 and LDP 19-07*. The proposed project would involve the improvement and use of the 18,917 square foot (0.43-acre) site for the cultivation, manufacturing (non-volatile), distribution, and transportation of medicinal cannabis. The proposed improvements would include the construction of two smaller buildings, referred to as Building A and Building B. Building A would be a two-story development that consists of 10,000 square feet of floor area and Building B, a one-story development, would consist of 2,430 square feet of floor area. This related project would be required to prepare and implement an odor control plan.

All except for one of the fifteen related projects are not located within one mile of the proposed project site. In addition, all of the cannabis-related uses were subject CEQA review. As a result, no significant cumulative sir quality impacts are anticipated.

MITIGATION MEASURES

The analysis of air quality impacts indicated that the projected emissions would be below the SCAQMD's thresholds of significance. However, the following mitigation would be required to address potential odor impacts:

Mitigation Measure No. 1 (Air Quality Impacts). The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.

Mitigation Measure No. 2 (Air Quality Impacts). Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project 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?			✖	
B. Would the project 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?				✖
C. Would the project 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?				✖
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✖
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✖		
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project 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? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[27]

General biological surveys were conducted during which biologists from RCA Associates, Inc. initially walked meandering transects throughout the site to collect data on the plant and wildlife communities. Following the completion of the initial reconnaissance survey, comprehensive surveys were performed throughout the site to document the vegetation present on the property and the wildlife species which inhabit the area. In addition to the general biological investigations, the property was evaluated for the presence of the desert tortoise and

[27] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

burrowing owl. A habitat assessment was also performed for the Mohave ground squirrel.[28] The majority of the site supports a creosote bush (*Larrea tridentata)* community. The dominant plant species include creosote bush, fiddleneck (*Amsinckia tessellata),* tirnbleweed (*Kali tragus subsp tragus),* kelch grass *(Schisms* forlorn), and Joshua tree *(Yucca brevifolia).* A majority of the site supports a relatively dense stand of vegetation with creosote bush *(Larrea tridentata),* fiddleneck (*Amsinckia tessellataj,* white bursage (*Ambrosia dumosa),* California buckwheat (*Eriogonum fasciculatum),* kelch grass *(Schismus barbatus),* and about thirty Joshua trees *Yucca brevifolia)* the dominant species. The site is expected to support a variety of wildlife species on the site; however, only a few species were observed during the field investigations. Antelope ground squirrels *(Ammospermophilus leucurus)* were the only mammal observed during the August 17. 2020 surveys, and other mammals which are expected to inhabit the site and/or occasionally utilize the site include desert cottontails (*Sylvilagus auduboni),* California ground squirrel (*Otospermophilus beecheyi),* and coyote (*Canis latrans).* Birds observed included ravens *(Corvus corax),* mourning dove *(Zenaida macroura),* house finch (*Haemorhous mexicanus),* and cactus wrens *(Campylorhynchus brunneicapillus).* Reptiles that likely inhabit the site, and species known to be common in the area, include desert spiny lizard *(Sceloporus magister),* side-blotched lizard *(Uta stansburiana),* western whiptail lizard *(Cnemidophorus tigris),* and Mohave rattlesnake (*Crotolus cerastes).*[29]

As part of the environmental process, a search of the California Natural Diversity Database (CNDDB, 2020) was performed. Based on this review, it was determined that five special status species have been documented within approximately five (5) miles of the property. The following table provide data on each special status species which has been documented in the area. The following Federal and State Listed Species were identified as part of this research:[30]

- *Mohave Ground Squirrel.* Mohave ground squirrel populations have been documented in the area and the nearest observation was recorded in 2011 about three miles northwest of the property. No Mohave ground squirrels were observed during field investigations; however, it should be noted the species is normally very inactive during the summer months and unlikely to be observed above ground.[31]

- *Desert Tortoise.* Desert Tortoise have been documented in the area and the nearest observation was recorded in 2007 about four miles southeast of the property. Although the site does support vegetation associated with the species, the site is not expected to support a population of the species given the absence of any tortoise sign (e.g., scats, burrows, tracks, etc.) as documented during the field investigations conducted by RCA Associates, Inc. on May 12, 2021.

- *Swainson's Hawk.* Swainson's hawks have been observed in the area with the nearest occurrence approximately 2- miles east of the site. The species is occasionally observed in the area hunting for its primary prey (e.g., small mammals), and may infrequently utilize the site for hunting.

[28] RCA Associates, Inc. General Biological Resources Assessment APN: 3210-611-02, Adelanto, San Bernardino County, California. (Township 6 North, Range 6 West, Section 36). May 12, 2021.

[29] Ibid.

[31] Ibid.

No Federal or State-listed species were observed on the site during the field investigations including the Mohave ground squirrel, desert tortoise, or Swainson's hawk. In addition, there are no documented observations of these species either on the site or in the immediate adjacent areas. The site is not expected to support populations of the desert tortoise based on the absence of any tortoise sign (e.g., burrows, scats, tracks, etc.) as noted during the field investigations. As noted above, Swainson's hawks may infrequently occur over the site during hunting forays; although, the species is not expected to use the site for nesting activities given the absence of suitable nesting trees. No burrowing owls or owl sign were observed on the project site; however, a 30-day pre-construction survey will be required prior to the start of any future ground disturbance activities to ensure no owls have moved onto the site since the latest surveys.

The only protected plant which were observed on the site was a single dead Joshua tree. No riparian vegetation or habitat (e.g., cottonwoods, willows, etc.) exist on the site or in the adjacent habitats and no potential jurisdictional areas were observed. Future development activities are not expected to have an impact on any special status species based on the results of the onsite surveys; furthermore, loss of about 15-acres of creosote bush habitat is not expected to be a significant cumulative impact given the presence of this community throughout the Mojave Desert. In addition, loss of this habitat is not expected to have a significant impact on wildlife which may inhabit the site or on those species which may infrequently traverse the site. As a result, the impact will be less than significant.

B. *Would the project 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? ● No Impact.*

No sensitive riparian habitats such as wetlands, vernal pools, and/or listed critical habitats for special status species were observed on the site or in the immediate area.[32] As a result, no impacts are anticipated.

C. *Would the project 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? ● No Impact.*

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.[19] The site's utility as a wetland or riparian habitat is constrained by the presence of adjacent roadways and existing developments in the surrounding areas. As a result, no impacts are anticipated.

D. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? ● No Impact.*

According to the United States Fish and Wildlife Service and the results of the site visits, there are no migratory fish corridors or wildlife nursery sites located within the project site or in the surrounding areas. The site's utility as a migratory fish corridor is constrained by the presence of adjacent roadways and existing developments in the surrounding areas. No off-site migratory fish corridors or wildlife nurseries will be affected by the proposed development since all new development will be confined to the project site.

[32] RCA Associates, Inc. General Biological Resources Assessment APN: 3210-611-02, Adelanto, San Bernardino County, California. (Township 6 North, Range 6 West, Section 36). August 18, 2020.

[19] Ibid.

As a result, no impacts are anticipated.

E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ● Less than Significant Impact with Mitigation.*

Joshua Trees are protected under Chapter 17.57 – Biotic Resources of the City of Adelanto's Municipal Code. In addition, the City of Adelanto enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the City to assure the Joshua tree is not a "specimen" class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006).

A biological field survey was conducted by RCA Associates, Inc. Based on the results of the field investigations there was a single Joshua tree located within the boundaries of the property. Based on the evaluation and analysis of this single tree, it was determined that the tree was dead. Nevertheless, the following mitigation measure will be required:

- An incidental take permit (ITP) will be required unless the Applicant is able to establish a 12-foot buffer around the tree or if the tree will not be disturbed during grading and or site development activities.

The impacts will be less than significant with adherence to the aforementioned requirements.

F. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ● No Impact.*

The proposed project's implementation would not be in conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans. As a result, no impacts are anticipated.

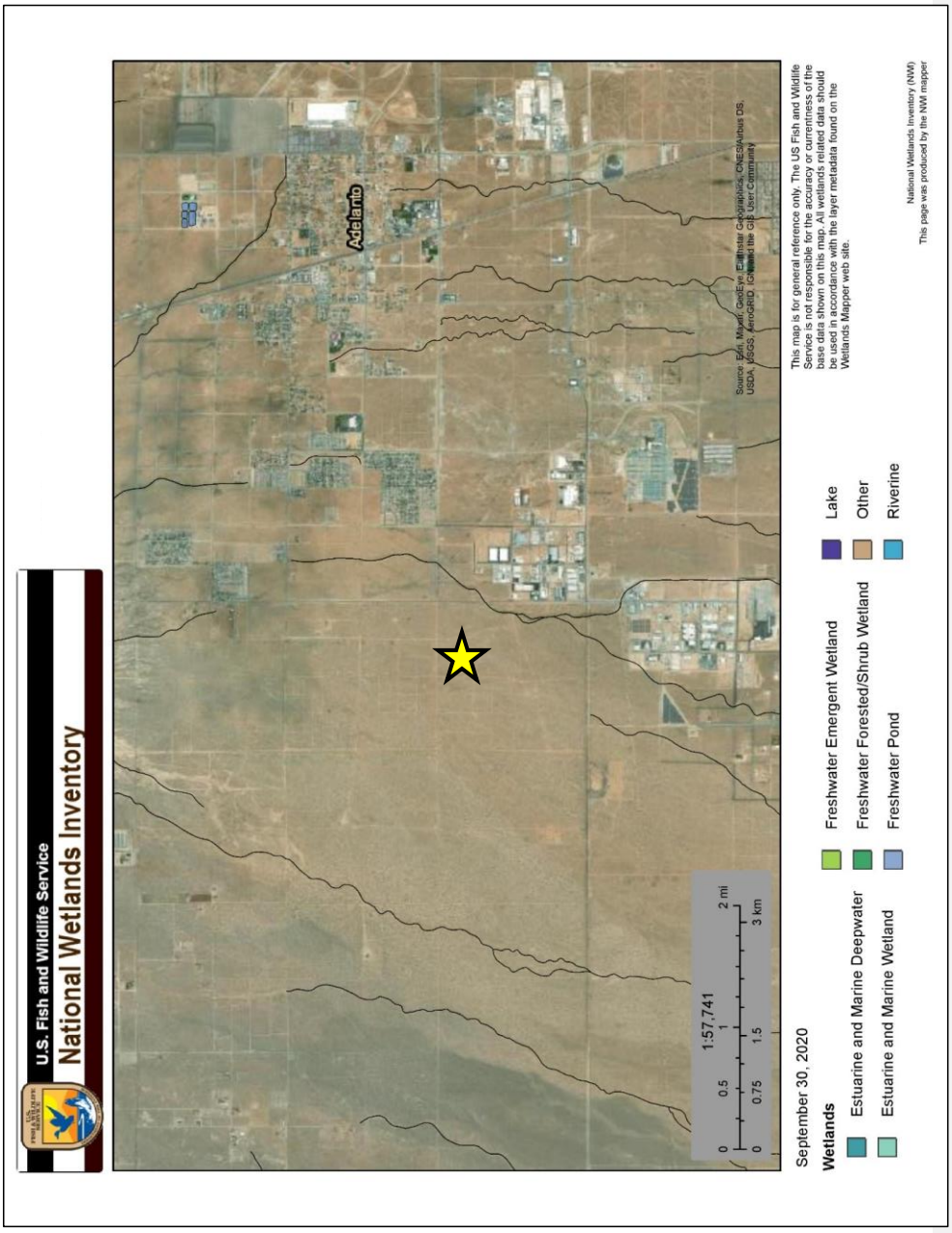

EXHIBIT 3-3
WETLAND MAP
SOURCE: U.S. FISH AND WILDLIFE SERVICE

CUMULATIVE IMPACTS

The site's future development will lead to an incremental and permanent loss of habitat. As indicated in the analysis, the site's development activities are not expected to have an impact on any special status species based on the results of the on-site surveys. Furthermore, loss of approximately 20-acres of creosote bush habitat is not expected to be a significant cumulative impact given the presence of this community throughout the Mojave Desert. In addition, loss of this habitat is not expected to have a significant impact on wildlife which may inhabit the site or on those species which may infrequently traverse the site. As a result, no cumulative impacts on biological resources are anticipated.

MITIGATION MEASURES

A biological field survey was conducted by RCA Associates, Inc. Based on the results of the field investigations there was a single Joshua tree located within the boundaries of the property. Based on the evaluation and analysis of this single tree, it was determined that the tree was dead. Nevertheless, the following mitigation measure will be required:

> *Mitigation Measure No. 3 (Biological Resources Impacts).* An incidental take permit (ITP) will be required unless the Applicant is able to establish a 12-foot buffer around the tree or if the tree will not be disturbed during grading and or site development activities.

3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				✖
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?			✖	
C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines? ● No Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[33]

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;

- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,

- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

[33] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.[34]

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no historic resources were listed within the City of Adelanto.[35]

The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[36] The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic

[34] U. S. Department of the Interior, National Park Service. National Register of Historic Places. http://nrhp.focus.nps.gov. 2010.

