INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

ADELANTO RANCHO PARK 10517-10559 RANCHO ROAD ADELANTO, CALIFORNIA CONDITIONAL USE PERMIT (CUP) 21-12 LAND DEVELOPMENT PLAN (LDP) 21-09 Tentative Parcel Map (TPM) 20446

LEAD AGENCY:

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

REPORT PREPARED BY:

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 S. HACIENDA BOULEVARD, SUITE 107
HACIENDA HEIGHTS, CALIFORNIA 91745

February 1, 2022

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: 98 Leaf, Inc. CUP 21-12; LDP 21-09; TPM 20446

PROJECT APPLICANT: The Applicant for the proposed project is Joe Buonya, ASI Development, 5932 Bolsa Avenue, Suite 107. Huntington Beach, California, 92649

PROJECT LOCATION: The proposed project site is located in the southwest corner of Rancho Road and Aster Road in Adelanto, California, 92301. The site address is 10517-10559 Rancho Road. The corresponding Assessor Parcel Number (APN) is 3128-051-03. The property site is located in Section 31, Township 6 North, Range 5 West (USGS Adelanto, California 7.5-minute quadrangle). The proposed project site is located in the south-central portion of the City of Adelanto.

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

PROJECT: The proposed project involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 167,000 square feet will be reserved for open space. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).

FINDINGS: The environmental analysis provided in the attached Initial Study indicates that the proposed project will 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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APPENDICES

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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

The proposed project involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 5% of the total site area will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[1]

The City of Adelanto is the designated *Lead Agency* and as such, the City will be responsible for the 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 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

1 Blue Engineering and Consulting, Inc. Site Plan.

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

proposed project and the findings of this Initial Study.[4] Questions and/or comments should be submitted to the following contact person:

Mary Blais, Planning Consultant
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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 5% of the total site area will be landscaped. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[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 in the southwest corner of Rancho Road and Aster Road in Adelanto, California, 92301. The corresponding Assessor Parcel Number (APN) is 3218-051-03. The property site is located in Section 31, Township 6 North, Range 5 West (USGS Adelanto, CA 7.5-minute quadrangle). The proposed project site is located in the south-central portion of the City of Adelanto. The proposed project site is located approximately 1.68 miles west of State Highway 395. A Citywide map is provided in Exhibit 2-2. A vicinity map is provided in Exhibit 2-3.

2.3 ENVIRONMENTAL SETTING

The Project site is currently undeveloped and has been privately owned for at least 20 years. The area is a high traffic area used by off-road vehicles (OHV) for access to trails throughout Adelanto. This area has been part of the long-term growth plan of Adelanto and has been heavily used for construction and upgrades to City infrastructure. While the site itself is undeveloped, the surrounding area is developed with heavy manufacturing and industrial uses. The land uses and development surrounding the Project site are outlined below:

5 Blue Engineering and Consulting, Inc. Site Plan.
6 Blodgett Baylosis Environmental Planning. 2021.
7 Google Maps. Website accessed May 2, 2021.

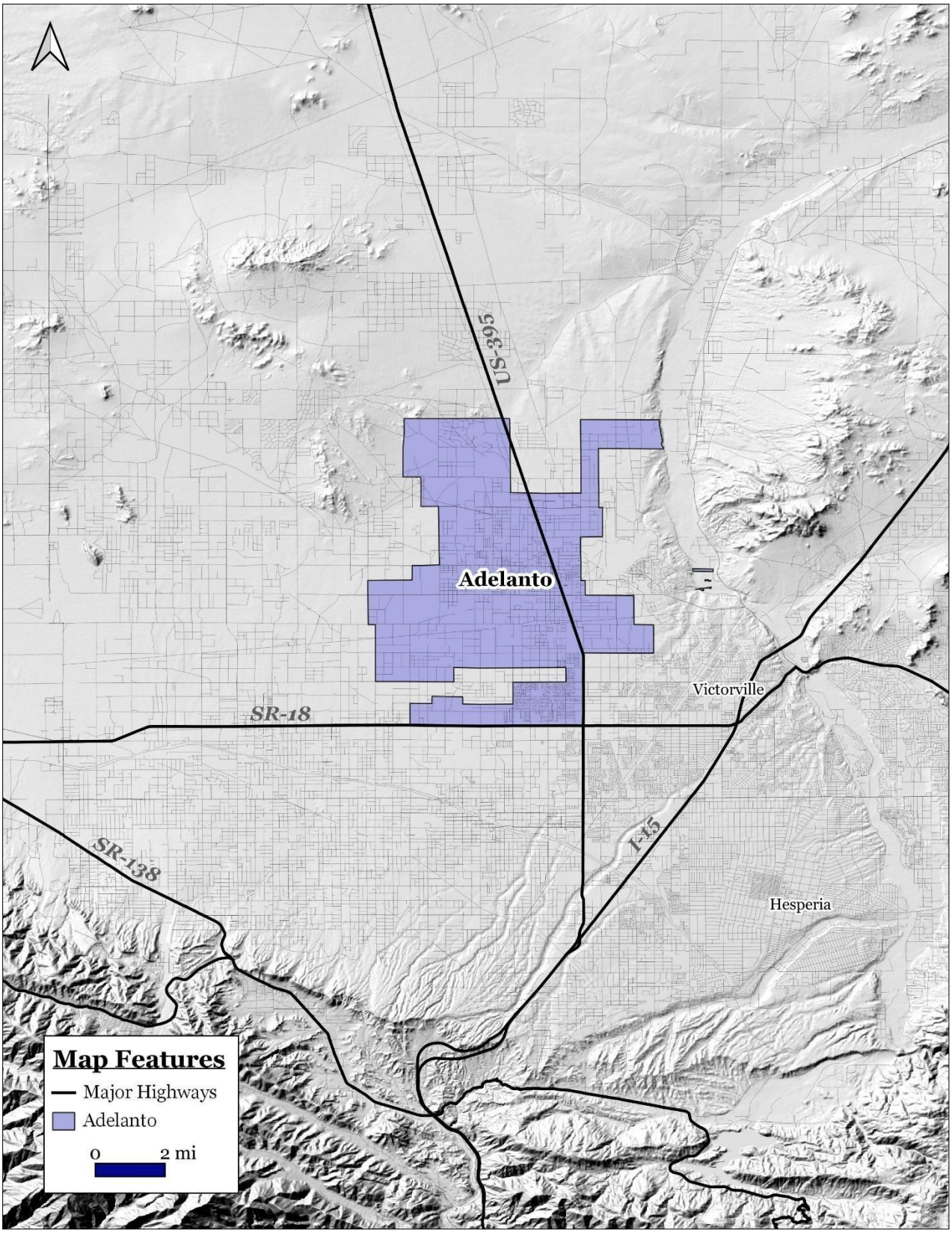


EXHIBIT 2-1
REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

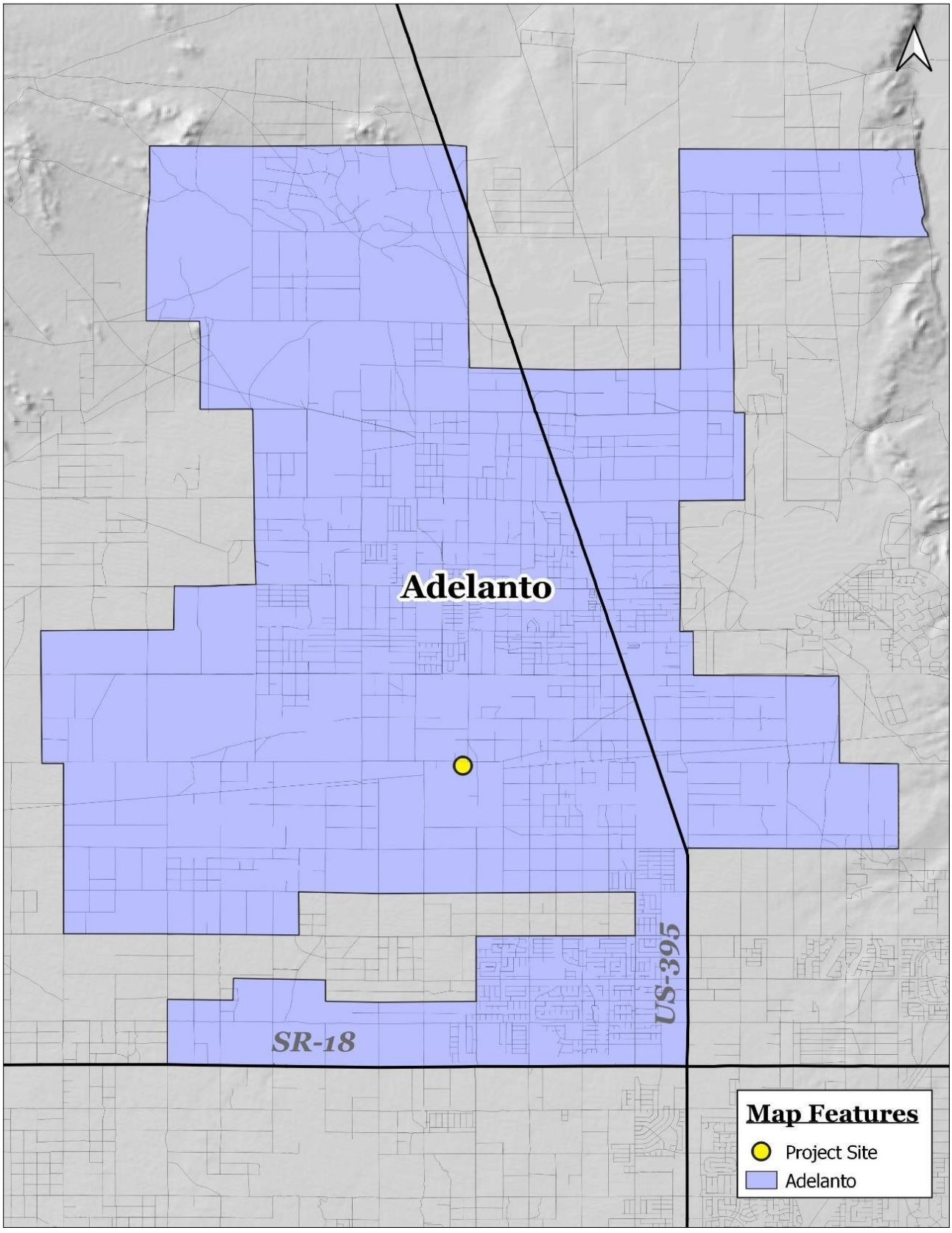


EXHIBIT 2-2
CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

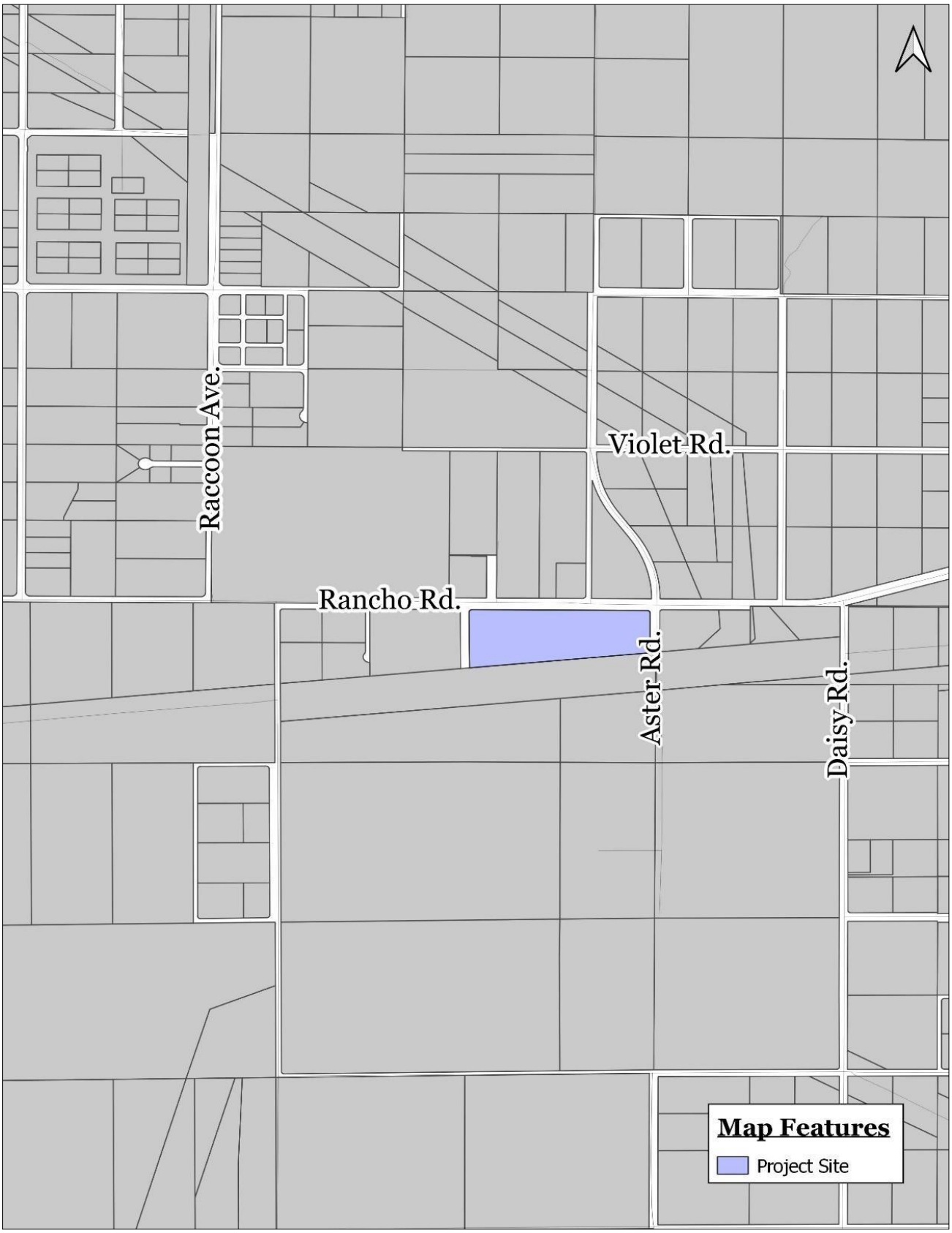


EXHIBIT 2-3
LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- North of the project site: Rancho Road extends along the north side of the Project site and is a main throughway, high traffic area through the City. Further north is the Desert View Modified Correctional Facility, the Adelanto ICE Processing Center, San Bernardino County Fire Station No. 322, and a Bank. These parcels are zoned as Manufacturing Industrial (M/I) (Adelanto 2021).
- East of the Project site: Aster Road extends along the Project site's east side. An industrial use building is located directly adjacent to the Project site, across Aster Road. Further east is additional manufacturing and industrial use development. This area is zoned as Manufacturing Industrial (M/I) (Adelanto 2021).
- South of the Project site: Directly south of the Project site is a utility corridor with transmission lines and is designated as a Greenbelt Corridor Easement (GCE). This area is envisioned to form a network of hiking and biking trails linking residential neighborhoods, open space areas, and recreational areas (Sustainable 2014). Further south from the site is a Department of Water and Power (DWP) Sub-Station. The area directly south is zoned as Manufacturing Industrial (M/I) and further south is zoned as Public Utilities (PU) (Adelanto 2021).
- West of the Project site: Vacant, undeveloped land is directly west of the Project site, however further west contains a large, fenced in industrial facility. This area is zoned as Manufacturing Industrial (M/I) (Adelanto 2021).

An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4.

2.4 PROJECT DESCRIPTION

Key elements of the proposed project, shown in Exhibit 2-5, are summarized below and on the following page.

- *Proposed Site Plan*. A total of five, single level buildings would be constructed within the 12.4-acre project site. The total floor area of the five building would be 234,000 square feet. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet (5% of the site) will be landscaped.[12]

- *Building A*. This building will be located in the northeast corner of the site, immediately south of Rancho Road. This building will have a total floor area of approximately 68,000 square feet and will include 50,000 square feet of warehouse area and a two-level office consisting of 18,000 square feet. The building would require 93 spaces.

- *Building B*. This building will be located immediately west of Building A, in the center portion of the site. This building will have a total floor area of approximately 80,000 square feet and will largely consist of warehouse space. This building would require contain 40 parking spaces. This building would also consist of a single level.

- *Building C*. This building will be located in the southwest portion of the site. This building will have a total floor area of approximately 60,000 square feet. The building would require a total of 35 parking spaces. This building would be a single level.

- *Building D1*. This building will be located in the northwest portion of the site. This building will have a total floor area of approximately 12,000 square feet. This building would require 12 parking spaces. This building would be a single level.

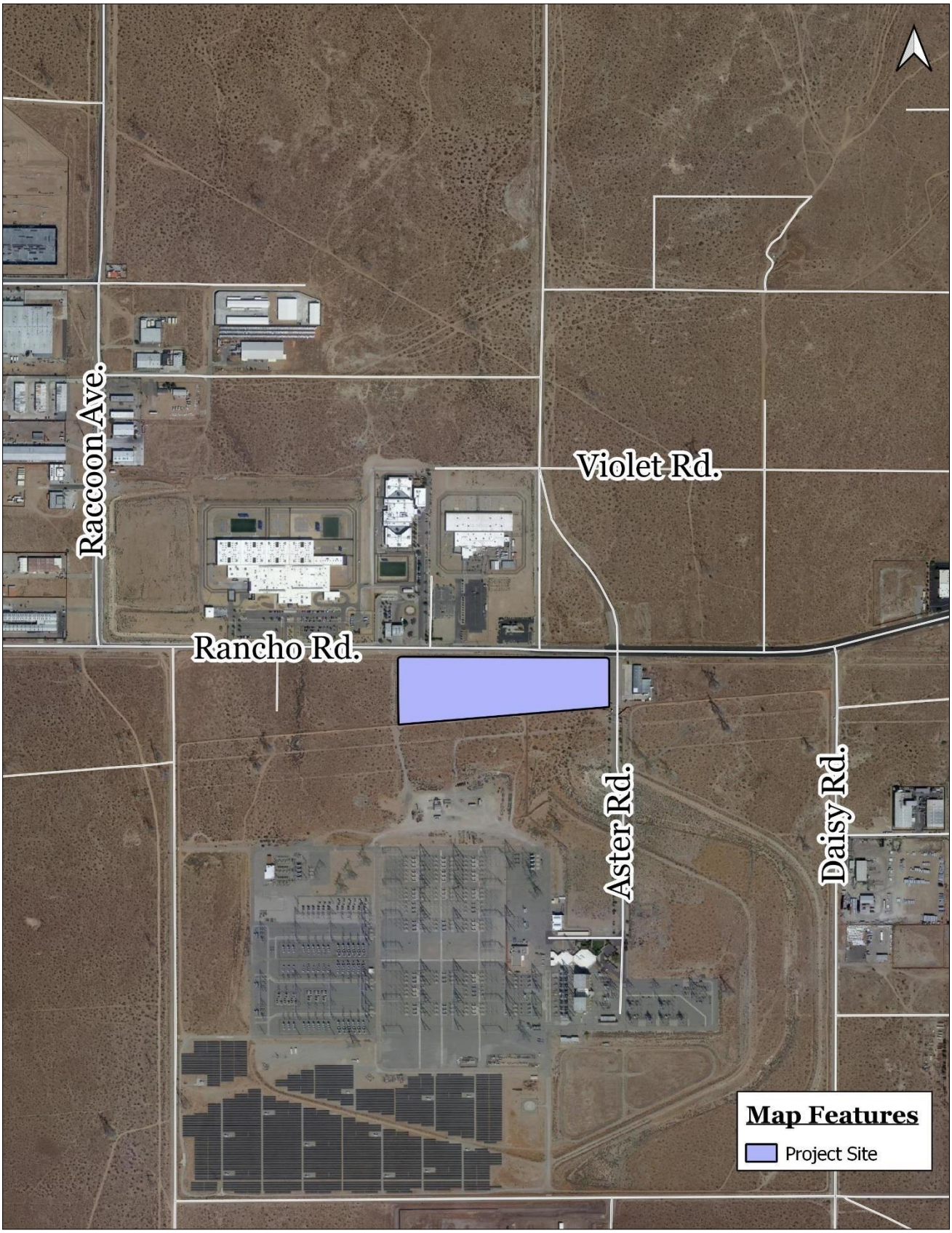


EXHIBIT 2-4
AERIAL IMAGE OF PROJECT SITE
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *Building D2*. This building will also be located in the northwest portion of the site. This building will have a total floor area of approximately 12,000 square feet. This building would require 12 parking spaces. This building would be a single level.

- *Access and Internal Circulation*. Access to the development would be provided by two driveway connections with the south side of Rancho Road. The driveways at Rancho Road would have a width of 30 feet. In addition, two driveway connections are proposed for the future roadway that will extend along the project site's west side. The internal drive aisles would separate the five buildings and the width of these drive aisles would range from 30 feet to 40 feet.

- *Parking*. A total of 216 parking spaces would be provided. Of this total, 16 spaces would be ADA accessible. In addition, each building would be equipped with ground level truck loading docks.

- *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 are located in Rancho Road.

- *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. The new facility is projected to employ up to 221 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	Total[1]
Onsite Manager	1	13
Maintenance Technician	1	13
Office/Vault	1	13
Security (Bldg.)	1	13
Grow/Cultivator Staff	3	39
Cannabis Trimmer	2	26
Extraction Technician	2	26
Packaging Associate	2	26
Shipping/Distribution	2	26
Drivers	2	26
Total	17	221

Notes: 1. A total of seven businesses are proposed.
Source: Blodgett Baylosis Environmental Planning

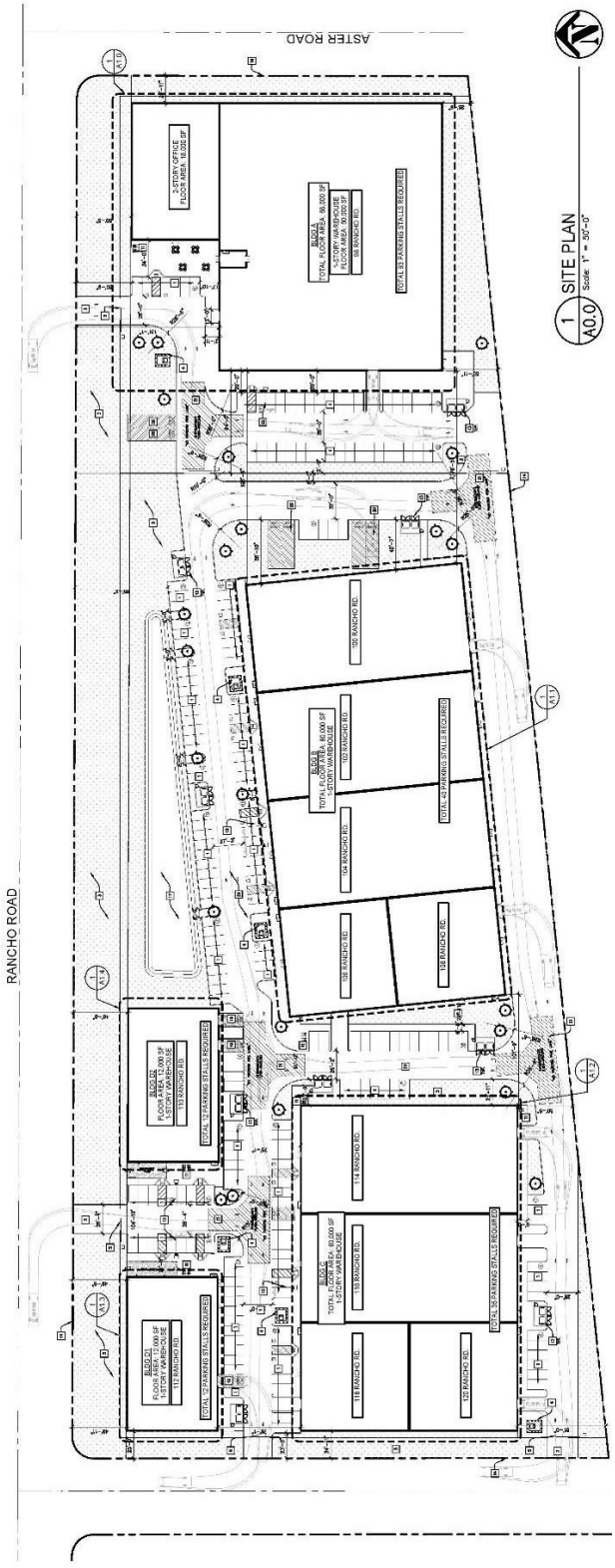


EXHIBIT 2-5
SITE PLAN OF PROJECT

SOURCE: BLUE ENGINEERING AND CONSULTING, INC.

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.[8] The key construction elements for *each of the three phase*s 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 five new buildings would be constructed during this phase. This phase would take approximately six 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 one month to complete.

2.5 EXISTING CONDITIONS

In June 2021, the Project Applicant submitted a CEQA document (IS/MND) for a cannabis manufacturing facility located at 10517-10559 Rancho Road, for City approval. While the City set to approve the Project, the Project was never publicly circulated or approved. Since then, the Project site was graded. During grading, and consistent with the Project described in the draft CEQA document, the Applicant removed 91 Joshua trees, translocating 32 of them to a different location of the site.

On September 10, 2021, the California Department of Fish and Wildlife (CDFW) was made aware of a potential violation of the California Endangered Species Act (CESA) involving the unauthorized removal of western Joshua tree (Yucca brevifolia), a candidate for listing under CESA. On October 25, 2021, the Applicant received a Notice of Violation (NOV) from CDFW and stopped work at the Project site.

Since receiving the NOV, the Applicant has had several meetings with the City and CDFW both separately and together, to address mitigation opportunities for impacts to Joshua Trees at this property, and also City-wide. The Applicant is actively working with CDFW to ensure that a CDFW-approved, Long Term Management Plan (LTMP) and appropriate mitigation for the Joshua trees, are adopted for this Project. The CEQA document has been revised to reflect changes to the biological resources section of the IS/MND including the proposed mitigation measures.

Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. The changes in environmental conditions between those two scenarios represent the environmental impacts of the proposed project. The description of the environmental conditions in the project study area under baseline conditions is referred to as the environmental setting. For the purposes of this document and consistent with the original Draft IS/MND, a baseline will be utilized that describes the Project site prior to the grading activities occurred. Any revisions to the environmental setting, particularly those within the

[8] Blue Engineering and Consulting, Inc. Site Plan.

Biological Resources section, were revised to correct erroneous information.

