

**Addendum
to
Mitigated Negative Declaration
for
CUP 16-37 and LDP 16-23**



City of Adelanto
Development Services – Planning Division
11600 Air Expressway
Adelanto, CA 92301

November 27, 2018

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1.0 INTRODUCTION

This Addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. This document has been prepared to serve as an Addendum to the previously adopted Mitigated Negative Declaration (MND) for Conditional Use Permit (CUP) No. 16-37 and Location and Development Plan (LDP) No. 16-23 ("Approved Project"). The City of Adelanto is the lead agency for the environmental review of the Proposed Project as described in Section 2.0 of this document. This Addendum addresses the proposed modifications in the Proposed Project in comparison to the previously adopted MND for the Approved Project pursuant to CEQA Guidelines Section 15164 and 15162.

1.1 Background and Purpose of the MND Addendum

The City of Adelanto Planning Commission adopted a Mitigated Negative Declaration (MND) for CUP No. 16-37 and LDP No. 16-23 on January 17, 2017 to establish a medical cannabis cultivation, manufacturing, distribution, transportation, and testing facility consisting of six (6) buildings totaling 628,425 square feet on 30.97 acres. The Applicant has commenced development of the Project, and prospective tenants therein have indicated they may ask the City for permission to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Project to a total of 1,260,000 square feet.

2.0 PROJECT DESCRIPTION

2.1 Project Location

Northeast corner of Yucca Road and Muskrat Avenue. (See Exhibit 1).

2.2 Approved Project

The Approved Project analyzed in the MND was to establish a medical cannabis cultivation, manufacturing, distribution, transportation, and testing facility consisting of six (6) buildings totaling 628,425 square feet on 30.97 acres.

2.2 Proposed Project:

The Applicant has commenced development of the Project, and prospective tenants therein have indicated they may ask the City for permission to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Project to a total of 1,260,000 square feet. The site area and building footprints are not proposed to be increased. Table 1 below summarizes the Approved Project vs. the Proposed Project characteristics.

Table 1. Approved Project vs. Proposed Project Characteristics

Land	Approved Project	Proposed Project	Change
Acreage	30.97	30.97	None
Building Square Footage	628,425	1,258,425	+630,000



**MND Addendum
CUP No. 16-37 and LDP No. 16-23**

**Location Map and Aerial Photo
(December 28, 2017)**

Exhibit 1

3.0 ENVIRONMENTAL DETERMINATION

Based on the analysis contained in Section 4.0 and the conclusions in Section 5.0 of this Addendum, the City of Adelanto, as lead agency, has determined the following pursuant to *CEQA Guidelines* Section 15162 (a):

(1) No substantial changes are proposed in the Project which will require major revisions of the previous Negative Declaration, involve any new significant environmental effects, or substantially increase the severity of previously identified significant effects;

(2) No substantial changes occur with respect to the circumstances under which the Project is undertaken that would in turn require major revisions of the previous EIR, involve any new significant environmental effects, or substantially increase the severity of previously identified significant effects; and

(3) No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The Project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Therefore, the preparation of an Addendum to the adopted MND for CUP 16-37 and LDP No. 16-23 is the appropriate CEQA document to support the City's consideration of the Proposed Project as outlined in the State CEQA Guidelines Section 15164.

Signature

City of Adelanto
Agency

Printed Name/Title:

Date:

Appendices

Appendix A. CalEEMod Printouts, Romo Planning Group Inc., November 21, 2018.

Appendix B. Adelanto Industrial Park Addendum Letter, Urban Crossroads, November 13, 2018.

4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

This section of the Addendum provides analysis and cites substantial evidence that support's the City's determination that the Proposed does not require the preparation a subsequent or supplemental MND under CEQA Guidelines Section 15162.

First, as addressed in the analysis that follows, the changes in the Proposed Project are not substantial changes that would not cause a new significant impact or substantially increase the severity of a previously identified significant impact from the Approved Project that would require major revisions to the MND for the Approved Project. All impacts would be nearly equivalent to the impacts previously analyzed in the MND for the Approved Project.

Second, as documented in Section 4.0, there is no new information of substantial importance (which was not known or could not have been known at the time of the MND for the Approved Project was adopted (January 17, 2017) that identifies: a new significant impact (condition "A" under CEQA Guidelines Section 15162[a][3]); a substantial increase in the severity of a previously identified significant impact (condition "B" CEQA Guidelines Section 15162[a][3]); mitigation measures or alternatives previously found infeasible that would now be feasible and would substantially reduce one or more significant effects of the MND adopted for the Approved Project; or mitigation measures or alternatives which are considerably different from those analyzed in the adopted MND for the Approved Project which would substantially reduce one or more significant effects on the environment (conditions "C" and "D" CEQA Guidelines Section 15162[a][3]). None of the "new information" conditions listed in the CEQA Guidelines Section 15162[a] [3] are present in this case to trigger the need for a subsequent or supplemental MND.

CEQA Guidelines Section 15164 states that "The lead agency or a responsible agency shall prepare an addendum to a previously certified MND if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent MND have occurred." An Addendum is appropriate in this case because, as explained above, none of the conditions calling for preparation of a subsequent MND have occurred.