[35] U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. http://focus.nps.gov/nrhp. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed December 6, 2019.

[36] California Department of Parks and Recreation. *California Historical Resources*. Website http:// ohp.parks.ca.gov/ ListedResources. Website accessed on December 20, 2019.

resources identified by the State Office of Historic Preservation (SHPO).[22] Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[37]

An archaeological field survey was conducted by examining the area within the project boundaries and the entire area of the project site was surveyed and reviewed. The NAHC conducted a Sacred Lands File Search and returned negative results for Sacred Lands near the proposed project area. All potentially interested tribes identified by the NAHC were also contacted for information regarding their knowledge of cultural resources that were within or near the project area. These groups include Brandy Kendricks (Kern Valley Indian Community), Kern Valley Indian Community (Chairperson and Secretary), Morongo Band of Mission Indians (Chairperson and Cultural Resources Manager), Quechan Tribe of the Fort Yuma Reservation (Acting Chairman and Historic Preservation Officer), Serrano Nation of Mission Indians (Co-Chairpersons), Tubatulabals of Kern Valley (Chairperson), and the 29 Palms Band of Mission Indians (Tribal Heritage Preservation Officer and Chairperson).[38]

The South-Central Coastal Information Center (SCCIC) at California State University, Fullerton conducted a records search of previously documented cultural resources sites and cultural resources reports archived for the Project area and within a one-mile radius (buffer) surrounding the subject property. The search included a review of all historic and prehistoric archaeological resources and any built-environment resources as well. Additionally, this review includes an archival search of the existing cultural resources reports on file with the Information Center. The California Points of Historical Interest (CPHI), California Historical Landmarks (CHL), California Register of Historical Resources (CALREG), National Register of Historic Places (NRHP), and California State Historic Properties Directory (CHPD) were all reviewed for the project site.

Field survey investigations were conducted which resulted in negative findings with no historic or prehistoric cultural resources within the project area. If previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find. Project construction activities shall be diverted from the location of the discovery until the finding's significance is established. If human remains are encountered during the undertaking, State Health and Safety Code Section 70.50.2 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her representative, the MLD may inspect the site of discovery. The MLD shall complete the inspection within

[37] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.
[38] Ibid.

48 hours of notification by the NAHC. The MLD shall make recommendations as the manner in which to treat the human remains and any associated offerings. Therefore, no significant impacts related to archaeological or historical resources is anticipated, and no further investigations are recommended for the proposed project. As a result, the impacts will be less than significant.

C. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries? ● Less than Significant Impact.*

There are no dedicated cemeteries located in the vicinity of the project site.[39] The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

> "A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures."

Additionally, Section 5097.98 of the Public Resources Code states:

> "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

Adherence to the aforementioned standard condition will ensure potential impacts remain at levels that are less than significant.

CUMULATIVE IMPACTS

The analysis determined that the site's future development will not result in any impacts on cultural resources. Such impacts are typically site specific. The cultural resources survey and the analysis indicated that in the event previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find. The analysis further stated that project-related construction activities shall be diverted from the location of the discovery

until the finding's significance is established. As a result, no cumulative impacts on cultural resources are anticipated.

MITIGATION MEASURES

The analysis of potential cultural resources impacts as well as the surveys yielded negative results for cultural resources. As a result, no mitigation is required. In the event of discovery or recognition of any human remains during grading and/or excavation activities, excavation or disturbance shall cease until the County Coroner has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death and the requisite treatment and disposition of the human remains.

3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✖	
B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[40]

The growing (cultivation) of cannabis is an agricultural production process where the environmental conditions, temperature, and humidity are tightly controlled to optimize the quality of the cannabis plants and to reduce crop loss. The quality and amount of light provided is the primary variable affecting crop yield and quality once air temperature and humidity needs are met. Dehumidification is generally achieved mechanically by sub-cooling the air to remove water and then reheating the air to the desired supply air temperature through traditional dehumidification units or by absorbing moisture in the air through a desiccant dehumidifier. The indoor air conditioning will also involve electrical consumption.

For indoor grow operations (as opposed to greenhouse operations), LED lighting fixtures are being successfully applied to vegetative rooms, saving up to 50% of the lighting energy compared to the standard practice. For flower rooms, double ended, high-pressure sodium (HPS) fixtures save 20-25% compared to the standard HPS fixtures. While less common, some growers are successfully applying LED fixtures or LED/HPS hybrid designs for up to 30-40% energy savings in flower rooms. For cooling and dehumidification, smaller grow operations are saving energy by using split ductless air conditioning units in place of standard rooftop units. Medium and large-sized grow operations are using chilled water systems to accomplish both cooling and dehumidification, with energy savings of up to 40% compared to the standard practice. By implementing all these best practices, a medium-size or larger indoor grow operation can achieve up to 30-35% energy savings compared to a standard indoor grow.[23] The total energy costs for

[40] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

[23] Trends and Observations of Energy Use in the Cannabis Industry," Jesse Remillard and Nick Collins, ERS, ACEEE Summer Study of Energy Efficiency in Industry, 2017.

indoor cannabis grow operations typically varies between 20-50% of total operating costs. By comparison, for a typical medium-size or larger brewery, energy use accounts for about 6-12% of total operating costs. The proposed project's electric power service would be provided by the Southern California Edison Company (SCE) which operates and maintains two transmission substations within the City of Adelanto and its sphere-of-influence.

Indoor cannabis cultivation facilities consume up to ~150 kilowatt-hours of electricity per year per square foot, which is about 10 times as much as a typical office building in the Southwest. The project Applicant will be required to closely work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. As a result, the impact will be less than significant.

B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ● Less Than Significant Impact.*

The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned commercial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. As a result, the potential impacts will be less than significant.

CUMULATIVE IMPACTS

For purposes of the cumulative energy analysis, the following related projects were considered in the analysis:

- *CUP 19-06 & LDP 19-05 Cannabis Warehouse.* This project was an application to construct a new a 7,051 square foot building located at the southeast corner of Rancho Road and Adelanto Road for the purpose of a warehouse for the cultivation, manufacturing, and distribution of cannabis. This related project's daily energy consumption is estimated to be 93 kWh of electricity and 91 cubic feet of natural gas per day.

- *Ikanik Farms MLDP 19-12 & MLDP 19-14.* The proposed project would involve a 6,100 square-foot building addition to the southwestern portion of the existing building and the construction of a 12,100 square-foot building addition. This related project's daily energy consumption is estimated to be 239 kWh of electricity and 234 cubic feet of natural gas per day.

- *MLDP 19-17 CRA Investments LLC. Project.* The proposed project would involve the sale and short-term storage of used, undamaged or damaged, operable or inoperable vehicles, trailers, watercraft, power sports equipment, industrial and construction machinery, and other equipment. This related project's daily energy consumption would be limited to security lighting.

- *Columbus Street Cannabis Warehouse. Project (CUP 19-13 & LDP 19-09).* The proposed project involves the construction of a 25,000 square-foot warehouse building on each of the two parcels. The total floor area for the two new buildings will be 50,000 square feet. This related project's daily energy consumption is estimated to be 658 kWh of electricity and 644 cubic feet of natural gas per day.

- *Land Development Plan (LDP) 19-15; Copart 61-Acre Project*. The project will also include an office/sales building (approximately 12,800 square feet), a customer and employee parking lot, a loading and unloading area, and a secured, short-term storage lot for the vehicles, equipment and machinery. This related project's daily energy consumption is estimated to be 168 kWh of electricity and 165 cubic feet of natural gas per day.

- *CUP 16-01 (Genex Trading, Inc.).* The applicant, Pontious Architecture, has already constructed a new building consisting of 12,020 square feet within a 0.78-acre site. The project involved the approval of the application for this proposed use. This related project's daily energy consumption is estimated to be 158 kWh of electricity and 155 cubic feet of natural gas per day.

- *Daewon Foods (TPM 20097 & LDP 19-12).* The Applicant is proposing to subdivide a 20-acre parcel into seven separate parcels and to construct two 30,000 square-foot industrial buildings on a newly created 190,431 square-foot parcel. This related project's daily energy consumption is estimated to be 789 kWh of electricity and 773 cubic feet of natural gas per day.

- *Topekoms Manufacturing Project*. The proposed project would involve the development of a 0.89-acre portion of a larger 9.11-acre land parcel including the construction of a new one-story 5,586 square-foot cannabis extraction laboratory. This related project's daily energy consumption is estimated to be 73 kWh of electricity and 72 cubic feet of natural gas per day.

- *Best Western Plus Hotel and Restaurant Project CUP 20-1 and LDP 20-1*. The proposed project would involve the development of a 4.54-acre land parcel including the construction of a new four-story 50,231 square-foot hotel and adjacent 5,293 square-foot restaurant. This related project's daily energy consumption is estimated to be 730 kWh of electricity and 715 cubic feet of natural gas per day.

- *Koala Road Greenhouse and Commercial Center*. The proposed development would involve the construction of two structures including a 3,400 square-foot (volatile and nonvolatile) manufacturing building, and a 42,856 square-foot greenhouse facility. This related project's daily energy consumption is estimated to be 608 kWh of electricity and 596 cubic feet of natural gas per day.

- *HD Biotech Cannabis Warehouse.* The proposed project involves the construction of a new addition to an existing cannabis facility. The new building will consist of 26,775 square feet of floor area and would be used for cannabis cultivation and distribution. This related project's daily energy consumption is estimated to be 352 kWh of electricity and 345 cubic feet of natural gas per day.

- *Adelanto South Ecosave Venture Development, TPM 20272 & LDP 20-05.* The first building would include 162,298 square feet of floor area and the second building would include 155,484 square

feet. This related project's daily energy consumption is estimated to be 4,179 kWh of electricity and 4,092 cubic feet of natural gas per day.

- *Green Wolf Organic Farms; CUP 20-6 and LDP 20-10*. The proposed project would involve the development of a 9.30-acre (198,149 square-foot) parcel within the northeast portion of the City of Adelanto. The proposed project involves construction consisting of eighty (80) cannabis greenhouses with a total floor area of 165,100 square feet. This related project's daily energy consumption is estimated to be 2,171 kWh of electricity and 2,126 cubic feet of natural gas per day.

- *Tiger Organic Farms Cannabis Facility; CUP 20-07 and LDP 20-11*. The proposed project would involve the development of a 14.74-acre (348,864 square-foot) parcel within the southwest area of the City of Adelanto. Proposal to establish Adult Use Cannabis Cultivation uses and construct cultivation buildings, totaling 189,000 square feet, in (3) phases on 14.74 -acres located in the Manufacture Industrial (MI) in the City of Adelanto, California. This related project's daily energy consumption is estimated to be 2,485 kWh of electricity and 2,434 cubic feet of natural gas per day.

- *SCCC Group Services, Inc. CUP 19-11 and LDP 19-07*. The proposed project would involve the improvement and use of the 18,917 square foot (0.43-acre) site for the cultivation, manufacturing (non-volatile), distribution, and transportation of medicinal cannabis. The proposed improvements would include the construction of two smaller buildings, referred to as Building A and Building B. Building A would be a two-story development that consists of 10,000 square feet of floor area and Building B, a one-story development, would consist of 2,430 square feet of floor area. This related project's daily energy consumption is estimated to be 163 kWh of electricity and 160 cubic feet of natural gas per day.

The fifteen related projects will consume an estimated 12,866 kWh of electricity and 12,602 cubic feet of natural gas on a daily basis. For purposes of comparison, the proposed project will consume 4,833 kWh of electricity and 4,732 cubic feet of natural gas. Electrical service in the City of Adelanto is supplied by the Southern California Edison Company (SCE) while natural gas service is provided by the Southwest Gas Company. The City is home to a number of initiatives that are designed to promote clean solar power generation. The Adelanto Solar Power Project is expected to produce an average of 20,000 megawatt hours annually and is an important element of the Los Angeles Department of Water and Power's (LADWP's) power supply transformation from fossil fuels to more renewable energy sources. The Adelanto Solar Power Project is being built on a 42-acre site at LADWP's Adelanto Switching Station. Clean Focus now owns and operates a 3.75-megawatt solar project (solar generation facility) that sells electricity to the SCE under the California Renewable Energy Small Tariff program. A number of other solar projects, such as the 1,197-acre Baldy Mesa Solar Power Project, are in the planning stages.

MITIGATION MEASURES

The analysis determined that the proposed project will not result in significant impacts related to energy and mitigation measures are not required.