2.6 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 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 9365Cassia 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.

- *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.

- *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.

- *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.

- *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).

- 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.

- *Morris Mu & Partners, CUP 21-04 and LDP 21-03*. 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

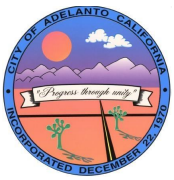
constructed in four phases within the 15-acre site. The new buildings would be used for adult and medical cannabis cultivation, manufacturing, and distribution. Access to the proposed project site would be provided by three new driveway connections with Jonathan Street, a new driveway connection with Auburn Avenue, and a new driveway connection with Montezuma Street.

The 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.

2.7 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) 12-21;
- The approval of a Land Development Plan (LDP) 21-09;
- The approval of Tentative Parcel Map (TPM) 20446;
- The approval of the Mitigated Negative Declaration (MND); and,
- The adoption of the Mitigation Monitoring and Reporting Program.


CITY OF ADELANTO CALIFORNIA
"Progress through unity"
INCORPORATED DECEMBER 22 1970

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[9] 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. In addition, local views are already dominated by the correctional facilities located to the north of Rancho Road. 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, Rancho Road that extends north of the project site is not designated as scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.[10] 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), located 15

9 Blue Engineering and Consulting, Inc. Site Plan.
10 California Department of Transportation. Official Designated Scenic Highways.

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.[11][16] The site would not qualify as undeveloped desert land since the property is currently surrounded by existing Manufacturing Industrial land uses. Lastly, the project site does not contain any buildings listed in the State or National registrar. 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 new building 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? ● No 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 Manufacturing Industrial land use. The nearest sensitive receptors to the project site are residential land uses located approximately one mile to the north of the site (north of Air Expressway). The Applicant will be required to submit a photometric study to the City for review and approval. 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.

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

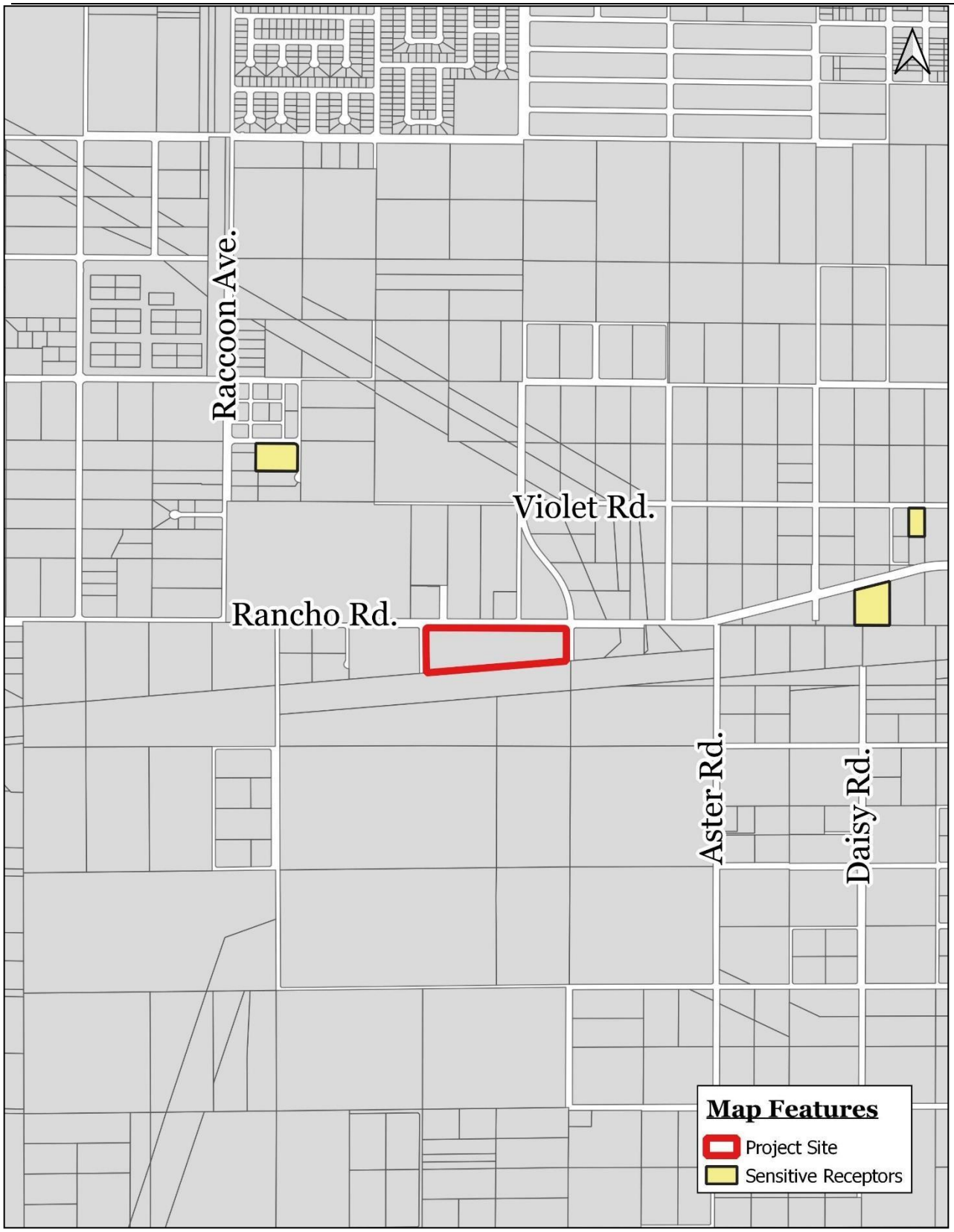


EXHIBIT 3-1
LIGHT SENSITIVE RECEPTORS MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[12] 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.[13]

17

12 Blue Engineering and Consulting, Inc. Site Plan.

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

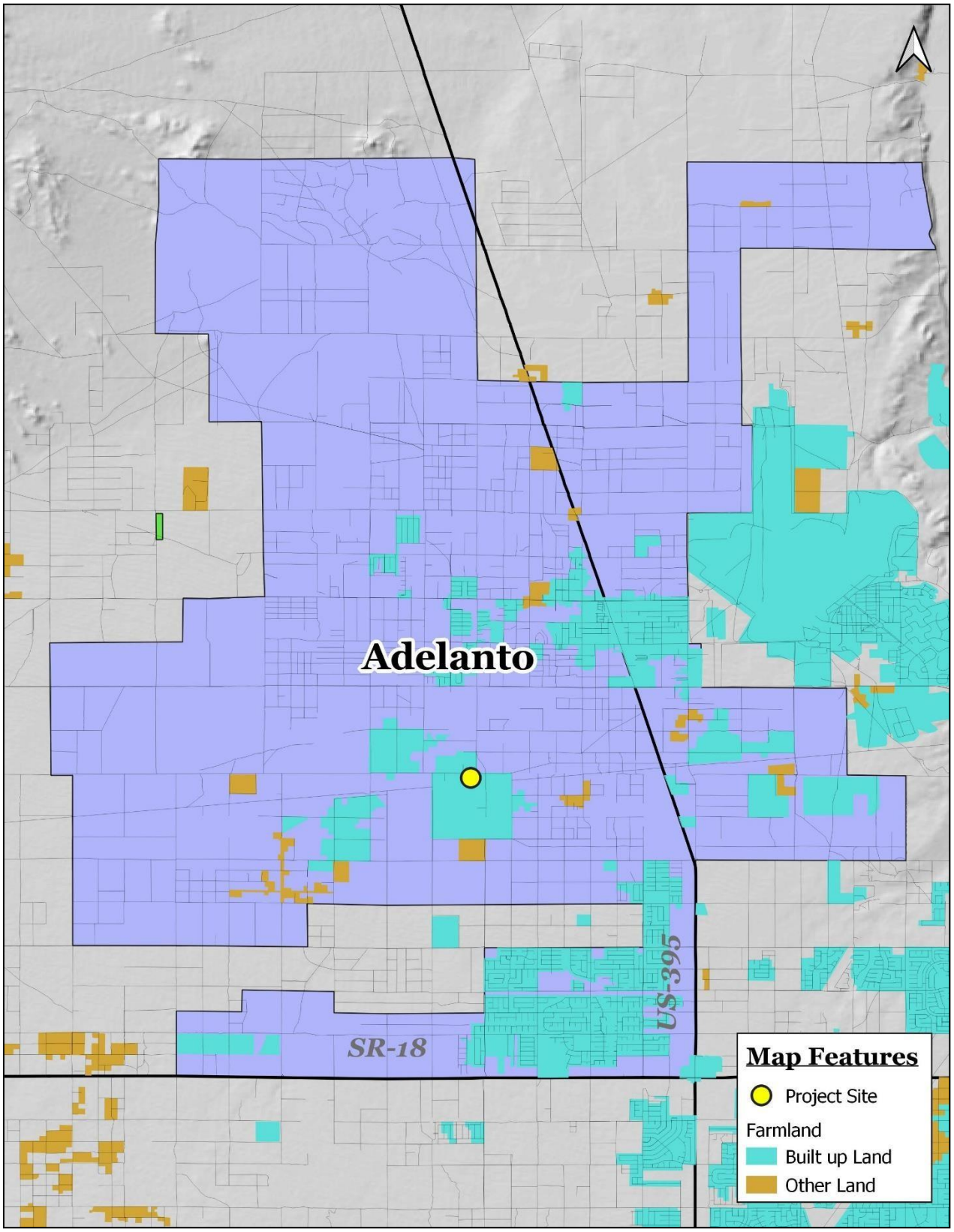


EXHIBIT 3-2
IMPORTANT FARMLAND MAP
SOURCE:CALIFORNIA DEPARTMENT OF CONSERVATION

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 Manufacturing Industrial (MI), 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.[14][18] 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 Manufacturing Industrial (MI) 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. 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.

14 California Department of Conservation. *State of California Williamson Act Contract Land.*

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.*

The proposed project involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[15][19] 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.[16] 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.

15 Blue Engineering and Consulting, Inc. Site Plan.

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

- *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).

- *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.

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.[17] The proposed project will not introduce new residents and is anticipated to employ an estimated 221 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. 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.

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.*

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. 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);

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

- 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 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.2016.3.2). For air quality modeling purposes, a 9-month construction period was assumed. As shown in Table 3-1, daily construction emissions will not exceed the SCAQMD significance thresholds. The short-term construction emissions will be limited to those emissions generated during project construction.

Table 3-1
Estimated Daily Construction Emissions

Construction Phase	ROG	NOx	CO	SOx	PM10	PM2.5
Demolition (on-site)	3.16	31.44	21.56	0.03	1.55	1.44
Demolition (off-site)	0.06	0.04	1.15	0.03	20.11	11.81
Total Demolition	**3.22**	**31.48**	**22.56**	**0.06**	**21.66**	**13.25**
Site Preparation (on-site)	3.88	40.49	1.15	0.03	9.09	5.75
Site Preparation (off-site)	0.08	0.04	30.87	0.06	9.77	5.32
Total Site Preparation	**3.96**	**40.53**	**31.53**	**0.09**	**18.86**	**11.08**
Grading (on-site)	4.19	46.39	30.87	0.06	5.02	3.19
Grading (off-site)	0.09	0.05	0.66	--	0.16	0.04
Total Grading	**4.28**	**46.44**	**31.44**	**0.06**	**5.18**	**3.23**
Building Construction (on-site)	1.90	17.43	16.57	0.02	0.95	0.90
Building Construction (off-site)	1.33	9.37	9.73	0.04	2.61	0.72
Total Building Construction	**3.23**	**26.80**	**26.10**	**0.06**	**3.56**	**1.62**
Paving (on-site)	1.25	12.91	14.65	0.02	0.67	0.62
Paving (off-site)	0.06	0.04	0.49	--	0.03	0.03
Total Paving	**1.31**	**12.95**	**15.14**	**0.02**	**0.70**	**0.65**
Architectural Coating (on-site)	56.61	1.53	1.81	--	0.09	0.09
Architectural Coating (off-site)	--	--	0.06	--	0.01	--
Total Architectural Coating	**56.61**	**1.53**	**1.87**	**--**	**0.10**	**0.09**
Maximum Daily Emissions	**57.43**	**46.45**	**31.53**	**0.07**	**9.23**	**5.79**
Daily Thresholds	**137**	**137**	**548**	**137**	**82**	**65**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2016.3.2.

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.2016.3.2 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)	15.73	--	0.05	0.00	--	--
Energy (lbs/day)	0.03	0.30	0.25	--	0.02	0.02
Mobile (lbs/day)	2.25	16.55	22.22	0.09	6.00	1.64
Total (lbs/day)	**18.02**	**16.86**	**22.53**	**0.09**	**6.02**	**1.66**
Daily Thresholds	**137**	**137**	**548**	**137**	**82**	**65**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2016.3.2.

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 MDAQMD has rules and regulations for controlling fugitive dust during construction. 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 these rules and 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 one mile to the northeast. 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 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. 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.[1816] 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 air tight 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.

- *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.

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.

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

- 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

None of the related projects are 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 with Mitigation*

On December 3, 2021, Chambers Group biologists reviewed both the California Natural Diversity Database (CNDDB) and United States Fish and Wildlife Services (USFWS) databases to evaluate if any candidate, sensitive, or special status species are located within five miles of the site. The results of the study determined that no USFWS occurrences or critical habitat is within five miles of the site. However, several species that have a potential for occurrence (PFO) occur within five miles of the site. A figure showing the results of the CNDDB search is in **Exhibit 3-3A: CNDDB Occurrences**.

Based on the results of the CNDDB review, it was determined that six special status species have been documented within approximately five miles of the property and have a PFO within the site. The following Federal and State Listed Species was identified as part of this research:

- Desert Tortoise (*Gopherus agassizii*). Desert Tortoise was last recorded in 2004 approximately 2.7 to 3.3 miles northwest of the Project site in an open space area much less developed than the Project site. The Project site is surrounded by many developments including the City of Adelanto Correctional Facility to the northwest, the Desert View Modified Community Correctional Facility immediately to

the north, the substation and solar array immediately to the south, and the Adelanto Detention Center to the southwest. It may be possible for a foraging Desert Tortoise to be on the site, however, based on review of all available information, it is expected that the potential to have an active burrow in such a developed and fragmented area is low. Nonetheless, an effective site visit as further detailed in **Mitigation Measure (MM) BIO-1**, would be conducted to confirm the low PFO. As such, and in an abundance of caution, the site is being treated as having a moderate PFO.

The research also identified the following Wildlife Species of Special Concern and Special Status Plants:

- Burrowing Owl (*Athene cunicularia*). This species has been recorded in 2005 approximately 2.75 miles from the project site. According to recent aerial images, the site appears to contain suitable habitat for the burrowing owl and therefore, there is a moderate potential for this species to occur within the site.

- Loggerhead shrike (*Lanius ludovicianus*). This species was recorded within 4 miles of the project site in 2005. According to recent aerial images, the project site does contain suitable habitat for this species; therefore, this species has a low potential to occur within the site.

- Le Conte's Thrasher (*Toxostoma lecontei*). Le Conte's Thrasher was last recorded approximately 2.5 miles north of the Project site in 1987. Factoring in both the age of the sighting and the fact that the habitat onsite is limited to only potential foraging, the PFO is considered to be low.

- Prairie Falcon (*Falco mexicanus*). This species was recorded within 5 miles of the Project site in 1980. Factoring in both the age of the sighting and the fact that the habitat onsite is limited to only potential foraging, the PFO is considered to be low.

- Beaver Dam breadroot (*Pediomelum castoreum*). This species is a perennial herb that blooms in April through March. This plant species was located in 2009 just under five miles from the site. Per the Protected Plant Preservation Plan prepared for the Proposed Project, none were located on site during the April 29, 2021 surveys.

In order to ensure impacts to these species that have a PFO within the Project Site, **MM BIO-1** would require pre-construction surveys be completed prior to the restart of Project construction activities. Depending on the results of the survey, species specific mitigation for nesting birds, including the Loggerhead Shrike, Le Conte's Thrasher, and Prairie Falcon, Desert Tortoises, Swainson's Hawk, and Burrowing Owls, would ensure that impacts to these species would remain less than significant. These measures are outlined in **MM BIO-2** through **MM BIO-4**.

Additionally, a Protected Plant Preservation Plan was prepared by RCA Associates on May 3, 2021 (Appendix B). The plant resources on the site consist of a desert scrub community typical of the area with creosote bush (*Larrea tridentata*), asian mustard (*Brassica tournefortii*), fiddleneck (*Ansickia tessellata*), Joshua trees (*Yucca brevifolia*), and rubber rabbitbrush (*Ericameria nauseosa*). The Joshua trees became a candidate species under the California Endangered Species Act (CESA) on October 9, 2020. As a candidate species, Joshua trees have full protection under CESA and any take of the species (including removal of Joshua tree or similar actions) would require authorization under CESA.

Pedestrian surveys were conducted on the Project site on April 29, 2021 where biologists from RCA Associates, Inc. evaluated each Joshua tree. The biologist noted 91 Joshua trees on site. Of these 91 Joshua trees, 25 trees were dead and 3 additional trees were in poor health and/or dying; leaving a total impact to 66 trees (91 total trees less 25 dead).

It was determined that 34 of the total 91 trees could be translocated and were subsequently relocated on site. The other trees that were already dead or dying as well as those not suitable for relocation were disposed of as per County requirements. Additionally, two Joshua trees died during the process of relocation. 32 Joshua trees remain on the property.

Since translocation is not an accepted mitigation under CESA, and dead and dying trees can provide an opportunity for seed banking, the LTMP must provide acceptable mitigation for all 91 trees that were taken on site, via a preserved Joshua Tree Woodland offsite that will be placed under a Conservation Easement and managed by a non-profit conservancy. The LTMP as required by **MM BIO-5** would also detail a compensatory mitigation plan for the total amount of trees taken from the Project site (66 living and 25 dead Joshua trees) via one of three options that would be managed in perpetuity. These options are further described in **MM BIO -5** and include A) land purchased by the Applicant and managed through a non-wasting endowment paid for by the Applicant, B) an agreement with the City to create a larger conservation bank, or C) credits purchased at a CDFW approved mitigation bank. With incorporation of this mitigation, impacts from removal of the Joshua trees would 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? ● Less than Significant with Mitigation*

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? ● Less than Significant with Mitigation*

According to the USFWS National Wetland Inventory and as shown in **Exhibit 3-3B: Water Resources**, the Project site does not contain any wetlands. The closest potential wetland habitat is a Riverine habitat located over 0.75 miles southwest of the Project site (USFWS 2021). However, according to the National Hydrography Dataset (NHD) and as shown in the same figure, the Project site has a stream/river that passes directly through the center. After review of aerial images, this resource appears to be an ephemeral wash that is approximately 440 feet long and runs into a USFWS Riverine Wetland. Ephemeral washes can fall under jurisdiction of California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and/or United States Army Corps of Engineers (USACE), depending on connectivity features downstream. The Project is continuing to work with the regulatory agencies to determine whether this feature is jurisdictional under Section 401/404 of the Clean Water Act and/or section 1602 of the California Fish and Game Code. Should this feature be jurisdictional, it is expected that approximately 0.17 acres would be impacted and permitted accordingly (based on a desktop visual analysis of the drainage, true impact area would be calculated with **MM BIO-6**).

Nonetheless, 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 SWPPP would include BMPs that would minimize impacts from stormwater runoff and disturbance to existing drainage patterns. The SWPPP would identify areas with potential construction related erosion and would specify the design of BMPs to minimize potential erosion and sedimentation impacts.

The Project will implement Best Management Practices (BMPs) to lessen potential impacts to the nearby wetland and riparian habitat due to increased runoff at the Project site during operations. These BMPs may include a stormwater retention basin which will be constructed in the northern portion of the site, immediately south of Rancho Road. BMPs may also include the use of swales.

However, depending on the connectivity of the ephemeral wash, removal of the wash may result in impacts to jurisdictional features. **MM BIO-6** would require a biological investigation of the ephemeral wash occur

prior to construction, and appropriate (if any) coordination with local, state and/or federal jurisdiction occur along with appropriate permitting. Therefore, impacts would be less than significant.

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? ● Less than Significant*

The Project site is not situated within a known migratory wildlife corridor or nursery site (Adelanto 2014). Following construction of the Project, ground-dwelling wildlife will continue to be able to move locally through the area using the surrounding undeveloped lands. 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. Therefore, implementation of the Project would not result in a significant impact to migratory fish. However, cannabis cultivation often requires the use of artificial lighting or mixed-lighting techniques in order to increase yields. To ensure that impacts to nocturnal wildlife species and migratory birds would remain less than significant, **MM BIO-7** would be implemented which would require that light not be visible outside of any structure used for cannabis cultivation. Implementation of the Project would not result in a significant impact resulting from interference with the movement of any native resident or migratory fish or wildlife species. Therefore, impacts would be less than significant.

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 with Mitigation*

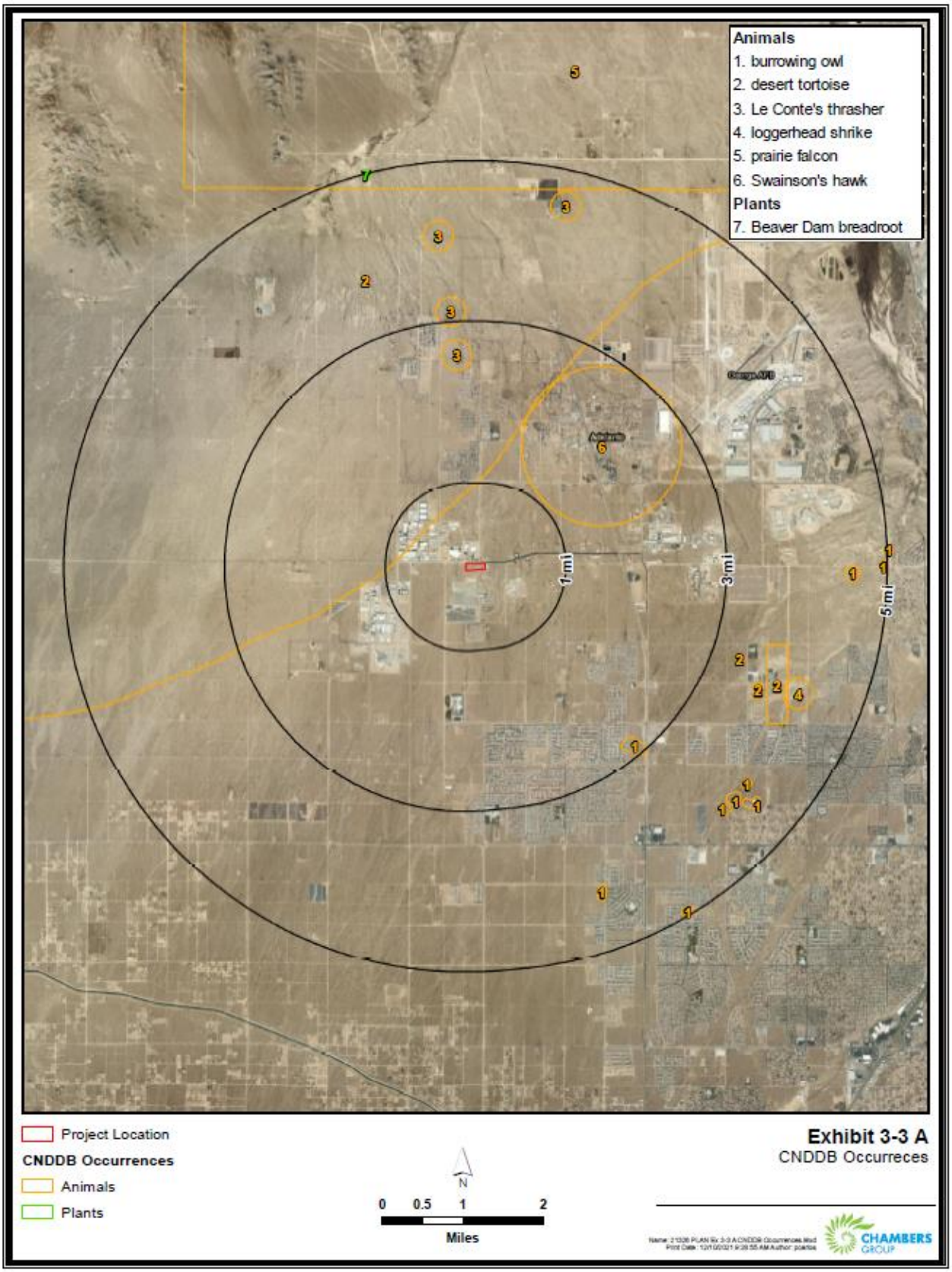
As stated above in Threshold a above, 91 Joshua trees were on the Project site. Of these 91 Joshua trees, 25 trees were dead and 3 additional trees were in poor health and/or dying; leaving a total direct impact to 66 trees (91 total trees less 25 dead). It was determined that 34 of the total 91 trees could be translocated and were subsequently relocated on site. The other trees that were already dead or dying as well as those not suitable for relocation were disposed of as per County requirements. Additionally, two Joshua trees died during the process of relocation. 32 Joshua trees remain on the property.