4.1 AESTHETICS

4.1.2 (A) *Have a substantial adverse effect on a scenic vista?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The adopted MND determined the Approved Project would have no impact for this issue. The increase in building square footage is proposed to be accomplished by adding mezzanine or second levels within the current building envelopes. The Proposed Project's overall height, massing, geometry, and rhythm will be the same as the Approved Project

No new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The adopted MND determined the Approved Project would have no impact for this issue. According to the California Department of Transportation, the Project site is not located within a State Scenic Highway. According to the *Adelanto General Plan*, the Project site is not adjacent to a local Scenic Highway.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.1.2 (c) *Substantially degrade the existing visual character or quality of the site and its surroundings?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The adopted MND determined the Approved Project would have a less than significant impact for this issue. The Proposed Project is currently under construction and the visual character of the site has changed from vacant desert land to an industrial development.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The adopted MND determined the Approved Project would have a less than significant impact for this issue. All lighting is required to be designed in accordance with the City of Adelanto Performance Standards as described in Section 17.90.040 of the Zoning Ordinance. This section requires that all on-site lighting shall be stationary and directed away from adjoining properties and public rights-of-way, that light fixtures

be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture, and light fixtures be shielded so no light above 0.5 foot-candle spills over onto adjacent properties and rights-of-way. The increase in building square footage is proposed to be accomplished by adding mezzanine or second levels within the current building envelopes.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.2 AGRICULTURE AND FORESTRY RESOURCES

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

There are no areas in the City of Adelanto designated by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance Land within the Proposed Project Area is classified as Grazing Land, Urban and Built-up Land, and Other Land.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

Agricultural Zoning

The Project site is designated as Light Manufacturing (LM) by the General Plan/Zoning Map which allows a variety of light industrial uses. The LM district does not allow agricultural uses as a primary use. As such, there is no impact. No mitigation measures are required.

Williamson Act

Pursuant to the California Land Conservation Act of 1965, a Williamson Act Contract enables private landowners to voluntarily enter into contracts with local governments for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive lower property tax assessments based upon farming and open space uses as opposed to full market value. According to the latest Williamson Act Map for the County of San Bernardino (FY 2017/2018) there are no properties within the Proposed Project area under a Williamson Act contract.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.2.2 (c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project area does not contain any forest lands, timberland, or timberland zoned as Timberland Production, nor are any forest lands or timberlands located on or nearby the Proposed Project area. Because no lands within the Proposed Project area are zoned for forestland or timberland, there is no potential to impact such zoning and no impact would occur.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project area and surrounding properties do not contain forest lands, are not zoned for forest lands, nor are they identified as containing forest resources by the *General Plan*. Because forest land is not present within the Proposed Project area or in the immediate vicinity of the area, future development has no potential to result in the loss of forest land or the conversion of forest land to non-forest use and no impact would occur.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

Based on the analysis under Issues 4.2.2 (a) through 4.2.2(e) above, no impact would occur with respect to changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.3 AIR QUALITY

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Mojave Desert Air Quality Management District is responsible for maintaining and ensuring compliance with the above described Air Quality Management Plans. A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project may also be non-conforming if it increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).

A project is conforming if it complies with all applicable Mojave Desert Air Quality Management District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

Consistency with Emission Thresholds and Rules

As shown in Tables 2 and 3 below, the Proposed Project would not exceed Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction or during long-term operation. Accordingly, the Project's air quality emissions are less than significant.

Consistency with Control Measures

The Proposed Project must comply with all applicable Mojave Desert Air Quality Management District rules, regulations, and control measures. These are mandatory requirements. As such, impacts are less than significant.

Consistency with Growth Forecasts

The Project site has a General Plan/Zoning designation of Light Manufacturing (LM). The project is not proposing the change the underlying land use designation. The Light Manufacturing (LM) designation was used in the land use assumptions to prepare the Mojave Desert Air Quality Management Plans listed above.

Conclusions

Based on the consistency analysis presented above, the proposed project will not conflict with the applicable Mojave Desert Air Quality Management Plans described above

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.3.2 (b) *Violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

Determination: Less Than Significant Impact With Mitigation Incorporated. Same Conclusion as the MND adopted for the Approved Project.

The MND adopted for the Approved Project determined that impacts were less than significant with implementation of the following Mitigation Measure:

AQ-1- Coating Restriction Plan: Prior to issuance of building permits, the project proponent shall submit, to the satisfaction of the Planning Department, a Coating Restriction Plan (CRP). The CRP measures shall be implemented to the satisfaction of City Building Department. The CRP shall include the following requirement:

- The maximum interior area that may be coated per building shall not exceed 50,000 square feet.

Both construction and operational emissions for the Proposed Project were estimated by using the California Emissions Estimator Model which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model can be used for a variety of situations where an air quality analysis is necessary or desirable such as California Environmental Quality Act (CEQA) documents and is authorized for use by the Mojave Desert Air Quality Management District. (See Appendix A for CalEEMod printouts).

Construction Emissions

Construction activities associated with the Proposed Project will result in emissions of CO, VOCs, NOx, SOx, PM10, and PM2.5. Construction related emissions are expected from the following construction activities:

- Building Construction (interior).
- Architectural Coatings (interior painting).
-

With implementation of Mitigation Measure AQ-1, emissions will not exceed MDAQMD thresholds as shown in Tables 2 and 3 below.

Table 2. Construction Emissions (Rule 402/403/1113 Requirements)

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	ROG	CO	SOx	PM10	PM2.5
	36.13	69.13	36.02	0.09	4.49	2.25
Regional Threshold	137	137	548	137	82	65
Exceeds Regional Threshold?	NO	NO	NO	NO	NO	NO
Source: MDAQMD and CalEEMod 2016.3.2						

Table 3. Operational Emissions

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	ROG	CO	SOx	PM10	PM2.5
	5.34	18.32	7.72	0.03	1.33	0.40
Regional Threshold	137	137	548	137	82	65
Exceeds Regional Threshold?	NO	NO	NO	NO	NO	NO
Source: MDAQMD and CalEEMod 2016.3.2						

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.3.2 (c) *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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project is proposing to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Project to a total of 1,260,000 square feet.

Attainment Designation

An “attainment” designation for an area signifies that criteria pollutant concentrations did not exceed the established standard. In contrast to attainment, a “nonattainment” designation indicates that a criteria pollutant concentration has exceeded the established standard.

If an area is in nonattainment for a criteria pollutant, then the background concentration of that criteria pollutant has historically been over the ambient air quality standard. It follows if a project exceeds the 1 threshold for that nonattainment criteria pollutant, then it would result in a cumulatively considerable net increase of that criteria pollutant and result in a significant cumulative impact.

The Mojave Desert Air Basin is in non-attainments status for Ozone (State and Federal), PM2.5 and PM10 (State) and PM10 (Federal). As discussed in Issue 4.3 (b) above, the Proposed Project would not exceed Mojave Desert Air Quality Management District thresholds for construction or operational activities for any criteria pollutant and therefore will not result in a cumulatively considerable net increase of any criteria pollutant.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.3.2 (d) *Expose sensitive receptors to substantial pollutant concentrations?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

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 using significance threshold criteria established by the Mojave Desert Air Quality Management District:

- Any industrial project within 1000 feet;
- A distribution center (40 or more trucks per day) within 1000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The Proposed Project falls under the “industrial project” category listed above. The nearest sensitive receptor is the residential area located approximately 1,400 feet northeast of the Project site along Air Expressway. In addition, as shown on Tables 2 and 3 above, the Project does not exceed the significance thresholds for any air pollutant. As such, the project will not impact the residential area with respect to exposing sensitive receptors to substantial pollutant concentrations

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.3.2 (e) *Create objectionable odors affecting a substantial number of people?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

Land uses typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.

Section 17.90.110-Odors of the Adelanto Municipal Code states: *“No operation or activity shall be permitted to emit odorous gases or other odorous matter in such quantities as to be dangerous, injurious, noxious, or otherwise objectionable and readily detectable without the aid of instruments at or beyond the lot line.”*

Compliance with this mandatory requirement will ensure that the Proposed Project will not create objectionable odors affecting a substantial number of people. As such, impacts are less than significant and no mitigation measures are required.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.4 BIOLOGICAL RESOURCES

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

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

4.4.2 (c) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

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

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

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

Determination: No Impact.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

The entire site has been graded and is under construction. All mitigation measures required by the MND for the Approved Project h for Biological Resources have been complied with. As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.5 CULTURAL RESOURCES

4.5.2 (a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

4.5.2 (b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5 or tribal cultural pursuant to Public Resources Code 21074?

4.5.2 (c) Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

4.5.2 (d) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

4.5.2 (e) Disturb any human remains, including those interred outside of formal cemeteries?

Determination: No Impact.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

The entire site has been graded and is under construction. All mitigation measures required by the MND for the Approved Project for Cultural Resources have been complied with. As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.6 GEOLOGY AND SOILS

4.6.2 (a) (1) Expose people or structures to 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? Refer to Division of Mines and Geology Special Publication 42.

4.6.2 (a) (2) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

4.6.2 (a) (3) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

4.6.2 (a) (4) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

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

4.6.2 (c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

4.6.2(d) Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?

4.6.2 (e) 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?

Determination: No Impact.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

The entire site has been graded and is under construction. Any impacts associated with Geology and Soils were ameliorated through the issuance of grading and building permits.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.7 GREENHOUSE GAS EMISSIONS

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

According to CEQA Guidelines Section 15064.4, when making a determination of the significance of greenhouse gas emissions, the “lead agency shall have discretion to determine, in the context of a particular project, whether to use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use.” Moreover, CEQA Guidelines section 15064.7(c) provides that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts” on the condition that “the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

The City of Adelanto has not adopted Greenhouse Gas (GHG) thresholds of significance therefore; the Mojave Desert Air Quality Management District threshold will be utilized.

A summary of the proposed Project’s projected annual operational greenhouse gas emissions, including amortized construction-related emissions, is provided in Table 4.

Table 4. Proposed Project Greenhouse Gas Emissions

Source	GHG Emissions MT/yr			
	N2O	CO2	CH4	CO2e
Mobile Sources	0.000	348.74	0.030	349.50
Area	0.000	0.0113	0.00003	0.012
Energy	0.006	2,032.69	0.0813	2,040.24
Solid Waste	0.000	158.97	9.39	393.85
Water/Wastewater	0.009	652.94	4.78	806.91
30-year Amortized Construction GHG				33.73
TOTAL				2,817.33
MDAQMD Threshold				100,000
Exceed Threshold?				NO

As shown in Table 3, the Proposed Project is estimated to emit approximately 2,817.33 MTCO2e per year, including amortized construction-related emissions which does not exceed the Mojave Desert Air Quality Management District threshold used by the City of Adelanto to determine if greenhouse gas emissions are significant.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The California Air Resources Board (CARB) *Scoping Plan* identifies strategies to reduce California's greenhouse gas emissions in support of AB 32. Many of the strategies identified in the Scoping Plan are not applicable at a project-level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the Project such as water conservation and energy conservation. Finally, while some measures are not directly applicable, the Proposed Project would not conflict with their implementation.

The *San Bernardino County Regional Greenhouse Gas Reduction Plan* (Reduction Plan), prepared by the San Bernardino Associated Governments (SANBAG) has been prepared in response to the CARB Scoping Plan recommendation that California cities and counties seek to reduce their GHG emissions consistent with statewide reductions. The Reduction Plan utilizes population, housing, and employment projections as detailed by the Southern California Association of Governments (SCAG).

The City of Adelanto has selected a target reduction of 30 percent below its projected GHG emissions level in 2020. The Reduction Plan summarizes the actions that each city has selected to take in order to reduce GHG emissions, State-mandated actions, GHG emissions avoided in 2020 associated with each local and State action, and each city's predicted progress towards their selected GHG reduction goal. The Project will support the following reduction measures:

- *Waste-2. Waste Diversion* -The Project's waste hauler would be required to comply with all applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the landfills that serve the Project are reduced in accordance with existing regulations
- *Water-1. Voluntary CALGreen: New Construction*-The City will require that all new development utilize water conservation techniques to conserve water resources, such as the use of low-flow irrigation and plumbing systems in new and existing development.
- *Water-3. Water-Efficient Landscaping Practices*-Promote low per capita water use through the use of low water consumptive plant materials/desert plants (xeriscape).

Based on the analysis above, the Project will not conflict with regional or State plans to reduce greenhouse gas emissions and will support the 30 percent long-term reduction in greenhouse gas emissions identified in the *San Bernardino County Regional Greenhouse Gas Emissions Inventories and Reduction Plan*.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.8 HAZARDS AND HAZARDOUS MATERIALS

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project proposes to cultivate, manufacture, distribute, transport, and test medical cannabis. All activities will take place in enclosed buildings. Indoor cultivation activities would involve growing marijuana plants, harvesting marijuana plants, and drying marijuana flowers. These activities would involve the use of pesticides which is a hazardous substance. Under California and federal law, the only pesticide products not illegal to use on cannabis are those that contain an active ingredient that is 1): exempt from residue tolerance requirements, and either 2) exempt from registration requirements or 3) registered for a use broad enough to include use on cannabis.

Manufacturing activities involve raw cannabis that has undergone a process whereby the raw agricultural product has been transformed into a concentrate, an edible product, or a topical product. The manufacturing process may involve the use of hazardous substances.

Hazardous materials and hazardous waste programs are managed by the San Bernardino County Fire Department Certified Unified Program Agency (CUPA). The CUPA is charged with the responsibility of conducting compliance inspections for regulated facilities within San Bernardino County that handle hazardous material, generate or treat a hazardous waste and/or operate an underground storage tank. The CUPA administers permits, inspection activities, and enforcement activities. The use of hazardous materials for operation of the facility would be regulated by the CUPA through a Hazardous Materials Release Response Plan and Inventory (Business Plan). Compliance with the CUPA permit requirements would reduce potential impacts to a level less than significant. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required

4.8.2 (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

As noted under issue 4.8 (a) above, any hazardous materials used to cultivate, manufacture, or test medical cannabis would be regulated by the CUPA through a Hazardous Materials Release Response Plan and Inventory (Business Plan). Compliance with the CUPA permit requirements would reduce potential impacts to a level less than significant. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is not located within one-quarter (0.25) mile of a mile from an existing or proposed school. The nearest school is the Harold George Visual and Performing Arts Magnet School located approximately one (1) mile northeast of the Project site. However, as discussed in the responses to Issues 4.8 (a) and 4.8 (b) above, the all hazardous or potentially hazardous materials would comply with all applicable federal, State, and local agencies and regulations with respect to hazardous materials.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.8.2 (d) 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?

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is not included on the list of hazardous materials sites compiled in accordance with Government Code No. 65962.5.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is not located within 2 miles of a public airport or within an airport land use plan. The nearest public airport is the Southern California Logistics Airport located approximately 3.5 miles northeast of the Project site.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

3.8(f) For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is located approximately two (2) miles northeast of the Adelanto Airport which is a privately owned general aviation facility with two unpaved runways. It is primarily used by single-engine aircraft, helicopters, ultralight aircraft, and gliders. The Project site is not within the vicinity or approach/departure flight path of the airport.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.8.2 (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

Access to the Project site is from Yucca Road and Muskrat Avenue, which are improved roadways. The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles via Yucca Road and Muskrat Avenue and connecting roadways as required by the City. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.8.2 (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

City of Adelanto Municipal Code Chapter 14.20 adopts the 2013 Edition of the California Fire Code making all provisions of it applicable in the City of Adelanto. Applicable provisions of the Fire Code implemented into the project design will reduce the risk of loss, injury, or death involving wildland fires to a level less than significant.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9. HYDROLOGY AND WATER QUALITY

4.9.2 (a) Violate any water quality standards or waste discharge requirements?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

Pursuant to the requirements of the City's National Pollutant Discharge Elimination System permit, a Water Quality Management Plan is required for managing the quality of storm water or urban runoff that flows from a developed site after construction is completed and the facilities or structures are occupied and/or operational. A Water Quality Management Plan describes the Best Management Practices that will be implemented and maintained throughout the life of a project to prevent and minimize water pollution that can be caused by storm water or urban runoff. In the case of this Project, the site will use on-site storm water quality basin(s) which are designed to be dual purpose retention and water quality basins relying on infiltration.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is served with potable water by the Adelanto Public Utility Authority. The City's water supply comes solely from groundwater production from 15 potable wells in three pressure zones, transmission and distribution pipelines, booster stations and reservoirs. The City obtains all of its water supply from local groundwater in the Mojave River Groundwater Basin. The Mojave Basin Area was the subject of a court ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area.

Given the City's total reliance on groundwater, the reliability of the City's water supply is thus entirely dependent on the reliability of the groundwater in the Mojave River Basin managed by MWA. Based on MWA's analysis, MWA has adequate supplies to meet demands during average, single-dry, and multiple-dry years throughout the 25-year planning period.

Thus, the Project's demand for domestic water service would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or offsite?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

The entire site has been graded and is under construction. Any impacts associated with altering the existing drainage pattern were ameliorated through the issuance of grading and building permits.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on or offsite?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

The entire site has been graded and is under construction. Any impacts associated with altering the existing drainage pattern were ameliorated through the issuance of grading and building permits.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

The entire site has been graded and is under construction. Any impacts associated with creating or contributing runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff were ameliorated through the issuance of grading and building permits.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2(f) *Otherwise substantially degrade water quality?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

There are no conditions associated with the proposed Project that could result in the substantial degradation of water quality beyond what is described above in 4.9 (a), 4.9 (c), and 4.9 (e) e above.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (g) *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project does not propose any housing. No impact would occur and no mitigation measures are required.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (h) *Place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is not located within a designated flood plain based upon a review of Federal Emergency Management Agency Flood Insurance Rate Map Panel No. 060671C5780H, dated August 28, 2008. This Panel identified the subject area as being located within Flood Zone X, which is defined as “Area of minimal flood hazard, usually depicted on Flood Insurance Rate Maps as above the 500-year flood level.”

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (i) *Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site and surrounding area is not located within a designated dam inundation area. The Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, as no levee or dam are located in the vicinity of the Project site.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.9.2 (j) Inundation by seiche, tsunami, or mudflow?

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project will not be impacted by inundation by seiche, tsunami, or mudflow, because the Project is not located in the vicinity of any body of water that has the potential of seiche or tsunami. The site is level and not subject to mudflows.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.10 LAND USE AND PLANNING

4.10.2 (a) Physically divide an established community?

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

The entire site has been graded and is under construction and it will not physically divide an established community.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

Sections 17.80.080 and 17.80.090 of the Adelanto Municipal Code regulate medical cannabis activities. The purpose of these sections of the Municipal Code are to regulate medical cannabis activities in a manner that is consistent with State law and promote the health, safety, and general welfare of the residents and businesses within the City, while limiting the negative impacts associated with such medical cannabis activities. In this context, these section of the Municipal Code are considered to fall under the category of a zoning ordinance adopted for the purpose of avoiding or mitigating an environmental effect.

These sections of the Municipal Code currently allow medical cannabis activities as a conditionally permitted use within the Light Manufacturing (LM) zoning district. As disclosed in the Mitigated Negative Declaration for the Approved Project, implementation of the Project would develop the subject property with buildings used to cultivate, manufacture, distribute, transport, and test medical cannabis. However, in all instances where significant impacts have been identified, mitigation is provided to reduce each impact to less-than-significant levels.

In addition, as demonstrated throughout this Addendum, the Proposed Project would otherwise not conflict with any applicable goals, objectives, and policies of the General Plan, Municipal Code or conflict with any applicable policy document whose purpose is to avoid or mitigate an environmental effect.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is located within the planning area of the West Mojave CDCA Plan Amendment. The West Mojave CDCA Plan Amendment was adopted by the BLM in 2006. The Record-of-Decision applies only to 3.3 million acres of BLM-managed lands. To date no approvals have been issued for the Habitat Conservation Plan component by the USFWS or the CDFW. The Project Site is located on private property outside of the BLM management; therefore the West Mojave Plan does not apply.

Additionally, the Project Site is located within the boundaries of the Desert Renewable Energy Conservation Plan (DRECP) NCCP/HCP. Phase I of the DRECP was approved on September 14, 2016 and applies to BLM land only and does not apply to the Project. Phase II which would apply to non-federal land is an on-going process and no implementing agreements have been issued. As such, no conflicts related to applicable land use plans or NCCPs/HCPs are anticipated.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.11 MINERAL RESOURCES

4.11.2 (A) 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?

4.11.2 (b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The entire site has been graded and is under construction. No mineral resources were impacted.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.12 NOISE

4.12.2 (a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet. The entire site has been graded and is under construction.

Building Operation Noise

There are no sensitive receptors (i.e. residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, and parks and other outdoor recreation areas) that may be affected by Project's operational noise. The Project site is located in an area characterized by primarily developed commercial/industrial land. The site is bounded by Joshua Avenue (a dirt roadway), followed by vacant land, to the north; Muskrat Avenue (an asphaltic and concrete paved roadway), followed by commercial/industrial development and vacant land, to the west; Yucca Road (an asphalt paved roadway), followed by commercial/industrial development and vacant land, to the south; and a transmission line easement, followed by Raccoon Avenue (a semi-paved roadway), followed by vacant land, to the east. The nearest sensitive receptors would be the residential neighborhood located approximately ½ mile to the northeast along Air Expressway.

Based on the above analysis, operational noise generated by the Project is less than significant and no mitigation measures are required.

Traffic Noise

Generally a project would result in a significant traffic-related noise impact if traffic generated by that project would cause or contribute to exterior noise levels at sensitive receptor locations in excess of 65 dBA and the project's contribution to the noise environment equals 3.0 dBA or more. (A change of 3.0 dBA is considered "barely perceptible" by the human ear and changes of less than 3.0 dBA generally cannot be perceived except in carefully controlled laboratory environments).

The additional mezzanine floor space would result in an additional 225 daily trips (10 AM and 5 PM peak hour trips). Given the low volume of additional vehicle trips, the Proposed Project will not generate significant traffic noise.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.12.2 (b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet. The entire site has been graded and is under construction.

Typical sources of groundborne vibration and noise include construction activities and train operations. There are no railways within the Proposed Project area and the Proposed Project does not involve rail activities. The only construction activities are for interior remodeling and does not involve heavy equipment. The Proposed Project does not involve any operational activity that could result in groundborne vibration.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.12.2 (c) A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

As noted in the response to Issue 4.12.2 (a) above, the increased level of noise from the Proposed Project will be less than significant. Therefore, the Project will not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.12.2 (d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

As noted in the response to Issue 4.12.2 (a) a above, the increased level of noise from the Proposed Project will be less than significant. Therefore, the Project will not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Project.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is located approximately 3.5 miles northwest of the Southern California Logistics Airport and is located outside of the 65 dBA CNEL noise contour. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from the airport.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.12.2(f) For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is located approximately two (2) miles northeast of the Adelanto Airport which is a privately owned general aviation facility with two unpaved runways. It is primarily used by single-engine aircraft, helicopters, ultralight aircraft, and gliders. The Project site is not within the vicinity or approach/departure flight path of the airport. As such, the Project will not be exposed to noise impacts from the airport. Impacts are less than significant and no mitigation measures are required.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.13 POPULATION AND HOUSING

4.13.2 (a) *Induce substantial 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)?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project would not directly result in population growth because it does not propose any residential dwelling units.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site does not contain any residential units. Therefore, implementation of the Project would not displace a substantial number of existing housing, nor would it necessitate the construction of replacement housing elsewhere.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site does not contain any residential units. Therefore, implementation of the Project would not displace substantial numbers of people necessitating the construction of replacement housing elsewhere.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.14 PUBLIC SERVICES

3.14.2(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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

Fire Protection: The San Bernardino County Fire Department provides fire protection services to the Project area. The Project would be primarily served by the Adelanto Station #322, an existing station located approximately 0.8 roadway miles southeast of the Project site at 10370 Rancho Road. Development of the Project would impact fire protection services by placing an additional demand on existing County Fire Department resources should its resources not be augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes.

Furthermore, the Project would be required to pay the Fire Facilities Impact Fee. Payment of the Fire Facilities Impact Fee would ensure that the Project provides fair share funds for the provision of additional fire services, including fire protection services, which may be applied to fire facilities and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project.

Police Protection: The San Bernardino County Sheriff's Department provides community policing to the Project area via the Victor Valley Sheriff Station located at 11613 Bartlett Street which is located approximately 2.6 roadway miles northeast of the Project site. The Victor Valley Station has one captain, two lieutenants, ten sergeants, seven detectives fifty three patrol deputies (November, 2016). If a permit is granted to operate the buildings to cultivate, manufacture, distribute, transport, and test medical cannabis, the Project is required to implement a security plan in conjunction with the City and the Sheriff's Department.

The Project site is located in a developed area of the City that is patrolled regularly. In addition, the City requires that 50% of the employees be current residents of the City so the Project will not substantially increase population requiring additional sheriff deputies. Therefore, the Project Is not expected to result in the construction of new or physically altered sheriff facilities, need for new or physically altered sheriff facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services.

Schools: The Project site is located within the Adelanto School District. The District is authorized by State law (Government Code § 65995-6) to levy a new commercial construction fee per square foot of commercial construction for the purpose or funding the reconstruction or construction of new school facilities. Pursuant to Section 65995(3) (h) of the California Government Code, the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of

adequate school facilities.” Therefore, the payment of school impact fees for future commercial development would offset the potential impacts of increased student enrollment related to the implementation of the project.

Parks: The Project will not create a demand for additional park facilities because the Project is an industrial development and no housing is proposed.

Other Public Facilities: The Project proposes industrial buildings intended to be used for medical cannabis cultivation, manufacturing, distribution, transportation, and testing.

These types of uses are not labor intensive and will not create an additional need for housing thus increasing the overall population of the City. In addition, the City requires that 50% of the future employees be current residents of the City. As such, there would be no need for increases in any other governmental services, such as public health services and library services which would require the construction of new or expanded public facilities.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.15 RECREATION

4.15.2 (a) *Would the proposed 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?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet. The Proposed Project would not directly increase the number of people using recreational facilities causing a substantial physical deterioration of any recreation facilities or accelerate the physical deterioration of any recreation facilities.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: No Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project does not propose any recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment. In addition, no offsite parks or recreational improvements are proposed or required as part of the Project.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.16 TRANSPORTATION AND TRAFFIC

4.16.2 (a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet.

Motorized Vehicle Impact Analysis

The MND adopted for the Approved Project determined that all of the study area intersections were anticipated to operate at an unacceptable Levels of service (LOS) and no mitigation measures were required.

Based on a revised trip generation analysis, taking into account the additional building square footage, prepared by Urban Crossroads on November 13, 2018 (Appendix B), the additional mezzanine floor space would result in an additional 225 daily vehicle trips (10 AM and 5 PM peak hour trips), which is negligible and less than the 50 peak hour trip criteria that is typically applied to determine if additional analysis is warranted. The “50 peak hour trip” criterion utilized by the City of Adelanto is consistent with the methodology employed by the County of San Bernardino, and generally represents a minimum number of trips at which a typical intersection would have the potential to be substantively impacted by a given development proposal.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

Transit Service Analysis

The study area is currently served by the Victor Valley Transit Authority (VVTA), a public transit agency serving the Victor Valley area within San Bernardino County, with bus service along Rancho Road via VVTA Route 33. Transit service is reviewed and updated by VVTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. The Proposed Project is not proposing to construct any street improvements that will interfere with any future bus service. As such, the Project as proposed will not conflict with an applicable plan, ordinance or policy applying to transit services.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

Bicycle & Pedestrian Facilities Analysis

The Project is not proposing to construct any improvements that will interfere with bicycle and pedestrian use. Pedestrian and bicycle access are available to the Project site on Yucca Road, Muskrat Avenue, and Joshua Avenue. In addition, bicycle parking is provided on the Project site. Therefore, the Project will not conflict with an applicable plan, ordinance or policy applying to non-motorized travel. Impacts are less than significant.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.16(b) Conflict with an applicable congestion management program, including, but not limited to, level-of-service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The San Bernardino Associated Governments (SANBAG) was designated as the Congestion Management Agency for San Bernardino County in 1990 and prepares and administers the San Bernardino County Congestion Management Program. The intent of the San Bernardino County Congestion Management Program is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality.

As required by the San Bernardino County Congestion Management Program, the Proposed Project will be required to pay the mandatory development impact fees per the SANBAG Development Mitigation Nexus Study (Nexus Study). The development contribution requirements are established by the Nexus Study for regional transportation improvements.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.16.2(c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is not located within 2 miles of a public airport or within an airport land use plan. The nearest public airport is the Southern California Logistics Airport located approximately 3.5 miles northeast of the Project site.

The Project site is located approximately two (2) miles northeast of the Adelanto Airport which is a privately owned general aviation facility with two unpaved runways. It is primarily used by single-engine aircraft, helicopters, ultralight aircraft, and gliders. The Project site is not within the vicinity or approach/departure flight path of the airport and will not impact air traffic patterns.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is accessible via Yucca Road, Muskrat Avenue, and Joshua Avenue which are improved roadways constructed per City Standards. Finally, the Proposed Project is located in an industrial area so it will not create a hazard with incompatible uses (e.g., farm equipment).

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.16.2 (e) *Result in inadequate emergency access?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is accessible via Yucca Road, Muskrat Avenue, and Joshua Avenue which are improved roadways constructed per City Standards. The Proposed Project is located in an industrial area so it will not create a hazard with incompatible uses (e.g., farm equipment).

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.16.2 (f) *Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?*

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Project site is accessible via Yucca Road, Muskrat Avenue, and Joshua Avenue which are improved roadways constructed per City Standards. Therefore, access for alternative transportation (i.e., public transit, pedestrian, bicycle) can be accommodated and the project will not decrease the performance of existing alternative transportation facilities or be in conflict with policies, plans, or programs supporting alternative transportation.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.17 UTILITIES AND SERVICE SYSTEMS

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Adelanto Public Utilities Authority is the sole agency for collecting, treating and discharging wastewater within its service area through the Adelanto Wastewater Treatment Facility. Wastewater from Adelanto's water service area is collected and treated at the City-owned 4.0 MGD activated sludge wastewater treatment facility through an operations and maintenance contract with the PERC Water Corporation. The Adelanto Public Utilities Authority is required to operate all of its treatment facilities in accordance with the waste treatment and discharge standards and requirements set forth by the Lahontan Regional Water Quality Control Board. The proposed Project would not install or utilize septic systems or alternative wastewater treatment systems; therefore, the Proposed Project would have no potential to exceed the applicable wastewater treatment requirements established by the Lahontan Regional Water Quality Control Board.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

Water service is available in Yucca Road to serve the Project site. Sewer service is provided to the area by the Adelanto Public Utility Authority (APUA) through a network of gravity and force main sewer pipelines. Sewer service is proposed by extending a sewer line within the Panther Avenue right-of-way between Joshua Avenue and Air Expressway.

The entire site has been graded and is under construction. Any impacts associated with the construction of new water or wastewater treatment facilities or expansion of existing facilities were ameliorated through the issuance of grading and building permits.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.17.2 (c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The entire site has been graded and is under construction. Any impacts associated with the construction of new stormwater drainage facilities or expansion of existing facilities were ameliorated through the issuance of grading and building permits.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

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

Determination: Less Than Significant Impact With Mitigation Incorporated. Same Conclusion as the MND adopted for the Approved Project.

Water service is currently provided to the Project site by the Adelanto Public Utility Authority. According to the *Adelanto 2015 Urban Water Management Plan*, estimated water use projections for cannabis cultivation has been estimated at 50 gallons per day for each 1,000 feet of cultivation area. (Ref. *Adelanto Urban Water Management Plan Pg.4-2*). It should be noted that this methodology will be reevaluated after several cultivators begin operation.

Based on information obtained from the City of Adelanto Engineering Department on behalf of the Adelanto Public Utility Authority, the Project is preliminarily estimated to have a water allowance of one-hundred (100) gallons a day for each 1,000 of square feet of building area. Utilizing that water allowance factor, each 30,000 square foot building would have a water allowance of up to 3,000 gallons a day for each building. The applicant has indicated a desire to estimate the water allowance at 6,000 gallons per day.

The Proposed Project is to potentially increase units by adding mezzanine or second levels within the current building envelopes, which could increase the Proposed Project to a total of 1,260,000 square feet. It is unknown at this time what portion of each building will be used for cultivation, manufacturing, distribution, transportation, or testing. As such, a precise estimate of water usage would be somewhat speculative and ultimately would be controlled by the amount of water allocated by the Adelanto Public Utility Authority (3,000 gallons per day for each building estimated at this time).

Cultivation activities are likely to use an indoor hydroponics system for the cannabis cultivation. Hydroponics is a system of agriculture that utilizes nutrient-laden water rather than soil for plant nourishment. In most hydroponic farming systems, water is recirculated. Run-off water that is not taken up by the plants is recaptured. Nutrients are constantly added to the water and water returns to the plants. The majority of water is recirculated and recycled which reduces the amount of water consumption.

The Mojave Water Agency has concluded sufficient water supplies will exist to meet the demand of their retail agencies through 2040 for all normal, single-dry and multiple dry years. While these findings are subject to future evaluation, they currently represent the best available information on which to base *Adelanto's 2015 Urban Water Management Plan* and future water supply (including cannabis cultivation).

In addition, for the past year, local water agencies have had to implement state-imposed water conservation goals initiated by the Governor last year in response to the ongoing drought. However, on August 16, 2016 the State Water Resources Control Board lifted the state mandated conservation restrictions and local water districts are no longer required to implement the annual water conservation limit on its users.

In order to ensure that the estimated water allocation of 3,000 gallons per day for each buildings or the requested allocation of 6,000 gallons per day for each building is available as discussed in the analysis above, the following mitigation measure was required for the Adopted Mitigated Negative Declaration and is still applicable to the Proposed Project:

Mitigation Measures (MM)

MM- UTL1- Water Will Serve Letter: *Prior to the issuance of an occupancy permit for any building, a Will Serve letter from the Adelanto Public Utility Authority shall be provided to the Planning Department confirming that a minimum of 3,000 gallons of water per day per 30,000 square feet of building are available to serve the Project.*

With implementation of Mitigation Measure UTL-1, it will be confirmed that water is available to serve the Project from existing entitlements and resources and no new or expanded entitlements are required.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.17.2(e) 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?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The Adelanto Public Utilities Authority is the sole agency for collecting, treating and discharging wastewater within its service area through the Adelanto Wastewater Treatment Facility. Wastewater from Adelanto's water service area is collected and treated at the City-owned 4.0 MGD activated sludge wastewater treatment facility through an operations and maintenance contract with the PERC Water Corporation.

Municipal wastewater is generated in Adelanto's service area from a combination of residential, commercial, and industrial sources. The quantities of wastewater generated are generally proportional to the population and water usage in the service area. It is estimated that Adelanto's customers generate wastewater roughly proportional to 60 to 70 percent of the City's water demand.

With the recent expansion of the Adelanto Wastewater Treatment Facility to 4.0 MGD, the City would have adequate capacity to serve the Project's wastewater needs and would not significantly impact existing commitments.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project.

4.17.2 (f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

Construction Related Impacts

Waste generated during the construction phase of the Project would primarily consist of discarded materials from the construction of adding additional floor area to each building.

According to the Cal Recycle Facility/Site Summary Details website accessed on November 21, 2018, the Victorville Landfill receives well below its maximum permitted daily disposal volume and demolition and construction waste generated by the Project is not anticipated to cause the Victorville Landfill to exceed its maximum permitted daily disposal volume. Furthermore, the Victorville Landfill is not expected to reach their total maximum permitted disposal capacities during the Project's construction period. As such, there is sufficient daily capacity to accept construction solid waste generated by the Project.

In addition, the Project shall comply with Section 4.408 of the *2013 California Green Building Code Standards*, which requires new development projects to submit and implement a construction waste management plan in order to reduce the amount of construction waste transported to landfills. Prior to the issuance of building permits, the City of Adelanto will confirm that a sufficient plan has been submitted. .

Operational Related Impacts

The California Emission Estimator Model (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. CalEEMod also estimates the amount solid waste generated by a project. Based on CalEEMod, the Proposed Project, in addition to the Approved Project, would generate approximately 1,560 tons of waste per year.

According to the Cal Recycle Facility/Site Summary Details website accessed on November 21, 2018 the Victorville Landfill has a permitted disposal capacity of 3,000 tons per day with a remaining capacity of 81,510,000 cubic yards. The Victorville Landfill is estimated to reach capacity, at the earliest time, in 2047.

Based on the above analysis, there is sufficient capacity in the Victorville Landfill to serve the additional solid waste generated by the Proposed Project.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project

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

Determination: Less Than Significant Impact. Same Conclusion as the MND adopted for the Approved Project.

The California Integrated Waste Management Act established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the Act established a 50% waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the San Bernardino County Board of Supervisors adopted the San Bernardino Countywide Integrated Waste Management Plan which outlines the goals, policies, and programs the County and its cities will implement to create an integrated and cost effective waste

management system that complies with the provisions of California Integrated Waste Management Act and its diversion mandates.

The Project's waste hauler would be required to coordinate with the waste hauler to develop collection of recyclable materials for the Project on a common schedule as set forth in applicable local, regional, and State programs. Recyclable materials that would be recycled by the Project include paper products, glass, aluminum, and plastic.

Additionally, the Project's waste hauler would be required to comply with all applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the landfills that serve the Project are reduced in accordance with existing regulations.

As such, there are no new significant adverse impacts are identified or anticipated and no new mitigation measures are required as a result of the Proposed Project