Commented [MB1]: Ask--- add both square feet x 150 kWh

Commented [MB2]: 29,722,350

Commented [MB3]: 52,329,600 161047

Commented [MB4]: 2,837,550

Commented [MB5]: Number needs to be divided. Multiplied 30,625 x 150 = 4,593,750

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?			✖	
B. Would the project result in substantial soil erosion or the loss of topsoil?			✖	
C. Would the project 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?			✖	
D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property?			✖	
E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✖
F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[41]

The City of Adelanto is located in a seismically active region. The closest fault to the project site is the Mirage Valley Fault Zone, which is located approximately 9.5 miles northwest of the City.[42] Surface ruptures are

[41] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

[42] California Department of Conservation. *Fault Activity Map of California. https://maps.conservation.ca.gov/cgs/fam/*

visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is located in a special liquefaction zone (AE).[43] The risk for liquefaction is ~~no~~ greater on-site than it is for the region. Projects within this zone requires flood proof construction and flood insurance if the property owner has a mortgage. As a result, the potential impacts in regard to liquefaction and landslides are less than significant.

B. *Would the project result in substantial soil erosion or the loss of topsoil? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by the Bryman soil association, which consists of very deep and well drained sandy soil. Slopes range from 0 to 2 percent.[44] The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program.

Commented [MB6]: 80% Bryman profile according to the soil database as opposed to Cajon at 5% underlain.

Prior to initiating construction, contractors must obtain coverage under a NPDES permit, which is administered by the State. In order to obtain an NPDES permit, the project Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP). The County has identified sample construction Best Management Practices (BMPs) that may be included in the mandatory SWPPP. The use of these construction BMPs identified in the mandatory SWPPP will prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. As a result, the impacts will be less than significant.

C. *Would the project 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? ● Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.[28]

[43] San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

[44] UC Davis. *SoilWeb*. Website accessed October 1, 2020.

[28] United States Department of Agriculture, Soil Conservation Service. *Soil Survey of Riverside California – Palm Spring Area.* Report dated 1978.

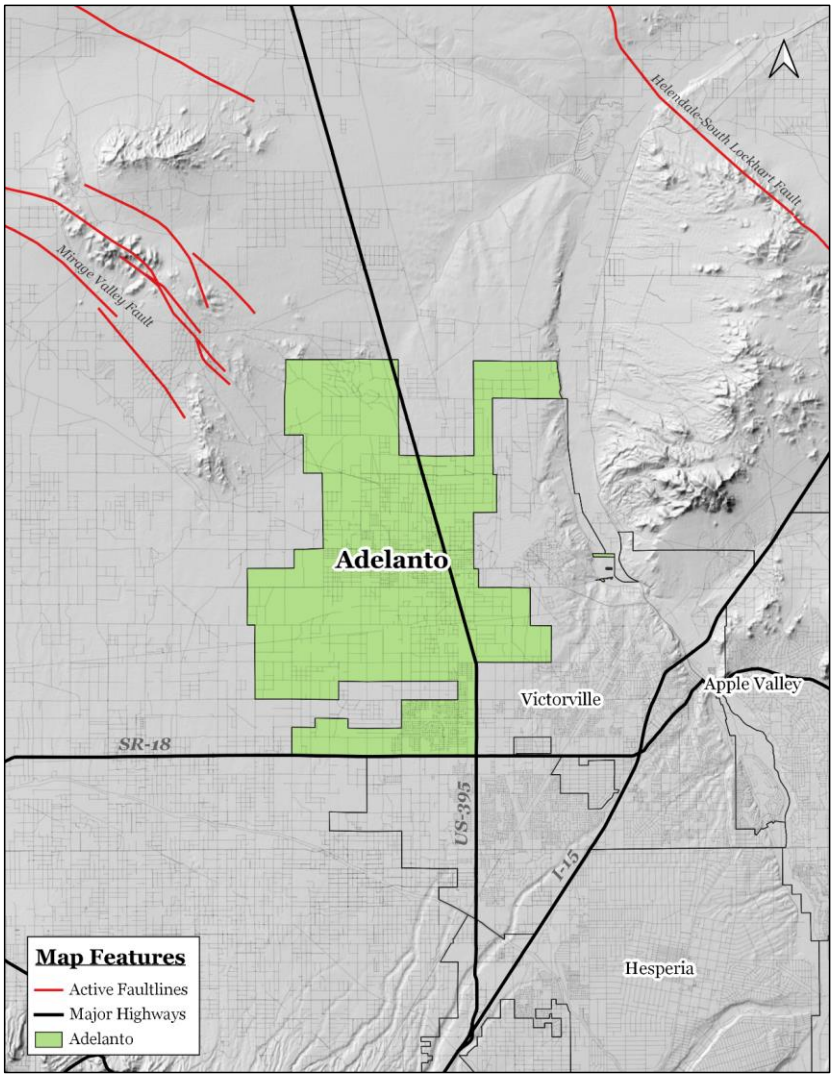

EXHIBIT 3-4
GEOLOGY MAP
SOURCE: U.S. GEOLOGICAL SURVEY

The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. As a result, the potential impacts will be less than significant.

Commented [MB7]: Correct. According to the soil database, moderate medium and thick platy structure; slightly hard, very friable, nonsticky and nonplastic.

D. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by the Bryman soil association, which consists of very deep and well drained sandy soil, with slopes ranging from 0 to 2 percent.[45] According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.[30] The applicant is required to adhere to all requirements detailed by the USDA, resulting in potential impacts which will be less than significant.

E. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? ● No Impact.*

The proposed project will connect to the City's sanitary sewer system on Auburn Avenue, north of the project site. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

Commented [MB8]: Correct will connect with water/ sewer on Auburn (north of project site) or Jonathan street (East of project site).

F. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ● No Impact*

The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The closest fossil vertebrate locality is LACM 7786, between Adelanto and the former George Air Force Base (now the Southern California Logistics Airport). This locality produced a fossil specimen of meadow vole, *Microtus*. The next closest vertebrate fossil locality from these deposits is LACM 1224, west of Spring Valley Lake, which produced a specimen of fossil camel, *Camelops*. Additionally, on the western side of the Mojave River below the bluffs, an otherwise unrecorded specimen of mammoth was collected in 1961 from older Quaternary Alluvium deposits. Since no significant new excavation or grading will occur, no impacts are anticipated.

[45] UC Davis. *SoilWeb*. Website accessed October 1, 2020.

[30] United States Department of Agriculture. Natural Resources Conservation Service. Website accessed July 2, 2020. https://www.nrcs.usda.gov/wps/PA_NRCSConsumption/download?cid=nrcseprd1295676&ext=pdf#:~:text=Small%20commercial%20buildings%20are%20structures,frost%20penetration%2C%20whichever%20is%20deeper.

CUMULATIVE IMPACTS

The potential cumulative impacts with respect to geology and soils are typically site specific. In addition, the analysis completed for the proposed project determined the analysis determined that the site's development would not lead to any significant adverse cumulative environmental impacts on geology and soils. All except for one of the related projects are located within one mile of the proposed project site. As a result, no cumulative impacts are anticipated.

MITIGATION MEASURES

The analysis determined that the proposed project will not result in significant impacts related to paleontological resources and no mitigation measures are required.

3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✖	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[46]

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Carbon dioxide equivalent, or CO_2E, is a term that is used for describing different greenhouses gases in a common and collective unit. The MDAQMD established the 100,000 $MTCO_2$ threshold for industrial land uses. As indicated in Table 3-4, the operational CO_2E is408.79 pounds per day which is well below the threshold.

Table 3-4
Greenhouse Gas Emissions Inventory

Source	GHG Emissions (lb./day)			
	CO_2	CH_4	N_2O	CO_2E
Long-Term – Area Emissions	0.08	--	--	0.09
Long-Term - Energy Emissions	406.29	--	--	408.7
Long-Term - Mobile Emissions	0.00	0.00	0.00	0.00
Long-Term - Total Emissions	406.37	--	--	408.79
Total Construction Emissions	5,366.18	1.19	0.22	5,448.46
Significance Threshold				**100,000 $MTCO_2E$**

[46] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

Furthermore, as mentioned in Section 3.17, Transportation, the projected vehicle trips to and from the site will not be significant given the proposed use as a cannabis cultivation facility. As a result, the potential impacts are considered to be less than significant.

B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? ● Less than Significant Impact.*

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was completed and finalized in March of 2014. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. It is important to note that the California Department of Transportation as well as the Counties of Los Angeles and San Bernardino are engaged in an effort to construct a multi-modal transportation corridor consisting of public transit, a new freeway, and bicycle lanes known as the High Desert Corridor (HDC). The aforementioned regional program will reduce potential GHG emissions related to excessive VMTs to levels that are less than significant.

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15g calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.[47] The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.

Commented [B09]: Cant find this statistic anywhere.

CUMULATIVE IMPACTS

For purposes of the cumulative air quality analysis, the following related projects were considered in the cumulative air quality analysis:

- *CUP 19-06 & LDP 19-05 Cannabis Warehouse.* This project was an application to construct a new a 7,051 square foot building located at the southeast corner of Rancho Road and Adelanto Road for the purpose of a warehouse for the cultivation, manufacturing, and distribution of cannabis. The CEQA analysis (a categorical exemption) indicated this project's construction and operational GHG emissions would be well below the MDAQMD daily thresholds of significance.

- *Ikanik Farms MLDP 19-12 & MLDP 19-14.* The new construction will include a 6,100 square-foot building addition to the southwestern portion of the existing 27,000 square-foot building and the construction of a 12,100 square-foot building addition to the eastern portion of the existing 27,000 square-foot building. The CEQA analysis (a categorical exemption) indicated this project's

[47] Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.* http://gov.ca.gov/news. May 2, 2020.

construction and operational GHG emissions would be well below the MDAQMD daily thresholds of significance.

- *MLDP 19-17 CRA Investments LLC. Project*. The proposed project would involve the sale and short-term storage of used, undamaged or damaged, operable or inoperable vehicles, trailers, watercraft, power sports equipment, industrial and construction machinery, and other equipment. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be well below the MDAQMD daily thresholds of significance.

- *Columbus Street Cannabis Warehouse. Project (CUP 19-13 & LDP 19-09)*. This related project would involve the development of two separate parcels (the APNs include 3128-051-11 and 3128-051-12) with a total land area of 189,922 square feet or 4.36 acres. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Land Development Plan (LDP) 19-15; Copart 61-Acre Project*. This related project involves the development of a 61-acre parcel located in the southern portion of the City for the purpose of the short-term storage and sale of operable and inoperable used vehicles, various types of equipment and machinery. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *CUP 16-01 (Genex Trading, Inc.)*. The applicant, Pontious Architecture, has already constructed a new building consisting of 12,020 square feet within a 0.78-acre site. The CEQA analysis (a CE) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Daewon Foods (TPM 20097 & LDP 19-12)*. The proposed project involved an application to subdivide, and to develop a portion of, a 20-acre site. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Topekoms Manufacturing Project*. The proposed development will require a Conditional Use Permit (CUP 19-17) to allow for the Adult Use Distribution and Volatile Manufacturing cannabis use and a Land Development Plan (LDP 19-13) for the physical development. he CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Best Western Plus Hotel and Restaurant Project CUP 20-1 and LDP 20-1*. The proposed project would involve the development of a 4.54-acre land parcel including the construction of a new four-story 50,231 square-foot hotel and adjacent 5,293 square-foot restaurant. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Koala Road Greenhouse and Commercial Center*. The proposed development would involve the construction of two structures including a 3,400 square-foot (volatile and nonvolatile) manufacturing building, and a 42,856 square-foot greenhouse facility. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *HD Biotech Cannabis Warehouse*. The proposed project would involve the development of a portion of a larger 4.69-acre (204,754 square-foot) parcel within the southern portion of the City. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Adelanto South Ecosave Venture Development, TPM 20272 & LDP 20-05*. The first building site would consist of 382,663 square feet (8.78 acres) and would include Building A with 162,298 square feet of floor area and Building B would include 155,484 square feet of floor area. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Green Wolf Organic Farms; CUP 20-6 and LDP 20-10*. The proposed project would involve the development of a 9.30-acre (198,149 square-foot) parcel within the northeast portion of the City of Adelanto. The proposed project involves construction consisting of eighty (80) cannabis greenhouses with a total floor area of 165,100 square feet. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *Tiger Organic Farms Cannabis Facility; CUP 20-07 and LDP 20-11*. The proposed project would involve the development of a 14.74-acre (348,864 square-foot) parcel within the southwest area of the City of Adelanto. Proposal to establish Adult Use Cannabis Cultivation uses and construct cultivation buildings, totaling 189,000 SF, in (3) phases on 14.74 -acres located in the Manufacture Industrial (MI) in the City of Adelanto, California. The CEQA analysis (an MND) indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

- *SCCC Group Services, Inc. CUP 19-11 and LDP 19-07*. The proposed project would involve the improvement and use of the 18,917 square foot (0.43-acre) site for the cultivation, manufacturing (non-volatile), distribution, and transportation of medicinal cannabis. The proposed improvements would include the construction of two smaller buildings, referred to as Building A and Building B. Building A would be a two-story development that consists of 10,000 square feet of floor area and Building B, a one-story development, would consist of 2,430 square feet of floor area. The CEQA analysis indicated this project's construction and operational GHG emissions would be below the MDAQMD daily thresholds of significance.