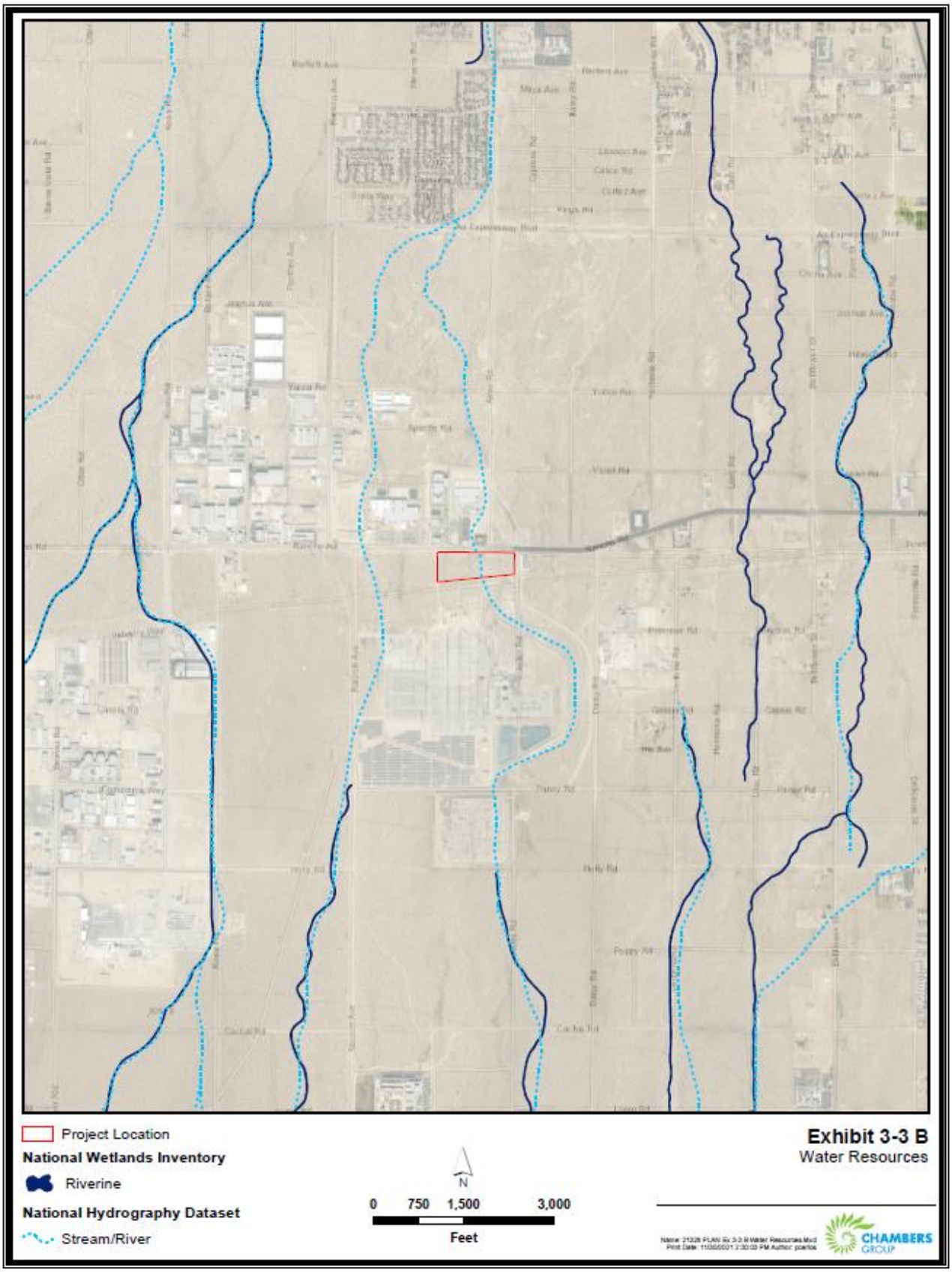
However, since translocation is not an accepted mitigation under CESA, and dead and dying trees can provide an opportunity for seed banking, **MM BIO-5** would require mitigation of all 66 living and 25 dead Joshua trees that were on the site. With incorporation of this mitigation, impacts from removal of the Joshua trees would be less than significant.

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.*

All applicable adopted habitat conservation plans, natural community conservation plans, or other conservation plans have been reviewed for consistency with the proposed Project. The review found that the City is a collaborator and participant in the WMPHCP in reference to the following species:

- Prairie Falcon: Although suitable nesting habitat does not occur within the proposed Project area, the City is required to comply with measures outlined in the WMPHCP pertaining to nest buffers. These requirements are detailed in **MM BIO-2** (Nesting Bird Surveys and Avoidance Measures) for the proposed Project.


Animals
1. burrowing owl
2. desert tortoise
3. Le Conte's thrasher
4. loggerhead shrike
5. prairie falcon
6. Swainson's hawk
Plants
7. Beaver Dam breadroot
1 mi
3 mi
5 mi
Project Location
CNDDB Occurrences
Animals
Plants
N
0 0.5 1 2
Miles
Exhibit 3-3 A
CNDDB Occurreces
CHAMBERS GROUP


Project Location
National Wetlands Inventory
Riverine
National Hydrography Dataset
Stream/River
N
0 750 1,500 3,000
Feet
Exhibit 3-3 B
Water Resources
CHAMBERS GROUP

- Desert Tortoise: Portions of the WMPHCP in reference to desert tortoise within the City and applicable to the proposed Project include guidance for utility construction and maintenance and survey protocols/methods. Mitigation measures for the proposed Project, including **MM BIO-3** (Desert Tortoise) include survey requirements that meet or exceed those detailed in the WMPHCP and provide for protection measures during construction.

- Burrowing owl: Requirements in the WMPHCP specific to measures for burrowing owl within the City include survey requirements, eviction or relocation of owls, and reporting information. These requirements are met or exceeded with the mitigation measures detailed above for the proposed Project and include **MM BIO-4** (Burrowing Owl Protection Measures).

Additionally, the City's 2035 Sustainable Plan Open Space and Conservation Element suggested that the City prepare a Multiple Species Habitat Conservation Plan (MSHCP) focusing on the conservation of species and their associated habitats in the Mojave Desert. The goal of the plan is to maintain the biological and ecological diversity while accommodating development growth (Sustainable Plan 2014). However, to date, there are no approved MSHCP has been adopted. Requirements in the WMPHCP for the City that are specific to the species noted above are met or exceeded by mitigation measures presented for the proposed Project. Therefore, the proposed Project would not conflict with any conservation plan, and there would be no impact.

CUMULATIVE IMPACTS

Based on the analysis presented above, significant direct or construction related impacts to special-status plants and wildlife, and jurisdictional waters are not expected to occur or have been mitigated to less than significant levels. Operational impacts would not result in additional significant impacts. Migrating birds would have access to suitable habitat within the adjacent areas and even within the translocated Joshua trees on site. Although species may be disrupted during certain activities impacts to migratory corridors from the proposed Project would not be significant. Impacts to sensitive wildlife, sensitive plants, jurisdictional waters and wildlife corridors, when combined with past, present, and probable future projects, would not be cumulatively considerable.

However, the proposed Project would result in direct impacts to native vegetation known to support special status plants and wildlife. Although impacts to native habitat, resulting from the proposed Project, would be mitigated to less than significant levels, the overall loss of these communities within California, and their suitability to support several special- status species, the loss of this habitat when combined with past, present, and probable future projects could be a cumulatively significant impact if not mitigated. Implementation of **MM's BIO-1** through **BIO-7** would reduce the proposed Project's contribution of cumulative impacts. These measures include preconstruction surveys, nesting bird buffer protocols, desert tortoise and burrowing owl protection measures, Joshua tree mitigation and mitigation for the ephemeral wash. Implementation of these mitigation measures and others would reduce the proposed Project's contribution to cumulative impacts such that they would not be cumulatively considerable.

MITIGATION MEASURES

The following mitigation would be required to address impacts to biological resources. With implementation of these measures, impacts would be less than significant:

BIO-1 Wildlife Pre-Construction Surveys and Biological Monitoring: Prior to construction within the proposed Project site, a lead biologist shall conduct pre-construction surveys for wildlife (no more than 7 days prior to construction) to ensure that no wildlife has entered the area that could be directly impacted by construction activities. The lead biologist must be approved by the City prior to the commencement of surveys. Wildlife found within the proposed Project site or in areas potentially affected by the proposed

Project shall be relocated to the nearest suitable habitat that would not be affected by the proposed Project prior to the start of construction. Special-status species found within a proposed Project impact area shall be relocated by the lead biologist to suitable habitat outside the impact area prior to the start of ground-disturbing activities that may impact those species and subject to prior incidental take authorization if required. This must be done by a qualified biologist with a scientific collecting permit. Nesting birds found within the proposed Project impact areas shall be subject to buffer requirements and additional conditions as detailed below in mitigation measure BIO-2.

Prior to construction, the Applicant shall provide written evidence to the City that the Applicant has retained a lead biologist(s) who meets the qualifications of an Authorized Biologist as defined by USFWS, with additional approval from CDFW (for state-listed species) to oversee compliance with the protection measures for desert tortoise and other special status species. The lead biologist shall be onsite during all ground disturbance activities throughout the construction phase. The lead biologist(s) shall have the right to halt all activities that are in violation of the desert tortoise or other special-status species protection measures. Work shall proceed only after hazards to desert tortoise or other special-status species are removed, the species are allowed to leave, or are removed (if allowed), and the species is no longer at risk. The lead biologist(s) shall have a copy of all the compliance measures in their possession while work is being conducted onsite. Construction activity may also be monitored by biological monitors under the lead biologist's supervision to ensure compliance with mitigation measures.

If required during pre-construction surveys or required monitoring efforts, the lead biologist(s) shall relocate common and special-status species that enter the proposed Project site; some special-status species may require specific permits prior to handling or have established protocols for relocation. Records of all detection, capture, and release shall be reported to CDFW.

BIO-2 Nesting Bird Surveys and Avoidance Measures: Prior to construction, the Applicant shall provide evidence to the City of the following. If construction is scheduled to begin during the avian nesting season (generally February 15 through September 15; January 1 through August 15 for raptors), breeding and nesting bird surveys shall be conducted by a qualified biologist no more than 3 days prior to the start of site disturbance. The qualified biologist must be approved by the City prior to the commencement of surveys. If construction activities carry over into a second nesting season(s), the surveys shall be completed annually until the proposed Project is complete. Surveys shall be conducted within 500 feet of all proposed Project activities, where feasible.

The Applicant shall coordinate with USFWS and/or CDFW if endangered or threatened species are observed. If breeding birds with active nests are found prior to or during construction, a qualified biological monitor shall establish a 300-foot buffer around the nest, and no activities shall be allowed within the buffer(s) until the young have fledged from the nest or the nest fails; initial buffers for nesting raptors shall be 500 feet; a buffer of 0.25 mile shall be used for nesting prairie falcon unless the line-of-sight from the edge of development is obscured as determined by a qualified ornithologist. The prescribed buffers for common species may be adjusted by the qualified biologist based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors; for example, buffers for common passerines, often found to be habituated to human activity, may be adjusted down to 25 - 50 feet depending on the disturbance tolerance of each specific species. Buffer adjustments for listed and/or other special-status species shall be done in coordination with the USFWS and CDFW as applicable. The qualified biologist shall conduct regular monitoring of the nest to determine success or failure and to ensure that proposed Project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails.

BIO-3 Desert Tortoise Protection Measures: If a desert tortoise is found on the proposed Project site during pre-construction surveys, the Lead Biologist will halt construction until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and State CESA permitting, and via an approved translocation plan pursuant to the above permits. the animal shall be relocated by the lead biologist, in accordance with the West Mojave Plan Habitat Conservation Plan (WMPHCP), to the nearest

suitable habitat that would not be affected by the proposed Project prior to the start of construction. Desert tortoise shall be moved in accordance with a Desert Tortoise Translocation Plan (DTRP) prepared for the Project.

Prior to the start of construction or any ground disturbance the Applicant shall retain a qualified wildlife biologist to prepare a comprehensive DTRP to be administered during the construction and operation of the project for the purpose of avoiding and minimizing impacts to this species. The DTRP shall be submitted to the City of Adelanto for review and approval and shall be updated and utilized for translocation and monitoring after construction. The DTRP shall include, but not be limited to, the following:

- Discussion on temporary construction fencing (if any)
- Description of clearance surveys of permanent exclusion areas
- Transportation and release procedures
- Schedule
- Translocation/relocation areas.
- Monitoring and reporting.

If a desert tortoise is found on the Project site during the construction phase of the Project, all active construction activities shall cease in the vicinity of the animal. Work shall proceed only after the animal is allowed to leave the area and is no longer at risk, or the animal is relocated by the lead biologist after approval from CDFW and USFWS..

In both cases, the lead biologist shall contact USFWS and CDFW and the Applicant shall be consulted regarding any additional avoidance, minimization, or mitigation measures that may be necessary. A report shall be prepared by the lead biologist to document the activities of the desert tortoise within the site; and compliance with other measures recommended by the agencies. This report shall be submitted to wildlife and resource agency representatives and the City.

If a desert tortoise is found on the proposed Project site during the operation and maintenance phase of the Project (when a lead biologist is not on site), all ground-disturbing operations and maintenance activities shall cease in the vicinity of the animal. The Applicant shall contact USFWS and CDFW (as applicable depending on the listing status of each species) and confer with the agency(ies) regarding potential relocation of the animal and any additional avoidance, minimization, or mitigation measures that may be necessary. Work shall not resume in the vicinity of the animal until the relevant agencies have responded, and all recommended measures are taken. A report shall be prepared by the Applicant to document the activities of the desert tortoise within the site; all fence construction, modification, and repair efforts; and compliance with other measures recommended by the agencies. This report shall be submitted to wildlife and resource agency representatives and the City.

BIO-4 Burrowing Owl Protection Measures: The following measures shall be implemented during proposed Project construction and operation, with respect to burrowing owls:

- The lead biologist(s) shall be onsite during all construction activities in suitable burrowing owl habitat. A qualified wildlife biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction surveys of the permanent and temporary impact areas to locate active breeding or wintering burrowing owl burrows no more than 30 days prior to construction. The survey methodology shall be consistent with the methods outlined in the California

Department of Fish and Game (CDFG) Staff Report (CDFG 2012). Copies of the survey results shall be submitted to CDFW and the City.

- If no burrowing owls are detected, no further mitigation is necessary. If burrowing owls are detected, no ground-disturbing activities, such as road construction or installation of solar arrays or ancillary facilities, shall be permitted except in accordance with the staff report or by written authorization of CDFW staff. Burrowing owls shall not be excluded from burrows unless or until a Burrowing Owl Exclusion Plan is developed by the lead biologist and approved by the applicable local CDFW office and submitted to the City. The plan shall adhere to the requirements set forth in the Burrowing Owl Mitigation Staff Report (CDFW 2012).

- In accordance with the Burrowing Owl Exclusion Plan, a qualified wildlife biologist shall excavate burrows using hand tools. Sections of flexible plastic pipe or burlap bag shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. One-way doors shall be installed at the entrance to the active burrow and other potentially active burrows within 160 feet of the active burrow. Forty-eight hours after the installation of the one-way doors, the doors can be removed, and ground disturbing activities can proceed. Alternatively, burrows can be filled to prevent reoccupation.

- During construction activities, monthly and final compliance reports shall be provided to CDFW, the City, and other applicable resource agencies documenting the effectiveness of mitigation measures and the level of burrowing owl take associated with the proposed Project.

BIO -5 Mitigation of Joshua Trees: Prior to construction, the Project Applicant is required obtain an Incidental Take Permit (ITP) through CDFW for the take of the 91 Joshua trees.

The Project Applicant must also develop and implement a Long Term Management Plan (LTMP) that is approved by CDFW for the protection and mitigation of the Joshua trees that were previously on site. Although there are 32 living translocated trees on site and 25 dead or dying trees, since translocation is not an accepted mitigation under CESA, and dead and dying trees can provide an opportunity for seed banking, the LTMP must provide acceptable mitigation for all 66 living and 25 dead Joshua trees that were taken on site, via a preserved Joshua Tree Woodland offsite that will be placed under a Conservation Easement and managed by a non-profit conservancy. The LTMP must consist of various tasks designed to effectively maintain and monitor all preserved areas to ensure long-term sustainability and natural recruitment of Joshua trees.

The LTMP must also detail a compensatory mitigation plan for the total amount of trees removed from the Project site (91 Joshua trees) via one of the following three options (A, B, or C) that would be managed in perpetuity:

Option A

Applicant Proposed. The Project Applicant proposes to secure 37.2 acres of "healthy" Joshua Tree Woodland habitat with a minimum of 7.3 Joshua trees per acre and that are varied in age class distribution such that the potential for sustained natural recruitment is high. This density represents the number of living Joshua trees (91) that were present at the time of the survey (living or dead) prior to the translocation effort took place (91 trees per 12.4 acres = 7.3 trees per acre). The acreage represents a 3:1 mitigation ratio as the habitat prior to translocation was disturbed and of only moderate quality. The proposed mitigation land will be purchased by the City as funded by the Project Applicant. A conservation easement (CE) or other deed restriction will be placed on the property to restrict future development (e.g., permanent construction of

structures). A non-profit third party beneficiary will act as the conservancy and be approved by the CDFW to hold the CE and manage the property through a non-wasting endowment paid for by the Project Applicant. An irrevocable standby letter of credit (LOC) will be provided to CDFW by the Applicant to guarantee payment and performance of this option.

Option B

Applicant Proposed. The Project Applicant proposes to enter into an agreement with the City to create a larger conservation bank that will acquire a minimum of 100 acres of contiguous Joshua Tree Woodland with a minimum density of 7.3 Joshua trees per acre. The City will pool funds from the Project Applicant and additional business owners in the area seeking to develop land with Joshua trees present within the City limits. By combining mitigation obligations into one contiguous parcel, a larger habitat can be preserved with connectivity and that minimizes edge effects. This increases the overall habitat value for native wildlife and those species that rely on Joshua tree for survival. The Applicant understands that this conservation bank option will require the habitat to already be of moderate to high quality and supporting healthy Joshua trees. The Applicant proposes to purchase 37.2 of the minimum 100 acres of qualifying Joshua Tree Woodland representing a 3:1 mitigation ratio (based on 91 trees per 12.4 acres = 7.3 trees per acre). If restoration or enhancement activities are needed on this proposed site, the Applicant will consult with CDFW to determine whether additional mitigation is required to account for any temporal losses of habitat value. In the event other business owners do not contribute funds to meet the purchase of the minimum acreage required (100 acres) within 1 year from the date the Project commences, the Applicant will be responsible for the purchase of the remaining 62.8 acres of qualifying Joshua Tree Woodland. An LOC will be provided to CDFW by the Applicant to guarantee payment and performance of this option.

Option C

CDFW-Approved Mitigation Bank. The Project Applicant elects to purchase 37.2-acre credits at an already established CDFW-approved mitigation bank (e.g., Antelope Valley Conservation Bank). Although the Antelope Valley Conservation Bank is under final review by CDFW and they have indicated that approval is one of the highest priorities in the region, the purchase of credits is not immediately available. Once available, the Applicant will pay for credits of Joshua Tree Woodland in the amount equal to the 37.2 acres representing a 3:1 mitigation ratio for the 12.4 acres that were impacted during Project activities. A copy of the mitigation banking instrument and payment receipt will be made available to CDFW upon completion of the transaction.
With implementation of the CDFW approved LTMP, impacts from removal of the Joshua trees would be less than significant.

BIO – 6 Potential Waters of the U.S./State: If the California Department of Fish and Wildlife (CDFW), California Coastal Commission, Regional Water Quality Control Board (RWQCB), or U.S. Army Corps of Engineers (USACE) determine that the ephemeral wash onsite is a water of the state/U.S., the Applicant or its contractor shall obtain, and shall comply with all mitigation and conditions associated with, one or more of the following permits, as applicable: a CDFW Lake and Streambed Alteration Agreement; RWQCB Section 401 Water Quality Certification; or Section 404 USACE permit. Permit compliance shall be met through the purchase of in-lieu credits for non-vegetated streams at an approved mitigation bank, implementation of in-kind or out-of-kind restoration, or a combination of these actions.

The mitigation replacement ratio shall be determined by the regulatory agencies during the permitting process. Evidence of compliance with agency requirements shall be provided to the City prior to Project activities.

BIO – 7 Nighttime Lighting: Light should not be visible outside of any structure used for cannabis cultivation. The Project Applicant shall implement that following during Project operations:

- Employ blackout curtains where artificial light is used to prevent light escapement.

- Eliminate all nonessential lighting from cannabis sites and avoid or limit the use of artificial light during the hours of dawn and dusk, as these windows of time are when many wildlife species are most active.
- Ensure that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky.
- Use LED lighting with a correlated color temperature of 3,000 Kelvins or less, properly dispose of hazardous waste, and recycle lighting that contains toxic compounds with a qualified recycler.

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? ● Less than Significant with Mitigation*

As defined by CEQA Public Resources Code Section 5020.1(j), a historical resource consists of, but is not limited to, "any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California." In addition, CEQA Guidelines define historical resources as: (1) resources listed in or eligible for listing in the California Register of Historical Resources (CRHR); (2) listed in a local register of cultural resources; or (3) determined to be significant by a Lead Agency (California Code of Regulations 15064.5[a][1]-[3]). A resource may be eligible for listing in the CRHR if it meets any one of the ensuing criteria (Public Resources Code 5024.1[c]):

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
2. Is associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. Has yielded, or may be likely to yield, information important in prehistory or history

Chambers Group conducted a cultural resources records search and literature review within the Project site and surrounding study area in January 2022 (Chambers 2022).

While a records request was made of the CHRIS database, at this time no results have been provided from the SCCIC to confirm the presence or absence of previously recorded cultural resources or studies within the Project site or surrounding half-mile study area. Additionally, the requested paleontological records search results have not yet been received from the Western Science Center. Chambers Group also submitted a search request of the NAHC SLF to determine the presence or absence of any known TCRs previously reported within the Project site or surrounding vicinity. The NAHC SLF search is currently pending.

Chambers Group found no evidence of archaeological or paleontological resources within the Project site based on the information publicly available and not including the review of the results of NAHC SLF,

paleontological, or cultural resources records search requests specific to this Project. The overall Adelanto area is associated with the traditional use areas of the Serrano and Vanyume, and as such, has the potential to yield prehistoric archaeological materials. However, based on the information available at this time, the subsurface context within the Project site is considered low sensitivity for buried resources, both archaeological and paleontological.

Nonetheless, it is recommended that the following mitigation measures be implemented for the associated Project construction activity. Moreover, because the records search results have not been received and reviewed, Chambers Group recommends that those results be adequately reviewed and incorporated into this report upon receipt. If any cultural resources are identified, they would need to be evaluated for eligibility for the CRHR. Evaluation for archaeological sites consists of an archaeological testing program. Similarly, evaluation for paleontological resources will require evaluation by a qualified paleontologist. If determined eligible by the CEQA lead agency or the State Historic Preservation Office, mitigation, consisting of data recovery for archaeological sites, paleontological resources and documentation would be required if avoidance is not feasible. Finally, in the event that the requested records search results indicate the presence of sensitive resources within the Project site, or until the records search results confirm the absence of sensitive resources within the Project site, mitigation measures **MM CUL-1** through **MM CUL-3** would ensure that potential impacts to sensitive resources remain less than significant.

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 with Mitigation*

As described in Threshold A, Historic Resources above, the Cultural Resources Letter Report concluded that based on the information available at this time, the subsurface context within the Project site is considered low sensitivity for buried resources, both archaeological and paleontological (Chambers Group 2022); therefore, the potential to encounter previously unknown buried archaeological resources would be low. However, due to the current condition of the site, in addition to the delay in the records search results, the potential for impacts still exists. Thus, in the event that the requested records search results indicate the presence of sensitive resources within the Project site, or until the records search results confirm the absence of sensitive resources within the Project site, mitigation measures **MM CUL-1** through **MM CUL-3** would ensure that potential impacts to sensitive resources remain less than significant.

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

As previously mentioned, the Cultural Resources Letter Report concluded that the likelihood of previously recorded resources within the Project site is low (Chambers Group 2022). However, in the unlikely event that human remains are discovered during ground-disturbing activities, then the proposed Project would be subject to California Health and Safety Code 7050.5, CEQA Section 15064.5, and California Public Resources Code Section 5097.98. If human remains are found during ground-disturbing activities, State of California Health and Safety Code Section 7050.5 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. In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the County Coroner shall notify the NAHC, which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Impacts would remain less than significant.

CUMULATIVE IMPACTS

Based on the information available at this time, the subsurface context within the Project site is considered low sensitivity for buried resources, both archaeological and paleontological. Nonetheless, the potential for impacts still exists. Implementation of **MM's CUL-1** through **CUL-3** would reduce the proposed Project's contribution of cumulative impacts. These measures include surveying during further ground disturbance, and proper handling and documenting of any resources found. Implementation of these mitigation measures and others would reduce the proposed Project's contribution to cumulative impacts such that they would not be cumulatively considerable.

MITIGATION MEASURES

The following mitigation measures shall be implemented to ensure that potential impacts to sensitive resources remain less than significant:

CUL-1 Archaeological Monitoring: In the event that the requested records search results indicate the presence of sensitive resources within the Project site, or until the records search results confirm the absence of sensitive resources within the Project site, the Contractor shall retain a qualified Archaeologist and provide the schedule of all future proposed ground-disturbing activities. A minimum of 48 hours will be provided to the Consultant for any additional ground-disturbing activities such as grading, trenching, or mass excavation.

An Archaeological Resources Monitor shall be present on site during any further ground-disturbing activities related to the Project. The monitor shall observe all ground-disturbing activities. All monitors will have stop-work authority to allow for recordation and evaluation of finds during construction. The monitor will maintain a daily record of observations to serve as an ongoing reference resource and to provide a resource for final reporting upon completion of the Project.

The Archaeological Monitor and the Lead Contractor and subcontractors shall maintain a line of communication regarding schedule and activity such that the monitor is aware of all ground-disturbing activities in advance in order to provide appropriate oversight.

MM-CUL-2 Undiscovered Archaeological Resources: If archaeological resources are discovered, construction shall be halted within 60 feet of the find and shall not resume until a Qualified Archaeologist can determine the significance of the find and whether the find has been fully investigated, documented, and cleared. If the Qualified Archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the City shall implement an archaeological data recovery program.

MM-CUL-3 Archaeological Resources Monitoring Report: At the completion of all ground-disturbing activities, the Consultant shall prepare an Archaeological Resources Monitoring Report summarizing all monitoring efforts and observations, as performed, and any and all prehistoric or historic archaeological finds as well as providing follow-up reports of any finds to the South Central Coastal Information Center (SCCIC), as required.

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[19][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

19 Blue Engineering and Consulting, Inc. Site Plan.

can achieve up to 30-35% energy savings compared to a standard indoor grow.[2023] The total energy costs for 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. Assuming this rate of consumption, the proposed project would consume approximately 906,575 kWh of electricity on a daily basis. 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.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. 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

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.

[20] 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.

MITIGATION MEASURES

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

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[21][41]

[21] Blue Engineering and Consulting, Inc. Site Plan.

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The closest fault to the project site is the Mirage Valley Fault Zone, which is located approximately 9.5 miles northwest of the City.[22] Surface ruptures are 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 moderate liquefaction zone.[23] The risk for liquefaction is no greater on-site than it is for the region. 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 Cajon soil association, which consists of very deep and well drained sandy soil. Slopes range from 0 to 2 percent.[24] 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, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. Since the site is less than one acre, the later applies to the proposed project.

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.