All but one of the fifteen related projects are located within one mile of the proposed project site. Furthermore, the combined daily GHG emissions for all twelve of the related projects will still be below the MDAQMD's established thresholds of 100,000 MTCO2 per day. As a result, the cumulative GHG impacts will be less than significant.

MITIGATION MEASURES

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✖	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✖	
C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✖
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✖
E. Would the project 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?				✖
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✖
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[48]

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent

[48] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

protocols. Once operational, the potentially hazardous materials that are often associated with the new development that involves the cultivation of cannabis are outlined below.

- *Mold.* Marijuana production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold. Previous studies of illegal indoor cultivation operations have reported elevated levels of airborne mold spores, especially during activities such as plant removal by law enforcement personnel. Physiological effects include allergic reactions, hypersensitivity, and anaphylaxis to marijuana.

- *Skin Sensitivity.* Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes. As with most sensitizers, initial exposure results in a normal response, but over time, repeated exposures can lead to progressively strong and abnormal responses.

- *Carbon dioxide (CO2).* CO2 is used in the marijuana industry to increase plant growth and to produce concentrates. In addition to the liquid gas form, solid carbon dioxide or dry ice can be used for extraction processes. Compressed gases can present a physical hazard and has additional safety regulations that must be adhered to.

- *Carbon monoxide (CO).* CO is a colorless, odorless, toxic gas which interferes with the oxygen-carrying capacity of blood. At elevated concentrations, CO can overcome persons without warning. Sources of carbon monoxide exposure include furnaces, hot water heaters, portable generators/generators in buildings; concrete cutting saws, compressors; forklifts, power trowels, floor buffers, space heaters, welding, and gasoline powered pumps.

- *Indoor Air Quality.* Workers may encounter ozone as a product of the chemical reaction of nitrogen oxides and volatile organic compounds (e.g., terpenes emitted from the marijuana plant) present inside a cultivation facility. Terpenes and nitric oxides are associated with eye, skin, and mucous irritation. Ozone generators may also be found in facilities for odor control. Ozone can cause decreased lung function and/or exacerbate pre-existing health effects, especially in workers with asthma or other respiratory complications.

- *Pesticides.* Cannabis cultivation facilities may have insecticides and fungicides used within the facility. Some pesticides, including pyrethrins and neem oil are non-persistent and have low volatility (neem oil is an organic pest repellent derived from the neem tree). However, these pesticides have been associated with dermal and respiratory toxicity for the workers who apply them. Depending on the pesticide, requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.

- *Nutrients and Corrosive Chemicals.* Cannabis Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the City and

the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As a result, less than significant impacts will occur.

B. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ● Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As indicated later in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Envirostor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project's construction phase is remote and the impacts will be less than significant.

C. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ● No Impact.*

There are no schools located within one-quarter of a mile from the project site. The nearest school is Westside Park Elementary School, which is located approximately 1.3 miles from the project site.[49] As a result, the proposed project will not create a hazard to any local school and no impacts are anticipated.

Commented [MWAN10]: or Westside Park Elementary School located approximately 1.3 miles away)

D. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ● No Impact.*

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.[32] Therefore, no impacts will occur.

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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ● No Impact.*

The nearest airport to the City is the Southern California Logistics Airport (SCLA) is located approximately

[49] Google Earth. Website accessed October 1, 2020.

[32] CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).* http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm.

4,800 feet west of the project site.[50] The project will not introduce a structure that will interfere with the approach and take off of airplanes utilizing any regional airports. The project site is located in an area (Zone 3) where manufacturing uses are normally acceptable as long as the population density is less than 150 persons per acre.[51] The proposed project's employment is anticipated to be 204 persons over the 15-acre site. As a result, no impacts related to this issue will occur.

F. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

At no time will any adjacent street be completely closed to traffic during the proposed project's construction. In addition, all construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

G. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? ● No Impact.*

The project site is not located within a "very high fire hazard severity zone."[33] As a result, no impacts will result.

CUMULATIVE IMPACTS

The analysis determined that the site's future development will not result in any impacts on hazards and hazardous materials. Such impacts are typical site specific. The analysis herein determined that the implementation of the proposed project would not result in any significant adverse impacts related to hazards and/or hazardous materials with the implementation of the required mitigation measures. As a result, no cumulative impacts related to hazards or hazardous materials will result from the proposed project's implementation.

MITIGATION MEASURES

The analysis of potential impacts related to hazards and hazardous materials indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

[50] Google Earth. Website accessed October 1, 2020.

[51] Southern California Logistics Airport, Global Access. *Comprehensive Land Use Plan*. September 2008.

[33] CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County*. http://frap.fire.ca.gov/webdata/maps/san_bernardino_sw/

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✖	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✖	
C. Would the project 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; 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, impede or redirect flood flows?			✖	
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				✖
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[52]

The project Applicant will be required to adhere to Chapter 17.93 - Erosion and Sediment Control, of the municipal code regulates erosion and sediment control. These regulations outlined in Section 17.93.050 – Soil Erosion and Sediment Control Plan. The project Applicant will also be required to conform to Section 17.93.060 – Runoff Control of the City's Municipal Code. In addition, stormwater discharges from construction activities that disturb one or more acres, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. As a result, the construction impacts will be less than significant.

[52] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

B. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ● Less than Significant Impact.*

No new direct construction related impacts to groundwater supplies, or groundwater recharge activities would occur as part of the proposed project's implementation. Water used to control fugitive dust will be transported to the site via truck. No direct ground water extraction will occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. As a result, the impacts are less than significant.

C. *Would the project 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; 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, impede or redirect flood flows? ● Less than Significant Impact.*

The proposed project's location will be restricted to the developed property and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site is presently undeveloped, though there are no stream channels or natural drainages that occupy the property. The site would be designed so the proposed hardscape surfaces (the building and paved areas) will percolate into the landscaped parkway areas and the percolation basins. As a result, the potential impacts will be less than significant.

D. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? ● No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Adelanto, the proposed project site is located in Zone AE.[34] Thus, properties located in a special flood hazard zone, Zone AE, are located within a 100-year flood plain. The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 65 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.[53] As a result, the potential impacts will be less than significant. As a result, no impacts are anticipated.

E. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ● No Impact.*

The proposed project is required to be in compliance with Chapter 17.93 the City of Adelanto Municipal Code. Chapter 17.93 of the City of Adelanto Municipal Code is responsible for implementing the NPDES and MS4 stormwater runoff requirements. In addition, the project's operation will not interfere with any

[34] Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2020.

[53] Google Earth. Website accessed October 1, 2020.

groundwater management or recharge plan because there are no active groundwater management recharge activities on-site or in the vicinity. As a result, no impacts are anticipated.

CUMULATIVE IMPACTS

The potential hydrological impacts of a project are typically site specific. For this project, the potential impacts would be less than significant. As a result, no cumulative impacts are anticipated.

MITIGATION MEASURES

As indicated previously, hydrological characteristics will not substantially change as a result of the proposed project. As a result, no mitigation is required.

3.11 LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				✖
B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide an established community? ● No Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[54] Other land uses, and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* Auburn Avenue extends along the project site's north side. The property located to the north of this roadway is undeveloped. These parcels are zoned as Airport Development District (ADD).[55]

- *West of the project site:* Montezuma Street extends along the project site's west side. Vacant, undeveloped properties are located further west on the east side of Montezuma Street. These parcels are zoned as Airport Development District (ADD).[56]

- *South of the project site:* Vintage Road extends along the site's south side. Vacant, undeveloped land is located further south on the south side of this roadway. These parcels are also zoned as Airport Development District (ADD).[57]

- *East of the project site:* Jonathan Street extends along the project site's east side. Vacant, undeveloped land is located west of the project site. This area is zoned as Airport Development District (ADD).[58]

[54] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

[55] Google Maps and City of Adelanto Zoning Map. Website accessed on September 29, 2020.

[56] Ibid.

[57] Ibid.

[58] Ibid.

This issue is specifically concerned with the expansion of an inconsistent land use into an established neighborhood. The proposed project will be confined within the project site's boundaries. The land use and zoning designations applicable to the site and the surrounding area are shown in in Exhibit 3-5.

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood and no impacts will occur.

B. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ● No Impact.*

The City of Adelanto permits and regulates Medicinal and Adult Use Cannabis activities in designated zones. Cannabis activity is permitted with a Conditional Use Permit (CUP) in the following zones: Light Manufacturing (LM), Light Manufacturing Cannabis Only (LMCO), Manufacturing Industrial (MI), and Airport Development District (ADD). The proposed project is conditionally permitted within the applicable zone (ADD). As a result, no impacts will occur.

CUMULATIVE IMPACTS

The potential cumulative impacts with respect to land use are site specific. All but one related project is located adjacent to the proposed project site nor within one mile. None of the related projects will require a zone change or general plan amendment. As a result, no cumulative land use impacts will result from the proposed project's implementation.

MITIGATION MEASURES

The analysis determined that no impacts on land use and planning would result upon the implementation of the proposed project. As a result, no mitigation measures are required.

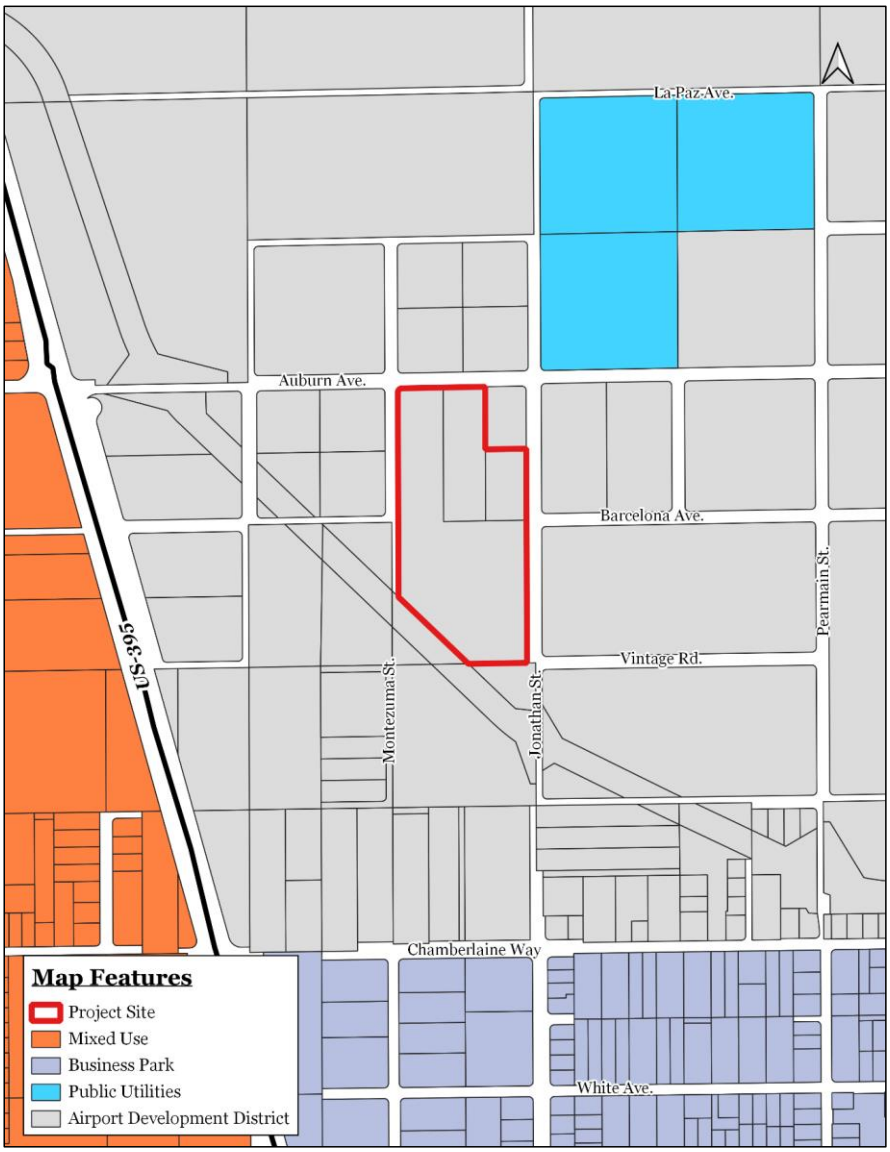

EXHIBIT 3-5
LAND USE AND ZONING MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✖
B. Would the project 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?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ● No Impact.*

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[36] The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.

- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.

- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and

[36] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*. *https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14*.

Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[59] The project site is located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.[60] As indicated previously, the site develop and there are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur.

B. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ● No Impact.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

CUMULATIVE IMPACTS

The potential impacts on mineral resources are site-specific. Furthermore, the analysis determined that the proposed project would not result in any impacts on mineral resources. No mineral resources or extraction activities are located within the project site boundaries nor are any such resources found within the boundaries of the related projects. As a result, no cumulative impacts will occur.

MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the approval of the proposed project and its subsequent implementation. As a result, no mitigation measures are required.