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

23 San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

24 UC Davis. *SoilWeb*. Website accessed October 1, 2020.

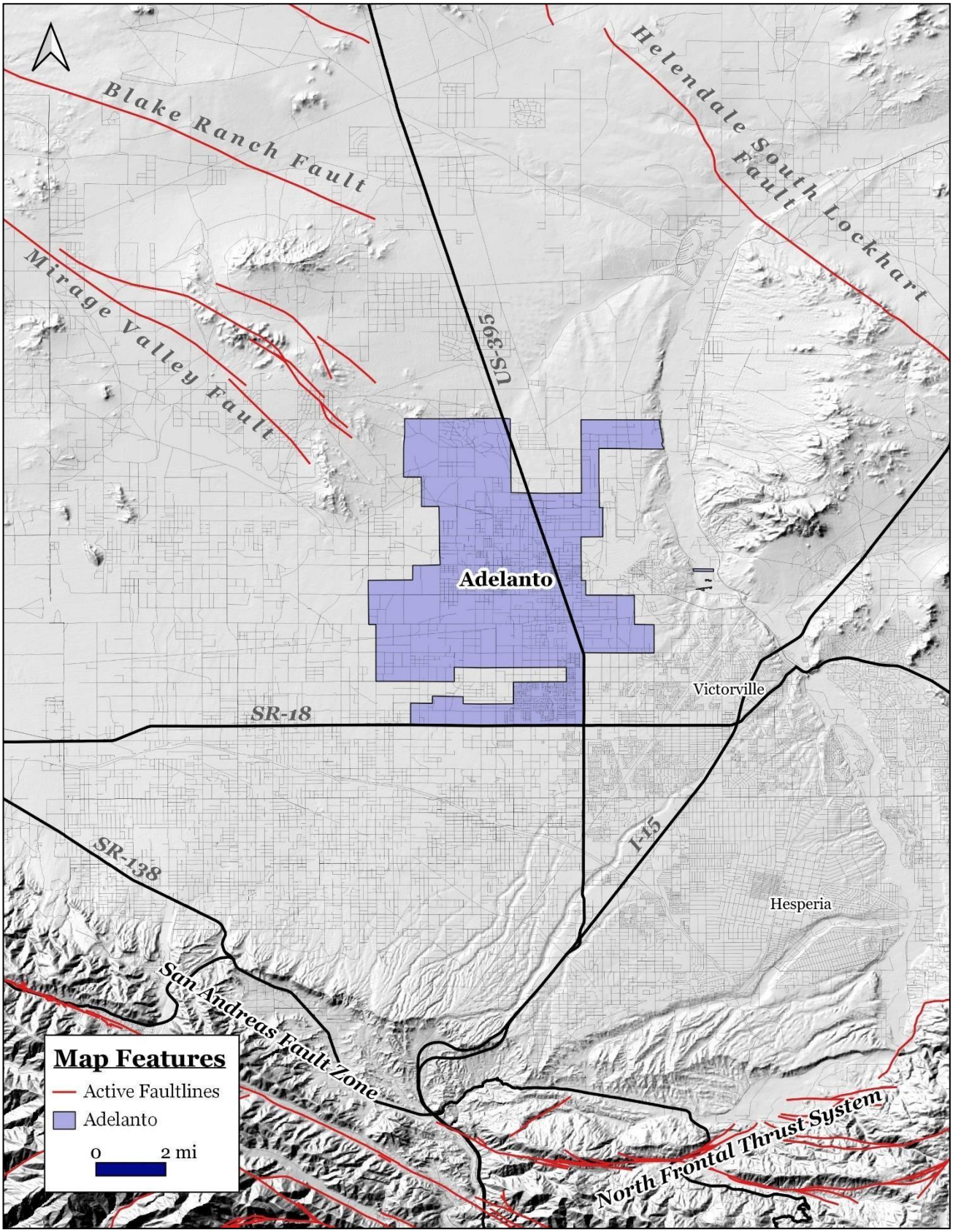


EXHIBIT 3-4
GEOLOGY MAP
SOURCE: U.S. GEOLOGICAL SURVEY

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.[25] 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.

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 Cajon soil association, which consists of very deep and well drained sandy soil, with slopes ranging from 0 to 2 percent.[26] According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.[27] 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. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

F. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ● Less than Significant with Mitigation*

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

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

26 UC Davis. *SoilWeb.* Website accessed October 1, 2020.

27 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.

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.

Nonetheless, as described in Section 3.5 Cultural Resources, Threshold A above, the Cultural Resources Letter Report concluded that based on the information available at this time, the subsurface context within the Project site is considered low sensitivity for buried resources, both archaeological and paleontological (Chambers Group 2022); therefore, the potential to encounter previously unknown buried archaeological resources would be low. However, due to the current condition of the site, in addition to the delay in the records search results, the potential for impacts still exists. Thus, in the event that the requested records search results indicate the presence of sensitive resources within the Project site, or until the records search results confirm the absence of sensitive resources within the Project site, mitigation measures **MM CUL-1** through **MM CUL-3** would ensure that potential impacts to sensitive resources remain less than significant.

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 that the site's development would not lead to any significant adverse cumulative environmental impacts on geology and soils and with implementation of **MM CUL-1** through **CUL-3**, impacts to paleontological resources would also remain less than significant. None 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 with implementation of **MM CUL-1** through **CUL-3**, the proposed project would result in less than significant impacts related to paleontological resources.

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[28][46]

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions of 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 is 7,377.77 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	0.12	--	--	0.13
Long-Term - Energy Emissions	370.99	--	--	373.19
Long-Term - Mobile Emissions	9,625.61	0.66	--	9,642.26
Long-Term - Total Emissions	9,996.75	0.66	--	10,015.59
Total Construction Emissions	7,355.14	1.94	0.00	7,377.77
Significance Threshold				**100,000 $MTCO_2E$**

[28] Blue Engineering and Consulting, Inc. Site Plan.

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.*

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-30-15 calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.[2947] 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.

CUMULATIVE IMPACTS

None of the related projects are located within one mile of the proposed project site. Furthermore, the combined daily GHG emissions for all 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.

[29] Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.*

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[30]

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,

[30] Blue Engineering and Consulting, Inc. Site Plan.

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. 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 schools to the project site include Adelanto High School, located 1.68 miles to the southwest and Westside Park Elementary School, which is located approximately 1.8 miles northeast of the project site.[31] As a result, the proposed project will not create a hazard to any local school and no impacts are anticipated.

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][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.*

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

[32] CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*.

The project site is not located within an airport land use plan and is not located within two miles of a public airport or public use airport.[33] The nearest airport to the City is the Southern California Logistics Airport is located approximately 3.4 miles northeast of the project site.[34] The project will not introduce a structure that will interfere with the approach and take off of airplanes utilizing any regional airports. 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 Rancho Road 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."[35] 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.

33 Toll-Free Airline. *Los Angeles County Public and Private Airports, California*.

34 Google Earth. Website accessed October 1, 2020.

35 CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County*.

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[36][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, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. As a result, the construction impacts will be less than significant.

[36] Blue Engineering and Consulting, Inc. Site Plan.

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 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 X.[37] Thus, properties located in Zone X are not 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 72 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.[38] 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 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

37 Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2020.

38 Google Earth. Website accessed October 1, 2020.

The potential cumulative impacts on hydrology 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

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI). The project site is zoned as Manufacturing Industrial (MI). Other land uses and development located in the vicinity of the proposed project are outlined below:

- North of the project site: Rancho Road extends along the north side of the Project site and is a main throughway, high traffic area through the City. Further north is the Desert View Modified Correctional Facility, the Adelanto ICE Processing Center, San Bernardino County Fire Station No. 322, and a Bank. These parcels are zoned as Manufacturing Industrial (M/I) (Adelanto 2021).
- East of the Project site: Aster Road extends along the Project site's east side. An industrial use building is located directly adjacent to the Project site, across Aster Road. Further east is additional manufacturing and industrial use development. This area is zoned as Manufacturing Industrial (M/I) (Adelanto 2021).
- South of the Project site: Directly south of the Project site is a utility corridor with transmission lines and is designated as a Greenbelt Corridor Easement (GCE). This area is envisioned to form a network of hiking and biking trails linking residential neighborhoods, open space areas, and recreational areas (Sustainable 2014). Further south from the site is a Department of Water and Power (DWP) Sub-Station. The area directly south is zoned as Manufacturing Industrial (M/I) and further south is zoned as Public Utilities (PU) (Adelanto 2021).
- West of the Project site: Vacant, undeveloped land is directly west of the Project site, however further west contains a large, fenced in industrial facility. This area is zoned as Manufacturing Industrial (M/I) (Adelanto 2021).

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. As a result, no impacts will occur.

CUMULATIVE IMPACTS

The potential cumulative impacts with respect to land use are site-specific. There are no related projects 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.

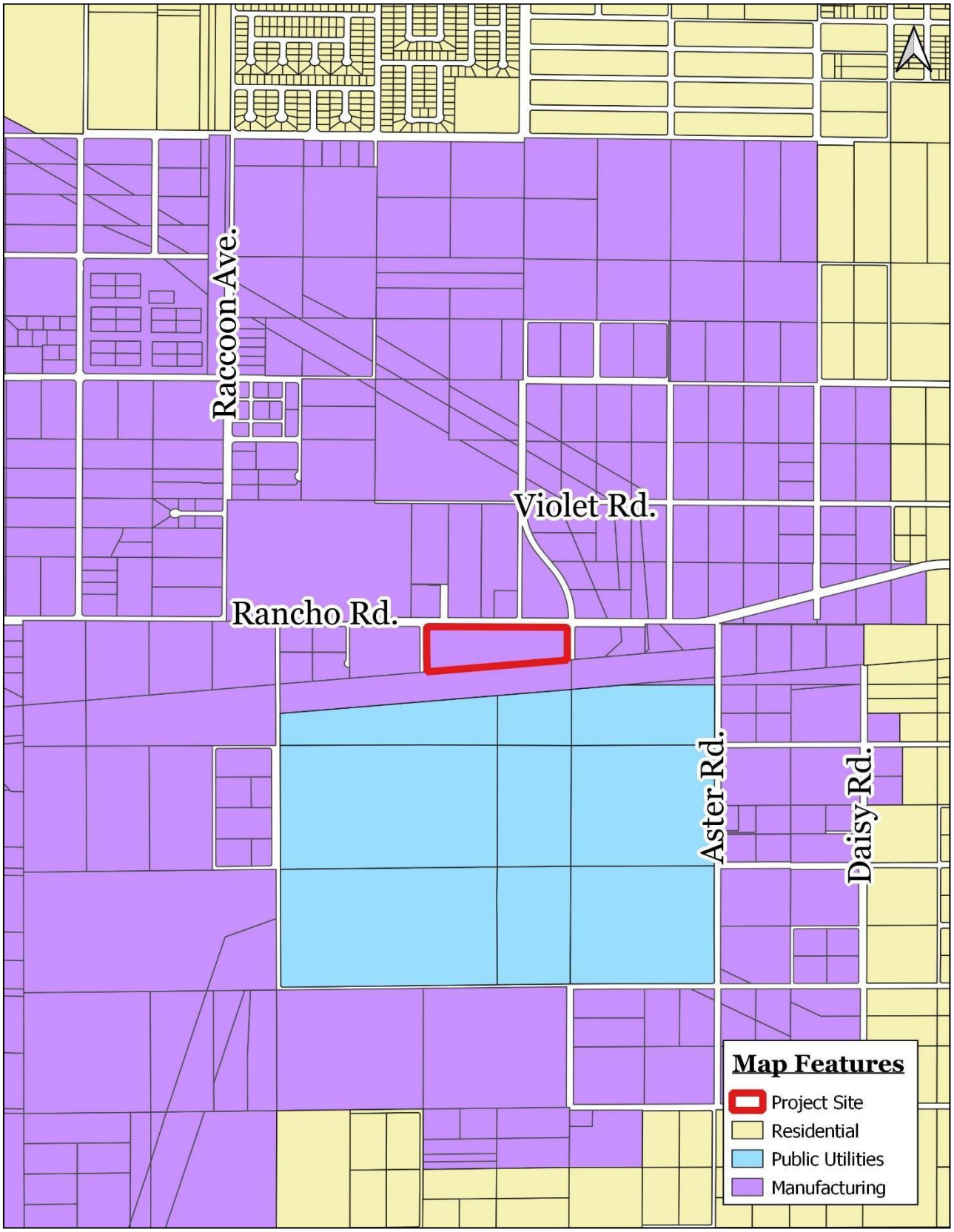


EXHIBIT 3-5
LAND USE AND ZONING MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

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.[39] 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 Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[40]

39 California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*.

40 California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*.

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.

[60] California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed April 11, 2019.

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[41] The project site is zoned as Manufacturing Industrial (MI).

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.[42] 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

41 Blue Engineering and Consulting, Inc. Site Plan.

42 Bugliarello, et. al. *The Impact of Noise Pollution,* Chapter 127, 1975.

receptors to excessive noise levels and the 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 3.4 miles northeast of the project site.[43] The project site is not located within the approach or takeoff zones of either of the two runways that are operating at the SCLA.[44] In addition, the project site is not located within the aforementioned airport's designated compatibility review areas.[45] Furthermore, the project site is not located within any 70 Community Noise Equivalent Level (CNEL) contour line boundaries.[46] 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.

43 Google Earth. Website accessed September 20, 2020.

44 Southern California Logistics Airport Near Victorville California. Website accessed on June 20, 2021.

45 Ibid.

46 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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[47] The project site is zoned as Manufacturing Industrial (MI).

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. Only Koala Road is paved.
- *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 or sewer utility lines within the immediate area 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

47 Blue Engineering and Consulting, Inc. Site Plan.

services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants. The project's potential utility impacts are further analyzed in Section 3.19.

- *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 221 persons per day at full build-out. The 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 Manufacturing Industrial (MI). 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 twelve 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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[48] The project site is zoned as Manufacturing Industrial (MI).

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 322 located at 10370 Rancho Road. This station is located opposite the project site.[49] 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

48 Blue Engineering and Consulting, Inc. Site Plan.

49 San Bernardino Fire Department. Website accessed June 20, 2021.

implementation. As a result, the potential impacts to fire protection services will be less than significant.

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.[50] 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 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. As a result, no cumulative housing and population impacts would occur as part of the proposed project's implementation.

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.

[50] San Bernardino Sheriff's Department. Website accessed on June 20, 2021.

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[51] The project site is zoned as Manufacturing Industrial (MI).

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 ½ mile of the project 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.

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.

[51] Blue Engineering and Consulting, Inc. Site Plan.

CUMULATIVE IMPACTS

All of the 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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[52] The project site is zoned as Manufacturing Industrial (MI). 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 208 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.

As indicated in Table 3-5, at build-out when all nine buildings are occupied and operational, the project will generate a total of 1,118 vehicle trips during a typical workday. Of this total number, 60 trips during the after-hour shifts for a total of 1,178 trips per day.

[52] Blue Engineering and Consulting, Inc. Site Plan.

Table 3-5
Potential Employment and Traffic Breakdown

Description of Activity	Employees		No of Trip (One Way Trips)		Trip Description
Regular Business Hours (Monday through Friday 8:00 AM to 5:00 PM)					
Onsite Manager	1	13	2	26	Home to Work; Work to Home
Maintenance Technician	1	13	2	26	Home to Work; Work to Home
Office/Vault	1	13	2	26	Home to Work; Work to Home
Security (Bldg.)	1	13	2	26	Home to Work; Work to Home
Grow/Cultivator Staff	3	39	6	234	Home to Work; Work to Home
Cannabis Trimmer	2	26	4	104	Home to Work; Work to Home
Extraction Technician	2	26	4	104	Home to Work; Work to Home
Packaging Associate	2	26	4	104	Home to Work; Work to Home
Shipping/Distribution	2	26	4	104	Home to Work; Work to Home
Drivers	2	26	4	104	Home to Work; Work to Home
Deliveries (# one-way trips)	--	--	8	208	Whse. to User; User back to Whse.
Vendors	--	--	2	26	1 round trip/day/vendor
Miscellaneous	--	--	2	26	1 round trip/day/visit
Total (Reg. Hours)	--	221	**46**	**1,118**	
After Hours (Monday through Friday 5:00 PM to 8:00 AM)					
Security (Bldg.)	2	10		20	2nd & 3rd shifts
Maintenance Technician (Bldg>	2	10		20	2nd & 3rd shifts
Grow/Cultivator Staff (Bldg.)	2	10		20	2nd & 3rd shifts
Total (After Hours)	--	30		**60**	
Total Daily Traffic (Regular Business Hours Plus After Hours)					
Total Daily Traffic	--	251	**58**	**1,178**	

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. 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 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 two driveway connections with the south side of Rancho Road. The driveways at Rancho Road would have a width of 30 feet. Internal drive aisles would separate the individual buildings and the width of these drive aisles would be 30 feet.[53] 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

At the present time, a traditional *vehicle mile 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. Unlike the urbanized areas where housing costs are high, local residents came to this area because of affordable housing. 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

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

53 Blue Engineering and Consulting, Inc. Site Plan.

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 221 persons per day, at full build-out. Even with the twelve 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: (a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or (b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public 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:*
(a) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
(b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public 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 with Mitigation.

Assembly Bill (AB) 52, which went into effect on July 1, 2015, established a consultation process with all California Native American tribes and required consideration of Tribal Cultural Resources in the determination of potential environmental impacts. Tribal Cultural Resources are defined as a site feature, place, cultural landscape, sacred place, or object which is of cultural value to a Tribe that is either: (1) on or eligible for the California Historic Register or a local historic register; or (2) treated by the lead agency, at its discretion, as a traditional cultural resource per Public Resources Code 21074 (a)(1)(A)-(B).

The City of Adelanto completed the initial AB 52 outreach for the Project on July 8, 2021, which included four tribal groups. As of the date of this report, only one tribe responded to the AB 52 consultation request. The San Manuel Band of Mission Indians (SMBMI) responded via email on July 13, 2021, requesting that the project include the mitigation measures which are noted in Section 3.5. Additionally, SMBMI indicated that they have no concerns with the proposed project and simply requests that additional language as detailed in

MM TCR—1 and **TCR-2** be included in the document to protect any inadvertent discoveries.

As such, AB-52 concluded with no other input, thus with implementation of **MM TCR—1** and **TCR-2**, and with mitigation measures CUL-1 through CUL-3, any cultural resources of importance uncovered will be handled properly. Therefore, with implementation identified mitigation measures, the project is not anticipated to cause a change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape, or object with 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. No further mitigation is required.

CUMULATIVE IMPACTS

The potential environmental impacts related to tribal/cultural resources are site-specific and Tribal Consultation is required for any future projects. Nonetheless the Project found that with implementation of **MM CUL-1** through **CUL-3** and **TCR-1** and **TCR-2** impacts to cultural and Tribal cultural resources would remain less than significant. As a result, no cumulative impacts on tribal/cultural resources are anticipated.

MITIGATION MEASURES

With implementation of the below mitigation and with **MM CUL-1** through **CUL-3**, any cultural resources of importance uncovered will be handled properly and impacts would be less than significant.

TCR-1 SMBMI Involvement: The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in CUL-2, of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

TCR-2 SMBMI Involvement: Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[54][76] 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 parcels. Therefore, the project's

54 Blue Engineering and Consulting, Inc. Site Plan.

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.[55] 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 located in Rancho Road.[56] 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.

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

56 City of Adelanto. City of Adelanto Existing Sewer and Water.

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 related projects daily water consumption is estimated to be 70,540 gallons per day, the effluent generation is 54,744 gallons per day, and the solid waste generation is 4,427 pounds per day. For purposes of comparison, the proposed project at total build-out will consume 60,102 gallons of water per day, generate 48,082 gallons of effluent per day, and generate 4,402 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 involves the construction of five buildings within the 12.4-acre site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 27,000 square feet will be reserved for landscaping. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).[57] The new buildings will be used for cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).

The project site is located in the midst of an urbanized area. Improved surface streets serve the project site and the surrounding area. Furthermore, the proposed project would not involve the closure or alteration

57 Blue Engineering and Consulting, Inc. Site Plan.

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.

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 in the midst of 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.*

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.

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 wild fire. 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. *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? ●Less than Significant with Mitigation*

As discussed in detail within the Biological Resources section, the proposed Project would implement **MM's BIO-1** through **BIO-7**; these mitigation measures have been specifically designed to avoid otherwise potentially significant effects to the quality of the environment, reductions in the habitat of fish or wildlife species, effects on population levels, or restrictions in range of endangered species. With implementation of these mitigation measures, impacts would be reduced for all potential impacts to a less than significant level. Additionally, as noted in the Cultural Resource section, the Project will implement **MM's CUL-1** through **CUL-3** and adhere to the standard conditions to minimize potential impacts to cultural resources thereby reducing impacts to less than significant and will include **MM TCR-1** and **TCR-2** as noted in the Tribal Cultural Resource section to minimize any potential impacts to Tribal Resources.

Implementation of the aforementioned measures and standard conditions would serve to ensure that the proposed Project would not 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; therefore, impacts would be less than significant with mitigation incorporated.

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?) ●Less than Significant with Mitigation*

The cumulative impacts analysis is provided throughout the IS/MND for each resource area and is consistent with Section 15130(a) of the CEQA Guidelines in which the analysis of cumulative effects of a project is based on two determinations: Is the combined impact of this project and other projects significant? If so, is the project's incremental effect cumulatively considerable, causing the combined impact of the projects evaluated to become significant? The cumulative impact must be analyzed only if the combined impact is significant and the project's incremental effect is found to be cumulatively considerable (CEQA Guidelines 15130(a)(2) and (3)). The Project would implement **Mitigation Measure No. 1** and **No. 2** for Air Quality, **BIO -1** through **BIO – 7** for Biological Resources, **CUL – 1** through **CUL -3** along with standard conditions for Cultural Resources, and **TCR-1** and **TCR-2** for Tribal Cultural Resources, which would mitigate all potential impacts to less than significant. Therefore, the proposed project will not have impacts that are individually limited, but cumulatively considerable.

C. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? ●Less than Significant Impact*

The proposed project will not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in this IS/MND, the proposed project will not result in any significant unmitigable environmental impacts.

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 Mitigated 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

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Heather Clayton, Project Biologist
Lucas Tutschulte, Cultural Resources Department Lead
Richard Shultz MA, RPA, Cultural Resources Principal Investigator
Kellie Kandybowicz, Cultural Resources Specialist
Phillip Carlos, Geographic Information Systems (GIS)

5.2 REFERENCES

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APPENDIX A – AIR QUALITY WORKSHEETS

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ADLT 25

Mojave Desert AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	567.00	1000sqft	13.02	567,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	30
Climate Zone	10			**Operational Year**	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - N/A

Land Use -

Construction Phase - N/A

Energy Use -

Construction Off-road Equipment Mitigation -

Area Mitigation -

Energy Mitigation -

Water Mitigation -

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True
tblConstructionPhase	NumDays	20.00	40.00
tblConstructionPhase	NumDays	300.00	45.00
tblConstructionPhase	NumDays	20.00	42.00
tblConstructionPhase	NumDays	30.00	45.00
tblConstructionPhase	NumDays	20.00	45.00
tblConstructionPhase	NumDays	10.00	44.00
tblConstructionPhase	PhaseEndDate	7/14/2022	12/31/2021
tblConstructionPhase	PhaseEndDate	5/19/2022	9/4/2021
tblConstructionPhase	PhaseEndDate	1/28/2021	3/1/2021
tblConstructionPhase	PhaseEndDate	3/25/2021	7/3/2021
tblConstructionPhase	PhaseEndDate	6/16/2022	11/5/2021
tblConstructionPhase	PhaseEndDate	2/11/2021	5/2/2021
tblConstructionPhase	PhaseStartDate	6/17/2022	11/6/2021
tblConstructionPhase	PhaseStartDate	3/26/2021	7/4/2021
tblConstructionPhase	PhaseStartDate	2/12/2021	5/3/2021
tblConstructionPhase	PhaseStartDate	5/20/2022	9/5/2021
tblConstructionPhase	PhaseStartDate	1/29/2021	3/2/2021
tblGrading	AcresOfGrading	112.50	75.00

2.0 Emissions Summary

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					
2021	328.9437	46.4552	31.5388	0.0738	18.2141	2.0454	20.2595	9.9699	1.8817	11.8516	0.0000	7,355.0147	7,355.0147	1.9480	0.0000	7,377.7765
Maximum	**328.9437**	**46.4552**	**31.5388**	**0.0738**	**18.2141**	**2.0454**	**20.2595**	**9.9699**	**1.8817**	**11.8516**	**0.0000**	**7,355.0147**	**7,355.0147**	**1.9480**	**0.0000**	**7,377.7765**

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					
2021	328.9437	46.4552	31.5388	0.0738	7.1937	2.0454	9.2391	3.9122	1.8817	5.7939	0.0000	7,355.0147	7,355.0147	1.9480	0.0000	7,377.7764
Maximum	**328.9437**	**46.4552**	**31.5388**	**0.0738**	**7.1937**	**2.0454**	**9.2391**	**3.9122**	**1.8817**	**5.7939**	**0.0000**	**7,355.0147**	**7,355.0147**	**1.9480**	**0.0000**	**7,377.7764**

	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	60.50	0.00	54.40	60.76	0.00	51.11	0.00	0.00	0.00	0.00	0.00	0.00

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	15.7393	5.3000e-004	0.0580	0.0000		2.1000e-004	2.1000e-004		2.1000e-004	2.1000e-004		0.1241	0.1241	3.3000e-004		0.1323
Energy	0.0340	0.3092	0.2597	1.8500e-003		0.0235	0.0235		0.0235	0.0235		370.9944	370.9944	7.1100e-003	6.8000e-003	373.1990
Mobile	2.2547	16.5538	22.2212	0.0942	5.9466	0.0539	6.0005	1.5915	0.0506	1.6421		9,625.6411	9,625.6411	0.6649		9,642.2638
Total	**18.0280**	**16.8635**	**22.5389**	**0.0960**	**5.9466**	**0.0776**	**6.0242**	**1.5915**	**0.0743**	**1.6658**		**9,996.7595**	**9,996.7595**	**0.6724**	**6.8000e-003**	**10,015.5951**

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	15.7393	5.3000e-004	0.0580	0.0000		2.1000e-004	2.1000e-004		2.1000e-004	2.1000e-004		0.1241	0.1241	3.3000e-004		0.1323
Energy	0.0340	0.3092	0.2597	1.8500e-003		0.0235	0.0235		0.0235	0.0235		370.9944	370.9944	7.1100e-003	6.8000e-003	373.1990
Mobile	2.2547	16.5538	22.2212	0.0942	5.9466	0.0539	6.0005	1.5915	0.0506	1.6421		9,625.6411	9,625.6411	0.6649		9,642.2638
Total	**18.0280**	**16.8635**	**22.5389**	**0.0960**	**5.9466**	**0.0776**	**6.0242**	**1.5915**	**0.0743**	**1.6658**		**9,996.7595**	**9,996.7595**	**0.6724**	**6.8000e-003**	**10,015.5951**

	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	1/1/2021	3/1/2021	5	42	
2	Site Preparation	Site Preparation	3/2/2021	5/2/2021	5	44	
3	Grading	Grading	5/3/2021	7/3/2021	5	45	
4	Building Construction	Building Construction	7/4/2021	9/4/2021	5	45	
5	Paving	Paving	9/5/2021	11/5/2021	5	45	
6	Architectural Coating	Architectural Coating	11/6/2021	12/31/2021	5	40	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 75

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 850,500; Non-Residential Outdoor: 283,500; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

ADLT 25 - Mojave Desert AQMD Air District, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Excavators	3	8.00	158	0.38
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Excavators	2	8.00	158	0.38
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Paving	Pavers	2	8.00	130	0.42
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
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Paving Equipment	2	8.00	132	0.36
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
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	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	238.00	93.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	48.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2021

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	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**		**1.5513**	**1.5513**		**1.4411**	**1.4411**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

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
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
Worker	0.0685	0.0415	0.4953	1.2100e-003	0.1232	7.5000e-004	0.1240	0.0327	6.9000e-004	0.0334		120.6001	120.6001	3.8800e-003		120.6971
Total	**0.0685**	**0.0415**	**0.4953**	**1.2100e-003**	**0.1232**	**7.5000e-004**	**0.1240**	**0.0327**	**6.9000e-004**	**0.0334**		**120.6001**	**120.6001**	**3.8800e-003**		**120.6971**

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	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**		**1.5513**	**1.5513**		**1.4411**	**1.4411**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

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
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
Worker	0.0685	0.0415	0.4953	1.2100e-003	0.1232	7.5000e-004	0.1240	0.0327	6.9000e-004	0.0334		120.6001	120.6001	3.8800e-003		120.6971
Total	**0.0685**	**0.0415**	**0.4953**	**1.2100e-003**	**0.1232**	**7.5000e-004**	**0.1240**	**0.0327**	**6.9000e-004**	**0.0334**		**120.6001**	**120.6001**	**3.8800e-003**		**120.6971**

3.3 Site Preparation - 2021

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					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

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
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
Worker	0.0822	0.0498	0.5944	1.4500e-003	0.1479	9.0000e-004	0.1488	0.0392	8.3000e-004	0.0401		144.7201	144.7201	4.6600e-003		144.8365
Total	**0.0822**	**0.0498**	**0.5944**	**1.4500e-003**	**0.1479**	**9.0000e-004**	**0.1488**	**0.0392**	**8.3000e-004**	**0.0401**		**144.7201**	**144.7201**	**4.6600e-003**		**144.8365**

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					7.0458	0.0000	7.0458	3.8730	0.0000	3.8730			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**7.0458**	**2.0445**	**9.0903**	**3.8730**	**1.8809**	**5.7539**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

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
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
Worker	0.0822	0.0498	0.5944	1.4500e-003	0.1479	9.0000e-004	0.1488	0.0392	8.3000e-004	0.0401		144.7201	144.7201	4.6600e-003		144.8365
Total	**0.0822**	**0.0498**	**0.5944**	**1.4500e-003**	**0.1479**	**9.0000e-004**	**0.1488**	**0.0392**	**8.3000e-004**	**0.0401**		**144.7201**	**144.7201**	**4.6600e-003**		**144.8365**

3.4 Grading - 2021

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					7.7896	0.0000	7.7896	3.5011	0.0000	3.5011			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**7.7896**	**1.9853**	**9.7749**	**3.5011**	**1.8265**	**5.3276**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

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
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
Worker	0.0913	0.0553	0.6604	1.6200e-003	0.1643	1.0000e-003	0.1653	0.0436	9.3000e-004	0.0445		160.8001	160.8001	5.1700e-003		160.9295
Total	**0.0913**	**0.0553**	**0.6604**	**1.6200e-003**	**0.1643**	**1.0000e-003**	**0.1653**	**0.0436**	**9.3000e-004**	**0.0445**		**160.8001**	**160.8001**	**5.1700e-003**		**160.9295**

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					3.0379	0.0000	3.0379	1.3654	0.0000	1.3654			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**3.0379**	**1.9853**	**5.0233**	**1.3654**	**1.8265**	**3.1919**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

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
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
Worker	0.0913	0.0553	0.6604	1.6200e-003	0.1643	1.0000e-003	0.1653	0.0436	9.3000e-004	0.0445		160.8001	160.8001	5.1700e-003		160.9295
Total	**0.0913**	**0.0553**	**0.6604**	**1.6200e-003**	**0.1643**	**1.0000e-003**	**0.1653**	**0.0436**	**9.3000e-004**	**0.0445**		**160.8001**	**160.8001**	**5.1700e-003**		**160.9295**

3.5 Building Construction - 2021

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	1.9009	17.4321	16.5752	0.0269		0.9586	0.9586		0.9013	0.9013		2,553.3639	2,553.3639	0.6160		2,568.7643
Total	**1.9009**	**17.4321**	**16.5752**	**0.0269**		**0.9586**	**0.9586**		**0.9013**	**0.9013**		**2,553.3639**	**2,553.3639**	**0.6160**		**2,568.7643**

3.5 Building Construction - 2021

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
Vendor	0.2691	8.7180	1.8767	0.0277	0.6307	0.0138	0.6445	0.1816	0.0132	0.1948		2,888.1296	2,888.1296	0.2329		2,893.9515
Worker	1.0868	0.6585	7.8586	0.0192	1.9551	0.0120	1.9671	0.5186	0.0110	0.5296		1,913.5213	1,913.5213	0.0616		1,915.0607
Total	**1.3559**	**9.3766**	**9.7353**	**0.0469**	**2.5858**	**0.0258**	**2.6116**	**0.7002**	**0.0242**	**0.7244**		**4,801.6508**	**4,801.6508**	**0.2945**		**4,809.0122**

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	1.9009	17.4321	16.5752	0.0269		0.9586	0.9586		0.9013	0.9013	0.0000	2,553.3639	2,553.3639	0.6160		2,568.7643
Total	**1.9009**	**17.4321**	**16.5752**	**0.0269**		**0.9586**	**0.9586**		**0.9013**	**0.9013**	**0.0000**	**2,553.3639**	**2,553.3639**	**0.6160**		**2,568.7643**

3.5 Building Construction - 2021

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
Vendor	0.2691	8.7180	1.8767	0.0277	0.6307	0.0138	0.6445	0.1816	0.0132	0.1948		2,888.1296	2,888.1296	0.2329		2,893.9515
Worker	1.0868	0.6585	7.8586	0.0192	1.9551	0.0120	1.9671	0.5186	0.0110	0.5296		1,913.5213	1,913.5213	0.0616		1,915.0607
Total	**1.3559**	**9.3766**	**9.7353**	**0.0469**	**2.5858**	**0.0258**	**2.6116**	**0.7002**	**0.0242**	**0.7244**		**4,801.6508**	**4,801.6508**	**0.2945**		**4,809.0122**

3.6 Paving - 2021

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	1.2556	12.9191	14.6532	0.0228		0.6777	0.6777		0.6235	0.6235		2,207.2109	2,207.2109	0.7139		2,225.0573
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.2556**	**12.9191**	**14.6532**	**0.0228**		**0.6777**	**0.6777**		**0.6235**	**0.6235**		**2,207.2109**	**2,207.2109**	**0.7139**		**2,225.0573**

3.6 Paving - 2021

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
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
Worker	0.0685	0.0415	0.4953	1.2100e-003	0.1232	7.5000e-004	0.1240	0.0327	6.9000e-004	0.0334		120.6001	120.6001	3.8800e-003		120.6971
Total	**0.0685**	**0.0415**	**0.4953**	**1.2100e-003**	**0.1232**	**7.5000e-004**	**0.1240**	**0.0327**	**6.9000e-004**	**0.0334**		**120.6001**	**120.6001**	**3.8800e-003**		**120.6971**

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	1.2556	12.9191	14.6532	0.0228		0.6777	0.6777		0.6235	0.6235	0.0000	2,207.2109	2,207.2109	0.7139		2,225.0573
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.2556**	**12.9191**	**14.6532**	**0.0228**		**0.6777**	**0.6777**		**0.6235**	**0.6235**	**0.0000**	**2,207.2109**	**2,207.2109**	**0.7139**		**2,225.0573**

3.6 Paving - 2021

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
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
Worker	0.0685	0.0415	0.4953	1.2100e-003	0.1232	7.5000e-004	0.1240	0.0327	6.9000e-004	0.0334		120.6001	120.6001	3.8800e-003		120.6971
Total	**0.0685**	**0.0415**	**0.4953**	**1.2100e-003**	**0.1232**	**7.5000e-004**	**0.1240**	**0.0327**	**6.9000e-004**	**0.0334**		**120.6001**	**120.6001**	**3.8800e-003**		**120.6971**

3.7 Architectural Coating - 2021

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	328.5056					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	**328.7245**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**		**281.4481**	**281.4481**	**0.0193**		**281.9309**

3.7 Architectural Coating - 2021

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
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
Worker	0.2192	0.1328	1.5849	3.8800e-003	0.3943	2.4100e-003	0.3967	0.1046	2.2200e-003	0.1068		385.9203	385.9203	0.0124		386.2307
Total	**0.2192**	**0.1328**	**1.5849**	**3.8800e-003**	**0.3943**	**2.4100e-003**	**0.3967**	**0.1046**	**2.2200e-003**	**0.1068**		**385.9203**	**385.9203**	**0.0124**		**386.2307**

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	328.5056					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309
Total	**328.7245**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**	**0.0000**	**281.4481**	**281.4481**	**0.0193**		**281.9309**

3.7 Architectural Coating - 2021

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
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
Worker	0.2192	0.1328	1.5849	3.8800e-003	0.3943	2.4100e-003	0.3967	0.1046	2.2200e-003	0.1068		385.9203	385.9203	0.0124		386.2307
Total	**0.2192**	**0.1328**	**1.5849**	**3.8800e-003**	**0.3943**	**2.4100e-003**	**0.3967**	**0.1046**	**2.2200e-003**	**0.1068**		**385.9203**	**385.9203**	**0.0124**		**386.2307**

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	2.2547	16.5538	22.2212	0.0942	5.9466	0.0539	6.0005	1.5915	0.0506	1.6421		9,625.6411	9,625.6411	0.6649		9,642.2638
Unmitigated	2.2547	16.5538	22.2212	0.0942	5.9466	0.0539	6.0005	1.5915	0.0506	1.6421		9,625.6411	9,625.6411	0.6649		9,642.2638

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Unrefrigerated Warehouse-No Rail	952.56	952.56	952.56	2,781,010	2,781,010
Total	952.56	952.56	952.56	2,781,010	2,781,010

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
Unrefrigerated Warehouse-No Rail	9.50	7.30	7.30	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Unrefrigerated Warehouse-No Rail	0.542047	0.035396	0.174897	0.107230	0.017469	0.005327	0.008901	0.094756	0.001421	0.002157	0.008671	0.000709	0.001020

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Install High Efficiency Lighting

	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	0.0340	0.3092	0.2597	1.8500e-003		0.0235	0.0235		0.0235	0.0235		370.9944	370.9944	7.1100e-003	6.8000e-003	373.1990
NaturalGas Unmitigated	0.0340	0.3092	0.2597	1.8500e-003		0.0235	0.0235		0.0235	0.0235		370.9944	370.9944	7.1100e-003	6.8000e-003	373.1990

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					
Unrefrigerated Warehouse-No Rail	3153.45	0.0340	0.3092	0.2597	1.8500e-003		0.0235	0.0235		0.0235	0.0235		370.9944	370.9944	7.1100e-003	6.8000e-003	373.1990
Total		**0.0340**	**0.3092**	**0.2597**	**1.8500e-003**		**0.0235**	**0.0235**		**0.0235**	**0.0235**		**370.9944**	**370.9944**	**7.1100e-003**	**6.8000e-003**	**373.1990**

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					
Unrefrigerated Warehouse-No Rail	3.15345	0.0340	0.3092	0.2597	1.8500e-003		0.0235	0.0235		0.0235	0.0235		370.9944	370.9944	7.1100e-003	6.8000e-003	373.1990
Total		**0.0340**	**0.3092**	**0.2597**	**1.8500e-003**		**0.0235**	**0.0235**		**0.0235**	**0.0235**		**370.9944**	**370.9944**	**7.1100e-003**	**6.8000e-003**	**373.1990**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

No Hearths Installed

	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	15.7393	5.3000e-004	0.0580	0.0000		2.1000e-004	2.1000e-004		2.1000e-004	2.1000e-004		0.1241	0.1241	3.3000e-004		0.1323
Unmitigated	15.7393	5.3000e-004	0.0580	0.0000		2.1000e-004	2.1000e-004		2.1000e-004	2.1000e-004		0.1241	0.1241	3.3000e-004		0.1323

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	3.6001					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.1338					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.3900e-003	5.3000e-004	0.0580	0.0000		2.1000e-004	2.1000e-004		2.1000e-004	2.1000e-004		0.1241	0.1241	3.3000e-004		0.1323
Total	**15.7393**	**5.3000e-004**	**0.0580**	**0.0000**		**2.1000e-004**	**2.1000e-004**		**2.1000e-004**	**2.1000e-004**		**0.1241**	**0.1241**	**3.3000e-004**		**0.1323**

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	3.6001					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.1338					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.3900e-003	5.3000e-004	0.0580	0.0000		2.1000e-004	2.1000e-004		2.1000e-004	2.1000e-004		0.1241	0.1241	3.3000e-004		0.1323
Total	**15.7393**	**5.3000e-004**	**0.0580**	**0.0000**		**2.1000e-004**	**2.1000e-004**		**2.1000e-004**	**2.1000e-004**		**0.1241**	**0.1241**	**3.3000e-004**		**0.1323**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

Use Water Efficient Irrigation System

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

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APPENDIX B – PROTECTED PLANT PRESERVATION PLAN

PROTECTED PLANT PRESERVATION PLAN

APN: 3128-051-03

CITY OF ADELANTO, CALIFORNIA

Prepared for:

Lip Yow

Prepared by:

RCA Associates, Inc.
15555 Main Street, #D4-235
Hesperia, CA 92345
(760) 956-9212

Biologists:
Ryan Hunter
Lisa Cardoso

Project No: RCA #2021-106 JT

May 3, 2021

REGISTERED PROFESSIONAL BIOLOGIST
RANDALL ARNOLD
1979-TWS
STATE OF CALIFORNIA

TITLE PAGE

Date Report Prepared:	**May 3, 2021**
Field Work Completed:	**April 29, 2021**
Report Title:	**Protected Plant Preservation Plan**
Project Location:	**Rancho Road and Aster Road,** **Adelanto, California** **APN: 3128-051-03**
Prepared for:	**Lip Yow**
Principal Investigators:	**Ryan Hunter, Environmental Scientist, Biologist** **Lisa Cardoso, Wildlife Biologist**
Contact Information:	**Randall C. Arnold, Jr.** **RCA Associates, Inc.** **15555 Main Street, #D4-235** **Hesperia, CA 92345** **(760) 956-9212** **rarnold@rcaassociatesllc.com** **www.rcaassociatesllc.com**

Table of Contents

1.0 SUMMARY

At the request of the project proponent, RCA Associates, Inc. surveyed an approximately 12.4-acre property (APN 3128-051-03) located on the southwest corner of the intersection Rancho Road and Aster Road in Adelanto, California (Figures 1 and 2). The property site is located in Section 5, Township 5 North, Range 5 West (USGS Adelanto, CA 7.5-minute quadrangle).

The purpose of the survey was to evaluate the Joshua trees present on the site and determine which trees were suitable for relocation and which trees could be discarded prior to site clearing activities. This report provides the results of the Joshua tree survey performed on April 29, 2021. Following completion of the survey, RCA Associates, Inc. prepared this Protected Plant Preservation Plan to assist the project proponent with future relocation of the Joshua trees. Information on the Joshua trees which will need to be relocated-transplanted in the future is provided in Section 4.0. The City of Adelanto complies with the Plant Protection and Management Code established by the County of San Bernardino (Adelanto Municipal Code: Chapter 17.57.040) to help protect and preserve desert vegetation, including Joshua trees, and the requirements of the Ordinance (Chapter 88.01.060) are provided in this report (Appendix B).

Based on the results of the field investigations there are 91 Joshua trees which occur within the boundaries of the property (Figures 1 and 2). Based on the evaluation and analysis of each tree it was determined that 34 of the 91 Joshua trees (37.4%) are suitable for transplanting. These trees are marked in red in Table 4-1. The remaining 57 Joshua trees (62.6%) were determined to be unsuitable for transplanting due to a variety of factors such as size, condition, damage, dying, excessive leaning, possibly disease, clonal, etc.

2.0 INTRODUCTION AND PROJECT LOCATION

The area surveyed is located on the northeast corner of the intersection Koala Road and Yucca Road in Adelanto, California (Figures 1 and 2). The property site is located in Section 31, Township 6 North, Range 5 West (USGS Adelanto, CA 7.5-minute quadrangle) (Figures 1 and 2). The biological resources on the site consist of a desert scrub community typical of the area with creosote bush (*Larrea tridentata)*, asian mustard (*Brassica tournefortii*), fiddleneck (*Ansickia tessellata*), Joshua trees (*Yucca brevifolia*), and rubber rabbitbrush (*Ericameria nauseosa*). Vacant lands border the project site north and west, with light manufacturing establishments located east and south of the property. (Figure 2).

Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 400 to 1,800 meters (~1,200 to ~5,400 feet). Joshua trees within the western portion of the Mojave Desert typically receive more annual precipitation during "normal" years; consequently, cloning occurs more often resulting in numerous trunks sprouting from the same root system (Rowland, 1978). Joshua tree habitats provide habitat for a variety of wildlife species including desert woodrats (*Neotoma* sp.) and night lizards (*Xantusia* sp.) both of which utilize the base of the trees. A variety of birds also utilize Joshua trees for nesting such as hawks, common ravens, and cactus wrens. CDFW 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).

3.0 METHODOLOGIES

Pedestrian surveys were walked throughout the site on April 29, 2021 where biologists from RCA Associates, Inc. evaluated each Joshua tree to determine which trees were suitable for relocation/transplanting based on a general health assessment. Each Joshua tree received a metal numbered tag which was affixed on the north side of each tree for orientation purposes during future transplanting. Surveyor flagging was also placed around those trees suitable for transplanting to facilitate future identification. The precise location of each tree was recorded using a Garmin GPS unit and a Bushnell Yardage Pro rangefinder was utilized to determine the extent of the property boundaries. Those Joshua trees which occur on the property site are presented in Table 4-1 and the locations are provided in Figure 3.

The factors utilized to determine which Joshua trees were suitable for transplanting include the following factors:

1. Trees from about 1 foot in height up to approximately 12 feet,
2. No visible signs of damage to the tree such as absence of bark due to rodent or other animals,
3. Minimal number of branches (No more than 2 to 3 branches),
4. No excessive leaning of the tree,
5. No yellow or brown fronds,
6. Proximity to other Joshua trees (i.e., clonal), and
7. No exposed roots at the base of the tree.

4.0 RESULTS

There are 91 Joshua trees on the property and the GPS locations of the Joshua trees are provided in Table 4-1. Only 34 Joshua trees (37.4%) are suitable for relocation/transplanting based on the seven factors listed in Section 3.0 (Table 4-1). The Joshua trees suitable for transplanting should be relocated/transplanted on-site, which is the preferable option, or to an off-site area approved by the County of San Bernardino. Those Joshua trees that are not suitable for relocation/transplanting due to size, health of the tree, presence of damage, excessive branches, excessive leaning, clonal, and exposed roots should be disposed of as per County's requirements.

Table 4-1: Joshua tree census. (Note: The GPS locations of the Joshua trees are provided below and those trees which are suitable for transplanting on-site as part of project landscaping are highlighted in red.)

Total Number of Joshua Trees On Site	Joshua Trees to be Transplanted	Number of Clonal Trees	Number of Non-Clonal Trees
91	34	14	57

Tag	Height (ft)	Location	Condition	Panicles Branches	Clonal	Transplantable
1917	12	N 34.33.434 W 117.26.095	Good- Multiple Branches	9P 6B		No
1918	10	N 34.33.419 W 117.26.102	Good	4P 2B		Yes
1919	2	N 34.33.413 W 117.26.104	Good	0P 0B		Yes
1920	7	N 34.33.405 W 117.26.097	Dead	0P 0B		No
1921	4	N 34.33.402 W 117.26.096	Good	0P 0B		Yes
1922	12	N 34.33.401 W 117.26.098	Good	4P 3B		Yes

Tag	Height (ft)	Location	Condition	Panicles Branches	Clonal	Transplantable
1923	4	N 34.33.414 W 117.26.114	Good	0P 0B		Yes
1924	13	N 34.33.417 W 117.26.111	Good- Size	11P 6B		No
1925	4	N 34.33.418 W 117.26.109	Good	0P 0B		Yes
1926	6	N 34.33.431 W 117.26.125	Good	0P 0B	X	No
1927	16	N 34.33.432 W 117.26.126	Good	28P 12B	X	No
1928	5	N 34.33.415 W 117.26.120	Dead	0P 0B		No
1929	2	N 34.33.420 W 117.26.123	Dead	0P 0B		No
1930	2	N 34.33.391 W 117.26.135	Good	0P 0B		Yes
1931	13	N 34.33.398 W 117.26.138	Good- Size	4P 4B		No
1932	6	N 34.33.386 W 117.26.155	Good	0P 0B		Yes
1933	12	N 34.33.384 W 117.26.159	Good- Multiple Branches	5P 4B		No
1934	13	N 34.33.394 W 117.26.162	Good- Size	13P 7B		No
1935	4	N 34.33.395 W 117.26.170	Good	0P 0B		Yes
1936	14	N 34.33.405 W 117.26.179	Dead	0P 6B		No
1937	5	N 34.33.408 W 117.26.170	Good	0P 0B		Yes
1938	6	N 34.33.405 W 117.26.162	Good	0P 0B		Yes
1939	16	N 34.33.410 W 117.26.148	Dead	0P 0B		No

Tag	Height (ft)	Location	Condition	Panicles Branches	Clonal	Transplantable
1940	8	N 34.33.417 W 117.26.156	Dead	0P 0B		No
1941	7	N 34.33.424 W 117.26.161	Dead	0P 0B		No
1942	3	N 34.33.430 W 117.26.150	Dead	0P 0B	X	No
1943	16	N 34.33.437 W 117.26.157	Good- Size	15P 8B		No
1944	4	N 34.33.425 W 117.26.170	Good	0P 0B		Yes
1945	17	N 34.33.431 W 117.26.176	Good- Size	39P 18B		No
1946	5	N 34.33.421 W 117.26.180	Good	0P 0B	X	No
1947	10	N 34.33.401 W 117.26.196	Good	0P 0B	X	No
1948	3	N 34.33.407 W 117.26.202	Dead	0P 0B		No
1949	5	N 34.33.418 W 117.26.207	Good	0P 0B		Yes
1950	15	N 34.33.428 W 117.26.202	Dead	0P 0B		No
1951	19	N 34.33.435 W 117.26.201	Good	14P 15B	X	No
1952	3	N 34.33.432 W 117.26.222	Good	0P 0B		Yes
1953	9	N 34.33.430 W 117.26.224	Dead	0P 0B		No
1954	5	N 34.33.428 W 117.26.227	Good	0P 0B	X	No
1955	5	N 34.33.422 W 117.26.229	Dead	0P 0B		No
1956	10	N 34.33.424 W 117.26.215	Good	3P 2B		Yes

Tag	Height (ft)	Location	Condition	Panicles Branches	Clonal	Transplantable
1957	10	N 34.33.422 W 117.26.214	Good	3P 1B	X	No
1958	14	N 34.33.401 W 117.26.221	Dead	0P 0B		No
1959	13	N 34.33.395 W 117.26.207	Good- Size	2P 3B		No
1960	11	N 34.33.386 W 117.26.210	Good- Multiple Branches	9P 6B		No
1961	10	N 34.33.384 W 117.26.209	Dead	0P 0B		No
1962	3	N 34.33.390 W 117.26.219	Good	0P 0B		Yes
1963	14	N 34.33.384 W 117.26.226	Good- Size	2P 2B		No
1964	13	N 34.33.381 W 117.26.233	Good	3P 4B	X	No
1965	1	N 34.33.380 W 117.26.233	Good- Small	0P 0B		No
1966	4	N 34.33.384 W 117.26.245	Good	0P 0B		Yes
1967	5	N 34.33.380 W 117.26.248	Good	0P 0B		Yes
1968	6	N 34.33.391 W 117.26.236	Dead	0P 0B		No
1969	5	N 34.33.393 W 117.26.234	Dead	0P 0B		No
1970	1	N 34.33.393 W 117.26.234	Good- Small	0P 0B		No
1971	9	N 34.33.400 W 117.26.233	Poor- Dying	0P 2B		No
1972	8	N 34.33.411 W 117.26.237	Dead	0P 0B		No
1973	9	N 34.33.421 W 117.26.252	Good	1P 2B		Yes

Tag	Height (ft)	Location	Condition	Panicles Branches	Clonal	Transplantable
1974	8	N 34.33.426 W 117.26.260	Dead	0P 0B		No
1975	13	N 34.33.416 W 117.26.258	Good- Size	2P 3B		No
1976	8	N 34.33.385 W 117.26.276	Poor- Dying	0P 0B		No
1977	5	N 34.33.382 W 117.26.283	Good	0P 0B		Yes
1978	8	N 34.33.396 W 117.26.280	Dead	0P 0B		No
1979	5	N 34.33.408 W 117.26.281	Dead	0P 0B		No
1980	2	N 34.33.417 W 117.26.273	Good	0P 0B		Yes
1981	13	N 34.33. W 117.26.	Dead	0P 0B		No
1982	9	N 34.33. W 117.26.	Dead	0P 0B		No
1983	12	N 34.33. W 117.26.	Good	2P 2B		Yes
1984	11	N 34.33. W 117.26.	Good	0P 2B		Yes
1985	1	N 34.33. W 117.26.	Dead	0P 0B		No
1986	2	N 34.33. W 117.26.	Good	0P 0B		Yes
1987	13	N 34.33. W 117.26.	Good- Size	1P 4B		No
1988	15	N 34.33. W 117.26.	Fair	5P 11B		No
1989	2	N 34.33. W 117.26.	Good	0P 0B		Yes
1990	16	N 34.33. W 117.26.	Good- Leaning	18P 16B		No

Tag	Height (ft)	Location	Condition	Panicles Branches	Clonal	Transplantable
1991	5	N 34.33. W 117.26.	Good	0P 0B		Yes
1992	8	N 34.33. W 117.26.	Good	0P 0B		Yes
1993	8	N 34.33. W 117.26.	Good	1P 0B		Yes
1994	7	N 34.33. W 117.26.	Good	0P 0B	X	No
1995	10	N 34.33.397 W 117.26.323	Dead	0P 0B		No
1996	2	N 34.33.401 W 117.26.334	Good	0P 0B		Yes
1997	2	N 34.33.400 W 117.26.337	Good	P B		Yes
1998	4	N 34.33.398 W 117.26.339	Good	P B		Yes
1999	13	N 34.33.402 W 117.26.337	Good- Size	P B		No
2000	5	N 34.33.403 W 117.26.340	Good	P B		Yes
2001	4	N 34.33.409 W 117.26.333	Good	P B	X	No
2002	7	N 34.33.411 W 117.26.342	Good	P B	X	No
2003	13	N 34.33.419 W 117.26.332	Dead	P B		No
2004	3	N 34.33.417 W 117.26.331	Good	P B		Yes
2005	7	N 34.33.414 W 117.26.322	Poor- Dying	P B	X	No
2006	1	N 34.33.430 W 117.26.338	Good	P B		Yes
2007	14	N 34.33.434 W 117.26.316	Good	P B	X	No

(Note: The Tag numbers correspond to the numbers placed on the Joshua trees.)

5.0 CONCLUSIONS

There are 91 Joshua trees located on the property and 34 of the trees are suitable for relocation/transplanting. This conclusion was based on: (1) trees which were one foot or greater in height and less than twelve feet tall (approximate); (2) in good health; (3), two branches or less; (4) trees that are not leaning over excessively; (5) no yellow or brown fronds; (6) density of trees (i.e., no clonal trees); and (7) no exposed roots. As indicated in Table 4-1, the majority of the Joshua trees which were not suitable for relocation are relatively large ranging from about 13 to 35 feet in height.

As of September 22, 2020, the California Department of Fish and Wildlife temporarily listed the western Joshua Tree (*Yucca brevifolia*) as an endangered species for one year until a final decision is made in 2021. Therefore, any attempt to remove a Joshua tree or part of a Joshua tree, dead or alive from its current position will require an Incidental Take Permit (ITP).

The City of Adelanto's Municipal Code (17.57.040) requires that the city comply with the County of San Bernardino's ordinances on Joshua trees. County of San Bernardino's Municipal Code (Chapter 18.01.060) requires preservation of Joshua trees given their importance in the desert community. A qualified County-approved biologist or arborist should be retained to conduct any future relocation/transplanting activities and should follow the protocol of the County's Municipal Code (Appendix B: Chapter 18.01). The following criteria will be utilized by the contractor when conducting any future transplanting activities.

A. The Joshua trees will be retained in place or replanted somewhere on the site where they can remain in perpetuity or will be transplanted to an off-site area approved by the County where they can remain in perpetuity. Joshua trees which are deemed not suitable for transplanting will be cut-up and discarded as per County requirements.

B. Earthen berms will be created around each tree by the biologist prior to excavation and the trees will be watered approximately one week before transplanting. Watering the

trees prior to excavation will help make excavation easier, ensure the root ball will hold together, and minimize stress to the tree.

C. Each tree will be moved to a pre-selected location which has already been excavated and will be placed and oriented in the same direction as their original direction. The hole will be backfilled with native soil, and the transplanted tree will be immediately watered. As noted in Section 3.0, a numbered metal tag was placed on the north side of the trees and the trees were also flagged with surveyor's flagging. The biologist will develop a watering regimen to ensure the survival of the transplanted trees. The watering regimen will be based upon the needs of the trees and the local precipitation.

6.0 REFERENCES

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7.0 CERTIFICATION

I hereby certify the statements furnished above and in the attached exhibits, present the data and information required for this Joshua tree survey and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. Field work conducted for this survey was performed by Ryan Hunter and Lisa Cardoso.

Date: May 3, 2020 Signed: Ryan Hunter
Lisa Cardoso

Field Work Performed by: Ryan Hunter
Environmental Scientist/Biologist

Lisa Cardoso
Wildlife Biologist

APPENDIX A

Figures

FIGURE 1: REGIONAL EXHIBIT

RCA ASSOCIATES, INC.
SOURCE: GOOGLE EARTH

RCA ASSOCIATES, INC.

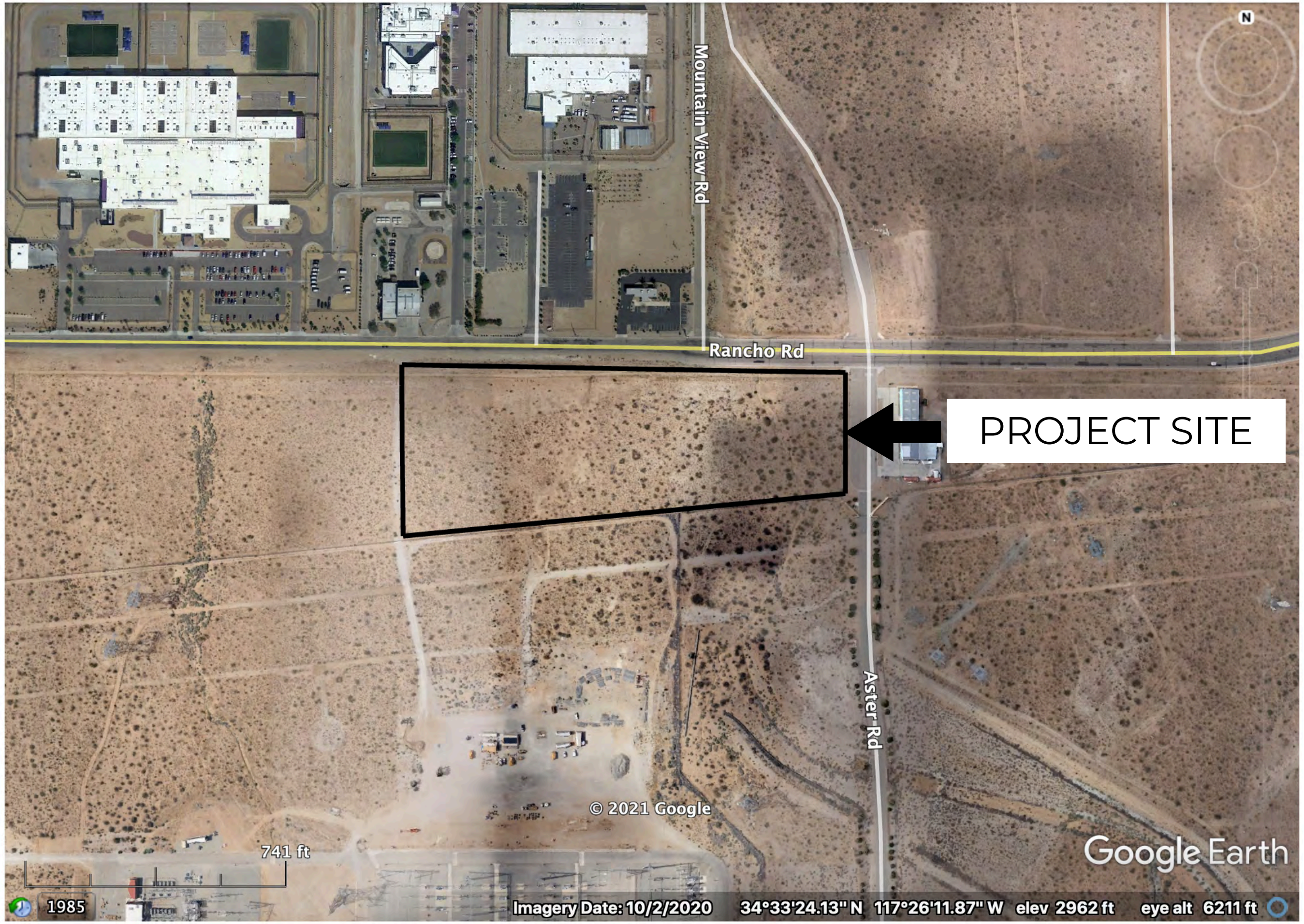

FIGURE 2: VICINITY EXHIBIT

RCA ASSOCIATES, INC.
SOURCE: GOOGLE EARTH

RCA ASSOCIATES, INC.

RCA ASSOCIATES, INC

SW Corner of Rancho Road & Aster Road, Adelanto, CA

12.4-acres

RCA ASSOCIATES, INC.
SOURCE: GOOGLE EARTH

FIGURE 3: LOCATION OF JOSHUA TREES

#2021-106 JT

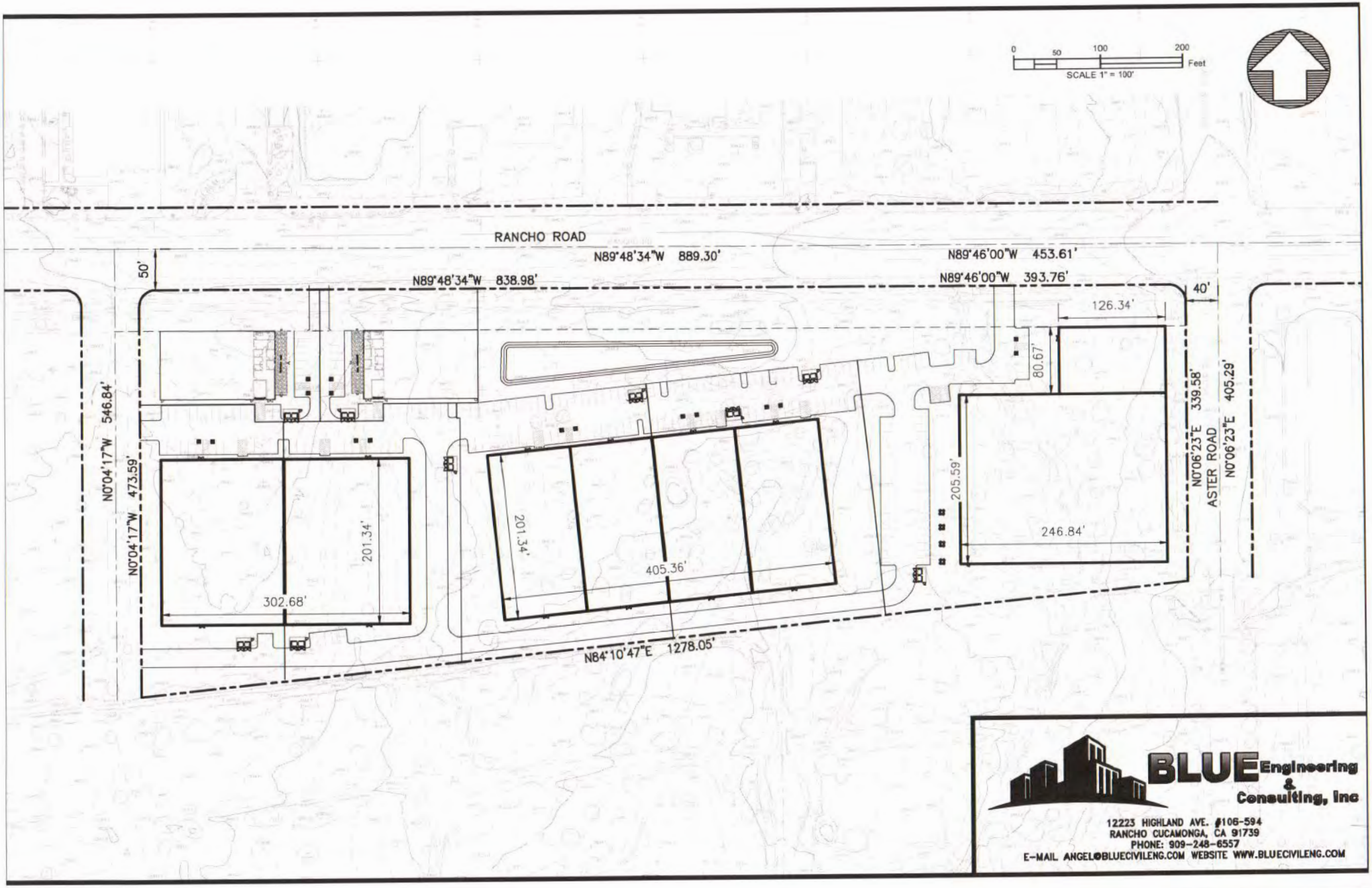

FIGURE 4: SITE PLAN

APPENDIX B

City of Adelanto's
Municipal Code: Chapter 17.57.040

County of San Bernardino
Municipal Code: Chapter 88.01

17.57.040 Plant Protection and Management

Development projects will comply with the requirements of the County of San Bernardino for the relocation of Joshua trees. The Building Department will review relocation plans and monitor the relocation of any Joshua trees.

CHAPTER 88.01 PLANT PROTECTION AND MANAGEMENT

Sections:

88.01.010 Purpose

This Chapter provides regulations and guidelines for the management of plant resources in the unincorporated areas of the County on property or combinations of property under private or public ownership. The intent is to:

(a) Promote and sustain the health, vigor and productivity of plant life and aesthetic values within the County through appropriate management techniques.

(b) Conserve the native plant life heritage for the benefit of all, including future generations.

(c) Protect native trees and plants from indiscriminate removal and to regulate removal activity.

(d) Provide a uniform standard for appropriate removal of native trees and plants in public and private places and streets to promote conservation of these valuable natural resources.

(e) Protect and maintain water productivity and quality in local watersheds.

(f) Preserve habitats for rare, endangered, or threatened plants and to protect animals with limited or specialized habitats.

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

88.01.020 Applicability

The provisions in this Chapter apply to the removal or relocation of regulated trees or plants and to any encroachment (for example, grading) within the protected zone of a regulated tree or plant on all private land within the unincorporated areas of the County and on public lands owned by the County, unless otherwise specified. Nothing in this Chapter shall relieve nor be interpreted to exempt a development from complying with applicable State or Federal laws and regulations.

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

88.01.030 Exempt Activities

The provisions in this Chapter, except those of Section 88.01.090 (Tree Protection From Insects and Disease), shall not apply to the removal of regulated trees or plants that may occur in the following situations. Removal actions shall not authorize the removal of perch trees within an identified American Bald Eagle habitat.

(a) Timber operations. Removal as part of a timber operation conducted in compliance with the Z'berg-Nejedly Forest Practice Act of 1973 (Public Resources Code Section 4526 et seq.).

(b) Government owned lands. Removal from lands owned by the United States, State of California, or local governmental entity, excluding Special Districts (i.e., Special Districts shall be subject to the provisions of this Division.).

(c) Public utilities. Removal by a public utility subject to jurisdiction of the Public Utilities Commission or any other constituted public agency, including franchised cable TV, where to establish or maintain safe operation of facilities under their jurisdiction, trees are pruned, topped, or braced.

(d) State agencies. Removal by, or under the authority of, the State of California:

(1) Department of Forestry and Fire Protection.

(2) Forest Improvement Program.

(3) Agricultural Conservation Program.

(e) Government laws. Removal required by other codes, ordinances, or laws of the County, State, or United States.

(f) Emergency. Removal of native trees and plants that are an immediate threat to the public health, safety, or welfare and that require emergency removal to prevent probable damage to a structure or injury to people or fenced animals.

(g) Forest stocking control program. Removal as part of a stocking control program prepared by a California Registered Professional Forester.

(h) Fire hazard reduction program. Removal as part of a fire hazard reduction program approved by the Fire Chief.

(i) Bona fide agricultural activity. Removal as part of a bona fide agricultural activity, as determined by the Director, which is one of the following:

(1) Conducted under a land conservation contract.

(2) An existing agricultural activity, including expansions of the activity onto undisturbed contiguous land.

(3) A proposed bona fide agricultural activity (i.e., an agricultural activity that is served by a water distribution system adequate for the proper operation of the activity).

(A) The Director shall be given 30 days' written notice of the removal describing the:

(I) Location of the land.

(II) Nature of the proposed activity.

(III) Proposed sources of water for the activity.

(B) The Director shall notify the landowner in writing before the elapse of the 30-day period if, in the opinion of the Director, the activity is not a bona fide agricultural activity, or else the activity shall be deemed bona fide.

(j) Parcel less than 20,000 square feet developed with primary structure. Removal on parcels that have a net area of 20,000 square feet or less and that are developed with a primary structure, other than a sign structure.

(k) Located within 20 feet of permitted structure. Removal from a parcel of a regulated native plant or tree that is within 20 feet of a structure that was constructed or set down on the parcel under a County development permit.

(l) Private fuel wood. Removal of two or fewer regulated native trees in the Mountain Region or Valley Region per year per acre for private fuel wood purposes. The year shall be measured as the last 12 consecutive months.

(m) Oak woodlands. The following projects shall be exempt from the conditions for mitigating the conversion of oak woodlands required in Subsection 88.01.050(e) (Native Tree or Plant Removal Permits Conditions of approval), below, in compliance with Public Resources Code 21083.4:

(1) Projects undertaken in compliance with a Natural Community Conservation Plan or subarea plan within a Natural Community Conservation Plan, as approved in compliance with Fish and Game Code Section 2800 *et seq.*, that includes oaks as a covered species or that conserves oak habitat through natural community conservation preserve designation and implementation and mitigation measures that are consistent with this Chapter.

(2) Affordable housing projects for lower income households, as defined in Health and Safety Code Section 50079.5, that are located within a city's sphere of influence.

(3) Projects on agricultural land within an Agricultural Land Use Zoning District that includes land used to produce or process plant and animal products for commercial purposes.

(4) Projects undertaken in compliance with a State agency's regulatory program certified in compliance with Public Resources Code Section 21080.5.

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

88.01.040 Regulated Trees and Plants and General Permit

(a) Regulated trees and plants. A regulated tree or plant shall be any of the those trees or plants identified in:

(1) Section 88.01.060(c) (Regulated desert native plants);

(2) Section 88.01.070(b) (Regulated trees); or

(3) Section 88.01.080(b) (Regulated riparian plants).

(b) Permit for removal required. A Tree or Plant Removal Permit issued in compliance with Section 88.01.050 (Tree or Plant Removal Requirements) shall be required for the removal of regulated tress and plants.

(c) Conditions of approval. The permits required by this Chapter may be subject to conditions imposed by the applicable review authority as identified in Subsection 88.01.050(e) (Tree or Plant Removal Permits - Condition of approval).

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

88.01.050 Tree or Plant Removal Permits

(a) When Tree or Plant Removal Permit required. A Tree or Plant Removal Permit shall be required for the removal of a regulated tree or plant as identified in this Chapter.

(1) Removals in conjunction with land use application or development permit Director approval. The Director may approve the removal of regulated trees or plants when requested in conjunction with a land use application, a Building Permit, and all other development permits (e.g., Grading Permits, Mobile Home Setdown Permits, etc.). An approved land use application and/or development permit shall be considered to include a Tree or Plant Removal Permit, if the land use application or development permit specifically reviews and approves the removals. The review of a land use application or development permit shall consider and require compliance with this Chapter.

(2) Removals not in conjunction with land use application or development permit Director approval. The Director may approve a Tree or Plant Removal Permit for the removal of regulated trees or plants requested not in conjunction with a land use application or development permit.

(3) Removals to mitigate fire hazards Fire Chief approval. The Fire Chief may approve a Tree or Plant Removal Permit for the removal of regulated trees or plants when requested for the purposes of mitigating fire hazards and independent of a land use application or development permit.

(b) Expert certification. The applicable review authority may require certification from an appropriate arborist, registered professional forester or a Desert Native Plant Expert that the proposed tree removal, replacement, or revegetation activities are appropriate, supportive of a healthy environment, and in compliance with this Chapter. The certification shall include the information in compliance with Department procedures.

(c) Preconstruction inspections. A preconstruction inspection before approval of development permits shall be required in areas with regulated trees or plants to determine the presence of regulated trees and plants. The preconstruction inspection may be combined with any other required inspection.

(d) Duration of Tree or Plant Removal Permits.

(1) Removals in conjunction with land use application or development permit. The duration of a Tree or Plant Removal Permit, when issued in conjunction with a land use application and/or a development permit, shall have the same duration of the associated application or permit, unless otherwise specified.

(2) Removals not in conjunction with land use application or development permit. The applicable review authority shall specify the expiration date for all other Tree or Plant Removal Permits.

(e) Conditions of approval. A Tree or Plant Removal Permit may be subject to the following conditions imposed by the applicable review authority:

(1) Types of conditions. The conditions may specify criteria, methods, and persons authorized to conduct the proposed activities in addition to the requirements in this Chapter.

(2) Transplanting or stockpiling. Where indicated in this Chapter, regulated trees and plants may be required to be transplanted and/or stockpiled for future transplanting.

(3) Performance bonds. The review authority may require the posting and maintenance of a monetary security deposit where necessary to ensure the completion of the required mitigation measures in compliance with Section 86.06.050 (Performance Guarantees).

(4) Conversion of oak woodlands. If a project will result in a conversion of oak woodlands that will have a significant effect on the environment and is not exempt under Subsection 88.01.030(m) (Exempt Activities Oak woodlands), one or more of the conditions in this Subsection may be imposed in compliance with Public Resources Code Section 21083.4. For the purposes of this Subsection, "oak" shall mean a native tree species that is in the genus *Quercus*, which is not designated as Group A or Group B commercial species under regulations adopted by the State Board of Forestry and Fire Protection in compliance with Public Resources Code Section 4526, and which is five inches or more in diameter as measured at a point 4.5 feet (breast height) above natural grade level. The applicable review authority may require certification from a Tree Expert that the proposed mitigation measures are appropriate, supportive of a healthy oak woodland environment, and in compliance with this Subsection. The certification shall include the information in compliance with Department procedures. The conditions that may be imposed include one or more of the following:

(A) Preservation. Preserve existing oak woodlands by recording conservation easements in favor of the County or an approved organization or agency.

(B) Replacement or restoration. Replace or restore former oak woodlands. The review authority may require the planting and maintenance of replacement trees, including replacing dead or diseased trees. The replacement ratio and tree sizes shall be based on the recommendation of an

Oak Reforestation Plan prepared by a registered professional forester. The requirement to maintain trees in compliance with this paragraph shall terminate seven years after the trees are planted.

(C) In-lieu mitigation fee. Contribute in-lieu mitigation fee to the Oak Woodlands Conservation Fund, established under Fish and Game Code Section 1363 for the purpose of purchasing oak woodlands conservation easements. A project applicant who contributes funds in compliance with this Subsection shall not receive or use a grant from the Oak Woodlands Conservation Fund as part of the mitigation for the project. The in-lieu fee for replacement trees shall be calculated based upon their equivalent value as established by the International Society of Arboriculture's (ISA) current edition of *Guide to Establishing Values for Trees and Shrubs*, etc.)

(D) Other mitigation measures. Perform other mitigation measures as may be required by the review authority (e.g., inch-for-inch off-site replacement planting; transfer of development rights, enrollment of project with offset provider for carbon credits in greenhouse gas emission registry, carbon reduction, and carbon trading system; etc.).

(f) Findings for Tree or Plant Removal Permits. The applicable review authority may authorize the removal of a regulated tree or plant only if the following findings are made:

(1) **Findings for removals in the Valley Region, Mountain Region, and Desert Region**. The removal of the regulated tree or plant is justified for <u>one</u> of the following reasons:

(A) The location of the regulated tree or plant and/or its dripline interferes with an allowed structure, sewage disposal area, paved area, or other approved improvement or ground disturbing activity and there is no other alternative feasible location for the improvement.

(B) The location of the regulated tree or plant and/or its dripline interferes with the planned improvement of a street or development of an approved access to the subject or adjoining private property and there is no other alternative feasible location for the improvement.

(C) The location of the regulated tree or plant is hazardous to pedestrian or vehicular travel or safety.

(D) The regulated tree or plant or its presence interferes with or is causing extensive damage to utility services or facilities, roadways, sidewalks,

curbs, gutters, pavement, sewer line(s), drainage or flood control improvements, foundations, existing structures, or municipal improvements.

(E) The condition or location of the regulated tree or plant is adjacent to and in such close proximity to an existing or proposed structure that the regulated tree or plant has or will sustain significant damage.

(2) **Additional findings for removals in the Mountain Region**. In the Mountain Region only, the applicable review authority shall also make all of the following findings:

(A) Where improvements are proposed, the design of the improvements ensures that at least the following minimum percentage of the subject parcel will be maintained or established in a natural undeveloped vegetated or revegetated condition sufficient to ensure vegetative coverage for a forest environment, as determined by the applicable Review Authority.

(I) Twenty percent of commercial, industrial, and administrative/ professional uses.

(II) Thirty-five percent of multi-family residential uses.

(B) At least one half of natural areas for all uses, except single family residential uses, will be located in the front setback area or located so that significant portions are visible from the public right-of-way on which the improvements are to be located.

(C) A perch tree within a federally identified American Bald Eagle habitat will not be removed unless an adequate substitution is provided.

(D) A Registered Professional Forester has certified in writing that the condition or location of a regulated tree is contributing to overstocked tree stand conditions and that its removal will improve the overall health, safety, and vigor of the stand of trees containing the subject tree.

(3) In the Desert Region only, the applicable Review Authority shall also make the following findings:

(A) Joshua trees that are proposed to be removed will be transplanted or stockpiled for future transplanting wherever possible.

(B) In the instance of stockpiling, the permittee has complied with Department policy to ensure that Joshua trees are transplanted appropriately. Transplanting shall comply with the provisions of the Desert Native Plants

Act (Food and Agricultural Code Section 80001 et seq.), as required by Subsection 88.01.060(d) (Compliance with Desert Native Plants Act).

(C) No other reasonable alternative exists for the development of the land when the removal of specimen size Joshua Trees is requested. Specimen size trees are defined as meeting one or more of the following criteria:

(I) A circumference measurement equal to or greater than 50 inches measured at 4.5 feet above natural grade level.

(II) Total tree height of 15 feet or greater.

(III) Trees possessing a bark-like trunk.

(IV) A cluster of 10 or more individual trees, of any size, growing in close proximity to each other.

(g) Plot plan requirements. Before the issuance of a Tree or Plant Removal Permit, a plot plan shall be approved by the applicable Review Authority for each site indicating exactly which trees or plants are authorized to be removed. The required information shall be added to any other required plot plan.

(h) Construction standards. During construction and before final inspection under a development permit, the following construction standards shall apply, unless otherwise approved in writing by an arborist, registered professional forester, or a Desert Native Plant Expert:

(1) Enclosures. The trunks of regulated trees and regulated plants shall not be enclosed within rooflines or decking.

(2) Attachments. Utilities, construction signs, or other hardware shall not be attached so as to penetrate or abrase any live regulated tree or plant.

(3) Grade alterations. No grade alterations shall bury any portion of a regulated tree or plant or significantly undercut the root system within the dripline.

(i) Enforcement.

(1) Other applicable Code provisions. The provisions of Chapter 86.09 (Enforcement) shall apply to this Chapter.

(2) Enforcement authorities. The authorities responsible for the enforcement of the provisions of this Chapter shall be the same as the review authorities responsible for permit approvals asspecified in this Section. In addition, the provisions of

this Chapter may be enforced by the California Department of Forestry, where applicable.

(3) Extension of time. If property is subject to snow, flooding, or other conditions that render compliance with the provisions of this Chapter within the specified time periods impractical because of inaccessibility, an enforcement officer may extend the period of time for compliance.

(4) Powers of enforcement officers.

(A) A peace officer or any authorized enforcement officer may in the enforcement of this Section:

(I) Make arrests without warrant for a violation of this Chapter that the officer may witness.

(II) Confiscate regulated native trees or plants, or parts of them, that are unlawfully harvested, possessed, sold, or otherwise obtained in violation of this Chapter.

(B) In addition, a designated enforcement officer shall be authorized and directed to enter in or upon any premises or other place, train, vehicle, or other means of transportation within or entering the State, which is suspected of containing or having present regulated plants in violation of this Chapter in order to examine permits and wood receipts and observe tags and seals and to otherwise enforce the provisions of this Chapter.

(5) When enforcement officer vested with power of peace officer. When power or authority is given by this Chapter to a person, it may be exercised by any deputy, inspector, or agent duly authorized by that person. A person in whom the enforcement of a provision of this Chapter is vested shall have the power of a peace officer as to that enforcement, which shall include State or Federal agencies with which cooperative agreements have been made by the County to enforce the provisions of this Chapter.

(6) Written permission of landowner required for removal. No person shall remove or damage all or part of any regulated tree or plant on the property of another person without first obtaining notarized written permission from the landowner and required permits, wood receipts, or tags and seals. In addition, it shall be unlawful for a person to falsify a document offered as evidence of permission to enter upon the property of another to harvest all or parts of a regulated tree or plant, whether alive or dead.

(7) Permit available for display and inspection. No person, except as provided in this Chapter, shall harvest, offer for sale, destroy, dig up or mutilate, or have in his or her possession a regulated plant or tree, or the living or dead parts of them, unless the plant or tree was harvested under a valid permit and, where applicable, a valid wood receipt on his or her person. A person shall exhibit the permit, wood receipt, tags and/or seals upon request for inspection by an authorized County enforcement officer or any peace officer. No wood receipt or tag and seal shall be valid unless it is issued with a valid permit and the permit bears the wood receipt number or tag number on its face. Required tags and seals shall be attached securely to a regulated desert native plant.

(8) Land Disturbance. No person, except as provided in this Chapter, shall commence with a disturbance of land (e.g., grading or land clearing) without first obtaining approval to assure that said disturbance will not result in the removal of any regulated native trees or plants. Said approval may be in the form of a development permit or a Tree or Plant Removal Permit issued by the appropriate authority.

(j) Penalties. Penalties shall be those specified in Chapter 86.09 (Enforcement) and shall include the following and any other penalties specified by individual Sections of this Chapter.

(1) Fine for illegal removal.

(A) In addition to other penalties and fees imposed by this Development Code or other law, a person, firm, or corporation convicted of a violation of the provisions of this Chapter shall be guilty of a misdemeanor upon conviction.

(B) When one or more plants or trees are removed in violation of the provisions of this Chapter, the removal of each separate plant or tree shall be a new and separate offense.

(C) The penalty for the offense shall be a fine of not less than $500 nor more than $1,000, or six months in jail, or both.

(D) Payment of a penalty shall not relieve a person, firm, or corporation from the responsibility of correcting the condition resulting from the violation.

(2) Replacement program for illegal removal.

(A) In addition to other penalties imposed by this Development Code or other law, a person, firm, or corporation convicted of violating the provisions of this Chapter regarding improper removal of regulated native trees or plants shall be required to retain, as appropriate, a Tree Expert or Desert Native Plant Expert to develop and implement a replacement program.

(B) The expert shall determine the appropriate number, size, species, location, and planting conditions for replacement plants or trees in sufficient quantities to revegetate the illegally disturbed area.

(C) If it is inappropriate to revegetate the illegally disturbed area, another appropriate location (e.g., public parks) may be substituted at the direction of the court.

(D) The violator shall post a bond in an amount sufficient to remove and reinstall plant/tree materials that were planted as a part of a replacement program and failed within two years.

(3) Revocation of permits.

(A) Upon conviction of a violation of this Chapter, all Tree or Plant Removal Permits issued to the convicted person, firm, or corporation shall be revoked.

(B) No new or additional Tree or Plant Removal Permits shall be issued to the permittee for a period of one year from the date of conviction.

(C) Additionally, in the Desert Region the permittee shall be required to surrender unused wood receipts or tags and seals to the Director.

Adopted Ordinance 4011 (2007); Amended Ordinance 4043 (2008); Amended Ordinance 4067 (2009)

88.01.060 Desert Native Plant Protection

This Section provides regulations for the removal or harvesting of specified desert native plants in order to preserve and protect the plants and to provide for the conservation and wise use of desert resources. The provisions are intended to augment and coordinate with the Desert Native Plants Act (Food and Agricultural Code Section 80001 et seq.) and the efforts of the State Department of Food and Agriculture to implement and enforce the Act.

(a) Definitions. Terms and phrases used within this Section shall be defined in Division 10 (Definitions) and/or defined by the California Food and Agricultural Code. The California Food and Agricultural Code definition, if one exists, shall prevail over a conflicting definition in this Development Code.

(b) Applicability. The provisions of this Section shall apply to desert native plants specified in Subsection (c) (Regulated desert native plants) that are growing on any of the following lands, unless exempt in compliance with Section 88.01.030 (Exempt Activities):

(1) Privately owned or publicly owned land in the Desert Region.

(2) Privately owned or publicly owned land in any parts of the Mountain Region in which desert native plants naturally grow in a transitional habitat.

(c) Regulated desert native plants. The following desert native plants or any part of them, except the fruit, shall not be removed except under a Tree or Plant Removal Permitin compliance with Section 88.01.050 (Tree or Plant Removal Permits). In all cases the botanical names shall govern the interpretation of this Section.

(1) The following desert native plants with stems two inches or greater in diameter or six feet or greater in height:

(A) *Dalea spinosa* (smoketree).

(B) All species of the genus *Prosopis* (mesquites).

(2) All species of the family *Agavaceae* (century plants, nolinas, yuccas).

(3) Creosote Rings, 10 feet or greater in diameter.

(4) All Joshua trees.

(5) Any part of any of the following species, whether living or dead:

(A) *Olneya tesota* (desert ironwood).

(B) All species of the genus *Prosopis* (mesquites).

(C) All species of the genus *Cercidium* (palos verdes).

(d) Compliance with Desert Native Plants Act. Removal actions of all plants protected or regulated by the Desert Native Plants Act (Food and Agricultural Code Section 80001 et seq.) shall comply with the provisions of the Act before the issuance of a development permit or approval of a land use application.

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

88.01.070 Mountain Forest and Valley Tree Conservation

This Section provides regulations to promote conservation and wise use of forest resources in the Mountain Region and native tree resources in the Valley Region. The provisions are intended to augment and coordinate with the Z'berg-Nejedly Forest Practice Act of 1973 (Public Resources Code Section 4526 et seq.) and the efforts of the State Department of Forestry and Fire Protection to implement and enforce the Act.

(a) Applicability.

(1) Private harvesting. The provisions of this Section apply to the private harvesting of all trees growing on private land and on public land in the unincorporated Mountain Region and Valley Region.

(2) Commercial harvesting. The commercial harvesting of trees shall be prohibited, except as allowed by and authorized by the State Department of Forestry and Fire Protection in compliance with the Z'berg-Nejedly Forest Practice Act of 1973 (Public Resources Code Section 4526 et seq.).

(b) Regulated trees. The following trees shall only be removed with an approved Tree or Plant Removal Permit issued in compliance with Section 88.01.050 (Tree or Plant Removal Permits):

(1) Native trees. A living, native tree with a six inch or greater stem diameter or 19 inches in circumference measured 4.5 feet above natural grade level.

(2) Palm trees. Three or more palm trees in linear plantings, which are 50 feet or greater in length within established windrows or parkway plantings, shall be considered to be heritage trees and shall be subject to the provisions of this Chapter regarding native trees.

(c) Tree protection from insects and disease. For regulations on the treatment and disposition of felled trees, see Section 88.01.090 (Tree Protection from Insects and Disease).

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

88.01.080 Riparian Plant Conservation

This Section provides regulations to promote healthy and abundant riparian habitats that protect watersheds; control transmission and storage of natural water supplies; provide unique wildlife habitats for rare, endangered and threatened plants and animals; provide attractive environments; control natural soil erosion and sedimentation to protect stream banks subject to erosion and undercutting; and provide sufficient shade to reduce temperature and evaporation and the growth of algae in streams. The provisions of this Section are intended to augment and coordinate with the responsibilities of the California Department of Fish and Game.

(a) Applicability.

(1) Applicable areas. The provisions of this Section shall apply to all riparian areas located on private land in all zones within the unincorporated areas of the County and to riparian areas on public land owned by the County, unless exempt as specified by Section 88.01.030 (Exempt Activities) and by Subsection (2) (Exemptions), below.

(2) Exemptions. The provisions of this Section shall not apply to:

(A) Emergency Flood Control District operations or water conservation measures established and authorized by an appropriate independent Special District.

(B) An area that has an existing man-made impervious structure, which is greater than 120 square feet in roof area, between the area proposed to be disturbed by a development permit and the bank of a subject stream, as measured in a straight line perpendicular to the centerline of the stream.

(b) Regulated riparian plants.

(1) Vegetation described. The removal of vegetation within 200 feet of the bank of a stream, or in an area indicated as a protected riparian area on an overlay map or Specific Plan, shall require approval of a Tree or Plant Removal Permit in compliance with Section 88.01.050 (Tree or Plant Removal Permits)shall be subject to environmental review.

(2) Streams. For the purposes of this Section, streams include those shown on United States Geological Survey Quadrangle topographic maps as perennial or intermittent, blue or brown lines (solid or dashed), and river wash areas.

(c) Preconstruction inspections. Preconstruction inspections shall include the verification of the presence of riparian vegetation.

(d) Conditions of approval. Conditions of approval for removal of riparian vegetation may be imposed in addition to, and in combination with, any condition imposed in compliance with Section 88.01.050 (Tree or Plant Removal Permits).

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

88.01.090 Tree Protection from Insects and Disease

This Section provides regulations for the treatment and disposition of felled trees in the Mountain Region to protect against damaging insects (e.g. bark beetles) and diseases. The intent is to mitigate the serious danger posed to forests from coniferous trees that are cut in land clearing operations and are then allowed to remain exposed and untreated against noxious insects, which then multiply in the felled trees to later attack and damage healthy coniferous trees.

(a) Applicability. The provisions in this Section apply to coniferous trees located on land in the Mountain Region. Every person, firm, or corporation, whether as principal, agent, or employee, that has control of, right of entry on, or access to land in the Mountain Region shall comply with this Section.

(b) Treatment of felled trees. Except as otherwise provided by this Section, felled coniferous trees, portions of trees, and stumps shall be treated in compliance with at least one, or a combination, of the following methods and the method in Subsection (c) (Stump treatment), below, within 15 days after a coniferous tree has been cut.

(1) Remove to a solid waste disposal site specifically designated by the County for this type of use.

(2) Burn sufficiently to consume the bark, when allowed by the Fire Department and the Air Pollution Control District.

(3) Lop and scatter material less than four inches in diameter so that it is piled no higher than 24 inches above the ground, when allowed by the Fire Department.

(4) Remove the bark

(5) Chip or grind.

(6) Split and scatter with bark toward the sun for a minimum of 45 consecutive days or until final inspection is completed, whichever is less.

(7) Stack in the sun and cover with six mil clear plastic, which has a continuous seal from the outside and for at least 180 days.

(8) Spray with a commercial insecticide, as approved by the Agricultural Commissioner for these insects and purposes.

(9) Treat under any other method approved by the enforcement officer in writing.

(c) Stump treatment. Fresh cut stumps of live coniferous trees shall be protected from infection by Annosus Root Rot *(Fomes annosus)* with borax powder (granular tech, 10 mole) as soon as possible after felling, covering the entire newly exposed cut and/or broken surface completely with a thin uniform layer of white borax within two hours.

(d) Inspections. In the case of construction activity, the Building Official shall not approve development permit inspections until felled coniferous trees, portions of trees, and stumps are treated in compliance with this Section.

(e) Certificate of compliance. Where trees have been treated by an approved method and the evidence of treatment is not readily observable to the inspector on the construction site, the Building Official shall require a permittee to obtain a certificate that the treatment has been completed in an acceptable manner. The certificate may be from one of the following authorities:

(1) Fire Chief.

(2) Agricultural Commissioner.

(3) Appropriately certified Pest Control Adviser as defined in Food and Agriculture Code Section 11401 et seq.

(4) Qualified Applicator as defined in Food and Agriculture Code Section 11401 et seq.

(f) Extension of time of enforcement. If compliance with Subsection (b) (Treatment of felled trees) and Subsection (c) (Stump treatment) within the specified time periods is impractical because of inaccessibility to the cut timber due to snow or flooding, an enforcement officer may extend the period of time for compliance.

Adopted Ordinance 4011 (2007); Amended Ordinance 4067 (2009)

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APPENDIX C – CULTURAL RESOURCES STUDY LETTER REPORT

CULTURAL RESOURCES STUDY RESULTS LETTER REPORT FOR THE ADELANTO RANCHO CANNABIS FACILITY PROJECT

City of Adelanto

January 28, 2022
9620 Chesapeake Drive, Suite 202
San Diego, CA 92123
(21326)

Lip Yow
D/T Builders Developer
16225 Beaver Road,
Adelanto, CA 92301

Subject: Cultural Resources Study Letter Report for the 10517-10559 Rancho Road Cannabis Facility Project, City of Adelanto, San Bernardino County, California

Dear Mr. Yow,

Chambers Group, Inc. (Chambers Group) is providing this Letter Report documenting the results of a cultural resources records search and literature review in support of the Adelanto Rancho Cannabis Facility Project (Project, Proposed Project) in the City of Adelanto (City), San Bernardino County, California. This assessment includes a cultural resources records search and literature review for the Project site and study area (Figure 1). The purpose of the review is to gather and analyze information needed to assess the potential for impacts to cultural resources within the Proposed Project site. Due to the current proposed timeline associated with the Project, as well as the ongoing delays in processing times for required records search requests from the appropriate California Historical Resources Information System (CHRIS) information center, the records search results have not yet been received and therefore are not incorporated into this cultural resource study letter report at this time. All subsequent conclusions and recommendations are based on the information available publicly to complete background research.

Project Description

The Project Applicant proposes the construction of five buildings within a 12.4-acre Project site. The five buildings will have a total floor area of approximately 234,000 square feet. A total of 216 parking spaces would be provided including 16 ADA spaces. A stormwater detention basin will be constructed in the northern portion of the site, immediately south of Rancho Road. Approximately 167,000 square feet will be reserved for open space. Access to the site will be provided by two driveway connections with the south side of Rancho Road. The new buildings will be used for adult and medical cannabis cultivation, manufacturing, and distribution. The project site is zoned as Manufacturing Industrial (MI).

The City of Adelanto is the lead agency for the Proposed Project. An Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] §15000 et seq.) and has determined that preparation of a Mitigated Negative Declaration would be appropriate under CEQA.

Location and Setting

The Proposed Project site comprises approximately 12.4 acres located on APN parcel 3128-051-03. The Project site is bound to the north by Rancho Road and to the east by Aster Road. The Los Angeles Department of Water & Power Switching Station to the immediate south and open space to the west. The Project is located on the United States Geological Survey (USGS) 7.5' Adelanto Quadrangle, Township 6 North, Range 5 West, Section 31.

In June 2021, the Project Applicant submitted a CEQA document (IS/MND) for a cannabis manufacturing facility located at 10517-10559 Rancho Road, for City approval. While the City set to approve the Project, the Project was never publicly circulated or approved. Since then, the Project site was graded. During grading, and consistent with the Project described in the draft CEQA document, the Applicant removed 91 Joshua trees, translocating 32 of them to a different location of the site.

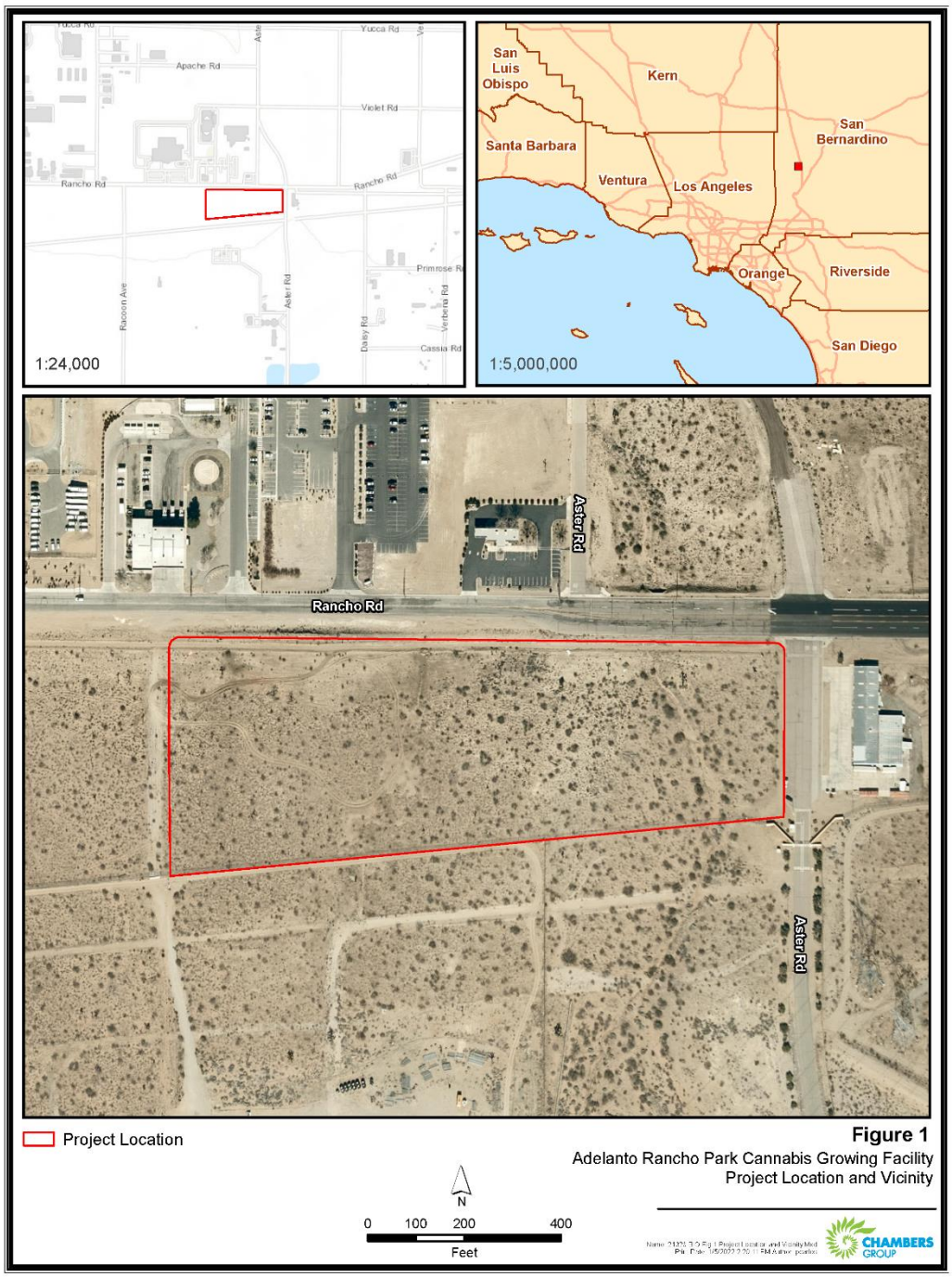


Figure 1: Project Location

Regulatory Context

As lead agency, the City of Adelanto must ensure that the Proposed Project complies with the provisions of CEQA, and determine whether a project may have a significant effect on historical resources (PRC Section 21084.1). In addition to State regulations, proposed projects are also subject to several City of Adelanto policies relating to archaeological, historical, and paleontological resources. Chapter 6 of the Adelanto North 2035 Comprehensively Sustainable Plan pertains specifically to cultural and historic preservation within the city. The regulatory framework as it pertains to cultural resources under CEQA is detailed below.

Under the provisions of CEQA, including the CEQA Statutes (PRC §§ 21083.2 and 21084.1), the CEQA Guidelines (Title 14 CCR § 15064.5), and PRC § 5024.1 (Title 14 CCR § 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for eligibility for listing in the California Register of Historical Resources (CRHR, PRC § 5024.1).

The purpose of the CRHR is to maintain listings of the State's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term *historical resources* includes a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CCR § 15064.5[a]). The criteria for listing properties in the CRHR were expressly developed in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP). The California Office of Historic Preservation (OHP 1995:2) regards "any physical evidence of human activities over 45 years old" as meriting recordation and evaluation.

California Register of Historic Resources

A cultural resource is considered "historically significant" under CEQA if the resource meets one or more of the criteria for listing in the CRHR. The CRHR was designed to be used by State and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

1. is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. is associated with the lives of persons important in our past;
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Under CEQA, if an archeological site is not a historical resource but meets the definition of a "unique archeological resource" as defined in PRC § 21083.2, then it should be treated in accordance with the provisions of that section. A *unique archaeological resource* is defined as follows:

- An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
    - Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information

- Has a special and particular quality, such as being the oldest of its type or the best available example of its type
- Is directly associated with a scientifically recognized important prehistoric or historic event or person

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a "unique archaeological resource" under CEQA PRC § 21083.2 are viewed as not significant. Under CEQA, "A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects" (PRC § 21083.2[h]).

Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a proposed project are thus considered significant if the project:

(1) physically destroys or damages all or part of a resource;

(2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or

(3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

Assembly Bill 52

Assembly Bill (AB) 52 was enacted in 2015 and expands CEQA by defining a new resource category: tribal cultural resources (TCRs). AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency. It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

- Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)
- 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 PRC Section 5024.1 (in applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe)

Local

In addition to State regulations, projects built in the City of Adelanto are also subject to the following goals and policies outlined in the Adelanto North 2035 Comprehensively Sustainable Plan, Chapter 6: Open Space and Conservation. Specifically, Chapter 6 of the General Plan outlines several policies relating to archaeological, historical, and paleontological resources driven by Goal OS 10.

Goals, Policies, and Implementing Programs

Goals:	Goal OS 10: Cultural and historical resources are protected and preserved.
Policies:	OS 10.1: Identify, protect, and minimize impacts to archaeological and paleontological resources.

OS 10.2 Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.

Implementing Programs Procedures, Permits, Agreements, and Ordinances

Program OS-8 **Historical Resources Assessment**. Prior to any construction activities that may affect historical resources, a historical resources assessment shall be performed by an architectural historian or historian who meets the PQS in architectural history or history. This shall include a records search at the SBAIC to determine if any resources that may be potentially affected by the project have been previously recorded, evaluated, and/or designated in the NRHP or CRHR. Following the records search, the qualified architectural historian or historian shall conduct a reconnaissance-level and/or intensive-level survey in accordance with the California Office of Historic Preservation guidelines to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project. Resources shall be evaluated pursuant to CEQA Guidelines and Public Resources Code Section 21083.2.

Program OS-9 **Alteration to Historical Resource**. To ensure that projects requiring the relocation, rehabilitation, or alteration of a historical resource not impair its significance, the Secretary of the Interior's Standards for the Treatment of Historic Properties shall be used to the maximum extent possible. The application of the standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. Prior to any construction activities that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City of Adelanto.

Program OS-10 **Historical Resource Demolition**. If a proposed project would result in the demolition or significant alteration of a historical resource, it cannot be mitigated to a less than significant level. However, recordation of the resource prior to construction activities will assist in reducing adverse impacts to the resource to the greatest extent possible. Recordation shall take the form of Historic American Building Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and shall be performed by an architectural historian or historian who meets the PQS. Documentation shall include an architectural and historical narrative; medium- or large format black and white photographs, negatives, and prints; and supplementary information such as building plans and elevations, and/or historic photographs. Documentation shall be reproduced on archival paper and curated with a qualified scientific or educational repository, as defined by the Guidelines for the Curation of Archaeological Collections. The specific scope and details of documentation are determined for each project.

Program OS-11 **Archaeological Sensitivity**. To determine the archaeological sensitivity of a proposed planning area, archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in either prehistoric or historic archaeology. Assessments shall include a CHRIS records search at the SBAIC and of the Sacred Lands File maintained by the NAHC. The records searches will determine if the proposed planning area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. A

pedestrian survey shall be undertaken in undeveloped areas of the planning area to locate any surface cultural materials. By performing a records search, consultation with the NAHC, and a pedestrian survey, a qualified archaeologist will classify the planning area as having High, Medium, or Low sensitivity for archaeological resources.

Program OS-12 **Archaeological Significance Evaluation**. If potentially significant archaeological resources are identified through an archaeological resource assessment, and impacts to these resources cannot be avoided, an Archaeological Significance Evaluation investigation shall be performed by an archaeologist who meets the PQS prior to any construction-related ground-disturbing activities to determine significance under CEQA and/or Section 106 of the NHPA. If resources are determined to be significant or unique through significance evaluation, and site avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. This might include an archaeological data recovery program that would be implemented by a qualified archaeologist and performed in accordance with the Office of Historic Preservation's Archaeological Resource Management Reports (ARMR).

Program OS-13 **Disturbances of Archaeological Resources**. If the archaeological assessment did not identify potentially significant archaeological resources in the proposed planning area, but indicates the area to be of medium or high sensitivity for archaeological resources, an archaeologist who meets the PQS shall be retained on an on-call basis. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) area exposed during ground disturbing activities, construction activities within a 50-foot radius of the discovery shall be halted while the on-call archaeologist is contacted. If the resource is determined to be significant or unique through significance evaluation, and site avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. These might include an archaeological data recovery program that would be implemented by a qualified archaeologist and performed in accordance with the Office of Historic Preservation's Archaeological Resource Management Reports (ARMR). If the discovery proves to be significant, it shall be curated with a qualified scientific of educational repository, as defined by the Guidelines for the Curation of Archaeological Collections.

Program OS-14 **Paleontological Resources**. Future development proposals subject to environmental review pursuant to the California Environmental Quality Act (CEQA) are subject to the following provisions at the expense of the project proponent, as directed by the Development Services Director.

Paleontological Assessment. In areas containing middle to late Pleistocene era sediments (Qof) where it is unknown if paleontological resources exist, prior to grading an assessment shall be made by a qualified paleontological professional to establish the need for paleontologic monitoring. Should paleontological monitoring be required after recommendation by the professional paleontologist and approval by the Development Services Director, paleontological monitoring shall be implemented.

Paleontological Monitoring. A project that requires grading plans and is located in an area of known fossil occurrence or that has been demonstrated to have fossils present in a paleontological field survey or other appropriate assessment shall have all grading monitored by trained paleontologic crews working under the direction of a qualified professional, so that fossils exposed during grading can be recovered and preserved. Paleontologic monitors shall be equipped to salvage fossils as they are unearthed, to avoid construction delays, and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Monitoring is not necessary if the potentially fossiliferous units described for the property in question are not present or if present are determined upon exposure and examination by qualified paleontologic personnel to have low potential to contain fossil resources. Should significant paleontological resources be discovered, paleontological recovery, identification, and curation shall be implemented.

Paleontological Recovery, Identification, and Curation. Qualified paleontologic personnel shall prepare recovered specimens to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Qualified paleontologic personnel shall identify and curate specimens into the collections of the Division of Geological Sciences, San Bernardino County Museum or a similar established, accredited museum repository with permanent retrievable paleontologic storage. The paleontologist must have a written repository agreement in hand prior to the initiation of mitigation activities. This measure is not considered complete until curation into an established museum repository has been fully completed and documented.

Paleontological Findings. Qualified paleontologic personnel shall prepare a report of findings with an appendix of itemized specimens subsequent to implementation of paleontological recovery, identification, and curation. A preliminary report shall be submitted to and approved by the Development Services Director before granting of building permits, and a final report shall be submitted to and approved by the Development Services Director before granting of occupancy permits.

Environmental Setting

The proposed Project is located within the City of Adelanto, north of State Route 18, west of US-395, and south of Rancho Road. The city is located within the Mojave Desert Air Basin (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 (USGS 2015). As a portion of the southern extent of the Mojave Desert and western extent of the Colorado Desert, this area is characterized by the presence of decomposing granite derived from the nearby hillsides and windborne or water-borne alluvial deposits. Native vegetation in the area is generally limited to Joshua Trees and desert sage scrub, but riparian zones can be found along washes and intermittent streams.

The University of California, Davis SoilWeb database was consulted to identify soils that underlie the project site. The database indicates that the property is underlain by the Cajon soil association, which consists of very deep and well drained sandy soil. Slopes range from 0 to 2 percent (2020).

The Project site is situated atop a geologic formation of Pleistocene to Holocene age sediments comprised of largely non-marine alluvium, lake, playa, and terrace deposits; both unconsolidated and semi-consolidated (Jennings 2010). In Southern California, the middle Pleistocene is generally associated with a pre-human presence, although recent research suggests early human exploration of North America earlier in the Late Pleistocene than previously documented. Fossil specimens are also associated with the Pleistocene, particularly in areas where deposits are referred to as "older Alluvium". The Holocene is the most recent geologic period and one that is directly associated with human activity. The Holocene is also generally associated with "younger Alluvium," which tend not to be fossil bearing, except in instances where fossils have been redeposited.

Cultural Setting

Prehistoric Overview

During the twentieth century, many archaeologists developed chronological sequences to explain prehistoric cultural changes within all or portions of Southern California (Moratto 1984; Jones and Klar 2007). A prehistoric chronology was devised for the Southern California coastal region based on early studies and focused on data synthesis that included four horizons: Early Man, Milling Stone, Intermediate, and Late Prehistoric (Wallace 1955, 1978). Though initially lacking the chronological precision of absolute dates (Moratto 1984:159), Wallace's 1955 synthesis has been modified and improved using thousands of radiocarbon dates obtained by Southern California researchers over recent decades (Byrd and Raab 2007:217; Koerper and Drover 1983; Koerper et al. 2003). The prehistoric chronological sequence for Southern California presented below is a composite based on Wallace (1955) and Warren (1968) as well as later studies, including Koerper and Drover (1983).

Ethnographic Overview

Various regional syntheses have been utilized in the archaeological literature for southern California. The following framework derives information from local studies to provide a useful overview for the Project site. The Project site is geographically associated with both the Serrano and Vanyume of Southern California (Kroeber 1925:615-619 and 692-708). Though near the territorial boundary separating these two populations, the area is more generally considered part of the "Pass Cahuilla" territory. Cahuilla culture has been described by several scholars, but most thoroughly by Bean (1972 and 1978). The "Pass Cahuilla" are one of the three main Cahuilla populations associated with western Riverside County as well as Desert Cahuilla and Mountain Cahuilla.

Serrano

The Serrano language is classified as being within the Takik language family (Bean and Smith 1978:570). The Serrano lived in the San Bernardino Mountains east of the Cajon Pass to as far east as present-day Twentynine Palms and as far south as the Yucaipa Valley (Bean and Smith 1978:570). The Serrano had exogamous moieties made up of exogamous, patrilineal clans (Bean and Smith 1978:572). Lineage and clan leaders were hereditary ceremonial leaders who controlled sacred bundles and lived in ceremonial houses (Bean and Smith 1978:571–572).

The Serrano were organized into local lineages occupying favored territories but rarely claiming any territory far from the lineage's home base (Bean and Smith 1978). The estimated population of the Serrano before European contact was 1,500-2,500. It is difficult to estimate the number of Serranos living in each village however, it is likely that the villages held only as many Serranos as could be accommodated by water sources (Stickle and Weinman-Roberts 1980).

The Serrano lived in dwellings which were circular, domed structures built over an excavated area. These structures were built with fire pits and primarily served as sleeping areas. Ceremonial houses were the only other buildings in the villages and were normally occupied by the village priest (Stickle and Weinman-Roberts 1980).

In the Serrano artifact assemblage, it is noted to be similar to that of the neighboring Cahuilla and includes musical instruments such as rattles and flutes; utensils and ornaments such as fire drills, mortars, metates, pipes, beads, awls, and projectile points from wood, shell, bone, and stone. The Serrano were talented pottery and basket makers. Their pots were made of coiled clay smoothed out with a paddle and set in the sun to dry before being fired in a pit. Serrano

Brown ware was sometimes decorated with designs of circles and lines of either red or black (Stickle and Weinman-Roberts 1980).

The Serrano were also known for their petroglyphs. Abstract and geometric designs are often see with representational figures of sheep, lizards (zoomorphs) and human beings (anthropomorphs). Researchers have proposed that the petroglyphs were records of important events, rough maps, and artistic representations of native life (Stickle and Weinman-Roberts 1980).

Vanyume

The Vanyume or Beñemé, as Father Garces called them, lived beyond and along much of the length of the Mojave River, from the eastern Mojave Desert to at least the Victorville region, and perhaps even farther upstream to the south. They also appear to have lived in the southern and southwestern Antelope Valley. They intermarried with the Serrano and spoke a dialect of the Serrano language, so they may be thought of as a desert division or branch of the Serrano proper.

The Vanyume living along the Mojave River were quite wealthy in shell-bead money and other items. This was perhaps on account of the active trade route running along the Mojave River, connecting the Colorado River tribes and the Indian nations of the Southwest with the Indian groups of coastal southern California (Eerkens 1999; Knack 1980; Kroeber 1925; Park et al. 1938).

The Serrano-speaking villages of the southern Antelope Valley were, according to Garces, affiliated with this desert branch of the Serrano. The southern Antelope Valley native communities, including Maviajek and Kwarung had strong ties with Serrano-speaking communities on the upper Mojave River and in the areas of the northern San Bernardino and San Gabriel Mountains.

The Vanyume had a culture and food supply practices that were similar to those of the Serrano of the San Bernardino Mountains. Despite living in the desert, this branch of the Serrano had the advantage that it could receive and use in its desert villages large quantities of acorns gathered in the San Bernardino and San Gabriel Mountain ranges to the south. This allowed large villages to be supplied with abundant food far out in the desert, far north of where oak trees could be found. Father Garces reported having been given acorn porridge at a Vanyume village just to the southwest of modern Barstow, far from any oak grove.

The Vanyume shared a territorial boundary with the Chemehuevi to the northeast. The Chemehuevi had much lower population densities than the Vanyume and other Serrano because their food resources were less abundant. The Vanyume population may have ranged from 500 to 1000 or more at the arrival of the Spanish (Bean 1972; Kroeber 1925; Steward 1938).

They had frequent contacts with Spaniards after 1776, and they were in continual contact with Mohave travelers and Paiutes throughout the contact and pre-contact periods. In 1844, along the Mohave River, John C. Frémont met a group of five Mohave's and an ex-mission neophyte who had returned to the "mountains" after secularization (1830's). This ex-neophyte said that they lived upon a large river in the Southeast, which the "soldiers called the Rio Colorado"; but that formerly, a portion of them lived upon this river [Mohave River], and among the mountains which had bounded the river valley to the northward during the day [Calico Mountains 7], and that here along the river they had raised various kinds of melons (Forbes 1963).

Historic Overview

Post-European contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), the Mexican Period (1822–1848), and the American Period (1848– present). Briefly, and in very general terms, the Spanish Period encompassed the earliest historic-period explorations of the West, bringing colonization, missionization and proselytization across the western frontier, the establishment of major centers such as Los Angeles and Monterey and a line of missions and presidios with attendant satellite communities, along with minor prospecting, and a foundational economic structure based on the rancho system. The Mexican Period initiated with a continuation of the same structures; however, commensurate with the political changes that led to the establishment of the Mexican

state the missions and presidios were secularized, the lands parceled, and Indian laborers released. Increased global trade introduced both foreign and American actors into the Mexican economic and political sphere, both coincidentally, and purposefully, smoothing the transition to the American Period. The American Period was ushered in with a momentous influx of people seeking fortune in the Sierra foothills where gold was "discovered" in 1848. By the early 1850s people from all over the globe had made their way to California. Expansive industries were required to supply the early mining operations, such as forestry products, food networks to supply grains, poultry, cattle, and water systems, which intensified the early Mexican Period structures of ranches and supply chains, as well as the development and expansion of port cities to supply hard goods and clothes, animals, and people that moved across vastly improved trail and road networks. California cycled through boom and bust for several decade until World War I when the Department of the Navy began porting war ships along the west coast. Subsequently, California has grown, and contracted, predominantly around military policy along the west coast, and the Pacific Ocean. Following the industrial expansion related to World War II and the Cold War, technology and systems associated have come to fore as economic drivers.

City of Adelanto

The City of Adelanto, which in Spanish means "progress" or "advance," was founded in 1915 by E. H. Richardson. The name was given to the post office when it was established in 1917. Richardson was the inventor of what became the Hotpoint Electric Iron. He sold his patent and purchased land for $75,000, with the goal to develop one of the first master-planned communities in Southern California. Richardson subdivided his land into one-acre plots, which he hoped to sell to veterans with respiratory ailments suffered during World War I. He also hoped to build a respiratory hospital. While Richardson never fully realized his dream, it was his planning that laid the foundation for what is currently the City of Adelanto (City of Adelanto 2022).

Famous throughout the state for fresh fruit and cider, the deciduous fruit tree orchards thrived until the depression, when they were replaced by poultry ranches. As the wartime emergency developed early in 1941, the Victorville Army Air Field was established land within the Adelanto sphere of influence. In September 1950, it was named George Air Force Base in honor of the late Brigadier General Harold H. George. Adelanto continued as a "community services district" until 1970, when the city became incorporated, and Adelanto became San Bernardino County's smallest city. Adelanto became a charter city in November 1992 and later a contract city in 2005. As of 2010, Adelanto had a population of almost 32,000 (City of Adelanto 2022; SBS Museum 2022; Census.gov 2022).

Methods of Review

Chambers Group requested a records search from the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) at California State University, Riverside on January 24, 2022. At this time no records search results have been provided by the SCCIC. Upon receipt of the results of the records search that was requested for this Project, the results will be incorporated into this report and included in Attachment B. Resources consulted during a records search conducted by the SCCIC include the NRHP, California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), Caltrans Historic Highway Bridge Inventory, the California State Historic Resources Inventory, local registries of historic properties, and a review of available Sanborn Fire Insurance maps as well as historical photographs, maps, and aerial imagery. The task also includes a search for potential prehistoric and/or historic burials (human remains) evident in previous site records and/or historical maps. Where possible Chambers Group consulted these sources via alternative means. Through researching the publicly available environmental documents for recent and local projects, Chambers Group located the Phase I Cultural Resources Survey Report prepared by POWER Engineers, Inc, for the Los Angeles Department of Water and Power Adelanto Switching Station Expansion Project (2020). That project is located directly adjacent to the current Project's southern boundary and reviewing the associated project documents provided more insight into nature of the previously recorded cultural resources in the area based on the findings and the records search results summaries within the adjacent project's Cultural Resources Survey Report (Power Engineers 2020).

In addition, Chambers Group submitted a request to the Native American Heritage Commission (NAHC) on January 24, 2022, to provide a review of the Sacred Land Files (SLF) for the Project site and surrounding vicinity; at this time no SLF record search results have been provided by the NAHC. Without the NAHC SLF records search results, we are unable to determine with 100 percent certainty if any TCRs are documented within the Project site or surrounding one-half mile study area. However, based on the available data the likelihood is low that the SLF records search will be positive for TCRs in the Project area.

Finally, Chambers Group requested a paleontological records search from the Western Science Center Museum on January 24, 2022. This information was requested with the intent to provide further context related to the paleontological sensitivity of the area based on known fossil locations identified within the Project site or one-half mile study area. The paleontological records provide insight into what associated geological formations are more likely to contain fossils as well as the associated depths and placement of the known fossil locals relative to the geological formations in the area. At this time the paleontological records search has not been received. Without the paleontological records search results, it is still unknown if any paleontological resources have been documented in the Project site or surrounding one-half mile study area.

Project Personnel

Chambers Group Cultural Resources Department Lead Lucas Tutschulte managed the Project and co-authored the report. Chambers Group archaeologist and cross-trained paleontologist Kellie Kandybowicz conducted the background research and supported with preparation of the report. Richard Shultz, MA, RPA, served as Principal Investigator for cultural resources, and performed quality control for the report.

Cultural Resources Reports within the Study Area

Due to processing delay issues with the CHRIS and SCCIC, as well as the proposed Project timelines, no records search results have been provided at this time. Upon receipt of the records search results Chambers Group will update the report to include the results and incorporate them into the background research results and subsequent conclusions and recommendations. However, due to the ongoing delays in processing times with the SCCIC and without the results of the current Project records search request it is unknown at this time if any additional cultural resource studies include the current Project site.

Previously Recorded Cultural Resources within the Study Area

Due to processing delay issues with the CHRIS and SCCIC, as well as the proposed Project timelines, no records search results have been provided at this time. Upon receipt of the records search results Chambers Group will update the report to include the results and incorporate them into the background research results and subsequent conclusions and recommendations. However, the cultural resources survey report for adjacent Adelanto Switching Station Expansion Project indicated that the records search results included 11 previously recorded resources within the one-mile radius of that project site. No previously recorded resources were identified within that project area. Additionally, that report indicated that an isolated find in their survey area was the only new discovery located during their survey (Powers Engineer, Inc 2020). However, due to the ongoing delays in processing times with the SCCIC and without the results of the records search request associated with this Project, it is unknown at this time if any cultural resources occur within the current Project site. However, based on the information available the likelihood of previously recorded resources within the Project site is low.

Background Research Results

In addition to the pending records search review, Chambers Group archaeologists completed research to determine if any additional historic properties, landmarks, bridges, or other potentially significant or listed properties are located within the Project footprint or one-half-mile study area. This background research included, but was not limited to, the NRHP, California State Historic Property Data Files, California State Historical Landmarks, California Points of Historical Interest, Office of Historic Preservation Archaeological Determinations of Eligibility, historical aerial imagery accessed

via NETR Online, historical U.S. Geological Survey topographic maps, Built Environment Resource Directory (BERD), and California Department of Transportation (Caltrans) State and Local Bridge Surveys.

As a result of the archival research, no previously recorded resources or any other listed or potentially significant properties were identified within the Project site. It must be noted that the archival research doesn't include the current records search results from SCCIC at this time.

Additionally, based on the review of available historical photographs and aerial imagery, it appears that the Project site has been open space with no built environment features visible from 1952 to 2018. Historical topographic maps indicate the area as undeveloped from 1957 through 2018. The historical aerial imagery and topographic maps indicate that the current alignment of Rancho Road Blvd was constructed as a paved roadway around 1994 (United States Department of Agriculture (USDA); NETRonline 2021).

Paleontological Resources

As mentioned in the environmental setting section, the overall Adelanto area is a portion of the southern extent of the Mojave Desert and western extent of the Colorado Desert. As such, this area is characterized by the presence of decomposing granite derived from the nearby hillsides and windborne or water-borne alluvial deposits. Additional information from California Geological Survey indicates that the Project site is situated atop geological formations of Pleistocene to Holocene age sediments comprised of largely non-marine alluvium, lake, playa, and terrace deposits; both unconsolidated and semi-consolidated (Jennings 2010). Based on that information the paleontological sensitivity could be considered low in the overall area. However, the requested paleontological records search for the Project site and one-half mile area would provide more context and allow for the sensitivity determination to be further supported based on what fossil types and localities have been documented in the area. At this time the results of the paleontological records search requested from the Western Science Center Museum have not been received. Based on the information available and the nature of the geological formation that the Project is located atop, the likelihood of encountering paleontological resources during construction activities is low.

Native American Heritage Commission Sacred Lands File Search

On January 24, 2022, Chambers Group requested that the Native American Heritage Commission (NAHC) conduct a search of its Sacred Lands File (SLF) to determine if Tribal Cultural Resources (TCR) important to Native Americans have been recorded in the Project footprint and one-half mile study area. At this time, no SLF results have been received. PRC Section 21074 defines a resource as a TCR if it meets either of the following criteria:

1. sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, or listed in a local register of historic resources; or
2. a resource that the lead agency determines, in its discretion, is a tribal cultural resource

Based on guidance from the lead agency, Chambers Group will not send NAHC scoping letters to the Tribal groups listed by the NAHC for this Project. Upon receipt of the NAHC SLF records search it is considered best practice to allow for additional outreach via scoping letters with the tribes indicated in the NAHC SLF letter. This effort further supports the goal to determine the nature of any existing TCRs located within the Project site or one-half mile study area. When received, the response from the NAHC will be included in Attachment A.

AB 52 Consultation

The City of Adelanto completed the initial AB 52 outreach for the Project on July 8, 2021, which included four tribal groups. As of the date of this report, only one tribe responded to the AB 52 consultation request. The San Manuel Band of Mission Indians (SMBMI) responded via email on July 13, 2021, requesting that the project include the mitigation measures which are noted in Section 3.5. Additionally, SMBMI indicated that they have no concerns with the proposed project and simply requests that additional language as detailed in MM TCR—1 and TCR-2 be included in the document

to protect any inadvertent discoveries. Additionally, SMBMI indicated that they have no concerns with the proposed project and simply requests additional language be included in the document to protect any inadvertent discoveries.

Since so much time has lapsed since the initial AB 52 outreach, a follow up consult effort was completed by Chambers Group on January 26, 2022. The follow up outreach included phone calls to the three tribes that were previously engaged for AB 52 consultation in July 2021 that did not respond. The groups contacted include the Serrano Nation, Morongo Band of Mission Indians, and Soboba Band of Luiseño Indians. As a result of the follow up outreach, only Soboba responded and conveyed that they defer to the SMBMI. No further responses have been received to date.

Thus, with implementation of MM TCR—1 and TCR-2, and with mitigation measures CUL-1 through CUL-3, any TCRs or cultural resources of importance uncovered will be handled properly. Therefore, with implementation identified mitigation measures, the project is not anticipated to cause a change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape, or object with 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. No further mitigation is required.

Discussion

Chambers Group conducted a cultural resources records search and literature review within the Project site and surrounding study area in January 2022.

While a records request was made of the CHRIS database, at this time no results have been provided from the SCCIC to confirm the presence or absence of previously recorded cultural resources or studies within the Project site or surrounding half-mile study area. Additionally, the requested paleontological records search results have not yet been received from the Western Science Center. Chambers Group also submitted a search request of the NAHC SLF to determine the presence or absence of any known TCRs previously reported within the Project site or surrounding vicinity. The NAHC SLF search is currently pending.

In summary, Chambers Group found no evidence of archaeological or paleontological resources within the Project site based on the information publicly available and not including the review of the results of NAHC SLF, paleontological, or cultural resources records search requests specific to this Project. The overall Adelanto area is associated with the traditional use areas of the Serrano and Vanyume, and as such, has the potential to yield prehistoric archaeological materials. However, based on the information available at this time, the subsurface context within the Project site is considered low sensitivity for buried resources, both archaeological and paleontological.

Recommendations

Based on the results of the background research utilizing publicly available sources, Chambers Group archaeologists assess that the Proposed Project site is currently a vacant parcel of land and is previously disturbed. The background research confirmed a relatively low level of sensitivity for buried resources. Although the NAHC SLF records search results have not yet been received, further consultation with the tribes listed in that response is recommended to determine if any known TCRs are present in the Project site or study area.

Chambers Group recommends the following mitigation measures be implemented for the associated Project construction activity. Moreover, because the records search results have not been received and reviewed, Chambers Group recommends that those results be adequately reviewed and incorporated into this report upon receipt. If any cultural resources are identified, they would need to be evaluated for eligibility for the CRHR. Evaluation for archaeological sites consists of an archaeological testing program. Similarly, evaluation for paleontological resources will require evaluation by a qualified paleontologist. If determined eligible by the CEQA lead agency or the State Historic Preservation Office, mitigation, consisting of data recovery for archaeological sites, paleontological resources and documentation would be required if avoidance is not feasible. Finally, in the event that the requested records search results indicate the presence of sensitive resources within the Project site, or until the records search results confirm

the absence of sensitive resources within the Project site, the following mitigation measures shall be implemented to ensure that potential impacts to sensitive resources remain less than significant.

MM CUL-1 In the event that the requested records search results indicate the presence of sensitive resources within the Project site, or until the records search results confirm the absence of sensitive resources within the Project site, the Contractor shall retain a qualified Archaeologist and provide the schedule of all future proposed ground-disturbing activities. A minimum of 48 hours will be provided to the Consultant for any additional ground-disturbing activities such as grading, trenching, or mass excavation.

An Archaeological Resources Monitor shall be present on site during any further ground-disturbing activities related to the Project. The monitor shall observe all ground-disturbing activities. All monitors will have stop-work authority to allow for recordation and evaluation of finds during construction. The monitor will maintain a daily record of observations to serve as an ongoing reference resource and to provide a resource for final reporting upon completion of the Project.

The Archaeological Monitor and the Lead Contractor and subcontractors shall maintain a line of communication regarding schedule and activity such that the monitor is aware of all ground-disturbing activities in advance in order to provide appropriate oversight.

MM-CUL-2 If archaeological resources are discovered, construction shall be halted within 60 feet of the find and shall not resume until a Qualified Archaeologist can determine the significance of the find and whether the find has been fully investigated, documented, and cleared. If the Qualified Archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the City shall implement an archaeological data recovery program.

MM-CUL-3 At the completion of all ground-disturbing activities, the Consultant shall prepare an Archaeological Resources Monitoring Report summarizing all monitoring efforts and observations, as performed, and any and all prehistoric or historic archaeological finds as well as providing follow-up reports of any finds to the South Central Coastal Information Center (SCCIC), as required.

MM-TCR-1 The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in CUL-2, of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

MM-TCR-2 Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

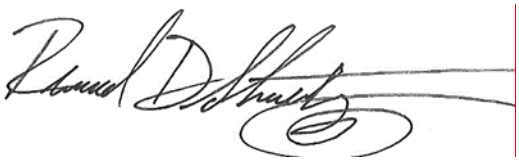
Unanticipated discovery of Human Remains: In the unlikely event that human remains are discovered during ground-disturbing activities, then the Proposed Project would be subject to California Health and Safety Code 7050.5, CEQA Section 15064.5, and California Public Resources Code Section 5097.98. If human remains are found during ground-disturbing activities, State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Ventura County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the County Coroner shall notify

the NAHC, which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Chambers Group is available to assist with any further support or document preparation related to Cultural Resources, including tribal consultation. Please contact the Project Manager Victoria Boyd, at (760) 685 -4838, or one of the contacts below if you have any questions or comments regarding this report.

Sincerely,

CHAMBERS GROUP, INC.



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Attachments

Attachment A: NAHC SLF Records Search Results

Attachment B (Confidential): Record Search Results

CULTURAL RESOURCES STUDY RESULTS LETTER REPORT FOR THE ADELANTO RANCHO CANNABIS FACILITY PROJECT

City of Adelanto

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ATTACHMENT A – NAHC SLF RECORDS SEARCH RESULTS LETTER

Attachment A: NAHC SLF Records Search Results Letter

CONFIDENTIAL. This document is confidential under California Government Code 6254.10 and the National Historic Preservation Act, Section 304, and other applicable federal, state, and local laws and regulations prohibiting public and unauthorized disclosure of records related to cultural resources. Recipients of this document acknowledge they are authorized to receive these materials and are responsible for maintaining the confidential nature of the contents related to cultural resources identified in this document and will not disclose confidential information to the public and/or unauthorized persons.

ATTACHMENT B (CONFIDENTIAL) – RECORD SEARCH RESULTS

Attachment B (Confidential): Record Search Results