[59] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*. *https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14*

[60] California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed March 5, 2021.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in 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?			✖	
B. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?			✖	
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?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in 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? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[61]

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.[38]

Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. All of the cultivation and manufacture of cannabis products will occur indoors. In addition, the operation of the facility will not expose surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. Finally, there are no noise sensitive land uses located in the vicinity of the site. As a result, the proposed project will not expose sensitive receptors to excessive noise levels and the

[61] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

[38] Bugliarello, et. al. *The Impact of Noise Pollution,* Chapter 127, 1975.

potential impacts are considered to be less than significant. As a result, the impacts will be less than significant.

B. *Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels? ● Less than Significant Impact.*

Once in operation, the proposed project will not significantly raise ground-borne noise levels. Slight increases in ground-borne noise levels could occur during the construction phase. The limited duration of construction activities and the City's construction-related noise control requirements will reduce the potential impacts to levels that are less than significant. Furthermore, there are no sensitive receptors or noise sensitive land uses located near the project site. As a result, the impacts will be less than significant.

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? ● No Impact.*

The Southern California Logistics Airport is located approximately 4.3 miles southeast of the project site.[62] The project site is not located within the approach or takeoff zones of either of the two runways that are operating at the SCLA.[63] In addition, the project site is not located within the aforementioned airport's designated compatibility review areas.[64] Furthermore, the project site is not located within any 70 Community Noise Equivalent Level (CNEL) contour line boundaries.[65] As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. As a result, no impacts will occur.

CUMULATIVE IMPACTS

The cumulative noise impacts are site specific. In addition, the analysis determined that the related projects' traffic will not result in a doubling of traffic volumes resulting in a discernable increase in traffic (mobile) noise. All of the related projects' stationary activities will occur indoors and, as a result, the stationary noise impacts will not affect any noise sensitive land uses. As a result, the potential cumulative noise impacts will be less than significant. The construction times for this related project and the proposed project will occur at different times. As a result, no cumulative short-term construction noise impacts are anticipated.

MITIGATION MEASURES

The analysis of potential noise impacts indicated that no significant adverse impacts would result from the proposed project's construction and operation. As a result, no mitigation measures are required.

[62] Google Earth. Website accessed September 20, 2020.

[63] Southern California Logistics Airport Near Victorville California. https://www.airplaneboneyards.com/ southern-california-logistics -airport-victorville-boneyard.htm. Website accessed on September 28, 2020.

[64] Ibid.

[65] Coffman Associates, Inc. *Comprehensive Land Use Plan – Southern California Logistics Airport – Exhibit 2H*. Report prepared September 2008.

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project 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)?				✖
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ● No Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[66] Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development*. The site is currently developed and occupied. All land use surrounding the property has been previously designated as Manufacturing Industrial (MI) zoning by the City of Adelanto.

- *Extension of roadways and other transportation facilities*. Future roadway and infrastructure connections will serve the proposed project site only. Access to the proposed project site would be provided by three new driveway connections with Jonathan Street, a new driveway connection with Auburn Avenue, and a new driveway connection with Montezuma Street.

- *Extension of infrastructure and other improvements*. The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only. At present, there are water and sewer utility lines within the immediate area that run along Auburn Avenue, north of the project site. The project's potential utility impacts are analyzed in Section 3.19.

- *Major off-site public projects (treatment plants, etc.)*. The project's increase in demand for utility

Commented [B011]: looks like montesuma, jonathan street, vintage road are all paved.

[66] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.

- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in a limited increase in employment which can be accommodated by the local labor market. The cultivation facility is projected to employ up to 204 persons per day at full build-out. The primary hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The proposed project will utilize existing roadways and infrastructure. The existing roads and utility lines will serve the project site only and will not extend into undeveloped areas. The proposed project will not result in any unplanned growth. Therefore, no impacts will result.

B. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ● No Impact.*

The project site is vacant and unoccupied. This property and surrounding areas have a General Plan and zoning designations of Airport Development District (ADD). No housing units will be permitted, and none will be displaced as a result of the proposed project's implementation. Therefore, no impacts will result.

CUMULATIVE IMPACTS

All of the fifteen related projects are commercial or manufacturing activities. None of the related projects will involve housing development. The implementation of the related project's would not involve any residential development, nor would they lead to any housing displacement. As a result, no cumulative housing and population impacts would occur as part of the proposed project's implementation.

MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project 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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for: fire protection; police protection; schools; parks; or other public facilities?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project 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 would cause significant environmental impacts, in* fire protection; police protection; schools; parks; or other public facilities? ● *Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[67]

Fire Department

The City of Adelanto contracts fire protection services with the San Bernardino County Fire Department from two fire stations located within the City limits. The nearest station serving the project site is Station Number 319 located at 18500 Readiness Street. This station is located approximately 4.3 miles east of the project site.[68] The Fire Department currently reviews all new development plans. The proposed project will be required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires). The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all pertinent Fire Code Standards including the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by City and County Fire officials to ensure adequate fire service and safety as a result of project implementation. As a result, the potential impacts to fire protection services will be less than significant.

[67] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

[68] San Bernardino Fire Department. https://www.firedepartment.net/directory/california/san-bernardino-county/adelanto. Website accessed September 30, 2020.

Law Enforcement

Law enforcement services within the City are provided by the San Bernardino County Sheriff's Department which serves the community from one police station. The Department operates out of a facility located at 11613 Bartlett Avenue, approximately 1 mile south of the project site.[69] The proposed project will not be open or be accessible to the general public. On-site security will include security personnel, gates, cameras, and detailed background checks of employees. The facility will be closed to the public at all times. Non-employees will only be allowed to enter the facility with a permitted escort. The proposed facility will also be required to comply with the County and City security requirements. As a result, the potential impacts to law enforcement services will be less than significant.

Schools

Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. As a result, the impacts on school-related services will be less than significant.

Recreational Services

The proposed project will not result in any local increase in residential development (directly or indirectly) which could potentially impact the local recreational facilities. As a result, less than significant impacts on parks will result from the proposed project's implementation.

Governmental Services

The proposed project will not create direct local population growth which could potentially create demand for other governmental service. As a result, less than significant impacts will result from the proposed project's implementation.

CUMULATIVE IMPACTS

All of the fifteen of the related projects are commercial or manufacturing activities. None of the related projects will involve residential developments which represent the greatest potential demand on public services. All but one of the proposed related projects involve manufacturing or distribution related, including cannabis. All of the cannabis related businesses are required to employ various on-site security devices and maintain security staff.

MITIGATION MEASURES

The analysis of public service impacts indicated that no significant adverse impacts are anticipated, and no mitigation is required with the implementation of the proposed project.

[69] San Bernardino Sheriff's Department. *https://www.google.com/maps/place/* Website accessed on September 28, 2020.

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	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?				✖
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

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? ● No Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[70]

Due to the industrial nature of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. In addition, no public park is located within one mile of the project site (the nearest park is Richardson Park located approximately 1.7 miles from the site).. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. As a result, no impacts are anticipated.

Commented [B012]: Closest is Richardson park 1.7 miles away

B. *Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ● No Impact.*

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site and, as a result, no impacts will occur.

[70] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

CUMULATIVE IMPACTS

All of the twelve related projects are commercial or manufacturing activities. None of the related projects will involve housing development. In addition, none of the related projects would affect an existing or proposed park. As a result, no cumulative impacts on recreation facilities and services occur as part of the proposed project's implementation.

MITIGATION MEASURES

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✖	
B. Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?				✖
C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✖	
D. Would the project result in inadequate emergency access?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[71]

The overall site plan is shown in Exhibit 2-7 and a typical floor plan of the individual buildings are shown in in Section 2. As indicated previously, the proposed development will involve the construction of a new cannabis manufacturing, cultivation, and distribution facility within the City of Adelanto. The new facility is projected to employ up to 204 persons during regular business hours, per day, at full build-out. The potential employment is summarized in Table 3-5 provided on the next page.

Commented [B013]: This seems to be accurate

As indicated in Table 3-5, each building is projected to generate 46 trips during an average normal weekday period and 12 after-hour trips. This translates into 58 daily trips per business. Finally, at build-out when all twelve buildings are occupied and operational, the project will generate a total of 552 vehicle trips during a typical workday and 144 trips during the after-hour shifts for a total of 696 trips per day.

[71] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

Table 3-5
Potential Employment and Traffic Breakdown

Description of Activity	Employees		No of Trip (One Wy Trips)		Trip Description
	Each Business	Total Project	Each Business	Total Project	
Regular Business Hours (Monday through Friday 8:00 AM to 5:00 PM)					
Onsite Manager	1	12	2	24	Home to Work; Work to Home
Maintenance Technician	1	12	2	24	Home to Work; Work to Home
Office/Vault	1	12	2	24	Home to Work; Work to Home
Security (Bldg.)	1	12	2	24	Home to Work; Work to Home
Grow/Cultivator Staff	3	36	6	72	Home to Work; Work to Home
Cannabis Trimmer	2	24	4	48	Home to Work; Work to Home
Extraction Technician	2	24	4	48	Home to Work; Work to Home
Packaging Associate	2	24	4	48	Home to Work; Work to Home
Shipping/Distribution	2	24	4	48	Home to Work; Work to Home
Drivers	2	24	4	48	Home to Work; Work to Home
Deliveries (# one-way trips)	--	--	8	96	Whse. to User; User back to Whse.
Vendors	--	--	2	24	1 round trip/day/vendor
Miscellaneous	--	--	2	24	1 round trip/day/visit
Total (Reg. Hours)	17	204	**46**	**552**	
After Hours (Monday through Friday 5:00 PM to 8:00 AM)					
Security (Bldg.)	1	12	4	48	2nd & 3rd shifts
Maintenance Technician	1	12	4	48	2nd & 3rd shifts
Grow/Cultivator Staff	1	12	4	48	2nd & 3rd shifts
Total (After Hours)	3	36	**12**	**144**	
Total Daily Traffic (Regular Business Hours Plus After Hours)					
Total (Daily Traffic	--	--	**58**	**696**	

Source: Blodgett Baylosis Environmental Planning

The proposed project will operate the cannabis cultivation facility from 8:00 AM to 5:00 PM, Monday through Friday. A total of 204 full-time staff will be on-site at full build-out during the regular work hours. The facility will be closed to the public at all times. Non-employees such as vendors, delivery persons, and maintenance personnel, will only be allowed to enter the facility with a permitted escort. Full-time security guards will be stationed at the facility 24 fours a day, seven days a week. The total trip generation at build-out when all nine buildings are occupied and operational, will be a total of 552 vehicle trips during a typical workday and 144 trips during the after-hour shifts for a total of 696 trips per day. The applicant will be required to provide the necessary roadway improvements that are required pursuant to City Code requirements. As a result, the impacts will be less than significant.

B. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? ● No Impact.*

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation

of a project's VMT. As previously mentioned in Subsection A, the proposed project will not create a significant amount of traffic in the surrounding area. As a result, the proposed project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impacts will occur.

C. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ● Less than Significant Impact.*

Access to the development would be provided by three new driveway connections with Jonathan Street to the east, a new driveway connection with Auburn Avenue to the north, and a new driveway connection on Montezuma Street to the west. The driveways at Jonathan Street, Auburn Avenue and Montezuma Street would have a width of 30 feet, while the Koala Road driveways would have a width of 40 feet. Internal drive aisles would separate the nine buildings and the width of these drive aisles range from 30 to 40 feet. All of the driveway entrances would be secured by gates.[72] The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. As a result, the potential impacts will be less than significant.

D. *Would the project result in inadequate emergency access? ● No Impact.*

The proposed project would not affect emergency access to any adjacent parcels. At no time during construction will the adjacent streets including Koala Road, Joshua Road, and Air Expressway Boulevard be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

CUMULATIVE IMPACTS (AND VMT ANALYSIS)

At the present time, a traditional *vehicle miles travelled* (VMT) analysis for the Adelanto area would not be readily applicable given the unique development pattens and characteristics common to this portion of the San Bernardino County. These residents in turn, often commute long distances into the urbanized areas of Riverside, San Bernardino, Orange, and Los Angeles Counties for their places of employment. Table 3-6 include the SCAG population and employment projections for the City of Adelanto and the adjacent cities between 2020 and 2035. As indicated in this table Adelanto's population will increase by 24,000 persons (64.6%) while the number jobs in the City are projected to increase by 2,300 (44.2%).

Table 3-6
Population/Employment Projections for the Adelanto Area 2020 to 2035

Jurisdiction	Population			Employment		
	2020	2035	Δ Change	2020	2035	Δ Change
Adelanto	37,600	61,900	24,300 (64.6%)	5,200	7,500	2,300 (44.2%)
Apple Valley	73,400	95,300	21,900 (29.8%)	15,400	26,500	11,100 (72.1%)
Hesperia	98,500	124,700	26,200 (26.6%)	19,700	27,300	7,600 (38.6%)
Victorville	123,300	171,100	47,800 (38.8%)	37,600	50,900	13,300 (35.4%)
Total	332,800	453,000	120,200 (36.1%)	77,900	112,200	34,300 (44.0%)
San Bern. County	2,197,400	2,637,400	440,000 (20.0%)	789,500	998,000	208,500 (26.4%)

Source: Southern California Association of Governments

[72] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

The jobs-housing balance is the ratio of jobs to housing in a given geographic area. If a jobs-housing balance is too high, adequate housing may be unaffordable or unavailable to workers that live in that geographic area resulting in housing affordability issues and traffic congestion from commuting workers. If the jobs-housing balance is too low, this may indicate inadequate job availability for area residents. According to the Building Industry Association (BIA), experts say that a healthy jobs-housing balance is 1.5 or one full time job and one part time job per housing unit. For purposes of the analysis, the SGAGs growth RTP growth projections for households were substitutes for housing units. As a result, the housing "in-balance" may actually be greater than that shown in Table 3-7.

Table 3-7
Jobs/Housing Balance for the Adelanto Area 2020 to 2035

Jurisdiction	Jobs/Housing Balance 2020			Jobs/Housing Balance 2035		
	Employment	Household	J/H Ratio	Employment	Household	J/H Ratio
Adelanto	5,200	10,100	0.51	7,500	16,000	0.47
Apple Valley	15,400	26,500	0.58	26,500	33,000	0.80
Hesperia	19,700	30,400	0.64	27,300	37,600	0.73
Victorville	37,600	37,700	1.00	50,900	51,400	0.99
Total	77,900	104,700	0.74	112,200	138,000	0.81
San Bern. County	789,500	687,100	1.15	998,000	824,600	1.21

Source: Southern California Association of Governments

As is evident in Table 3-7, Adelanto's jobs housing balance is significantly skewed to being housing rich and jobs poor. In other words, to enable the City to maintain an adequate supply of jobs for local residents both to sustain the local economy and to reduce long distance worker commutes and the resulting vehicle miles travelled (VMT), the proposed project will contribute to the area's local employment base. The new facility is projected to employ up to 204 persons per day, at full build-out. Even with the fifteen related projects, the projected cumulative employment would have the potential in reducing the VMT by adding local jobs in the Adelanto area. As a result, the impacts would be less than significant.

MITIGATION MEASURES

The analysis of potential impacts related to traffic and circulation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	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 section 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: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k).			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[73] A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be

[73] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

A cultural resources records search was provided on October 6, 2020. The results of this archival records search are summarized in this report. The records search details the previously documented cultural resources in the Project area and employs a one-mile buffer surrounding it. A Sacred Lands File Search was also conducted through the Native American Heritage Commission (NAHC). This search offers valuable contextual information regarding Native American traditional land use in the high desert region. The search indicated a negative response for the presence of sensitive properties in the Project and vicinity. NAHC provided a list of 14 interested parties representing seven Native American groups that were identified as being associated with the area and all were contacted for consultation. The NAHC conducted a Sacred Lands File Search and returned negative results for Sacred Lands near the proposed project area. All potentially interested tribes identified by the NAHC were also contacted pursuant to AB-52 for information regarding their knowledge of cultural resources that were within or near the project area. These groups include: Brandy Kendricks (Kern Valley Indian Community), Kern Valley Indian Community (Chairperson and Secretary), Morongo Band of Mission Indians (Chairperson and Cultural Resources Manager), Quechan Tribe of the Fort Yuma Reservation (Acting Chairman and Historic Preservation Officer), Serrano Nation of Mission Indians (Co-Chairpersons [2]), Tubatulabals of Kern Valley (Chairperson), and the 29 Palms Band of Mission Indians (Tribal Heritage Preservation Officer and Chairperson).

The South-Central Coastal Information Center (SCCIC) at California State University, Fullerton conducted a records search of previously documented cultural resources sites and cultural resources reports archived for the Project area and within a one-mile radius (buffer) surrounding the subject property. The search included a review of all historic and prehistoric archaeological resources and any built-environment resources as well. Additionally, this review includes an archival search of the existing cultural resources reports on file with the Information Center. The California Points of Historical Interest (CPHI), California Historical Landmarks (CHL), California Register of Historical Resources (CALREG), National Register of Historic Places (NRHP), and California State Historic Properties Directory (CHPD) were all reviewed for the project site. According to the Information Center results, 14 cultural resources reports have been previously completed within the Project area and its one-mile buffer. Eleven cultural resources sites have also been identified within that same area; all of these resources are mapped outside of the site boundaries.

If previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find. Project construction activities shall be diverted from the location of the discovery until the finding's significance is established.

If human remains are encountered during the undertaking, State Health and Safety Code Section 70.50.2 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her representative, the MLD may inspect the site of discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD shall make recommendations as the manner in which to treat the human remains and any associated offerings.

No significant impacts related to archaeological or historical resources is anticipated, and no further investigations are recommended for the proposed project. As a result, the impacts will be less than significant. Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant.

CUMULATIVE IMPACTS

The potential environmental impacts related to tribal/cultural resources are site-specific. The analysis determined that the site's future development will not result in any impacts on cultural resources. Such impacts are typical site specific. The cultural resources survey and the analysis indicated that in the event previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find. The analysis further stated that project-related construction activities shall be diverted from the location of the discovery until the finding's significance is established. As a result, no cumulative impacts on tribal/cultural resources are anticipated.

MITIGATION MEASURES

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant. As a result, no mitigation is required.

3.19 UTILITIES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✖	
B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✖	
C. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✖	
D. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✖	
E. Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?				✖
F. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? ● Less than Significant Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[74]

There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site or within adjacent

[74] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0.* June 23, 2020.

parcels. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. As a result, no impacts will result.

B. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? ● Less than Significant Impact.*

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario.[75] The proposed project at total build-out will consume 60,102 gallons of water per day and generate 48,082 gallons of effluent per day. There are existing water and sewer lines that run through Auburn Ave and sewer connections along Jonathan Street at approximately 2,290 feet north and 1,000 feet east of the project site.[76] Therefore, the project's implementation will not require the relocation or construction of any water facilities or connections. The indoor agricultural areas will utilize an automated irrigation system. The medicinal cannabis will be cultivated, harvested, dried, packaged, stored, and distributed from this facility. In addition, the project will be equipped with water efficient fixtures and hydroponics. As a result, the impacts will be less than significant.

C. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ● Less than Significant Impact.*

The City operates a 1.5-million-gallons-per-day activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program. The City is currently constructing a 2.5-million-gallons-per-day upgrade that will increase wastewater treatment capabilities to 4.0 million gallons per day and produce treated water that can be used for lawn/public parks irrigation, construction and dust control and other beneficial uses. The project's implementation will not require the relocation or construction of any water facilities or connections. As a result, the impacts are expected to be less than significant.

D. *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ● Less than Significant Impact.*

The proposed project at total build-out is projected to generate 4,402 pounds of non-cannabis solid waste ped day. The cannabis waste will be controlled using a "track and trace" system. In addition, licensed waste haulers must remove the organic waste. Other conventional solid waste may be handled by commercial waste disposal companies. As a result, the potential impacts will be less than significant.

[75] City of Adelanto. *2015 Urban Water Management Plan*. Report dated June 22, 2016.

[76] City of Adelanto. City of Adelanto Existing Sewer and Water. https://www.ci.adelanto.ca.us/DocumentCenter/View/614/Sewer-and-Water-Map.

E. *Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals? ● No Impact.*

The proposed project, like all other development in San Bernardino County and the City of Adelanto, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

F. *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? ● No Impact.*

The proposed project, like all other development in Adelanto and San Bernardino County, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

CUMULATIVE IMPACTS

The fifteen related projects identified below and on the following page are industrial or commercial in nature. The identified related projects and their corresponding water consumption, effluent generation, and solid waste generation are outlined below:

- *CUP 19-06 & LDP 19-05 Cannabis Warehouse.* This project was an application to construct a new a 7,051 square foot building located at the southeast corner of Rancho Road and Adelanto Road for the purpose of a warehouse for the cultivation, manufacturing, and distribution of cannabis. This related project's daily water consumption is 1,001 gallons per day, the effluent generation is 801 gallons per day, and the solid waste generation is 42 pounds per day.

- *Ikanik Farms MLDP 19-12 & MLDP 19-14.* The proposed project would involve a 6,100 square-foot building addition to the southwestern portion of the existing building and the construction of a 12,100 square-foot building addition. This related project's daily water consumption is 2,584 gallons per day, the effluent generation is 234 gallons per day, and the solid waste generation is 109 pounds per day.

- *MLDP 19-17 CRA Investments LLC. Project.* The proposed project would involve the sale and short-term storage of used, undamaged or damaged, operable or inoperable vehicles, trailers, watercraft, power sports equipment, industrial and construction machinery, and other equipment. This related project's daily water consumption and effluent generation is minimal and is limited to a restroom in a small onsite office.

- *Columbus Street Cannabis Warehouse. Project (CUP 19-13 & LDP 19-09).* The proposed project involves the construction of a 25,000 square-foot warehouse building on each of the two parcels. The total floor area for the two new buildings will be 50,000 square feet. This related project's daily water consumption is 7,100 gallons per day, the effluent generation is 5,680 gallons per day, and the solid waste generation is 300 pounds per day.

- *Land Development Plan (LDP) 19-15; Copart 61-Acre Project.* The project will also include an office/sales building (approximately 12,800 square feet), a customer and employee parking lot, a loading and unloading area, and a secured, short-term storage lot for the vehicles, equipment and

machinery. This related project's daily water consumption is 1,704 gallons per day, the effluent generation is 1,363 gallons per day, and the solid waste generation is 72 pounds per day.

- *CUP 16-01 (Genex Trading, Inc.)*. The applicant, Pontious Architecture, has already constructed a new building consisting of 12,020 square feet within a 0.78-acre site. The project involved the approval of the application for this proposed use. This related project's daily water consumption is 1,707 gallons per day, the effluent generation is 1,365 gallons per day, and the solid waste generation is 72 pounds per day.

- *Daewon Foods (TPM 20097 & LDP 19-12)*. The Applicant is proposing to subdivide a 20-acre parcel into seven separate parcels and to construct two 30,000 square-foot industrial buildings on a newly created 190,431 square-foot parcel. This related project's daily water consumption is 8,520 gallons per day, the effluent generation is 6,816 gallons per day, and the solid waste generation is 360 pounds per day.

- *Topekoms Manufacturing Project*. The proposed project would involve the development of a 0.89-acre portion of a larger 9.11-acre land parcel including the construction of a new one-story 5,586 square-foot cannabis extraction laboratory. This related project's daily water consumption is 793 gallons per day, the effluent generation is 635 gallons per day, and the solid waste generation is 34 pounds per day.

- *Best Western Plus Hotel and Restaurant Project CUP 20-1 and LDP 20-1*. The proposed project would involve the development of a 4.54-acre land parcel including the construction of a new four-story 50,231 square-foot hotel and adjacent 5,293 square-foot restaurant. This related project's daily water consumption is 5,585 gallons per day, the effluent generation is 4,708 gallons per day, and the solid waste generation is 333 pounds per day.

- *Koala Road Greenhouse and Commercial Center*. The proposed development would involve the construction of two structures including a 3,400 square-foot (volatile and nonvolatile) manufacturing building, and a 42,856 square-foot greenhouse facility. This related project's daily water consumption is 4,903 gallons per day, the effluent generation is 3,923 gallons per day, and the solid waste generation is 278 pounds per day.

- *HD Biotech Cannabis Warehouse*. The proposed project involves the construction of a new addition to an existing cannabis facility. The new building will consist of 26,775 square feet of floor area and would be used for cannabis cultivation and distribution. This related project's daily water consumption is 2,838 gallons per day, the effluent generation is 2,271 gallons per day, and the solid waste generation is 161 pounds per day.

- *Adelanto South Ecosave Venture Development, TPM 20272 & LDP 20-05*. The first building would include 162,298 square feet of floor area and the second building would include 155,484 square feet. This related project's daily water consumption is 95,335 gallons per day, the effluent generation is 63,556 gallons per day, and the solid waste generation is 2,838 pounds per day.

- *Green Wolf Organic Farms; CUP 20-6 and LDP 20-10*. The proposed project would involve the development of a 9.30-acre (198,149 square-foot) parcel within the northeast portion of the City of Adelanto. The proposed project involves construction consisting of eighty (80) cannabis greenhouses with a total floor area of 165,100 square feet. This related project's daily water

consumption is 49,530 gallons per day, the effluent generation is 33,020 gallons per day, and the solid waste generation is 1,474 pounds per day.

- *Tiger Organic Farms Cannabis Facility; CUP 20-07 and LDP 20-11*. The proposed project would involve the development of a 14.74-acre (348,864 square-foot) parcel within the southwest area of the City of Adelanto. Proposal to establish Adult Use Cannabis Cultivation uses and construct cultivation buildings, totaling 189,000 square feet, in (3) phases on 14.74 -acres located in the Manufacture Industrial (MI) in the City of Adelanto, California. This related project's daily water consumption is 56,700 gallons per day, the effluent generation is 37,800 gallons per day, and the solid waste generation is 1,688 pounds per day.

- *SCCC Group Services, Inc. CUP 19-11 and LDP 19-07.* The proposed project would involve the improvement and use of the 18,917 square foot (0.43-acre) site for the cultivation, manufacturing (non-volatile), distribution, and transportation of medicinal cannabis. The proposed improvements would include the construction of two smaller buildings, referred to as Building A and Building B. Building A would be a two-story development that consists of 10,000 square feet of floor area and Building B, a one-story development, would consist of 2,430 square feet of floor area. This related project's daily water consumption is 3,729 gallons per day, the effluent generation is 2,486 gallons per day, and the solid waste generation is 111 pounds per day.

The twelve related projects daily water consumption is estimated to be 242,029 gallons per day, the effluent generation is 164,658 gallons per day, and the solid waste generation is 7,872 pounds per day. For purposes of comparison, the proposed project at total build-out will consume 110,250 gallons of water per day, generate 73,500 gallons of effluent per day, and generate 3,282 pounds of solid waste ped day.

MITIGATION MEASURES

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.20 WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				✖
B. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✖
C. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✖
D. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

The proposed project would involve the construction of twelve, 30,625 square foot buildings referred to as Building A through L. Each building would include a main floor consisting of 24,375 square feet and a mezzanine level consisting of 6,250 square feet. The total floor area of the twelve buildings would be 367,500 square feet and the project would be constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution.[77]

The project site is located adjacent to an urbanized area. Improved surface streets will serve the project site and the surrounding area. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts will occur.

Commented [MWAN14]: Seems to be accurate. Fairly urbanized area and street will need to be improved.

[77] Pontious Architecture. *Morris Mu & Partners [Site Plan] Sheet A1.0*. June 23, 2020.

B. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project 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? ● No Impact.*

The project site is located adjacent to an urbanized area. The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 20 miles north and northwest of the San Gabriel and San Bernardino Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, no impacts will occur.

C. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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? ● No Impact.*

The project site is not located in an area that is classified as a high fire risk severity, and therefore will not require the installation of specialized infrastructure such *as fire roads, fuel breaks, or emergency water sources*. As a result, no impacts will occur.

D. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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? ● No Impact.*

The project site is located within a wildfire State Responsibility Area (SRA). There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes and no impacts will occur.

Commented [MWAN15]: Seems to be applicable.

CUMULATIVE IMPACTS

The analysis herein determined that the proposed project would not result in any significant adverse impacts with respect to potential wildfire. In addition, none of the related projects are located within an area located in a geographic area where there is a risk from wildfire. All of the related projects occupy properties that surrounded by areas that are not at risk for wildfires. As a result, no cumulative impacts related to wildfire will occur.

MITIGATION MEASURES

The analysis of wildfires impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	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?				✖
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)?				✖
C. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✖

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

A. The proposed project *will not* 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. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.

B. The proposed project *will not* have impacts that are individually limited, but cumulatively considerable. The proposed project is relatively small, and the attendant environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.

C. The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.

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SECTION 4 CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* 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 an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory with the implementation of the recommended mitigation.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly, with the implementation of the recommended mitigation.

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Adelanto can make the following additional finding that a mitigation monitoring and reporting program will be required.

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SECTION 5 REFERENCES

5.1 PREPARERS

Blodgett Baylosis Environmental Planning
16388 Colima Road, Suite 206J
Hacienda Heights, CA 92240
(626) 336-0033

Marc Blodgett, Project Principal
Andrea Withers, Project Manager
Karla Nayakarathne, Mapping/Planning,

5.2 REFERENCES

Bugliarello, et. al., *The Impact of Noise Pollution,* Chapter 127, 1976.

California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *California Important Farmland Finder*.

California Department of Fish and Wildlife, *Natural Diversity Database*.

California Department of Parks and Recreation, *California Historical Landmarks*.

California Division of Mines and Geology, *Seismic Hazards Mapping Program,* 2012.

California Office of Planning and Research, *California Environmental Quality Act and the CEQA Guidelines*, as amended 2018.

Google Earth.

Adelanto, City of, *Municipal Code,* Chapter 17.70, Signs.

Southern California Association of Governments, *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040,* April 2016.

United States Department of Agriculture. *Web Soil Survey*.

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APPENDIX A – AIR QUALITY WORKSHEETS

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Auburn Ave.
South Coast Air Basin, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Industrial Park	367.50	1000sqft	8.44	367,500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	10			**Operational Year**	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Construction Phase - Construction Characteristics

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	250.00
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	250.00
tblArchitecturalCoating	EF_Residential_Exterior	50.00	100.00
tblAreaCoating	Area_EF_Parking	100	0
tblAreaCoating	Area_Nonresidential_Exterior	183750	0
tblAreaCoating	Area_Nonresidential_Interior	551250	0
tblAreaMitigation	UseLowVOCPaintNonresidentialExteriorValue	100	0
tblAreaMitigation	UseLowVOCPaintNonresidentialInteriorValue	100	0

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblAreaMitigation	UseLowVOCPaintResidentialExteriorValue	50	0
tblAreaMitigation	UseLowVOCPaintResidentialInteriorValue	50	0
tblConstructionPhase	NumDays	20.00	45.00
tblConstructionPhase	NumDays	230.00	120.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	NumDays	20.00	45.00
tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	PhaseEndDate	3/24/2023	2/10/2023
tblConstructionPhase	PhaseEndDate	1/27/2023	10/7/2022
tblConstructionPhase	PhaseEndDate	2/24/2023	12/9/2022
tblConstructionPhase	PhaseEndDate	2/11/2022	4/22/2022
tblConstructionPhase	PhaseStartDate	2/25/2023	12/10/2022
tblConstructionPhase	PhaseStartDate	3/12/2022	4/23/2022
tblConstructionPhase	PhaseStartDate	2/12/2022	1/29/2022
tblConstructionPhase	PhaseStartDate	1/28/2023	10/8/2022
tblConstructionPhase	PhaseStartDate	1/29/2022	3/12/2022
tblConsumerProducts	ROG_EF	1.98E-05	2.14E-05
tblFleetMix	HHD	8.5840e-003	0.00
tblFleetMix	LDA	0.54	0.00
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT2	0.18	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	6.3390e-003	0.00
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.13	0.00
tblFleetMix	MH	3.7740e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	8.1500e-004	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblFleetMix	SBUS	7.4300e-004	0.00
tblFleetMix	UBUS	5.1500e-004	0.00

2.0 Emissions Summary

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	189.5728	33.1269	23.1450	0.0540	19.8582	1.6138	21.4720	10.1558	1.4847	11.6405	0.0000	5,366.1767	5,366.1767	1.1970	0.2175	5,448.4648
2023	189.5522	1.3690	2.8920	6.0000e-003	0.3465	0.0728	0.4193	0.0919	0.0726	0.1645	0.0000	587.8060	587.8060	0.0243	6.9800e-003	590.4937
Maximum	**189.5728**	**33.1269**	**23.1450**	**0.0540**	**19.8582**	**1.6138**	**21.4720**	**10.1558**	**1.4847**	**11.6405**	**0.0000**	**5,366.1767**	**5,366.1767**	**1.1970**	**0.2175**	**5,448.4648**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	189.5728	33.1269	23.1450	0.0540	19.8582	1.6138	21.4720	10.1558	1.4847	11.6405	0.0000	5,366.1767	5,366.1767	1.1970	0.2175	5,448.4648
2023	189.5522	1.3690	2.8920	6.0000e-003	0.3465	0.0728	0.4193	0.0919	0.0726	0.1645	0.0000	587.8060	587.8060	0.0243	6.9800e-003	590.4937
Maximum	**189.5728**	**33.1269**	**23.1450**	**0.0540**	**19.8582**	**1.6138**	**21.4720**	**10.1558**	**1.4847**	**11.6405**	**0.0000**	**5,366.1767**	**5,366.1767**	**1.1970**	**0.2175**	**5,448.4648**

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	7.8680	3.4000e-004	0.0375	0.0000		1.3000e-004	1.3000e-004		1.3000e-004	1.3000e-004		0.0804	0.0804	2.1000e-004		0.0857
Energy	0.0372	0.3386	0.2844	2.0300e-003		0.0257	0.0257		0.0257	0.0257		406.2933	406.2933	7.7900e-003	7.4500e-003	408.7077
Mobile	0.0000	0.0000	0.0000	0.0000	8.9447	0.0000	8.9447	2.1955	0.0000	2.1955		0.0000	0.0000	0.0000	0.0000	0.0000
Total	**7.9052**	**0.3389**	**0.3219**	**2.0300e-003**	**8.9447**	**0.0259**	**8.9706**	**2.1955**	**0.0259**	**2.2214**		**406.3737**	**406.3737**	**8.0000e-003**	**7.4500e-003**	**408.7934**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	7.8680	3.4000e-004	0.0375	0.0000		1.3000e-004	1.3000e-004		1.3000e-004	1.3000e-004		0.0804	0.0804	2.1000e-004		0.0857
Energy	0.0372	0.3386	0.2844	2.0300e-003		0.0257	0.0257		0.0257	0.0257		406.2933	406.2933	7.7900e-003	7.4500e-003	408.7077
Mobile	0.0000	0.0000	0.0000	0.0000	8.9447	0.0000	8.9447	2.1955	0.0000	2.1955		0.0000	0.0000	0.0000	0.0000	0.0000
Total	**7.9052**	**0.3389**	**0.3219**	**2.0300e-003**	**8.9447**	**0.0259**	**8.9706**	**2.1955**	**0.0259**	**2.2214**		**406.3737**	**406.3737**	**8.0000e-003**	**7.4500e-003**	**408.7934**

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2022	1/28/2022	5	20	
2	Site Preparation	Site Preparation	1/29/2022	3/11/2022	5	30	
3	Grading	Grading	3/12/2022	4/22/2022	5	30	
4	Building Construction	Building Construction	4/23/2022	10/7/2022	5	120	
5	Paving	Paving	10/8/2022	12/9/2022	5	45	
6	Architectural Coating	Architectural Coating	12/10/2022	2/10/2023	5	45	

Acres of Grading (Site Preparation Phase): 45

Acres of Grading (Grading Phase): 30

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 551,250; Non-Residential Outdoor: 183,750; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	7.00	231	0.29
Demolition	Excavators	3	8.00	158	0.38
Grading	Excavators	1	8.00	158	0.38

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Grading	Graders	1	8.00	187	0.41
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Grading	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	154.00	60.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	31.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6392	25.7194	20.5941	0.0388		1.2427	1.2427		1.1553	1.1553		3,746.7812	3,746.7812	1.0524		3,773.0920
Total	**2.6392**	**25.7194**	**20.5941**	**0.0388**		**1.2427**	**1.2427**		**1.1553**	**1.1553**		**3,746.7812**	**3,746.7812**	**1.0524**		**3,773.0920**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0512	0.0361	0.5683	1.5200e-003	0.1677	1.0000e-003	0.1687	0.0445	9.2000e-004	0.0454		153.1717	153.1717	4.0100e-003	3.6600e-003	154.3616
Total	**0.0512**	**0.0361**	**0.5683**	**1.5200e-003**	**0.1677**	**1.0000e-003**	**0.1687**	**0.0445**	**9.2000e-004**	**0.0454**		**153.1717**	**153.1717**	**4.0100e-003**	**3.6600e-003**	**154.3616**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6392	25.7194	20.5941	0.0388		1.2427	1.2427		1.1553	1.1553	0.0000	3,746.7812	3,746.7812	1.0524		3,773.0920
Total	**2.6392**	**25.7194**	**20.5941**	**0.0388**		**1.2427**	**1.2427**		**1.1553**	**1.1553**	**0.0000**	**3,746.7812**	**3,746.7812**	**1.0524**		**3,773.0920**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0512	0.0361	0.5683	1.5200e-003	0.1677	1.0000e-003	0.1687	0.0445	9.2000e-004	0.0454		153.1717	153.1717	4.0100e-003	3.6600e-003	154.3616
Total	**0.0512**	**0.0361**	**0.5683**	**1.5200e-003**	**0.1677**	**1.0000e-003**	**0.1687**	**0.0445**	**9.2000e-004**	**0.0454**		**153.1717**	**153.1717**	**4.0100e-003**	**3.6600e-003**	**154.3616**

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Site Preparation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					19.6570	0.0000	19.6570	10.1025	0.0000	10.1025			0.0000			0.0000
Off-Road	3.1701	33.0835	19.6978	0.0380		1.6126	1.6126		1.4836	1.4836		3,686.0619	3,686.0619	1.1922		3,715.8655
Total	**3.1701**	**33.0835**	**19.6978**	**0.0380**	**19.6570**	**1.6126**	**21.2696**	**10.1025**	**1.4836**	**11.5860**		**3,686.0619**	**3,686.0619**	**1.1922**		**3,715.8655**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0614	0.0434	0.6820	1.8200e-003	0.2012	1.2000e-003	0.2024	0.0534	1.1100e-003	0.0545		183.8060	183.8060	4.8100e-003	4.3900e-003	185.2340
Total	**0.0614**	**0.0434**	**0.6820**	**1.8200e-003**	**0.2012**	**1.2000e-003**	**0.2024**	**0.0534**	**1.1100e-003**	**0.0545**		**183.8060**	**183.8060**	**4.8100e-003**	**4.3900e-003**	**185.2340**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Site Preparation - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					19.6570	0.0000	19.6570	10.1025	0.0000	10.1025			0.0000			0.0000
Off-Road	3.1701	33.0835	19.6978	0.0380		1.6126	1.6126		1.4836	1.4836	0.0000	3,686.0619	3,686.0619	1.1922		3,715.8655
Total	**3.1701**	**33.0835**	**19.6978**	**0.0380**	**19.6570**	**1.6126**	**21.2696**	**10.1025**	**1.4836**	**11.5860**	**0.0000**	**3,686.0619**	**3,686.0619**	**1.1922**		**3,715.8655**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0614	0.0434	0.6820	1.8200e-003	0.2012	1.2000e-003	0.2024	0.0534	1.1100e-003	0.0545		183.8060	183.8060	4.8100e-003	4.3900e-003	185.2340
Total	**0.0614**	**0.0434**	**0.6820**	**1.8200e-003**	**0.2012**	**1.2000e-003**	**0.2024**	**0.0534**	**1.1100e-003**	**0.0545**		**183.8060**	**183.8060**	**4.8100e-003**	**4.3900e-003**	**185.2340**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					14.1652	0.0000	14.1652	6.8495	0.0000	6.8495			0.0000			0.0000
Off-Road	1.9486	20.8551	15.2727	0.0297		0.9409	0.9409		0.8656	0.8656		2,872.0464	2,872.0464	0.9289		2,895.2684
Total	**1.9486**	**20.8551**	**15.2727**	**0.0297**	**14.1652**	**0.9409**	**15.1060**	**6.8495**	**0.8656**	**7.7151**		**2,872.0464**	**2,872.0464**	**0.9289**		**2,895.2684**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1023	0.0723	1.1366	3.0300e-003	0.6269	2.0100e-003	0.6289	0.1605	1.8500e-003	0.1623		306.3434	306.3434	8.0200e-003	7.3100e-003	308.7233
Total	**0.1023**	**0.0723**	**1.1366**	**3.0300e-003**	**0.6269**	**2.0100e-003**	**0.6289**	**0.1605**	**1.8500e-003**	**0.1623**		**306.3434**	**306.3434**	**8.0200e-003**	**7.3100e-003**	**308.7233**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Grading - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					14.1652	0.0000	14.1652	6.8495	0.0000	6.8495			0.0000			0.0000
Off-Road	1.9486	20.8551	15.2727	0.0297		0.9409	0.9409		0.8656	0.8656	0.0000	2,872.0464	2,872.0464	0.9289		2,895.2684
Total	**1.9486**	**20.8551**	**15.2727**	**0.0297**	**14.1652**	**0.9409**	**15.1060**	**6.8495**	**0.8656**	**7.7151**	**0.0000**	**2,872.0464**	**2,872.0464**	**0.9289**		**2,895.2684**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1023	0.0723	1.1366	3.0300e-003	0.6269	2.0100e-003	0.6289	0.1605	1.8500e-003	0.1623		306.3434	306.3434	8.0200e-003	7.3100e-003	308.7233
Total	**0.1023**	**0.0723**	**1.1366**	**3.0300e-003**	**0.6269**	**2.0100e-003**	**0.6289**	**0.1605**	**1.8500e-003**	**0.1623**		**306.3434**	**306.3434**	**8.0200e-003**	**7.3100e-003**	**308.7233**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1096	2.8311	0.9470	0.0115	0.3841	0.0289	0.4130	0.1106	0.0276	0.1382		1,239.2804	1,239.2804	0.0456	0.1800	1,294.0532
Worker	0.5253	0.3709	5.8346	0.0156	1.7214	0.0103	1.7317	0.4565	9.4900e-003	0.4660		1,572.5627	1,572.5627	0.0412	0.0375	1,584.7794
Total	**0.6349**	**3.2020**	**6.7816**	**0.0271**	**2.1055**	**0.0392**	**2.1447**	**0.5671**	**0.0371**	**0.6042**		**2,811.8431**	**2,811.8431**	**0.0867**	**0.2175**	**2,878.8326**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1096	2.8311	0.9470	0.0115	0.3841	0.0289	0.4130	0.1106	0.0276	0.1382		1,239.2804	1,239.2804	0.0456	0.1800	1,294.0532
Worker	0.5253	0.3709	5.8346	0.0156	1.7214	0.0103	1.7317	0.4565	9.4900e-003	0.4660		1,572.5627	1,572.5627	0.0412	0.0375	1,584.7794
Total	**0.6349**	**3.2020**	**6.7816**	**0.0271**	**2.1055**	**0.0392**	**2.1447**	**0.5671**	**0.0371**	**0.6042**		**2,811.8431**	**2,811.8431**	**0.0867**	**0.2175**	**2,878.8326**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1028	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225		2,207.6603	2,207.6603	0.7140		2,225.5104
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.1028**	**11.1249**	**14.5805**	**0.0228**		**0.5679**	**0.5679**		**0.5225**	**0.5225**		**2,207.6603**	**2,207.6603**	**0.7140**		**2,225.5104**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0512	0.0361	0.5683	1.5200e-003	0.1677	1.0000e-003	0.1687	0.0445	9.2000e-004	0.0454		153.1717	153.1717	4.0100e-003	3.6600e-003	154.3616
Total	**0.0512**	**0.0361**	**0.5683**	**1.5200e-003**	**0.1677**	**1.0000e-003**	**0.1687**	**0.0445**	**9.2000e-004**	**0.0454**		**153.1717**	**153.1717**	**4.0100e-003**	**3.6600e-003**	**154.3616**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1028	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	0.0000	2,207.6603	2,207.6603	0.7140		2,225.5104
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.1028**	**11.1249**	**14.5805**	**0.0228**		**0.5679**	**0.5679**		**0.5225**	**0.5225**	**0.0000**	**2,207.6603**	**2,207.6603**	**0.7140**		**2,225.5104**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0512	0.0361	0.5683	1.5200e-003	0.1677	1.0000e-003	0.1687	0.0445	9.2000e-004	0.0454		153.1717	153.1717	4.0100e-003	3.6600e-003	154.3616
Total	**0.0512**	**0.0361**	**0.5683**	**1.5200e-003**	**0.1677**	**1.0000e-003**	**0.1687**	**0.0445**	**9.2000e-004**	**0.0454**		**153.1717**	**153.1717**	**4.0100e-003**	**3.6600e-003**	**154.3616**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	189.2625					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.9062
Total	**189.4670**	**1.4085**	**1.8136**	**2.9700e-003**		**0.0817**	**0.0817**		**0.0817**	**0.0817**		**281.4481**	**281.4481**	**0.0183**		**281.9062**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1058	0.0747	1.1745	3.1300e-003	0.3465	2.0800e-003	0.3486	0.0919	1.9100e-003	0.0938		316.5548	316.5548	8.2800e-003	7.5600e-003	319.0140
Total	**0.1058**	**0.0747**	**1.1745**	**3.1300e-003**	**0.3465**	**2.0800e-003**	**0.3486**	**0.0919**	**1.9100e-003**	**0.0938**		**316.5548**	**316.5548**	**8.2800e-003**	**7.5600e-003**	**319.0140**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	189.2625					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.9062
Total	**189.4670**	**1.4085**	**1.8136**	**2.9700e-003**		**0.0817**	**0.0817**		**0.0817**	**0.0817**	**0.0000**	**281.4481**	**281.4481**	**0.0183**		**281.9062**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1058	0.0747	1.1745	3.1300e-003	0.3465	2.0800e-003	0.3486	0.0919	1.9100e-003	0.0938		316.5548	316.5548	8.2800e-003	7.5600e-003	319.0140
Total	**0.1058**	**0.0747**	**1.1745**	**3.1300e-003**	**0.3465**	**2.0800e-003**	**0.3486**	**0.0919**	**1.9100e-003**	**0.0938**		**316.5548**	**316.5548**	**8.2800e-003**	**7.5600e-003**	**319.0140**

Auburn Ave. - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	189.2625					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
Total	**189.4542**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**		**281.4481**	**281.4481**	**0.0168**		**281.8690**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0981	0.0661	1.0809	3.0300e-003	0.3465	1.9500e-003	0.3485	0.0919	1.8000e-003	0.0937		306.3580	306.3580	7.4300e-003	6.9800e-003	308.6246
Total	**0.0981**	**0.0661**	**1.0809**	**3.0300e-003**	**0.3465**	**1.9500e-003**	**0.3485**	**0.0919**	**1.8000e-003**	**0.0937**		**306.3580**	**306.3580**	**7.4300e-003**	**6.9800e-003**	**308.6246**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	189.2625					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
Total	**189.4542**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**	**0.0000**	**281.4481**	**281.4481**	**0.0168**		**281.8690**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0981	0.0661	1.0809	3.0300e-003	0.3465	1.9500e-003	0.3485	0.0919	1.8000e-003	0.0937		306.3580	306.3580	7.4300e-003	6.9800e-003	308.6246
Total	**0.0981**	**0.0661**	**1.0809**	**3.0300e-003**	**0.3465**	**1.9500e-003**	**0.3485**	**0.0919**	**1.8000e-003**	**0.0937**		**306.3580**	**306.3580**	**7.4300e-003**	**6.9800e-003**	**308.6246**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	8.9447	0.0000	8.9447	2.1955	0.0000	2.1955		0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	8.9447	0.0000	8.9447	2.1955	0.0000	2.1955		0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Industrial Park	1,238.48	933.45	455.70	4,307,266	4,307,266
Total	1,238.48	933.45	455.70	4,307,266	4,307,266

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Industrial Park	16.60	8.40	6.90	59.00	28.00	13.00	79	19	2

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Industrial Park	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0372	0.3386	0.2844	2.0300e-003		0.0257	0.0257		0.0257	0.0257		406.2933	406.2933	7.7900e-003	7.4500e-003	408.7077
NaturalGas Unmitigated	0.0372	0.3386	0.2844	2.0300e-003		0.0257	0.0257		0.0257	0.0257		406.2933	406.2933	7.7900e-003	7.4500e-003	408.7077

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Industrial Park	3453.49	0.0372	0.3386	0.2844	2.0300e-003		0.0257	0.0257		0.0257	0.0257		406.2933	406.2933	7.7900e-003	7.4500e-003	408.7077
Total		**0.0372**	**0.3386**	**0.2844**	**2.0300e-003**		**0.0257**	**0.0257**		**0.0257**	**0.0257**		**406.2933**	**406.2933**	**7.7900e-003**	**7.4500e-003**	**408.7077**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Industrial Park	3.45349	0.0372	0.3386	0.2844	2.0300e-003		0.0257	0.0257		0.0257	0.0257		406.2933	406.2933	7.7900e-003	7.4500e-003	408.7077
Total		**0.0372**	**0.3386**	**0.2844**	**2.0300e-003**		**0.0257**	**0.0257**		**0.0257**	**0.0257**		**406.2933**	**406.2933**	**7.7900e-003**	**7.4500e-003**	**408.7077**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	7.8680	3.4000e-004	0.0375	0.0000		1.3000e-004	1.3000e-004		1.3000e-004	1.3000e-004		0.0804	0.0804	2.1000e-004		0.0857
Unmitigated	7.8680	3.4000e-004	0.0375	0.0000		1.3000e-004	1.3000e-004		1.3000e-004	1.3000e-004		0.0804	0.0804	2.1000e-004		0.0857

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	7.8645					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	3.4700e-003	3.4000e-004	0.0375	0.0000		1.3000e-004	1.3000e-004		1.3000e-004	1.3000e-004		0.0804	0.0804	2.1000e-004		0.0857
Total	**7.8680**	**3.4000e-004**	**0.0375**	**0.0000**		**1.3000e-004**	**1.3000e-004**		**1.3000e-004**	**1.3000e-004**		**0.0804**	**0.0804**	**2.1000e-004**		**0.0857**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	7.8645					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	3.4700e-003	3.4000e-004	0.0375	0.0000		1.3000e-004	1.3000e-004		1.3000e-004	1.3000e-004		0.0804	0.0804	2.1000e-004		0.0857
Total	**7.8680**	**3.4000e-004**	**0.0375**	**0.0000**		**1.3000e-004**	**1.3000e-004**		**1.3000e-004**	**1.3000e-004**		**0.0804**	**0.0804**	**2.1000e-004**		**0.0857**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation