

Innovative Cultivation
INITIAL STUDY/NEGATIVE DECLARATION

PREPARED FOR:

City of San Jacinto
595 S. San Jacinto Avenue
San Jacinto, CA 92583

PREPARED BY:

EcoTierra Consulting
633 W 5th Street, 26th Floor
Los Angeles, CA 90071

APPLICANT:

Innovative Cultivation Group, LLC.
26400 La Alameda, Suite 100
Mission Viejo CA 92691

January 2023

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1 INTRODUCTION

An application for the proposed Innovative Cultivation Project (“project”) has been submitted to the City of San Jacinto Planning Division of the Community Development Department for discretionary review. The City of San Jacinto, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq. The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.¹

¹ *State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: “(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project’s effects were adequately examined by an earlier EIR or negative declaration.*

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the project.

2 EXECUTIVE SUMMARY

PROJECT TITLE	Innovative Cultivation Project
PROJECT CASE NO.	

PROJECT LOCATION	Assessor Parcel Number (APN) 432-130-025 (previously 432-130-002)
GENERAL PLAN DESIGNATION	Mixed Use
GENERAL PLAN NEIGHBORHOOD DESIGNATION	Not located within a General Plan Neighborhood
SPECIFIC PLAN NAME AND DESIGNATION	Not located within a Specific Plan
ZONING	MU-Mixed Use

LEAD AGENCY	City of San Jacinto
CITY DEPARTMENT	Planning Division of the Community Development Department
STAFF CONTACT	Kevin White, Planning Manager
ADDRESS	595 S. San Jacinto Avenue, San Jacinto, CA 92583
PHONE NUMBER	951-487-7330
EMAIL	kwhite@sanjacintoca.gov

APPLICANT	Innovative Cultivation Group, LLC, Clinton Wesselink
ADDRESS	26400 La Alameda, Suite 100, Mission Viejo, CA 92691
PHONE NUMBER	949-680-4300

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

PRINTED NAME, TITLE

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 ENVIRONMENTAL SETTING

3.1.1 Project Location

The project site's location within the City of San Jacinto and greater Riverside region is depicted in *Figure 1, Regional and Vicinity Map* and *Figure 2, Aerial View of the Project Site*, included at the end of this section. The project site is located at 450 N. Sanderson Avenue² and is approximately 0.37-mile north of the intersection of N. Sanderson Avenue and Cottonwood Avenue on the west side of N. Sanderson Avenue. Regional access to the project site is provided by the Ramona Expressway (79), located approximately 2.1 miles north of the project site. Local access to the project site is provided via N. Sanderson Avenue and Cottonwood Avenue.

3.1.2 Existing Conditions

The project site is comprised of one parcel within Assessor Parcel Number ("APN") APN 432-130-025 (previously APN 432-130-002) (cultivation parcel). The project site is rectangular in shape and totals 839,837 square feet (19.28-acres) in area. The area has historically been used for farming. The property is characterized by the flat terrain with an averaged elevation of 1,577 feet and was utilized for agricultural purposes. Due to the historic agricultural practices, as well as increased urbanization, a majority of the original plant life surrounding the project area has been either destroyed or reduced to a bare minimum. As shown in *Figure 3, Views of the Project Site*, included at the end of this section, the relatively flat project site is currently developed with a surface parking area, containing 25 parking spaces, which are located on the eastern frontage, a mobile modular trailer utilized for security purposes, a six-foot high vinyl fence along the project site frontage, a six-foot high chainlink perimeter fence along the other three boundaries, and agricultural land that is utilized for cannabis cultivation. The eastern half of the project site is currently developed with 36 existing hoop-houses.³ The western half of the project site is currently vacant agricultural land that has been previously utilized for farming.

Vehicular access to the project site is currently provided by one existing driveway on N. Sanderson Avenue. The existing driveway is 30-feet wide, has a 30-foot wide security rolling gate, and provides direct access to a surface parking area. Access to the cultivation area is provided by an exclusive/private-use decomposed granite driveway starting at the surface parking area. The exclusive/private-use driveway is approximately 30 feet wide and runs through the center of the cannabis support area. The exclusive/private-use driveway contains three separate fire truck return areas, located in the surface parking area, the central portion of the project site, and the western end of the project site.

² Section 29 of Township 4 South, Range 1 West, Lakeview 7.5 Quadrangle U.S. Geological Survey (USGS), San Bernardino Base and Meridian (SBBM).

³ Hoop-houses are non-engineered, semi-permanent greenhouses used to extend growing seasons typically constructed of netting or plastic sheeting draped over a series of metal or PVC arches, or "hoops."

Agricultural chemicals associated with the cannabis cultivation (i.e. fertilizers and pesticides) are currently stored within secure sheds. The secure sheds are installed within the southern end of the surface parking area in two separate 20-foot by 8-foot containers.

As shown in *Figure 4, Existing General Plan Land Use* and *Figure 5, Zoning Designations*, included at the end of this section, the project site has General Plan land use designation of Mixed Use and is zoned as Mixed Use (MU). Chapter 17.435 of the Development Code states that outdoor cannabis cultivation is permitted on parcels located west of north Sanderson Avenue and north Cottonwood Avenue, which includes the Project Site.

3.1.3 Surrounding Land Uses

Property in the surrounding area is characterized by a mix of vacant and active agricultural land (including cannabis cultivation), commercial uses, and single-family residential neighborhoods. Specifically, the property immediately to the west is zoned Residential, High Density (RH) and is comprised of agricultural land used for cannabis cultivation. The property immediately to the north is also zoned MU and is comprised of agricultural land used for cannabis cultivation. The San Jacinto Valley Regional Water Reclamation Facility is located just north of this property. The property to the east, across N. Sanderson Avenue, is Residential, Medium Density (RM) and is comprised of vacant agricultural land. The property immediately to the south is zoned MU and is comprised of vacant agricultural land. A single-family residential use is located approximately 500 feet south of the project site, on the east side of N. Sanderson Avenue, and several commercial retail uses are located 0.4 mile south of the project site, on the southwest corner of N. Sanderson Avenue and Cottonwood Avenue. Refer to *Figure 6, Views of Surrounding Uses, Views 1, 2, and 3* and *Figure 7, Views of Surrounding Uses, Views 4, 5, and 6*, included at the end of this section.

3.2 DESCRIPTION OF PROJECT

3.2.1 Project Overview

The project is the establishment of outdoor cannabis cultivation at the project site. As shown in *Figure 8* through *Figure 12*, included at the end of this section, the project site is comprised of five separate cultivation areas, each leased to individual cultivators. Each leased area would contain various support structures and hoop-houses for nursery, greenhouse, and/or drying areas as follows:

1. **SoCal Innovative Group, LLC:** SoCal Innovative Group, LLC occupies the 2.70 acres of the northwestern corner of the project site and will have a total of 34 hoop-houses (consisting of 24 22-foot by 96-foot hoop-houses for greenhouse use, 6 24-foot by 60-foot hoop-houses for greenhouse use, and 4 24-foot by 60-foot hoop-houses for cannabis drying space). The total canopy area would be 59,328 square-feet (refer to *Figure 8, SoCal innovative Group, LLC Site Plan*, included at the end of this section).
2. **SJCG Holding, LLC:** SJCG Holding, LLC occupies the 2.70 acres of the central north portion of the project site and will have 27 26-foot by 75-foot hoop-houses

for greenhouse use. The total canopy area would be 52,650 square-feet (refer to *Figure 9, SJCG Holding, LLC Site Plan*, included at the end of this section).

3. **Golden Greens:** Golden Greens occupies the 3.05 acres of the northeastern corner of the project site and currently has 18 existing 20-foot by 125-foot hoop-houses for greenhouse use and would include an additional 24 hoop-houses (consisting of 12 30-foot by 60-foot hoop-houses and 12 30-foot by 65-foot hoop-houses) for greenhouse use. The total canopy area, including existing and new hoop-houses, would be 90,000 square-feet (refer to *Figure 10, Golden Greens Site Plan*, included at the end of this section).
4. **AYR LLC:** AYR LLC occupies the 4.79 acres of the southwestern corner of the project site and will have 48 hoop-houses, 44 of which are for greenhouse use and 4 are for drying areas. The total canopy area is 109,500 square-feet, which includes 10,000 square-feet of nursery canopy (refer to *Figure 11, AYR LLC Site Plan*, included at the end of this section).
5. **B&B Logistics:** B&B Logistics occupies the 3.69 acres of the southeastern corner of the project site and has 18 existing 16-foot by 124-foot prefabricated portable cannabis cultivation hoop-houses totaling approximately 35,712 square feet of canopy area and 3 existing 20-foot by 120-foot prefabricated portable hoop houses utilized for cannabis drying space totaling 7,200 square feet. B&B Logistics also has a 900 square foot compost area (Refer to *Figure 12, B&B Logistics Site Plan*, included at the end of this section).

It should be noted that B&B Logistics currently operates the described cultivation in their leased portion of the project site under City Permit CMCP-18-04 and State Permit ECL19-0000715 and they propose no changes or additions to their existing conditions. As such, their operations are not considered a part of the project. The applicant is seeking to obtain the following City Cannabis Oriented Businesses Permits:

- City Regulatory Permits for Outdoor Cultivation⁴ pursuant to San Jacinto Municipal Code Section 9.28

The cultivation method would be outdoor cultivation within hoop-houses. AYR and Socal Innovative Group propose to utilize direct inground planting while Golden Greens and SJCG propose to utilize above-ground pots. All cultivation would utilize drip-irrigation.

The fertilizers and pesticides used for the project would be from an approved list by California Department of Food and Agriculture. All fertilizers, nutrients, and pesticides would only be purchased and delivered to the property as needed and any small, unused

⁴ Pursuant to San Jacinto Municipal Code Section 17.435, "Outdoor Cultivation" means the cultivation and distribution of cannabis that occurs outdoors or within a greenhouse or other similar agricultural structure, and includes "Mixed-Light cultivation" (cultivation of mature cannabis in a greenhouse, hoop-house, glasshouse, conservatory, hothouse, or other similar structure) and "outdoor cultivation" (cultivation of mature cannabis without the use of artificial lighting or light deprivation in the canopy area at any point).

amounts would be stored separately in the secure storage sheds, in their original containers and used as directed by the manufacturer. All organic pesticides and fertilizers would be mixed/prepared on an impermeable surface within the cultivation support area with secondary containment, at least 100 feet from surface water bodies. Empty containers would be disposed of by placing them in a separate seal tight bin with a fitted lid and disposed of at the local solid waste facility within the county. In accordance with the requirements of the State Water Resource Control Board's Cannabis General Order, at no time would fertilizers/nutrients be applied at a rate greater than 319 pounds of nitrogen per acre per year. The project does not propose the storage or use of any hazardous materials. All organic waste would be placed in a designated composting area in the cultivation support area and all solid waste would be stored in bins with secure fitting lids until being disposed of at a Riverside County Integrated Waste Management facility (at least once a week during the cultivation season).

3.2.2 Employees

Employment and operating hours are as follows:

- AYR LLC has 4 total employees with operating hours from 6 AM to 12 PM and 3 PM to 7 PM daily;
- Golden Greens has 3 total employees with operating hours from 6 AM to 12 PM and 3 PM to 7 PM daily;
- SJCG LLC has 2 total employees with operating hours from 6 AM to 12 PM and 3 PM to 7 PM daily; and
- Socal Innovative Group has 3 total employees with operating hours from 6 AM to 12 PM and 3 PM to 7 PM daily.

Each operation may potentially add an additional 1-2 temporary employees added during harvest periods, depending on crop size and parking availability.⁵ Based on the above, the project would involve up to 12 employees onsite daily, with up to an additional 8 employees onsite during harvest periods.

3.2.3 Deliveries and Operational Equipment

During operation, vendors and other visitors would visit the site on a monthly or weekly basis as follows: 2 deliveries per month for operational materials and supplies, such as soils, fertilizers, and other cultivation materials; 1 delivery of clones per month; and 1 export delivery of cannabis product per week. Operational equipment would be limited to one John Deere compact utility tractor (including a forklift attachment). Visits by the Riverside County Cannabis Regulation Task Force Staff would continue to occur periodically to ensure compliance with the annual licensing, and other relevant regulations (e.g., applicable County Code, track and trace system).

⁵ A total of two parking spaces are required to remain available at all times to accommodate onsite compliance checks.

3.2.4 Utilities

Water from the project site would be obtained from an on-site well, located in the surface parking area. Produced water would be used for both potable uses and irrigation and would be untreated. The project would use drip irrigation and precision irrigation monitoring technologies. Septic systems would be used to collect sewage associated with the project.

The project site is currently connected to the electrical grid with power provided by San Jacinto Power, however, it should be noted that none of the cultivation operations require electricity as all proposed cultivation activities would utilize sunlight and would not involve artificial lighting. The tenants would not require substantial quantities of petroleum products in its cultivation operations, except for gasoline in 1- to 5-gallon containers that would be used to fuel small engines, such as for line trimmers and rototillers, and utility vehicles. The project would not require natural gas.

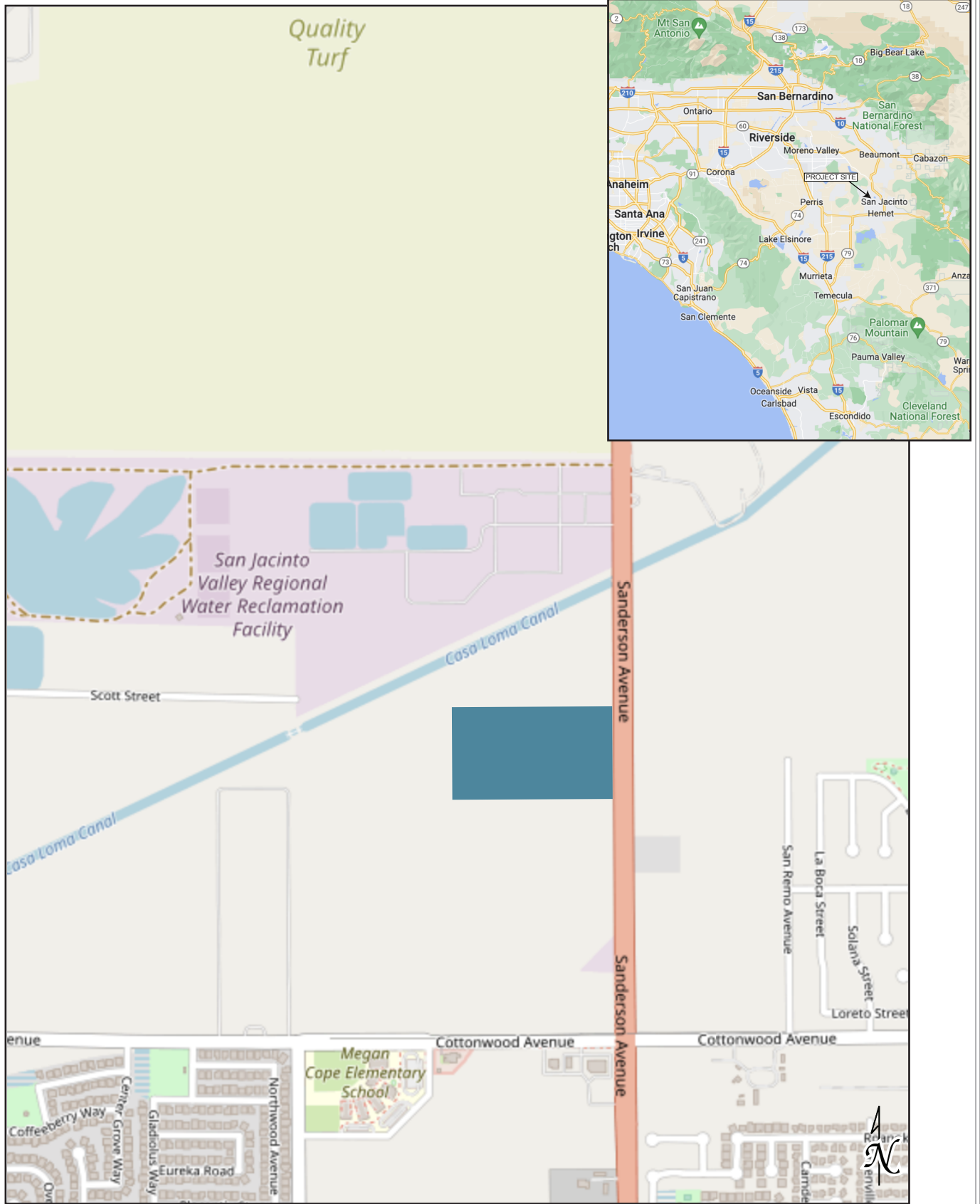
3.2.5 Site Access

Site access would continue to be provide from the one driveway on N. Sanderson Avenue. The existing driveway is 30-feet wide, has a 30-foot wide security rolling gate, and provides direct access to a surface parking area. Access to the cultivation area would continue to be provided by an exclusive/private-use decomposed granite driveway starting at the surface parking area.

3.3 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the project.

- San Jacinto Community Development Department
- San Jacinto Department of Public Utilities
- Riverside County Department of Environmental Health
- Riverside County Air Quality Management District
- Riverside County Sheriff Department
- Santa Ana Regional Water Quality Control Board
- California Water Resources Control Board
- California Department of Fish & Wildlife (CDFW)
- California Department of Food and Agriculture (CalCannabis)
- California Department of Pesticides Regulations
- California Department of Public Health
- California Bureau of Cannabis Control
- California Department of Consumer Affairs
- California Department of Transportation (CalTrans)



■ = PROJECT SITE

Source: OpenStreetMaps, June 2022.

Figure 1
Regional and Vicinity Map



■ = PROJECT SITE

Source: GoogleEarth, June 2022.

Figure 2
Aerial View of the Project Site



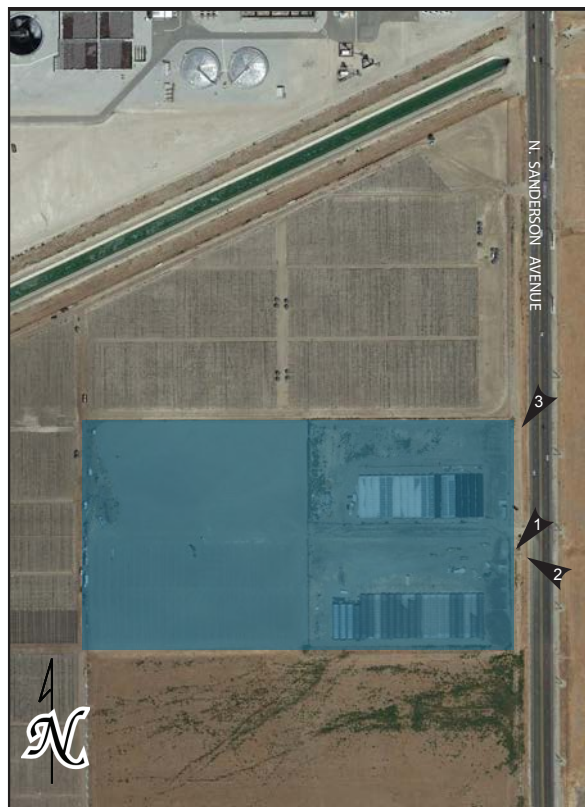
View 1: Looking southwest towards the Project entrance.



View 2: Looking northwest towards the Project.

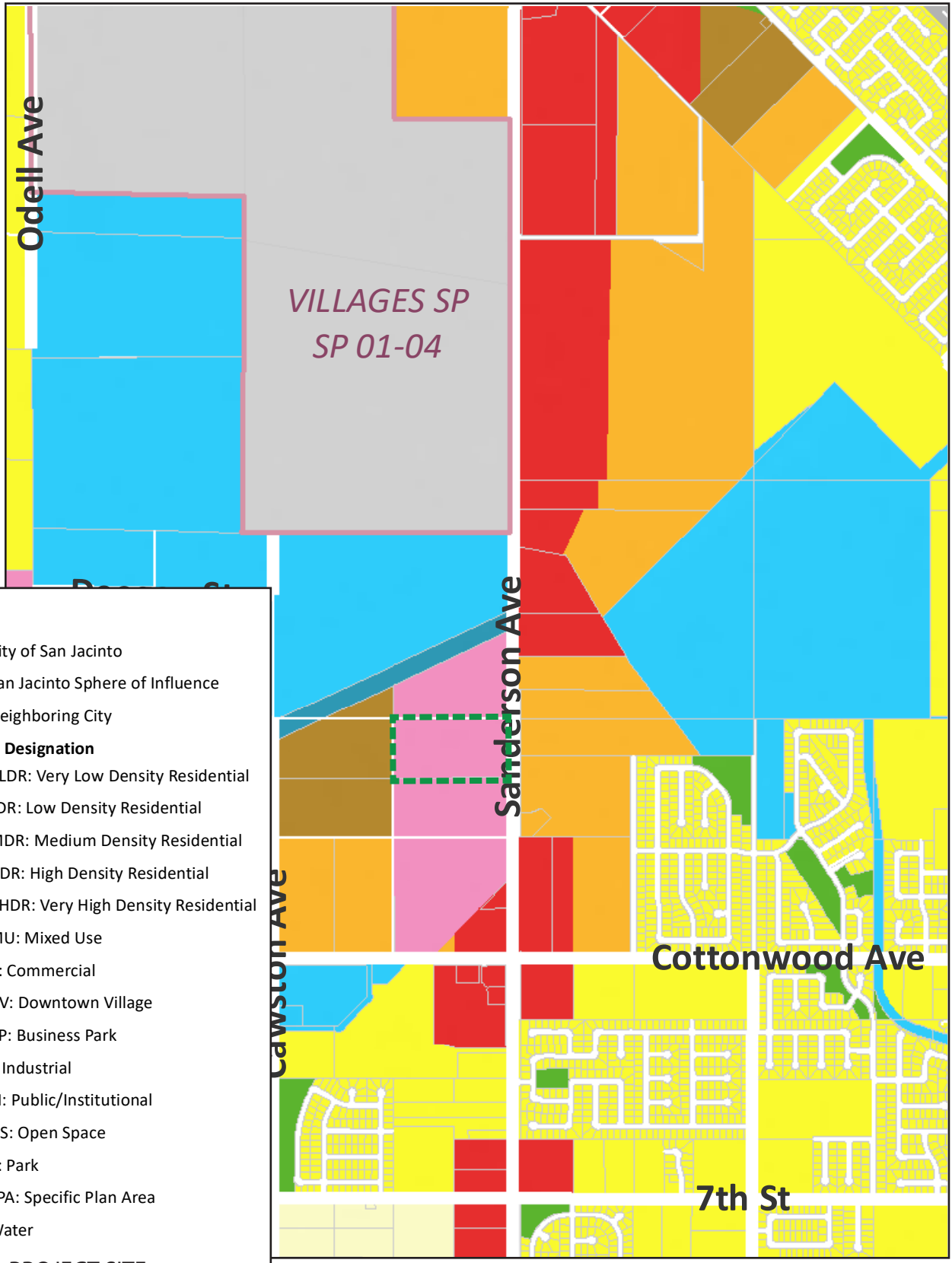


View 3: Looking southeast towards the Project.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2022.

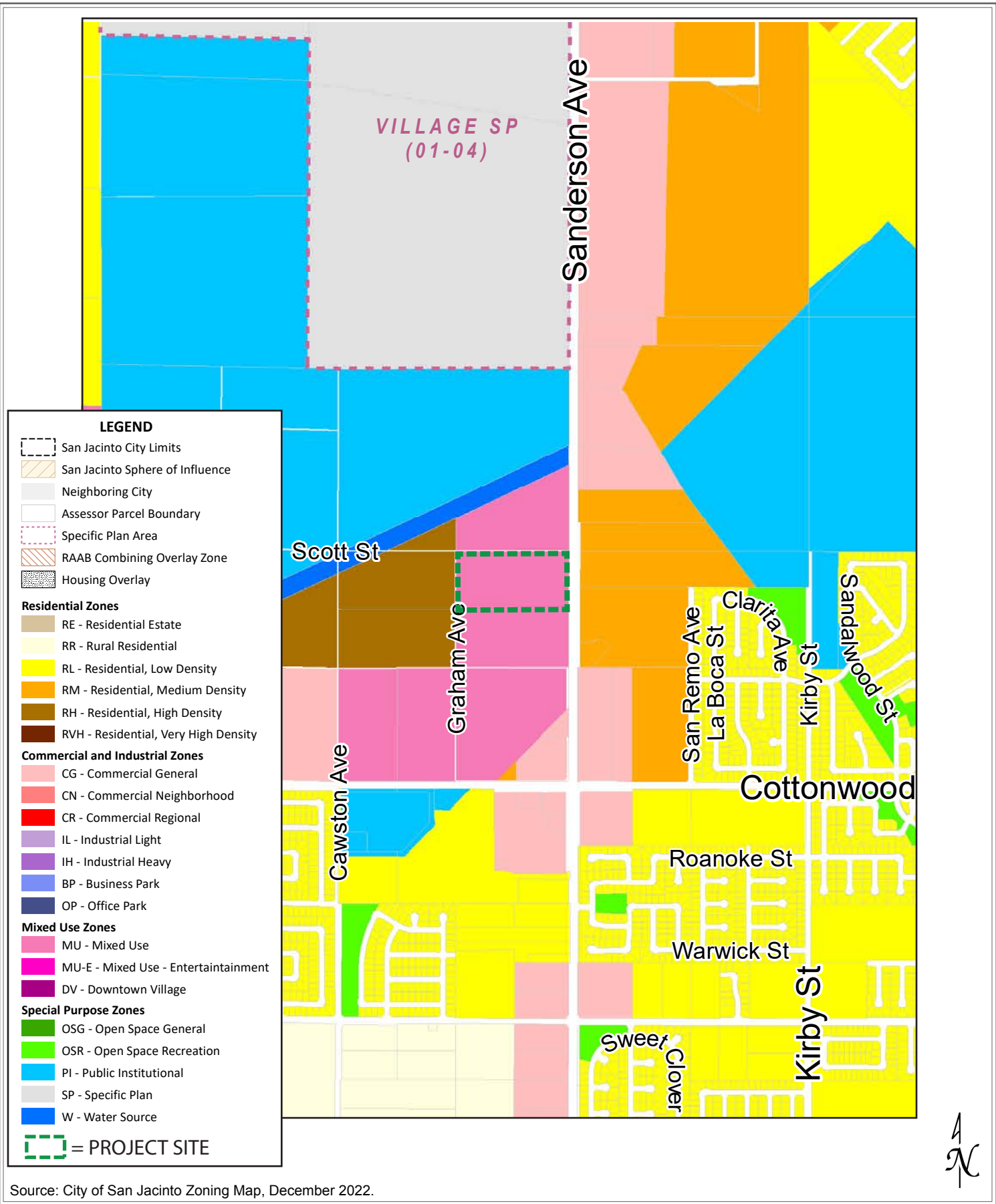


Legend

- City of San Jacinto
- San Jacinto Sphere of Influence
- Neighboring City
- Land Use Designation**
- VLDR: Very Low Density Residential
- LDR: Low Density Residential
- MDR: Medium Density Residential
- HDR: High Density Residential
- VHDR: Very High Density Residential
- MU: Mixed Use
- C: Commercial
- DV: Downtown Village
- BP: Business Park
- I: Industrial
- PI: Public/Institutional
- OS: Open Space
- P: Park
- SPA: Specific Plan Area
- Water
- = PROJECT SITE

Source: City of San Jacinto, Riverside County, Adopted November 15, 2022.

Figure 4
Existing General Plan Land Use



Source: City of San Jacinto Zoning Map, December 2022.



Figure 5
Zoning Designations



View 1: Looking northwest towards vacant agricultural land.



View 2: Looking southwest towards vacant agricultural land.



View 3: Looking northeast towards agricultural land.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2022.



View 4: Looking southwest towards vacant agricultural land.



View 5: Looking northwest towards the San Jacinto Valley Regional Water Reclamation Facility.

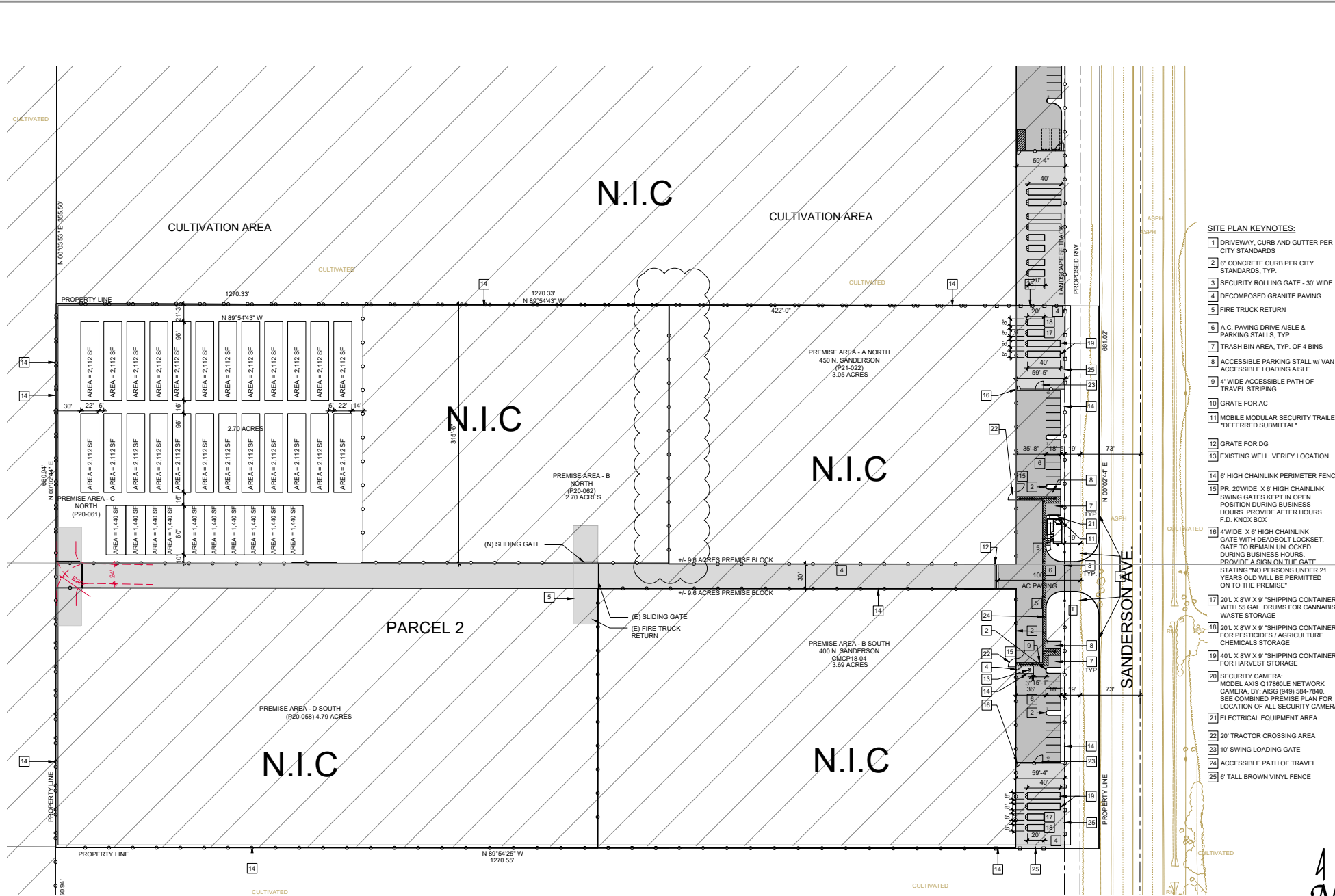


View 6: Looking at commercial uses on the southwest corner of N. Sanderson Avenue and Cottonwood Avenue.



PROJECT SITE
PHOTO LOCATION MAP

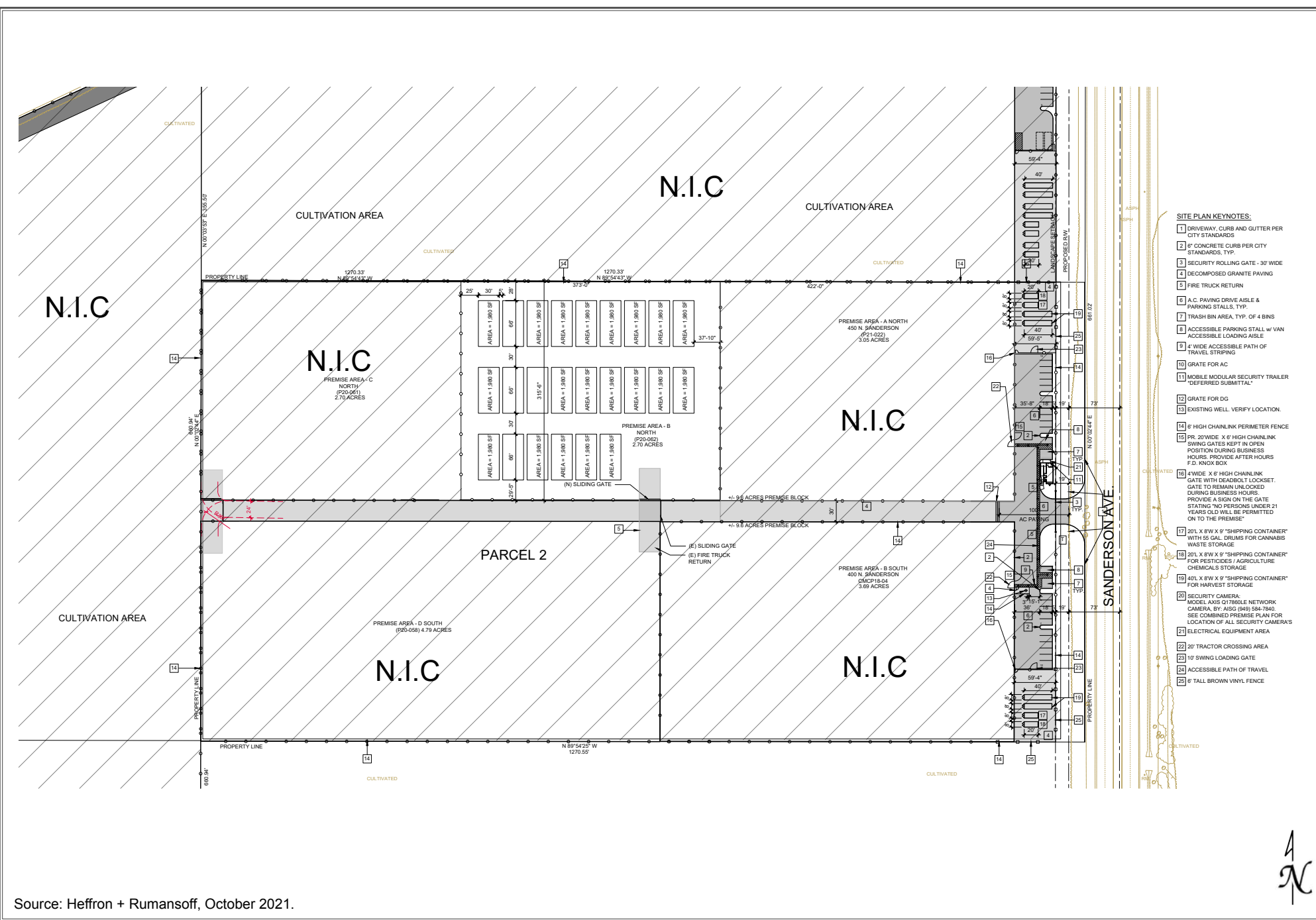
Source: EcoTierra Consulting, June 2022.



- SITE PLAN KEYNOTES:**
- 1 DRIVEWAY, CURB AND GUTTER PER CITY STANDARDS
 - 2 6" CONCRETE CURB PER CITY STANDARDS, TYP.
 - 3 SECURITY ROLLING GATE - 30' WIDE
 - 4 DECOMPOSED GRANITE PAVING
 - 5 FIRE TRUCK RETURN
 - 6 A.C. PAVING DRIVE AISLE & PARKING STALLS, TYP.
 - 7 TRASH BIN AREA, TYP. OF 4 BINS
 - 8 ACCESSIBLE PARKING STALL w/ VAN ACCESSIBLE LOADING AISLE
 - 9 4' WIDE ACCESSIBLE PATH OF TRAVEL STRIPING
 - 10 GRATE FOR AC
 - 11 MOBILE MODULAR SECURITY TRAILER "DEFERRED SUBMITTAL"
 - 12 GRATE FOR DG
 - 13 EXISTING WELL, VERIFY LOCATION.
 - 14 6' HIGH CHAINLINK PERIMETER FENCE
 - 15 PR. 20"WIDE X 6' HIGH CHAINLINK SWING GATES KEPT IN OPEN POSITION DURING BUSINESS HOURS. PROVIDE AFTER HOURS F.D. KNOX BOX
 - 16 4"WIDE X 6' HIGH CHAINLINK GATE WITH DEADBOLT LOCKSET. GATE TO REMAIN UNLOCKED DURING BUSINESS HOURS.
 - 17 20' L X 8' W X 9' "SHIPPING CONTAINER" WITH 55 GAL DRUMS FOR CANNABIS WASTE STORAGE
 - 18 20' L X 8' W X 9' "SHIPPING CONTAINER" FOR PESTICIDES / AGRICULTURE CHEMICALS STORAGE
 - 19 40' L X 8' W X 9' "SHIPPING CONTAINER" FOR HARVEST STORAGE
 - 20 SECURITY CAMERA, MODEL AXIS Q17860LE NETWORK CAMERA, BY: AISG (049) 584-7840. SEE COMBINED PREMISE PLAN FOR LOCATION OF ALL SECURITY CAMERAS
 - 21 ELECTRICAL EQUIPMENT AREA
 - 22 20' TRACTOR CROSSING AREA
 - 23 10' SWING LOADING GATE
 - 24 ACCESSIBLE PATH OF TRAVEL
 - 25 6' TALL BROWN VINYL FENCE

Source: Heffron + Rumansoff, December 2021.

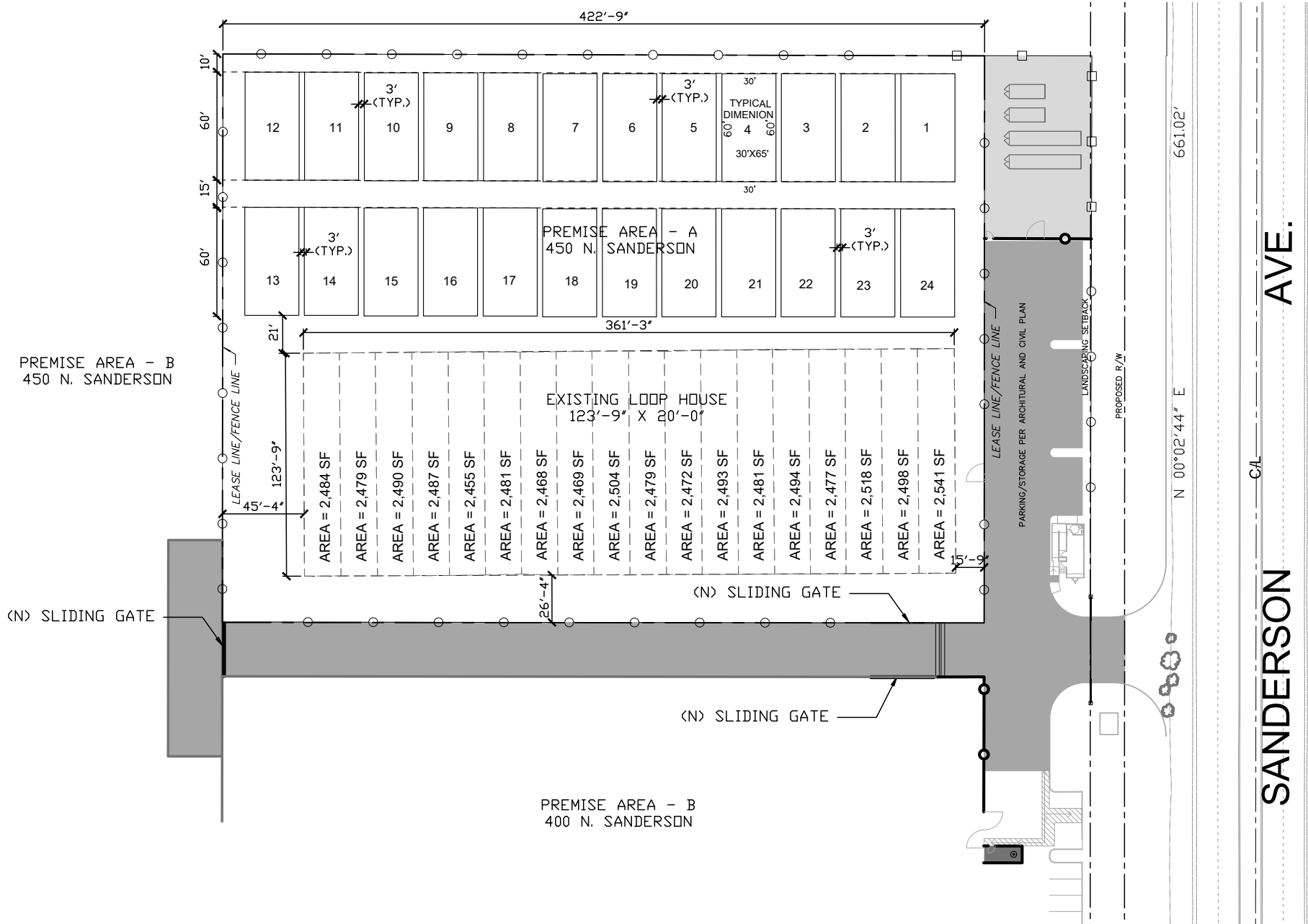
Figure 8
SoCal Innovative Group, LLC Site Plan



- SITE PLAN KEYNOTES:**
- 1 DRIVEWAY, CURB AND GUTTER PER CITY STANDARDS
 - 2 6" CONCRETE CURB PER CITY STANDARDS, TYP.
 - 3 SECURITY ROLLING GATE - 30' WIDE
 - 4 DECOMPOSED GRANITE PAVING
 - 5 FIRE TRUCK RETURN
 - 6 A.C. PAVING DRIVE AISLE & PARKING STALLS, TYP.
 - 7 TRASH BIN AREA, TYP. OF 4 BINS
 - 8 ACCESSIBLE PARKING STALL w/ VAN ACCESSIBLE LOADING AISLE
 - 9 4' WIDE ACCESSIBLE PATH OF TRAVEL STRIPING
 - 10 GRATE FOR AC
 - 11 MOBILE MODULAR SECURITY TRAILER "DEFERRED SUBMITTAL"
 - 12 GRATE FOR DG
 - 13 EXISTING WELL VERIFY LOCATION.
 - 14 6' HIGH CHAINLINK PERIMETER FENCE
 - 15 PR. 20' WIDE X 6' HIGH CHAINLINK SWING GATES KEPT IN OPEN POSITION DURING BUSINESS HOURS. PROVIDE AFTER HOURS F.D. KNOX BOX.
 - 16 4' WIDE X 6' HIGH CHAINLINK GATE WITH DEADBOLT LOCKSET. GATE TO REMAIN UNLOCKED DURING BUSINESS HOURS. PROVIDE A SIGN ON THE GATE STATING TWO PERSONS UNDER 21 YEARS OLD WILL BE PERMITTED ON TO THE PREMISE.
 - 17 20L X 8' W X 9' "SHIPPING CONTAINER" WITH 5 GAL DRUMS FOR CANNABIS WASTE STORAGE
 - 18 20L X 8' W X 9' "SHIPPING CONTAINER" FOR PESTICIDES / AGRICULTURE CHEMICALS STORAGE
 - 19 40L X 8' W X 9' "SHIPPING CONTAINER" FOR HARVEST STORAGE
 - 20 SECURITY CAMERA MODEL AXIS Q1780LE NETWORK CAMERA, BY: AISG (849) 584-7840. SEE COMBINED PREMISE PLAN FOR LOCATION OF ALL SECURITY CAMERAS
 - 21 ELECTRICAL EQUIPMENT AREA
 - 22 TRACTOR CROSSING AREA
 - 23 10' SWING LOADING GATE
 - 24 ACCESSIBLE PATH OF TRAVEL
 - 25 6' TALL BROWN VINYL FENCE

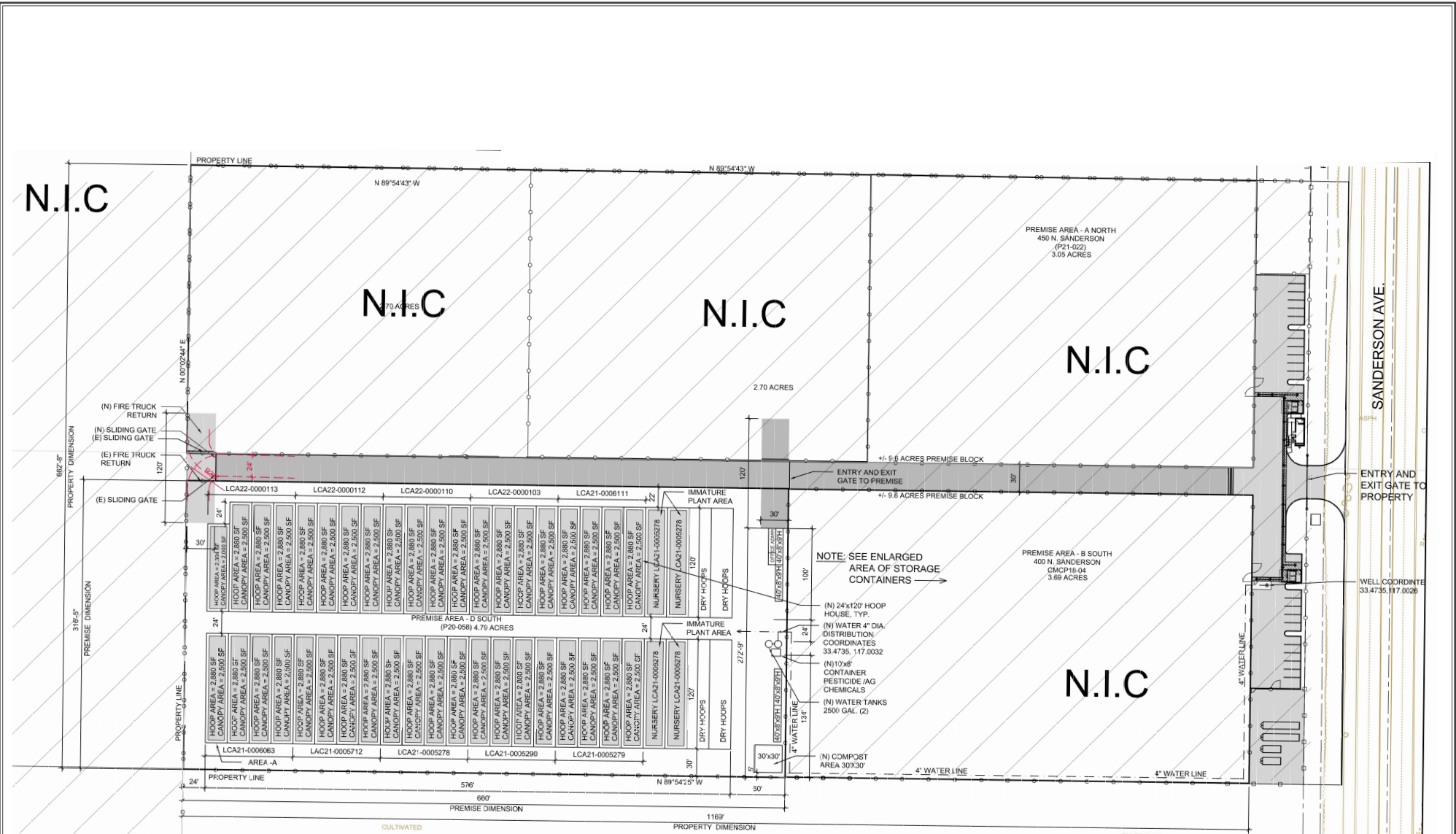
Source: Heffron + Rumansoff, October 2021.

Figure 9
SJC Holding, LLC Site Plan



Source: Heffron + Rumansoff, October 2021.

Figure 10
Golden Greens Site Plan



N.I.C

N.I.C

N.I.C

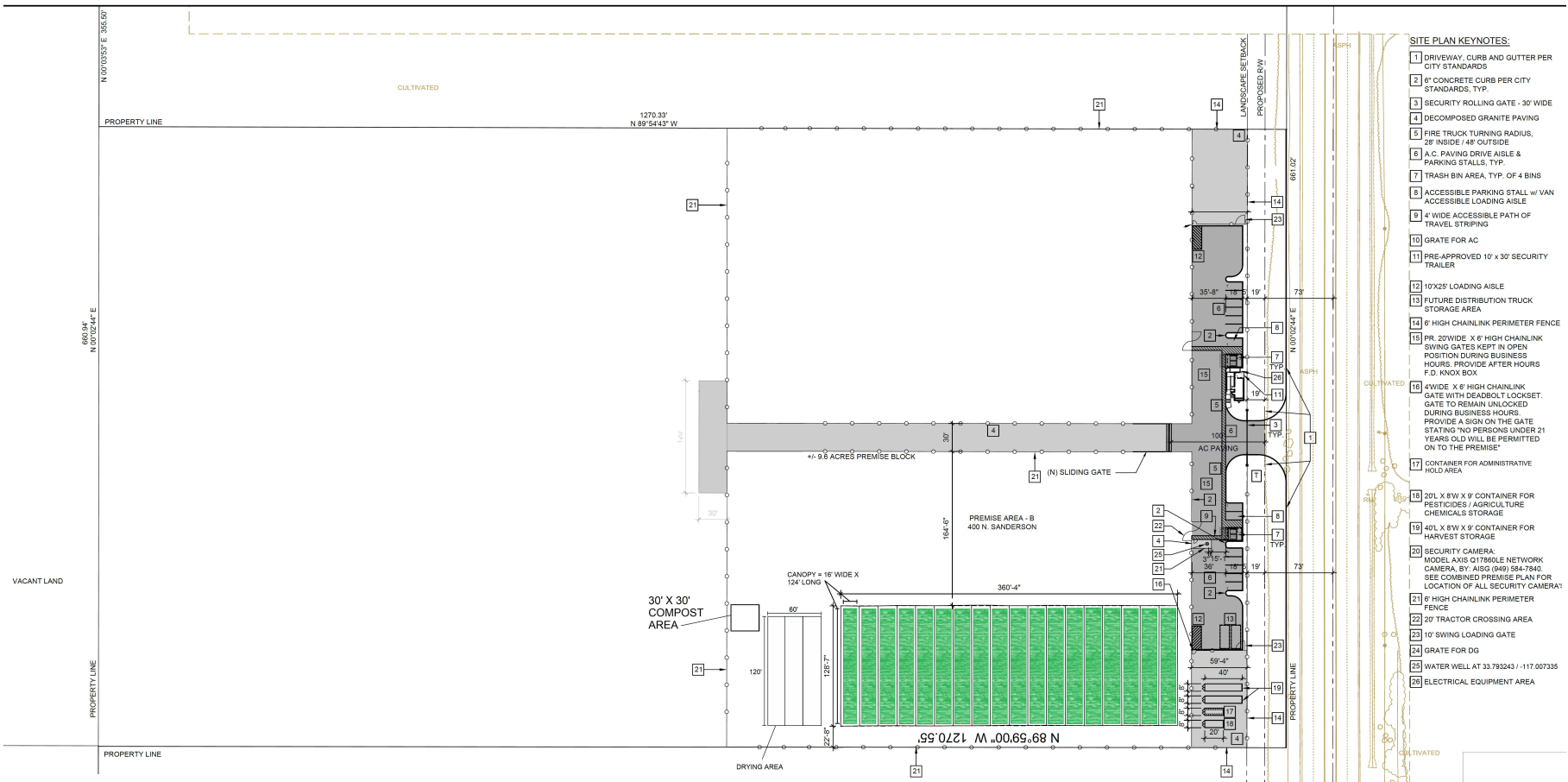
N.I.C

N.I.C

Source: Heffron + Rumansoff, April 2022.



Figure 11
AYR LLC Site Plan



- SITE PLAN KEYNOTES:**
- 1 DRIVEWAY, CURB AND GUTTER PER CITY STANDARDS
 - 2 6" CONCRETE CURBS PER CITY STANDARDS, TYP.
 - 3 SECURITY ROLLING GATE - 30' WIDE
 - 4 DECOMPOSED GRANITE PAVING
 - 5 FIRE TRUCK TURNING RADIUS, 28' INSIDE / 48' OUTSIDE
 - 6 A.C. PAVING DRIVE AISLE & PARKING STALLS, TYP.
 - 7 TRASH BIN AREA, TYP. OF 4 BINS
 - 8 ACCESSIBLE PARKING STALL w/ VAN ACCESSIBLE LOADING AISLE
 - 9 4' WIDE ACCESSIBLE PATH OF TRAVEL STRIPING
 - 10 GRATE FOR AC
 - 11 PRE-APPROVED 10' x 30' SECURITY TRAILER
 - 12 10'X25' LOADING AISLE
 - 13 FUTURE DISTRIBUTION TRUCK STORAGE AREA
 - 14 6' HIGH CHAINLINK PERIMETER FENCE
 - 15 PR. 20'WIDE X 6' HIGH CHAINLINK SWING GATES KEPT IN OPEN POSITION DURING BUSINESS HOURS. PROVIDE AFTER HOURS F.D. KNOX BOX
 - 16 4'WIDE X 6' HIGH CHAINLINK GATE WITH DEADBOLT LOCKSET. GATE TO REMAIN UNLOCKED DURING BUSINESS HOURS. PROVIDE A SIGN ON THE GATE STATING "NO PERSONS UNDER 21 YEARS OLD WILL BE PERMITTED ON TO THE PREMISE"
 - 17 CONTAINER FOR ADMINISTRATIVE HOLD AREA
 - 18 20L X 8W X 9' CONTAINERS FOR PESTICIDES / AGRICULTURE CHEMICALS STORAGE
 - 19 40L X 6W X 9' CONTAINER FOR HARVEST STORAGE
 - 20 SECURITY CAMERA. MODEL AXIS Q1760LE NETWORK CAMERA, BY AISG (949) 584-7840. SEE COMBINED PREMISE PLAN FOR LOCATION OF ALL SECURITY CAMERA.
 - 21 6' HIGH CHAINLINK PERIMETER FENCE
 - 22 20' TRACTOR CROSSING AREA
 - 23 10' SWING LOADING GATE
 - 24 GRATE FOR DG
 - 25 WATER WELL AT 33.793243 / -117.007335
 - 26 ELECTRICAL EQUIPMENT AREA

Source: Heffron + Rumansoff, September 2020.



Figure 12
B&B Logistics Site Plan

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. The City is surrounded by hillsides and ridgelines associated with the San Jacinto Mountain Range and also contains scenic vistas in the form of open space and agricultural lands. The topography of the project site and surrounding area is flat, and the site does not include any scenic elements or unique topographic features. The project site is located on agricultural land and is surrounded by vacant and active agricultural land, including cannabis cultivation. The site is surrounded by fencing and is generally not visible to the public from adjacent areas. Implementation of the project would include development of structures, specifically rows of hoop-houses to be utilized as nurseries (AYR lease area only), greenhouses, and drying space that would appear typical of those found on agricultural lands. A portion of the project site is currently under lease by B&B Logistics, which utilizes existing hoop-houses at the site. As such, the project would expand an existing, permitted use at the project site consistent with the surrounding uses. Therefore, the project would not substantially change the view of the project site or surrounding areas. Furthermore, due to the existing setback from the public roadway, any project-related changes

would not prevent long-distance views of the surrounding hillsides and ridgelines. Accordingly, the project would not have a substantial adverse effect on a scenic vista. The impact would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. The project site is located along N. Sanderson Avenue, which is not a designated state scenic highway nor is it listed as eligible for designation. The nearest scenic highway is over 13 miles southeast of the project site, which is State Route 74 at the entrance of Mt. San Jacinto State Park,⁶ The scenic highway is not visible from the project site. Accordingly, the project would not damage scenic resources within a state scenic highway. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The project site and surrounding vicinity are considered a nonurbanized area in that it is surrounded by agricultural land and one residential development to the southeast.⁷ As discussed in Section 3. Project Description, views of the project site from adjacent areas are limited due to the surrounding fencing. The project involves installation of hoop-houses to be utilized as nurseries (AYR lease area only), greenhouses, and drying space consistent with those currently used at the project site and surrounding properties. Therefore, from non-adjacent viewpoints, the project would appear similar to other agricultural land uses. As such, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

⁶ California Department of Transportation, *California State Scenic Highways List*, available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

⁷ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 4.*

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

Less than Significant Impact. The project proposes the installation of additional hoop-house that would utilize sunlight and would not involve the installation of artificial lights. Some hoop-house structures can result in glare when sunlight reflects off of the covering material/membrane. However, the project would be required to be consistent with the requirements of California Code of Regulations Title 3, Food and Agriculture, Division 8, Cannabis Cultivation, Chapter 1, Cannabis Cultivation Program, which includes the following requirements for the control of light sources at cultivation sites:

- Section 8304(c): All outdoor lighting used for security purposes shall be shielded and downward facing.
- Section 8304(g): Mixed-light license types of all tiers and sizes shall ensure that lights used for cultivation are shielded from sunset to sunrise to avoid nighttime glare.

In addition, the project would comply with San Jacinto Municipal Code, Title 17, Zoning, which includes the following requirements for the control of outdoor light and glare:

- Section 17.300.080: Light or glare from exterior lights, mechanical or chemical processes, or from reflective materials used or stored on a site shall be shielded or modified to prevent emission of light or glare beyond the property line, or upward into the sky.
- Section 17.300.080(A): Exterior shall be located so as to eliminate spillover illumination or glare onto adjoining properties and to prohibit any interference with the normal operation or enjoyment of adjacent property.
- Section 17.300.080(B): Exterior lights shall be made up of a light source, reflector, and shielding devices so that, acting together, the light beam is controlled and not directed across a property line or upward into the sky. Bare bulbs shall not be allowed.

The project site is used for agriculture, and light is not generated on the site. The project would include the provision of nighttime lighting for security purposes, which would contribute additional sources to the overall ambient nighttime lighting conditions. However, all outdoor lighting would be hooded, appropriately angled toward the project site, and would be in compliance with the San Jacinto Development Code, Section 17.300.080 that provides specifications for shielding lighting away from adjacent uses and intensity of lighting. Compliance with the City's lighting regulations that would be verified by the City's Building and Safety Department during the permitting process, the lighting increase in light that would be generated by the project would not adversely affect day or nighttime views in the area. With mandatory compliance with the applicable State and City requirements controlling light and glare, the project's impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, 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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less than Significant Impact. The California Department of Conservation (DOC) classifies farmlands based on a system that combines technical soil ratings and current land use, as part of the Farmland Mapping and Monitoring Program (FMMP). Descriptions of the FMMP categories are presented in Table 4.II-1, Farmland Mapping and Monitoring Program Categories. The categories Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are collectively referred to under CEQA as “Important Farmland.” The project site is designated as Farmland of Statewide Importance and Unique Farmland.⁸

**Table 4.II-1
Farmland Mapping and Monitoring Program Categories**

Category	Important Farmland under CEQA?	Description
Prime Farmland	Yes	Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields, Land must have been used for irrigated agricultural production at some time during the 4 years before the mapping date.
Farmland of Statewide Importance	Yes	Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years before the mapping date.
Unique Farmland	Yes	Farmland of lesser quality soils used for the production of the state’s leading agricultural crops. This land is usually irrigated but may include orchards or vineyard as found in some climatic zones in California. Land must have been cropped at some time during the 4 years before the mapping date.
Farmland of Local Importance	No	Land of importance to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee.
Farmland of Local Potential	No	Land that is of prime of statewide importance but that is not presently irrigated or cultivated.
Grazing Land	No	Land on which the existing vegetation is suited to the grazing of livestock.

⁸ California Department of Conservation, *Farmland Mapping and Monitoring Program, California Important Farmland Finder Interactive Map*, available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

**Table 4.II-1
Farmland Mapping and Monitoring Program Categories**

Category	Important Farmland under CEQA?	Description
Urban and Built-Up Land	No	Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
Other Land	No	Land not included in any other mapping category. Common examples include low-density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines and borrow pits, and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.
Water	No	Perennial water bodies with an extent of at least 40 acres.
<i>Source: California Department of Conservation, Important Farmland Categories, available at: https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx.</i>		

The project consists of development plans to support the cultivation of cannabis, which is considered an agricultural crop by the State under California Health and Safety Code Section 11362.777(a) and Business and Profession Code Section 26067(a). Therefore, implementation of the project, including the installation of structures (hoop-houses), would not convert farmland to non-agricultural use. Therefore, no impact would occur and no mitigation would be required.

Mitigation Measures

None required.

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

No Impact. The project site is not subject to a Williamson Act contract and is zoned Mixed Use (MU). As outlined in Chapter 17.435 of the Development Code, outdoor cannabis cultivation is permitted on parcels located west of north Sanderson Avenue and north Cottonwood Avenue, which includes the Project Site. The City would verify that the project complies with the list of activities allowed in the zone and the development standards applicable to the project. Therefore, no impacts to agricultural zoning or Williamson Act contracts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

- 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))?**

No Impact. The project site is not zoned as forest land, timberland, or timberland production, nor does it contain such uses.⁹ Therefore, no impact would occur and no mitigation would be required.

Mitigation Measures

None required.

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

No Impact. The project site is not zoned as forest land, timberland, or timberland production, nor does it contain such uses¹⁰. The project site has General Plan land use designation of Mixed Use and is zoned as Mixed Use (MU). Therefore, no impact would occur and no mitigation would be required.

Mitigation Measures

None required.

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

No Impact. As discussed in Section II(a), above, cannabis is considered an agricultural crop by the State. The project proposes an expansion of the existing cannabis cultivation use at the site and does not include housing or commercial retail uses that would encourage additional nearby development. Moreover, the project site and surrounding area are zoned for commercial and residential uses and do not contain forest land. As such, the project would not result in the conversion of farmland or forest land to non-agricultural or non-forest use.

Mitigation Measures

None required.

⁹ California Department of Fish & Wildlife, California Forest and Timberlands Map in California Department of Fish and Wildlife, available at: file:///Users/jenniferjohnson/Downloads/CA_forest_timbered_20150928_web_state_regions.pdf.

¹⁰ California Department of Fish & Wildlife, California Forest and Timberlands Map in California Department of Fish and Wildlife, available at: file:///Users/jenniferjohnson/Downloads/CA_forest_timbered_20150928_web_state_regions.pdf.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. The project site is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD); therefore, the applicable air quality plan is SCAQMD’s 2016 Air Quality Management Plan (AQMP). The 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG) and contained within the Regional Transportation Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCS). The growth projections contained in the RTP/SCS are based in part on projections originating under county and city general plans. As such, projects that propose development that is consistent with the growth anticipated by SCAG’s growth projections and/or the applicable general plan would not conflict with the AQMP.

The project’s proposed installation of additional hoop-houses for cannabis cultivation on the project site would not generate a substantial increase in regional population or employment growth (12 employees would be expected to staff the project, with up to an additional 8 employees during harvest periods) and does not meet the criteria for statewide, regional, or area wide significance as defined in the CEQA Statute and Guidelines Section 15206. Because the project would be consistent with the allowed uses within the MU zoning of the corresponding Mixed Use

land use designations in the General Plan of the City of San Jacinto, which include outdoor cannabis cultivation, per Chapter 17.435 of the Development Code, the project would also be considered consistent with the region's AQMP. In addition, as discussed below in Section III(b), below, project implementation would not exceed any ambient air quality standards or thresholds. As such, the project would not conflict with or obstruct implementation of the SCAQMD's AQMP. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Consistent with CEQA Guidelines Section 15064(h)(3), SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean Air Acts. If the mass regional emissions result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment¹¹ under an applicable federal or state ambient air quality standard emissions generated by the project would be considered cumulatively considerable. The applicable SCAQMD daily significance thresholds are shown in Table 4.111-1. They are designed to assist the region in attaining the applicable national and state ambient air quality standards, emissions generated by the project would be considered cumulatively considerable.

Air Pollutant Types

Criteria Pollutants

The six principal pollutants for which national and State criteria and standards have been promulgated, known as "criteria pollutants", and which are most relevant to current air quality planning and regulation in the Air Basin include ozone (O₃), respirable and fine particulate matter (PM₁₀ and PM_{2.5}, respectively), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them.

Title I of the Federal Clean Air Act requirements are implemented for the purpose of attaining National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. The South Coast Air Basin, where the project site is located, currently fails to meet national standards for O₃ and PM_{2.5} and, therefore, is considered a federal "non-attainment" area for these pollutants.¹²

¹¹ Refers to areas of the United States that have not met air standards for human health by deadlines set in the Clean Air Act.

¹² United States Environmental Protection Agency, NAAQS Table, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>. Accessed September 2022. CARB, Ambient Air Quality Standards May 4, 2016, <https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf>. Accessed September 2022.

Standards of Significance

The SCAQMD has developed significance thresholds for regulated pollutants, as summarized in Table 4.III-1, SCAQMD Air Quality Significance Threshold. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

**Table 4.III-1
SCAQMD Air Quality Significance Thresholds**

Mass Daily Thresholds^a		
Pollutant	Construction	Operation
NO _x	100 pounds/day	55 pounds/day
VOC ^b	75 pounds/day	55 pounds/day
PM ₁₀	150 pounds/day	150 pounds/day
PM _{2.5}	55 pounds/day	55 pounds/day
SO _x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
Ambient Air Quality for Criteria Pollutants^c		
NO ₂ 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM ₁₀ 24-hour average Annual average	10.4 µg/m ³ (construction) ^d & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM _{2.5} 24-hour average	10.4 µg/m ³ (construction) ^d & 2.5 µg/m ³ (operation)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
<p>Notes: ppm = parts per million by volume; µg/m³ = micrograms per cubic meter</p> <p>^a Source: SCAQMD CEQA Handbook (SCAQMD, 1993).</p> <p>^b The definition of VOC includes ROG compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.</p> <p>^c Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.</p> <p>^d Ambient air quality threshold based on SCAQMD Rule 403.</p> <p>Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, revised April 2019 and accessed: September 2022.</p>		

The project site is already graded and the proposed hoop-houses would not require the installation of foundations or slabs; therefore, the use of heavy equipment that would emit

pollutants (graders, excavators, or dump trucks, etc.) would not be required during construction. In addition, no import or export of soil would be required; therefore, no mobile sources of pollutant emissions would occur. During operation, the proposed hoop-houses would not utilize electricity or any other form of energy, and operation of the project would not include stationary point sources of pollutant emissions (condensers, exhaust vents, etc.). Emissions of stationary area wide pollutants, which currently occur as a result of existing operations of the utility tractor, line trimmers and rototiller would continue to occur; however, the use of such equipment would continue to be sporadic and consistent with typical agricultural use and would not be expected to exceed regional significance thresholds. In addition, the negligible increase in traffic associated with employees would also not be expected to exceed regional significance thresholds. Because neither construction nor operation of the project would exceed SCAQMD's regional significance thresholds, neither construction nor operation of the project would result in a cumulatively considerable increase in criteria pollutants. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. In addition to the regional significance thresholds discussed above, SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards. Collectively, these are referred to as localized significance thresholds. The nearest sensitive receptor to the project site is the single-family residence located approximately 500 feet to the south. As discussed above, the project would not require the use of heavy equipment that would emit pollutants during construction but would generate some sporadic pollutant emissions during operation associated with the use of small hand-held equipment and the utility tractor. However, at a distance of 500 feet, emissions would not be expected to exceed localized significance thresholds (refer to Section III(b)).

In addition to criteria pollutants, receptors are also sensitive to emissions of toxic air contaminants (TACs). TACs are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. Construction activities can emit TACs in the form of diesel particulate matter (DPM) from heavy equipment. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. Furthermore, as previously discussed, construction of the project would not require the use of heavy equipment. During operation, the project does not propose the type of land use that would generate TACs (such as gasoline stations, dry cleaners, or industrial operations). The only potential source of TACs generated by the project would be DPM, which would be generated by motor vehicles traveling to and from the project site. However, as discussed above, the project would result in a negligible increase in employees at the Site. As

detailed in response to Checklist Question XVII(b), conservatively assuming that all projected employees during harvest time would visit the site and all projected monthly/weekly deliveries would occur on the same day, the project would result in 48 daily trips to and from the site. Therefore, the project would result in correspondingly negligible emissions of DPM.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Construction of the project would not involve activities that would generate objectionable odors, such as paving. Some exhaust odors may be generated during operation as a result of the use of equipment, however, such use would be sporadic and would disperse rapidly with distance from the source such that they would not reach objectionable levels at the location of any receptor. In addition, although the cultivation of cannabis may produce odors that are objectionable to some, cultivation and drying activities would be contained within the hoop-house structures, effectively containing any odors on-site. Odors generated by the plants, particularly during harvest season, would be reduced through passive means (separation distance and maintenance of native flowering vegetation surrounding the cultivation area), and through storage of plants in shipping containers, located in the southeast corner of the property. Furthermore, additional land uses within the vicinity of the project site include the San Jacinto Valley Regional Water Reclamation Facility and several dairy farms, which are the dominant odor producing land uses in the area and would effectively mask any odors produced at the project site. Therefore, the project would not adversely affect a substantial number of people with odors. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

IV. BIOLOGICAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The following analysis of the potential biological resources impacts of the project is based, in part, on the information and conclusions contained within the Biological Resources Assessment,

Jurisdictional Delineation, and MSHCP Consistency Analysis¹³ (Biological Assessment) prepared for the project by Jennings Environmental, LLC in April 2022 and the 30-Day Pre-Construction Burrowing Owl Survey¹⁴ (Owl Survey) previously conducted at the project site by Kidd Biological, Inc. in May 2021. The Biological Assessment and Owl Survey are included as **Appendix A and Appendix B**, respectively, to this IS and their findings, conclusions, and recommendations are incorporated by reference herein.

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

No Impact. According to the California Native Diversity Database (CNDDDB) California Native Plant Society's Electronic Inventory of Rare and Endangered Vascular Plants of California (EIREVPC), and other relevant literature and databases, 52 sensitive species, including 10 listed species, and 5 sensitive habitats have been documented in the Lakeview and San Jacinto quads.¹⁵ In addition, the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) addresses 146 species of plants and animals that are threatened with extinction within western Riverside County; specifically, the project site is located within the MSHCP special survey area for burrowing owls and the following narrow endemic plant species: Munz's onion, San Diego ambrosia, Many-stemmed dudleya, Spreading navarretia, California Orcutt grass, and Wright's trichocoronis.¹⁶

The Biological Assessment prepared for the project site included a reconnaissance survey to identify the potential for the occurrence of special status species, vegetation communities, or habitats that could support special status wildlife species. The habitat on-site consists of a mix of ruderal vegetation/bare ground with London rocket (*Sisymbrium irio*) and wall barley (*Hordeum murinum*) being the dominant ruderal vegetation. The ruderal vegetation is classified as *Avena spp.*-*Bromus spp.* Herbaceous Semi-Natural Alliance, or wild oats and annual brome grasslands. The site shows signs of recent disturbance from the existing agricultural facilities and historical disturbance from mowing and disking. Wildlife species observed or otherwise detected on or in the vicinity of the project site during the surveys included black phoebe (*Sayornis nigricans*) and song sparrow (*Melospiza melodia*). No State- and/or federally-listed threatened or endangered species or other sensitive species were observed on-site during the Biological Assessment

¹³ Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022.

¹⁴ 30-Day Pre-Construction Burrowing Owl Survey, APN # 432-130-002, City of San Jacinto Conditions of Approval for CMCP-18-04, May 27, 2021. Mitigation measures are not included in the Initial Study as no more earth-moving or construction type activities would take place on the property.

¹⁵ Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 6. It should be noted that the project site is located within the boundaries of the Lakeview Quadrangle, however, due to its proximity to the boundaries of the San Jacinto Quadrangle, both were included in the review.

¹⁶ Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, pages 7-8, and 11.

survey.¹⁷ The on-site habitat was also not found to be suitable for the applicable narrow endemic plant species identified in the MSHCP and none were observed within or adjacent to the site, and the Biological Assessment found that further focused surveys would not be required.¹⁸ In addition, no burrowing owls, their sign (e.g. pellets, white wash, feathers, tracks), or signs of occupation were found on-site during a focused survey conducted as part of the Owl Survey,¹⁹ nor were suitable habitat, burrows of any kind, evidence of past or present burrowing owl activity, or suitable burrow surrogate species found on-site during the field survey conducted as part of the Biological Assessment.²⁰ Furthermore, because no suitable habitat exists on-site and the site is continually maintained, the Biological Assessment concluded that further focused surveys would not be required.²¹ The project site does not contain habitat suitable to support any other plant or wildlife species covered by the MSHCP, such as fairy shrimp, riparian birds, Delhi Sand flower-loving fly, or any of the species covered by the MSHCP that have not been adequately conserved.²²

Based on the above, the project would not have a substantial adverse effect on candidate, sensitive, or special status species. Furthermore, consistent with the best management practices established for the project area in the MSHCP, the project would implement the following best management practices:

- To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from the site(s); and
- Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with an orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.

Accordingly, no impacts would occur and no mitigation measures would be required.

¹⁷ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, pages 8-9.

¹⁸ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, page 11.

¹⁹ *30-Day Pre-Construction Burrowing Owl Survey, APN # 432-130-002, City of San Jacinto Conditions of Approval for CMCP-18-04, May 27, 2021*, page 4.

²⁰ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, page 12.

²¹ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, pages 11-12.

²² Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, pages 13-14.

Mitigation Measures

None required.

- 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?**

No Impact. As discussed above, the habitat on-site consists of a mix of ruderal vegetation/bare ground with London rocket (*Sisymbrium irio*) and wall barley (*Hordeum murinum*) being the dominant ruderal vegetation. The ruderal vegetation is classified as *Avena spp.-Bromus spp.* Herbaceous Semi-Natural Alliance, or wild oats and annual brome grasslands. The project site is not located within or adjacent to any Critical Habitat designated by the U.S. Fish and Wildlife Service.²³ In addition, no drainage features or definable bed and bank or associated riparian vegetation were observed during literature review or reconnaissance surveys of the site. As such, the project site does not contain any wetlands and there are no streams, channels, washes, or swales that meet the definitions of: Section 1600 of the State of California Fish and Game Code under the jurisdiction of the California Department of Fish and Wildlife; Section 401 (“Waters of the State”) of the Clean Water Act (CWA) under the jurisdiction of the Regional Water Quality Control Board; or “Waters of the United States” as defined by Section 404 of the CWA under the jurisdiction of the U.S. Army Corps of Engineers within the project site.²⁴ Therefore, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. As discussed above, no drainage features or definable bed and bank or associated riparian vegetation were observed during literature review or reconnaissance surveys of the site and there are no streams, channels, washes, or swales that meet the definitions of: Section 1600 of the State of California Fish and Game Code under the jurisdiction of the California Department of Fish and Wildlife (CDFW); Section 401 (“Waters of the State”) of the Clean Water Act (CWA) under the jurisdiction of the Regional Water Quality Control Board; or “Waters of the United States” as defined by Section 404 of the CWA under the jurisdiction of the U.S. Army Corps of Engineers within the project site.²⁵ The National Wetlands Inventory maps do not identify Riverine/Riparian systems within the boundaries of the project site and none were observed

²³ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 9.*

²⁴ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, pages 9 and 15.*

²⁵ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, pages 9 and 15.*

during surveys.²⁶ The project site contains hydric soils, one criterion required for designation as a wetland; however, the site does not contain hydric vegetation or wetland hydrology, the remaining two criteria. Designation as a wetland requires the presence of all three criteria. As such, the project site does not contain wetlands. In addition, the project site does not contain the appropriate soils, vegetation, or hydrology to allow for vernal pools.²⁷ Therefore, the project would not have a substantial adverse effect on state- or federally-protected wetlands. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact . There are no riparian corridors or waterways located in the vicinity of the project site that are used by migratory fish, and there are no wildlife nursery sites in the area. The project site is located within an area that is already fragmented by paved roads and development, including residential areas, agricultural uses, and the San Jacinto Valley Regional Water Reclamation Facility. As such, there are no native habitats or wildlife corridors left in the vicinity of the project site. There are no on-site trees that could provide bird nesting habitat. However, all migratory bird species receive protection under the Migratory Bird Treaty Act (MBTA) of 1918, which prohibits individuals from killing, taking, possessing, or selling any migratory bird, bird parts (including nests and eggs) except per regulations prescribed by the Secretary of the Interior Department. In addition, Section 3503 of the California Department of Fish and Wildlife Code regulates vegetation removal during the nesting season (February 15 to August 15). The project's mandatory compliance with these existing regulations would ensure that that the project would not interfere substantially with nesting birds. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?**

No Impact. Local policies protecting biological resources are contained within the Resource Conservation Element of the City's General Plan and include protection of those vegetation communities and sensitive wildlife species identified in the MSHCP. As detailed further below, the project would not conflict with the provisions of the MSHCP. Therefore, the project would not

²⁶ *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, pages 9-10 and 12.*

²⁷ *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 13.*

conflict with local policies protecting biological resources. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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?

No impact. As discussed previously, the project site is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The MSHCP is administered by the Riverside Conservation Authority and is intended to balance the demand of the growth of western Riverside County with the need to preserve open space and protect species of plants and animals that are threatened with extinction. The following is a discussion of the project's consistency with applicable provisions of the MSHCP.

Public/Quasi-Public (PQP) Lands

To meet planning area open space goals, the MSHCP designated Public/Quasi-Public (PQP) Lands, which are lands known to be in public/private ownership and expected to be managed for open space value and/or in a manner that contributes to the conservation of covered species; as well as, existing roadways within PQP Lands. The project site is not located within or adjacent to any PQP Lands and the project would not affect and roadways within PQP Lands.²⁸

Subunit Area/Cell Criteria

The MSHCP also identified target conservation acreage criteria for subunit areas/cells criteria. The project site is not located within a subunit area or cell criteria.²⁹

Narrow Endemic Plant Species

The MSHCP maps the project site within a Narrow Endemic Plant Survey Area that requires focused surveys for areas that contain habitat for: Munz's onion, San Diego ambrosia; Many-stemmed dudleya; Spreading navarretia; California Orcutt grass; and Wrights's trichocoronis. However, munz's onion and San Diego ambrosia have reached their conservation goals when 75 percent of the species occurrences have been confirmed within an 8-year monitoring period and do not require further surveys. Therefore, a habitat assessment was conducted at the project site for Many-stemmed dudleya; Spreading navarretia; California Orcutt grass; and Wrights's trichocoronis only.

These four species are very habitat-specific and water-dependent species. These species are usually found within areas that receive more water than the project site; they are typically found

²⁸ *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 10.*

²⁹ *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 11.*

in or near vernal pools, riparian areas, and areas associated with those habitat types. The project site is a cultivation site that is subject to mowing, pedestrian traffic, and vehicle traffic. Additionally, as discussed in further detail in **Appendix B** of this Initial Study, the site showed evidence of past soil disturbance in the form of disking and construction activity³⁰ and research suggests that the site has been utilized for agricultural purposes since the early 1900's.³¹ The project site is also isolated from any flows or terraces from the San Jacinto River to the north, where known occurrences for these species have been documented. Therefore, the Biological Assessment found that the habitat on-site is not suitable for these species and further focused surveys are not warranted or recommended. Furthermore, none of these species were observed within or adjacent to the project site during survey conducted as part of the Biological Assessment.³²

Additional Survey Needs and Procedures

The project site is located within an area which the MSHCP identifies as requiring additional surveys for burrowing owls. Accordingly, the Biological Assessment included an evaluation of the on-site habitat for suitability for burrowing owls. Based on a field survey conducted in April 2022, the Biological Assessment concluded that the project site does not contain suitable habitat for burrowing owls. No burrowing owls were observed during the survey and no burrows of any kind were located within the project site. No portion of the project site showed any evidence of past or present BUOW activity and the property is continually maintained. No feathers, whitewash, or castings were found and no suitable burrow surrogate species are present on-site. Accordingly, the Biological Assessment found that no focused surveys are required.³³ Furthermore, a focused burrowing owl survey previously conducted at the project site detected no burrowing owls or their sign on or adjacent to the project site.³⁴

Riparian/Riverine Areas and Vernal Pools

Within the MSHCP area, the protection of Riparian/Riverine Areas and Vernal Pools is important to the conservation of certain amphibian, avian, fish, invertebrate, and plant species, and includes specific coverage for three species of fairy shrimp and many riparian birds associated with these habitats. The project site does not contain any areas that meet the definition of Riparian/Riverine or the appropriate soils, vegetation, or hydrology to allow for vernal pools.³⁵ Consequently, fairy

³⁰ *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 11.*

³¹ *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019, page 22.*

³² *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 11.*

³³ *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, page 12.*

³⁴ *30-Day Pre-Construction Burrowing Owl Survey, APN # 432-130-002, City of San Jacinto Conditions of Approval for CMCP-18-04, May 27, 2021, page 4.*

³⁵ *Jennings Environmental, LLC, Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022, pages 12-13.*

shrimp and riparian birds associated with these habitats would also be absent from the project site.³⁶

Other Species

Other species covered by the MSHCP that could exist within the project area and/or the habitat at the project site include the Delhi sands flower-loving fly. This species is restricted by the distribution and availability of open Habitats within the fine, sandy Delhi series soils. Therefore, the project site does not contain the appropriate soils for this species and is not within or near known areas for this species.³⁷ In total, the MSHCP covers 146 species, 118 of which are considered to be adequately conserved. According to the Biological Assessment, the project site does not contain the appropriate habitats for any of these species and there is no occurrence potential for them to occur within the project site.³⁸

Urban/Wildlands Interface

The MSHCP includes guidelines for drainage, toxics, lighting, noise, invasives, barriers, and grading/land development in order to minimize the indirect effects of development in proximity to the MSHCP Conservation areas. The project site is not located within or adjacent to any area meeting the definition of an urban/wildland interface.³⁹ The urban/wildland interface is the zone of transition between unoccupied land and human development. It is the line, area or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels.⁴⁰

Best Management Practices

The MSHCP includes best management practices that should be implemented for projects that would impact the covered species or habitats described within the MSHCP. As previously detailed, the project would implement the MSHCP's applicable best management practices for avoiding attracting predators and containing construction activities to a minimal, established footprint (see response to Checklist Question IV(a) above). The project would not impact any covered species or habitat identified in the MSHCP; therefore, no other best management practices would be applicable to the project or the project site.⁴¹

³⁶ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, page 13.

³⁷ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, page 13.

³⁸ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, page 14.

³⁹ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, page 14.

⁴⁰ U.S. Fire Administration, *What is WUI?*, available at: <https://www.usfa.fema.gov/wui/what-is-the-wui.html>.

⁴¹ Jennings Environmental, LLC, *Biological Resources Assessment, Jurisdictional Delineation, and MSHCP Consistency Analysis for Innovative Cultivation Group Project San Jacinto, Riverside County, California, April 2022*, page 14.

Summary

The project site is not mapped within a criteria cell or subunit and is not located within an area mapped for Criteria Area Plant Species, Special Status Species, Riparian/Riverine/Vernal Pools, and Urban/Wildlife Interface. The project site is mapped within an area for Narrow Endemic Plant species; however, there is no suitable habitat within the site for those species. The project is also consistent with the MSHCP policies for Riparian/Riverine Areas/Vernal Pools; Narrow Endemic Plant Species; Urban/Wildlands Interface; and Surveys for Special Status Species. In addition, the project site is not suitable for burrowing owls, and no individuals were observed. Therefore, based on the above, the Project would be consistent with the provisions of the MSHCP.

Mitigation measures

None required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis of the potential cultural resources impacts of the project is based, in part, on the information and conclusions contained within the Cultural/Tribal Resource Records Search and Preliminary Assessment⁴² (Cultural Assessment) prepared for the project site by SRSINC At Riverwalk in February 2019 and the Cultural Resource Treatment and Disposition Agreement⁴³ (Cultural Agreement) between the Soboba Band of Luiseño Indians and Innovative Cultivation Group signed in March 2021. The Cultural Resource Treatment encompasses the Innovative Group Farm, which covers the entire parcel totaling 839,837 square feet (19.28-acres). The Cultural Assessment and Cultural Agreement are included as **Appendix C and Appendix D**, respectively, to this IS and their findings, conclusions, and recommendations are incorporated by reference herein.⁴⁴ It should be noted that, in addition to the project site, the Cultural Assessment also evaluated the parcels to the west and southwest of the project parcel; therefore, the below analysis describes the findings as they relate to the proposed project and the project parcel and not the entire area evaluated by the Cultural Assessment.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

No Impact. Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain

⁴² *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019. Mitigation measures are not included in the Initial Study as no more earth-moving or construction type activities would take place on the property.*

⁴³ *Cultural Resource Treatment and Disposition Agreement, between Soboba Band of Luiseño Indians (Isaiah Vivanco, Tribal Chairman) and Innovative Cultivation Group (Clinton Wesselink), signed: March 16, 2021.*

⁴⁴ *Per the AB52 consultation process the Soboba Band of Luiseño Indians has required a new Treatment and Disposition Agreement to allow the Tribe to be present for monitoring during any future development of the Project Site. Refer to **Appendix G** of this document.*

state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

As part of the Cultural Assessment, an official records search was conducted from the Eastern Information Center (EIC) located at the University of California, Riverside to identify previously recorded historical and archaeological resources in or near the project site and existing cultural resources reports pertaining to the project vicinity. The EIC is the official cultural resource records repository for Riverside County and is part of the California Historical Resource Information System (CHRIS), established and maintained under the auspices of the Office of Historic Preservation. Archival information from earlier records searches conducted by SRSINC in an adjacent area identified 30 previous cultural resources studies/surveys within one mile of the project area. The EIC records also showed that a total of 13 cultural resources have been recorded within one mile of the project area. None of the 13 known area cultural resources were located on the project site.⁴⁵ Additional historical indices consulted included: Local Point of Historical Interest, California Historical Landmarks (CHL), The California Register of Historic Places (CRHP), as well as the National Register of Historic Places (NRHP). No cultural resources were listed on these sources for the project site.⁴⁶ One of the 13 known cultural resources is the Casa Loma Canal, which forms the northern boundary of the parcel adjacent to west of the project parcel. The Casa Loma Canal has been recorded as eligible for listing on the National Register (Primary Record #P-33-15734).⁴⁷ Only one archeological resource has been identified within a one-mile radius of the project area: a single isolated prehistoric artifact, consisting of a ground stone fragment, with no associated surface or subsurface artifacts.

In addition to the search of EIC records, the Native American Heritage Commission (NAHC) was contacted to request a search of the Sacred Lands File to identify potential Native American cultural resources or sacred lands that could be impacted by the project. The NAHC record search did not produce any record of Native American cultural resources or sacred lands within a one-mile radius of the proposed project. However, these negative results do not indicate the absence of cultural resources within the area because many traditional cultural places and sites are only known by Native American tribes or individuals. The NAHC provided a list of tribes culturally affiliated to the project area and recommended that those tribes be contacted to further assess the presence or absence of cultural resources. Accordingly, SRSINC contacted 39 entities representing nearby Native groups. SRSINC received comments back from two tribal groups: San Manuel Band of Mission Indians who stated that the project was outside of their territorial boundaries, and Agua Caliente Band of Cahuilla Indians who deferred to the Soboba Band of Luiseño Indians.⁴⁸ On March 16, 2021, the Soboba Band of Luiseño Indians and Innovative Cultivation Group signed a Cultural Agreement to formalize procedures for the treatment and

⁴⁵ *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019, page 27.*

⁴⁶ *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019, page 27.*

⁴⁷ *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019, pages 30-31.*

⁴⁸ *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019, page 25.*

disposition of all Tribal Cultural Resources, ceremonial items, items of cultural patrimony, artifacts, and Native American human remains and associated grave goods in the event that any are found in conjunction with development of the project, including archeological studies, excavation, geotechnical investigation, grading, and any ground-disturbing activities. The Cultural Agreement also formalizes procedures for Native American monitoring during the course of project-related archeological studies, grading, and ground-disturbing activities.⁴⁹

Significantly, in 2006 CRM TECH archaeologists with a Native Luiseño participant conducted an on-foot survey which included the entire project site (including the two additional parcels discussed above). In addition, the parcel to the west of the project site has been reported on twice by Applied Earthworks in 2011 and again in 2014. The 2006 survey of the entire project site did not identify any cultural resources. Isolated historic materials associated with the earlier agricultural efforts were observed off-site but were considered not significant artifacts. The other two partial site surveys produced no evidence of prehistoric or historic materials. Therefore, parts of the project site and half of the parcel to the west have been surveyed/studied three times, and all three parcels have been completely surveyed once, all with negative results.⁵⁰

Summary

The results of the Cultural Assessment indicate that there are no known significant cultural resources located on the project site. The one nearby National Register site, the Casa Loma Canal, has a set-back within the State Route 79 right-of-way and would not be impacted by the proposed development plans. As all other known recorded resources located within one-mile of the project site are either outside of the project's viewshed, not considered significant, and/or would not derive any potential significance based on the project area, the project would not have the potential to significantly impact these resources. In addition, parts of the project parcel and half of the parcel adjacent to the project parcel to the west have been surveyed/studied three times, and the project parcel and parcels adjacent to the west and to the southwest have been completely surveyed once, all with negative results.

Furthermore, all grading and other ground-disturbing activities proposed for the project site have already occurred under the monitoring supervision requirements of the Cultural Agreement and no cultural resources were encountered or identified. The project does not propose additional ground-disturbing activities and would only install additional hoop-house structures, which are temporary structures that do not require foundations or footings, and would not require further ground-disturbing activities such as grading or excavation. Therefore, the installation and operation of additional hoop-houses at the project site would not be expected to encounter cultural resources not previously identified during earlier surveys of the site and cultural monitoring of site-wide grading. As such, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁴⁹ *Cultural Resource Treatment and Disposition Agreement, between Soboba Band of Luiseño Indians (Isaiah Vivanco, Tribal Chairman) and Innovative Cultivation Group (Clinton Wesselink), signed: March 16, 2021, page 1.*

⁵⁰ *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019, page 27.*

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

No Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources.

Please see above response to Checklist Question V(a). As detailed there, the results of the Cultural Assessment indicate that there are no known significant cultural resources, including archaeological resources, located on the project site. In addition, all ground-disturbing activities proposed for the site have been completed under the monitoring requirements of the Cultural Agreement and no cultural resources were encountered or identified. Furthermore, the project would not require and does not propose additional ground-disturbing activities that would have the potential to encounter previously unidentified cultural resources. Therefore, the project would not be expected to encounter archaeological resources. As such, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. During preparation of the Cultural Assessment, there was no evidence suggesting human remains would be discovered at the project site. In addition, all grading and other ground-disturbing activities have already occurred at the project site. Furthermore, California State Law (California Health & Safety Code 7050.5) and Federal Law and Regulations ([Archaeological Resources Protection Act (ARPA) 16 USC 470 & 43 CFR 7], [Native American Graves Protection & Repatriation Act (NAGPRA) 25 USC 3001 & 43 CFR 10] and [Public Lands, Interior 43 CFR 8365.1-7]) establish a defined protocol that must be adhered to if human remains are inadvertently discovered.

Should human remains be encountered unexpectedly during project activities, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. The Coroner has two working days to examine the remains after notification and will determine if the remains are historic/archaeological or a modern legal case. If the Coroner's Office determines the remains are of modern origin, the appropriate law enforcement officials will be called by the Coroner to conduct the required procedures. Work will not resume until law enforcement has released the area.

If human remains of Native American origin are discovered, compliance with state laws, which fall within the jurisdiction of the NAHC (Public Resource Code Section 5097), relating to the disposition of Native American burials would be required. The Coroner would have 24 hours to notify the NAHC, which would immediately notify the person it believes to be the Most Likely Descendent (MLD) of the remains (in this case, the Soboba Band of Luiseño Indians for the project area). As previously discussed, there is an existing Cultural Agreement between the Soboba Band of Luiseño Indians and Innovative Cultivation Group. The agreement stipulates the

procedures to be followed during construction at the project site, including in the event of the inadvertent discovery of human remains, pursuant to applicable State law.

Considering the low potential for any human remains to be located on the project site, the lack of ground-disturbing activities proposed, the existing Cultural Agreement between the Soboba Band of Luiseño Indians (the identified MLD) and Innovative Cultivation Group, and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the project would not be expected to encounter human remains. As such, no impact on human remains would occur and no mitigation measures would be required.

Mitigation Measures

None required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Less than Significant Impact. Electricity is currently provided to the project site by San Jacinto Power to power electrical equipment, such as the security trailer and system (cameras and lights) and the well pump; however, the lease areas would not require and do not propose the use of electricity. Cultivation activities would utilize sunlight and would not involve artificial lighting. The project would not require natural gas and minimal petroleum-based fuel would be required for small equipment, such as line trimmers and rototillers. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant and no mitigation measures would be required.

Mitigation measures

None required.

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

No Impact. State plans for renewable energy plans include California's Renewable Portfolio Standards (RPS). First established in 2002 under SB 1078, California's Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030. On September 10, 2018, former Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. The project site receives its power from San Jacinto Power, which is required to verify its compliance with the RPS regulations to the California Public Utilities Commissions and California Energy Commission on an annual basis. Furthermore, the project site does not

contain sources of renewable energy, such as water, solar, wind, or geothermal, that would be destroyed or withheld from procurement as a result of the project. In addition, the project is not required to procure renewable energy under State or local plans, such as through the installation of solar panels or windmills. Therefore, the project would not conflict with plans for renewable energy.

State plans for energy efficiency include the California Title 24 energy standards and the California Green Building Standards Code. The project does not propose any new structures or buildings that would require or utilize energy. Therefore, the project would not conflict with plans for energy efficiency.

Based on the above, no impact would occur and no mitigation measures would be required.

Mitigation measures

None required.

VII. GEOLOGY AND SOILS

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

The following analysis of the potential geology and soils impacts of the project is based, in part, on the information and conclusions contained within the Geotechnical Investigation⁵¹ prepared for the project site by Sladden Engineering in April 2019 (revised July 2019). The Geotechnical Investigation is included as **Appendix E** to this IS and its findings, conclusions, and recommendations are incorporated by reference herein.

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less than Significant Impact. The project site is located within the San Jacinto Fault Zone for the Casa Loma Fault.⁵² In addition, previous subsurface exploration identified active faulting within three of five exploratory trenches at the project site. Accordingly, the Geotechnical Investigation found that the potential for surface rupture at the project site is high.⁵³ However, the project does not propose any habitable structures that would require design features in consideration of State or local building codes pertaining to fault rupture. Therefore, impacts related to fault rupture would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

- ii. **Strong seismic ground shaking?**

Less than Significant Impact. The project site is located within the San Jacinto Fault Zone for the Casa Loma Fault. In addition, there are numerous active faults in the region capable of producing strong seismic shaking at the project site.⁵⁴ However, as also discussed above, the project does not propose any habitable structures. Therefore, impacts related to seismic ground shaking would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

⁵¹ Sladden Engineering, *Geotechnical Investigation, Proposed Cultivation Facility, Parking Lot and Guard House, APNs 432-130-002, 008, & 009, San Jacinto, California, Aprils 30, 2019 (revised July 22, 2019).*

⁵² California Department of Conservation, *California Earthquake Hazards Zone Application map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.*

⁵³ Sladden Engineering, *Geotechnical Investigation, Proposed Cultivation Facility, Parking Lot and Guard House, APNs 432-130-002, 008, & 009, San Jacinto, California, Aprils 30, 2019 (revised July 22, 2019), page 5.*

⁵⁴ Sladden Engineering, *Geotechnical Investigation, Proposed Cultivation Facility, Parking Lot and Guard House, APNs 432-130-002, 008, & 009, San Jacinto, California, Aprils 30, 2019 (revised July 22, 2019), page 4.*

iii. Seismic-related ground failure, including liquefaction?

No Impact. Based on the depth to groundwater in the vicinity of the project site, the Geotechnical Investigation concluded that the risks associated with liquefaction at the site are negligible.⁵⁵ Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

iv. Landslides?

No Impact. Based on the relatively flat ground surface of the project site and the absence of slopes or hillsides in the vicinity, the Geotechnical Investigation concluded that risks associated with slope instability, including landslides, are negligible.⁵⁶ Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Because the project site has been previously graded, only clearing, grubbing, and smoothing of scattered shrub roots and brush would be required in the footprint of the proposed hoop-houses and no new grading would occur. In addition, project site access would be provided by existing roads and driveways that would not require additional grading and would be covered in decomposed granite to prevent erosion. No soil import or export would be required for the project. Therefore, impacts related to erosion or loss of topsoil would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. Potential impacts with respect to liquefaction and landslide potential are evaluated in Checklist Questions VI(a.iii) and (a.iv) above. As detailed above, the risks associated with liquefaction and landslide at the site are negligible. Because lateral spreading is the lateral movement of soils that have undergone liquefaction and because the risks of liquefaction would be negligible, the risks associated with lateral spreading would, accordingly, be negligible.

⁵⁵ Sladden Engineering, *Geotechnical Investigation, Proposed Cultivation Facility, Parking Lot and Guard House, APNs 432-130-002, 008, & 009, San Jacinto, California, Aprils 30, 2019 (revised July 22, 2019), page 6.*

⁵⁶ Sladden Engineering, *Geotechnical Investigation, Proposed Cultivation Facility, Parking Lot and Guard House, APNs 432-130-002, 008, & 009, San Jacinto, California, Aprils 30, 2019 (revised July 22, 2019), page 6.*

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The project site is not identified as being located in an oil field or within an oil drilling area; however, according to the County of Riverside, the site is situated in an “Active” Subsidence zone. No fissures or other surficial evidence of subsidence were observed at or near the site; however, the near-surface soil is considered loose, potentially compressible, and not suitable for support of shallow foundations or concrete slabs in the existing condition. However, the project does not propose structures that would require foundations or slabs. Therefore, no impacts related to soil instability would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. Based on the results of laboratory testing of the on-site soils, the Geotechnical Investigation found the expansion potential of the surface soils at the site that would support the proposed structures is low.⁵⁷ In addition, the project does not propose structures with foundations or slabs that would be susceptible to damage from soil expansion. Therefore, no impacts related to expansive soil would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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?

No Impact. The project site currently utilizes rented portable toilets and would continue to do so under the project. Therefore, no impacts related to the underlying soil’s adequacy to support septic tanks would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The project site is located within an area designated as having a high sensitivity for paleontological resources by the County of Riverside.⁵⁸ Specifically, the project site is designated as High Sensitivity B, which is defined as an area of high paleontological

⁵⁷ Sladden Engineering, *Geotechnical Investigation, Proposed Cultivation Facility, Parking Lot and Guard House, APNs 432-130-002, 008, & 009, San Jacinto, California, Aprils 30, 2019 (revised July 22, 2019), page 7.*

⁵⁸ *County of Riverside, General Plan Environmental Impact Report, February 2015, Figure 4.9.3, Paleontological Sensitivity, page 4.9-17.*

sensitivity based on the occurrence of fossils at a specified depth below the surface and indicates that fossils are likely to be encountered at or below 4 feet of depth and may be impacted during construction activities.⁵⁹ However, as previously discussed in Section V, Cultural Resources, no cultural resources, including paleontological resources, were identified on- or off-site during pedestrian surveys previously conducted at the project site as part of cultural resource assessments. In addition, the following standard condition of approval related to paleontological resources would be implemented: “If paleontological resources are encountered during grading, ground disturbance activities shall cease so a qualified paleontological monitor can evaluate any paleontological resources exposed during the grading activity. If paleontological resources are encountered, adequate funding shall be provided to collect, curate and report on these resources to ensure the values inherent in the resources are adequately characterized and preserved. Collected specimens shall be sent to the appropriate authorities for collection.” Through compliance with the City’s established condition of approval, impacts to paleontological resources would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

⁵⁹ *County of Riverside, General Plan Environmental Impact Report, February 2015, page 4.9-11.*

VIII. GREENHOUSE GAS EMISSIONS

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

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

Less than Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. The analysis of GHG emissions is different from the analysis of criteria pollutants. For criteria pollutants, significance thresholds have been established by SCAQMD based on ambient air quality standards. For GHG emissions, however, no significance thresholds have been established by the State or the SCAQMD. Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. CEQA Guidelines §15064.4 recommends that lead agencies consider several factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130[f]). Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

As evaluated throughout this IS, the project would not conflict with water quality control plans (see Checklist Section X, Hydrology and Water Quality), air quality attainment or maintenance plans (see Checklist Section III, Air Quality), integrated waste management plans (see Checklist Section

XIX, Utilities and Service Systems), and habitat conservation plans or natural community conservation plans (see Checklist Section IV, Biological Resources). With regard to plans or regulations for the reduction of GHG emissions, the applicable plans would be the California Air Resource Board's (CARB) Climate Change Scoping Plan, which defines potential strategies for achieving the 2030 CO₂e reduction target of 40 percent below 1990 levels. These statewide initiatives are implemented at the local level through compliance with Title 24 of the California Energy Code and the CalGreen Building Code. These codes contain standards that are intended to reduce energy use, conserve water, reduce waste generation, and reduce vehicle travel consistent with statewide strategies and regulations.

Although Title 24 and CalGreen do not include standards that would be applicable to the proposed hoop-houses, there are minimal GHG emissions that would result from outdoor cultivation activities and the cannabis plants would, to a small degree, help capture carbon dioxide (CO₂). In addition, no energy (e.g. electricity or natural gas) would be required for the hoop-houses. GHG emissions associated with the project would result primarily from vehicle emissions during construction activities, transportation of employees to and from the site, harvest pickup, delivery or servicing of products and supplies that support project activities, including cleanout of the rental toilets. However, the Project would be consistent with existing zoning and would not increase VMT beyond what was anticipated based on existing acreage and zoning. Based on the maximum number of employees that would potentially travel to and from the project site (i.e., during harvest periods), the number of deliveries (conservatively assumed to all occur on the same day), the project could potentially generate a maximum total of 48 trips in one day.⁶⁰ Because the project would not exceed the OPR's screening criterion of 110 trips per day, the project's transportation trips would be less than significant and emissions would not be substantial. Therefore, the project would not conflict with Climate Change Scoping Plan strategies or otherwise impede implementation of plans and policies focused on meeting statewide GHG emissions reduction goals. As such, the project would not generate GHG emissions that may have a significant impact on the environment. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

⁶⁰ Calculated as follows: 20 on-site employees x 2 daily trips (e.g. 1 trip to and 1 trip from the project site) = 40 employee trips; 2 monthly supply deliveries + 1 monthly clone delivery + 1 weekly export delivery, conservatively all assumed to occur on the same day x 2 trips (1 to and 1 from the site) = 8 delivery trips; 40 employee + 8 delivery trips = 48 total trips.

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

Less than Significant Impact. Refer to the response to Checklist Question VIII(a). As detailed there, the project would not conflict with a plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

The following analysis of the potential hazards and hazardous materials impacts of the project is based, in part, on the information and conclusions contained within the Phase I Environmental Assessment (Environmental Assessment)⁶¹ prepared for the project site by Sladden Engineering

⁶¹ Sladden Engineering, *Geotechnical Investigation, Proposed Cultivation Facility, Parking Lot and Guard House, APNs 432-130-002, 008, & 009, San Jacinto, California, Aprils 30, 2019 (revised July 22, 2019).*

in October 2018. The Environmental Assessment is included as **Appendix F** to this IS and its findings, conclusions, and recommendations are incorporated by reference herein.

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

Less than Significant Impact. Hazardous materials that would be used in conjunction with project activities include small amounts of petroleum products, fertilizers, and pesticides. All hazardous materials would be transported, used, and disposed of in compliance with the applicable regulations of the Resource Conservation and Recovery Act, the Department of Transportation Hazardous Materials Regulations, the State Water Resources Control Board's Cannabis Cultivation General Order WQ 2019-0001-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities, and manufacturer's instructions.

All pesticides that may be used would be from a list of those approved by California Department of Food and Agriculture. All fertilizers, nutrients, and pesticides would only be purchased and delivered to the property as needed and would be stored separately in their respective secure storage sheds, in their original containers and used as directed by the manufacturer. All pesticides and fertilizers would be mixed/prepared on an impermeable surface with secondary containment, at least 100 feet from surface water bodies. Empty containers would be disposed of by placing them in a separate seal tight bin with a fitted lid and disposed of at the local solid waste facility within the county. In accordance with the requirements of the State Water Resource Control Board's Cannabis General Order, at no time would fertilizers/nutrients be applied at a rate greater than 319 pounds of nitrogen per acre per year. Water soluble organic fertilizers/nutrients would be delivered via the drip irrigation system of the proposed cultivation operation to promote optimal plant growth and flower formation while using as little product as necessary. Any petroleum products would be stored year-round within the processing facility in containers approved by the State of California with secondary containment separate from pesticides and fertilizers.

Based on the above, impacts associated with the use of hazardous materials at the project site would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Construction of the project would require standard-type pick-up trucks and hand-held power tools. All equipment staging would occur on previously disturbed areas or on areas that would be further developed as part of the project and any required petroleum products or machinery lubricants would be stored under cover and in state approved containers within a secondary containment inside of the storage area. As discussed above, the small amounts of hazardous materials that would be used during operation of the project (e.g.,

petroleum products, fertilizers, and pesticides) would be used, stored, and disposed of in accordance with all applicable federal, State, and local regulations and manufacturer's instructions. Therefore, the project would not create a significant hazard involving the release hazardous materials into the environment. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. There are no schools located within 0.25-mile of the project site. The nearest school is the Megan Cope Elementary School (2550 Via La Sierra Lane), located approximately 0.5-mile southwest of the project site. Therefore, no impacts related to proximity to schools would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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?

No Impact. The Environmental Assessment prepared for the project site included a search of lists and databases compiled pursuant to Government Code Section 65962.5. An environmental database record search was completed for the Project Site and surrounding areas within a quarter-mile radius using the EnviroStor and GeoTracker databases.^{62,63} The project site was not listed on any such hazardous materials sites lists or databases. As such, no impact related to Government Code Section 65962.5 would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁶² California Department of Toxic Substances Control, EnviroStor, available at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=13691+Gavina+Ave%2C+Sylmar%2C+CA+91342>.

⁶³ California Water Boards, GeoTracker available at: <https://geotracker.waterboards.ca.gov/>.

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

No Impact. The project site is not located within the boundaries of an airport land use plan nor within two miles of an existing airport.⁶⁴ The nearest airport to the project site is the Hemet-Ryan Airport, located approximately 4 miles to the south. Moreover, the project site is not located within an existing or projected noise contour associated with Hemet-Ryan Airport, or within the airport influence area established for the Hemet-Ryan Airport, including the runway safety area or runway protection zone,⁶⁵ and the project would not extend into the airspace protection zone. As such, the project would not expose people to excessive noise from airports. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. The City's Emergency Operation Plan describes the City's process for responding to emergencies or disasters. In addition, the City adopted Resolution 3738 on September 18, 2018 approving the City of San Jacinto Local Hazard Mitigation Plan Annex from the Riverside County Operational Jurisdictional Local Hazard Mitigation Plan. The City of San Jacinto 2017 Local Hazard Mitigation Plan provides a framework for emergency response. The project would not alter the existing circulation pattern within the project area and would maintain an existing access point to the site off of N. Sanderson Avenue. Adequate access for emergency vehicles, including internal roadway widths, turn-about area, and vertical clearance currently exist at the site and would be maintained by the project. Accordingly, the project would not impair implementation of or physically interfere with emergency response or evacuation plans. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁶⁴ *Riverside County, Airport Land Use Commission, Riverside County Airport Land Use Compatibility Plan, Current Compatibility Plans, available at: <https://www.rcaluc.org/Plans/New-Compatibility-Plan>.*

⁶⁵ *Riverside County, Airport Land Use Commission, Riverside County Airport Land Use Compatibility Plan, Volume 1: Policy Document, October 14, 2004, Map HR-3, Future Noise Impacts, Hemet-Ryan Airport.*

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

No Impact. The project site is not located within a Very High Fire Hazard Severity Zones (VHFHSZ).⁶⁶ In addition, the project site is surrounded by agricultural, residential, and public facility uses that do not contain unmaintained wildlands with an elevated fire susceptibility. Therefore, the project would not expose people or structures to significant risk involving wildland fires. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁶⁶ *California Department of Forestry and Fire Protection, Fire and Resource Assessment Program, Map of Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE, San Jacinto.*

X. HYDROLOGY AND WATER QUALITY

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

Less than Significant Impact. The project would comply with the State Water Quality Control Board (SWQCB) Cannabis Cultivation Waste Discharge Regulatory Program, which ensures that the project site meets the requirements of the federal Clean Water Act, California Water Code, and State Nonpoint Source Policy. As discussed in response to Checklist Section IX, the small amounts of hazardous materials that would be used during operation of the project (e.g.,

petroleum products, fertilizers, and pesticides) would be used, stored, and disposed of in accordance with all applicable federal, State, and local regulations and manufacturer's instructions. Therefore, the project would not violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The project site currently utilizes an on-site groundwater well and would continue to do so under the project. The existing well is estimated to be capable of producing approximately 300 gallons per minute.⁶⁷ As detailed in response to Checklist Question X(b), the project site overlies the San Jacinto Groundwater Basin, which is monitored by the Hemet-San Jacinto Watermaster. Accordingly, the Hemet-San Jacinto Watermaster is responsible for overseeing the Groundwater Monitoring Programs, which include Groundwater Level Monitoring and groundwater Extraction Monitoring to maintain a "safe yield" for the groundwater basin. The existing well at the project site is permitted to withdraw groundwater from beneath the project site under County of Riverside Department of Environmental Health Permit No. WP29087. Local and basin-wide groundwater levels and extraction amount would continue to be monitored throughout the life of the project to ensure that adequate levels of groundwater are maintained without overdraft. Furthermore, in accordance with the State Water Quality Control Board Cannabis General Order, the project would implement best management practices to conserve water, including: a visual monitoring inspection program to check all water conveyance areas to identify any leaks; utilization of drip lines for water delivery to plants; and application of mulch to areas within the cultivation area without groundcover to conserve soil moisture within the grow area. Therefore, impacts to groundwater supplies and recharge would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

⁶⁷ *State of California, Well Completion Report, , Form DWR 188 Submitted: May 29, 2020, WCR2020-006850, Local Permit Agency: County of Riverside Department of Environmental Health, Permit Number: WP29087, Permit Date: February 27, 2020.*

- c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**
- i. **Result in substantial erosion or siltation on- or off-site;**
 - ii. **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
 - iii. **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
 - iv. **Impede or redirect flood flows?**
- i. **Result in substantial erosion or siltation on- or off-site;**

The property is characterized by the flat terrain and has been utilized for agricultural purposes. The natural drainage pattern in the western portion of the project site is toward the northwestern corner and toward a low point in the center of the eastern portion.⁶⁸ As shown in *Figure 3, Views of the Project Site*, included in Section 3, the relatively flat project site is currently developed with a surface parking area, containing 25 parking spaces, which are located on the eastern frontage, a mobile modular trailer utilized for security purposes, a six-foot high vinyl fence along the project site frontage, a six-foot high chainlink perimeter fence along the other three boundaries, and agricultural land that is utilized for cannabis cultivation. The eastern half of the project site is currently developed with 36 existing hoop-houses.⁶⁹ The western half of the project site is currently vacant agricultural land that has been previously utilized for farming.

Although the project would result in ponding of slightly less than 1-foot within the eastern portion of the site, the Hydrology Calculations concluded that the post-project conditions, including the ponding and increased runoff, would not require mitigation. Therefore, operational impacts to surface water hydrology drainage patterns with respect to potential for erosion or siltation would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

⁶⁸ Tuttle Engineering, *Hydrology Calculations, Innovative Cultivation Group, Sanderson Ave., San Jacinto, CA, April 2022, page 1.*

⁶⁹ *Hoop-houses are non-engineered, semi-permanent greenhouses used to extend growing seasons typically constructed of netting or plastic sheeting draped over a series of metal or PVC arches, or "hoops."*

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

Less than Significant Impact. The natural drainage pattern in the western portion of the project site is toward the northwestern corner and toward a low point in the center of the eastern portion.⁷⁰ The Hydrology Calculations conducted for the project determined that during a 100-Year Storm, the project would increase the 24-hour total volume of offsite flow from 0.9 acre-foot to 1.5 acre-foot within the western portion of the site and 2.0 acre-foot to 3.4 acre-foot within the eastern portion of the site. Although the project would result in ponding of slightly less than 1-foot within the eastern portion of the site, the Hydrology Calculations concluded that the post-project conditions, including the ponding and increased runoff, would not require mitigation. Therefore, impacts related to the project's alteration of drainage patterns would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

- iii. **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;**

Less than Significant Impact. Refer to **Question X(ci)**, above. Although the project would result in ponding of slightly less than 1-foot within the eastern portion of the site, the Hydrology Calculations concluded that the post-project conditions, including the ponding and increased runoff, would not require mitigation. Furthermore, the project would comply with the SWQCB Cannabis Cultivation Waste Discharge Regulatory Program, which would ensure that the project site meets the requirements of the federal Clean Water Act, California Water Code, and State Nonpoint Source Policy. Therefore, impacts related to the project's contribution of water runoff would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

- iv. **Impede or redirect flood flows?**

Less Than Significant Impact. According to the Federal Emergency Management Agency's FEMA Flood Insurance Rate Map, the project site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.⁷¹ Furthermore, the project does not propose any structures which would impede floodwater such as a dam or berm.

⁷⁰ Tuttle Engineering, *Hydrology Calculations, Innovative Cultivation Group, Sanderson Ave., San Jacinto, CA, April 2022, page 1.*

⁷¹ Federal Emergency Management Agency, *National Flood Insurance Program, Flood Insurance Rate Map, Riverside County, California and Incorporated Areas, Panel 1470G, Map Number 06065C1470G, August 28, 2008.*

The Riverside County Floodplain Map indicates that the Project Site is not located within the inundation area boundaries of the San Jacinto Reservoir, which is located 3.0 miles southeast of the Project Site.⁷² Accordingly, the Project would not be expected to impede or redirect flood flows from the San Jacinto Reservoir. Additionally, this reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing reservoirs and dams are intended to ensure that all are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the reservoir and/or dam. Pursuant to these regulations, the San Jacinto Reservoir is regularly inspected and meets current safety regulations. Given the oversight by the Division of Safety of Dams, including regular inspections, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. According to the Federal Emergency Management Agency, the project site is located within Flood Zone X, defined as an area determined to be outside of the 0.2 annual percent chance floodplain.⁷³ In addition, the project site is not located in an area that is susceptible to tsunami or seiche. Furthermore, as previously detailed, the small amounts of hazardous materials that would be used during operation of the project (e.g., petroleum products, fertilizers, and pesticides) would be used, stored, and disposed of in accordance with all applicable federal, State, and local regulations and manufacturer's instructions. Therefore, the project would not risk the release of pollutants due to project inundation. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. As discussed above, the project would comply with the SWQCB Cannabis Cultivation Waste Discharge Regulatory Program, which would ensure that the project site meets the requirements of the federal Clean Water Act, California Water Code, and State Nonpoint Source Policy. In addition, the underlying groundwater basin is under the purview of the

⁷² *Riverside County Floodplain Map, available at: <https://content.rcflood.org/floodplainmap/>.*

⁷³ *Federal Emergency Management Agency, National Flood Insurance Program, Flood Insurance Rate Map, Riverside County, California and Incorporated Areas, Panel 1470G, Map Number 06065C1470G, August 28, 2008.*

Hemet-San Jacinto Watermaster, which is required to conduct ongoing monitoring of both the groundwater levels and extraction volumes in order to protect “safe yield” amounts and prevent overdraft of the basin. The existing on-site well is permitted to withdraw groundwater and on-going monitoring of the basin would ensure that adequate groundwater supplies to meet current and projected demands would be maintained. Accordingly, the project would not conflict with water quality control plans or sustainable groundwater management plans. Impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Physically divide an established community?

No impact. The project site is located in a rural area outside of an established community. The project would not directly disrupt, divide, or isolate an existing neighborhood or community, as all proposed improvements would occur within the boundaries of the existing project site. Additionally, the project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The project would result in the expansion of an existing use at the project site, consistent with the surrounding area. Therefore, the project would not physically divide and established community. No impact would occur and no mitigation measure would be required.

Mitigation Measures

None required.

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

No impact. The project site has General Plan land use designation of Mixed Use and is zoned as Mixed Use (MU). According to Chapter 17.435 of the Development Code, outdoor cannabis cultivation is permitted on parcels located west of north Sanderson Avenue and north Cottonwood Avenue, which includes the Project Site. Therefore, the project would not conflict with land use plans, policies, or regulations. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No impact. No oil wells were identified within 500 feet of the subject property.⁷⁴ According to the California Geological Survey's Surface Mining and Reclamation Act Mineral Land Classification System, the City of San Jacinto has been classified as Mineral Resource Zone 1 (MRZ-1), which are areas where geologic information indicates that no significant mineral deposits are present.⁷⁵ In addition, the project site and surrounding areas do not include existing or previous mining uses.⁷⁶ Therefore, the project would not result in the loss of availability of a known mineral resource of value to the State or region. No impact would occur and no mitigation would be required.

Mitigation Measures

None required.

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

No impact. The Riverside County General Plan identifies sand and gravel and limestone resources in the eastern portion of the San Jacinto Planning Area, east of the San Jacinto River. Rock and granite products are also located in the eastern hillsides. The City of San Jacinto General Plan Final EIR identifies the Lakeview Mountains as having a granitic bedrock. The San Jacinto Mountain foothills and the San Timoteo badlands are comprised of sedimentary, granitic,

⁷⁴ California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Well Finder Interactive Web Map, available at: <https://maps.conservation.ca.gov/doggr/wellfinder/#/-117.00376/33.80604/13>.

⁷⁵ California Department of Conservation, California Geological Survey, Surface Mining and Reclamation Act, Mineral Resources Program.

⁷⁶ City of San Jacinto General Plan Final EIR, available at: https://cdn5-hosted.civiclive.com/UserFiles/Servers/Server_10384345/Image/City%20Government/CommunityDevelopment/General%20Plan/San%20Jacinto%20General%20Plan%20Final%20EIR-web.pdf, page 5.6-7.

and metamorphic rock types.⁷⁷ However, the project site is not located within these areas. Therefore, the project would not result in the loss of availability of a locally-important mineral resource recovery site. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁷⁷ *City of San Jacinto General Plan Final EIR, available at: https://cdn5-hosted.civiclive.com/UserFiles/Servers/Server_10384345/Image/City%20Government/CommunityDevelopment/General%20Plan/San%20Jacinto%20General%20Plan%20Final%20EIR-web.pdf, page 5.6-1.*

XIII. NOISE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project result in:

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b. Generation of excessive groundborne vibration or groundborne noise levels?
- c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

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

Less than Significant Impact. The nearest sensitive receptor to the project site is the single-family residence located approximately 500 feet to the south. Construction would not require the use of heavy machinery that would generate a substantial increase in noise levels. Furthermore, construction noise is temporary in nature and all construction activities would be required to abide by the City’s noise requirements for construction activities pursuant to Section 8.40.090, Construction Activity Noise Regulations, of the Municipal Code. Section 8.40.090 allows for construction to occur between the hours of 7:30 AM to 6:00 PM on weekdays. On weekends and federal holidays, construction must not create or produce loud noise that disrupts a peace officer or a person of normal sensitivity who works or resides in the vicinity. Operation would not include the generation of substantial levels of noise; no sources of consistent noise, such as large condensers or amplified sound is proposed. Equipment, such as the utility tractor would be used sporadically and would be consistent with other agricultural noises. In addition, the negligible increase in traffic as a result of employee trips to and from the project site would generate a correspondingly negligible increase in noise. Therefore, noise impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

No Impact. Neither construction nor operation of the project would involve equipment of activities that would generate groundborne vibration or noise. Furthermore, at a distance of 500 feet, any negligible increase in the levels of groundborne vibration or noise generated by the project would not be perceived. Therefore, no impacts related to groundborne vibration or noise would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. As discussed in response to Checklist Question IX(e) above, the project site is not located within an existing or projected noise contour associated with an airport.⁷⁸ As such, the project would not expose people to excessive noise from airports. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁷⁸ *Riverside County, Airport Land Use Commission, Riverside County Airport Land Use Compatibility Plan, Volume 1: Policy Document, October 14, 2004, Map HR-3, Future Noise Impacts, Hemet-Ryan Airport.*

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

No Impact. The project does not propose new homes and the increase of 12 employees at the site (with up to an additional 8 employees during harvest periods) would not represent a substantial increase in population growth in the area. Furthermore, it is likely that project employees would already reside within driving distance of the site and would not relocate for employment by the project. In addition, the project site is currently accessed by an existing roadway and served by existing infrastructure. No extensions of roads or expansion of infrastructure would be required nor are any proposed by the project. Therefore, the project would not directly or indirectly induce substantial unplanned population growth. No impact would occur and no mitigation measures would be required.

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

No Impact. The project would expand an existing cannabis cultivation use at the project site. No people or housing would be displaced. Therefore, no displacement impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Fire protection?

No Impact. The project is the expansion of an existing cannabis cultivation use through the installation of additional hoop-houses on the project site. The project does not propose housing or other uses that would increase the population of the City such that the need for new or altered fire protection facilities would occur. In addition, the project site is not located within a VHFHSZ. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

b) Police protection?

No Impact. The project is the expansion of an existing cannabis cultivation use through the installation of additional hoop-houses on the project site. The project does not propose housing or other uses that would increase the population of the City such that the need for new or altered police protection facilities would occur. In addition, the project site currently contains a security trailer and system (camera and lights) in order to control site access and maintain the security of the project site. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

c) Schools?

No Impact. The project is the expansion of an existing cannabis cultivation use through the installation of additional hoop-houses on the project site. The project does not propose housing or other uses that would increase the population of the City such that the need for new or altered schools would occur. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

d) Parks?

No Impact. The project is the expansion of an existing cannabis cultivation use through the installation of additional hoop-houses on the project site. The project does not propose housing or other uses that would increase the use of park facilities such that the need for new or altered parks would occur. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

e) Other public facilities?

No Impact. The project is the expansion of an existing cannabis cultivation use through the installation of additional hoop-houses on the project site. The project does not propose housing or other uses that would increase the population of the City such that the need for new or altered public facilities would occur. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XVI. RECREATION

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

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

No Impact. The project is the expansion of an existing cannabis cultivation use through the installation of additional hoop-houses on the project site. As discussed above in response to Checklist Question XV(d), the project does not propose housing or other uses that would increase the use of park facilities such that the need for new or altered parks would occur. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. The project is the expansion of an existing cannabis cultivation use through the installation of additional hoop-houses on the project site. The project would not include recreation facilities nor would it require the construction or expansion of recreation facilities. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XVII. TRANSPORTATION

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

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

No Impact. No transit, bicycle, or pedestrian facilities exist within the vicinity of the project site. Some increase in traffic along local roadways would occur as a result of employee trips and deliveries. However, based on the estimated maximum total of 48 trips in one day⁷⁹ such an increase would be negligible. Furthermore, there are no existing capacity issues with N Sanderson Avenue. Accordingly, the project would not conflict with the circulation system. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. CEQA chapter 15064.3, subdivision (b) requires analysis of a project's transportation impacts with regard to their resulting vehicle miles traveled (VMT) per project user (resident and employee). Guidance regarding project-related VMT impacts is provided by the California Governor's Office of Planning and Research (OPR) in the publication Technical Advisory on Evaluating Transportation Impacts in CEQA. The OPR Technical Advisory identifies several criteria that may be used to identify certain types of projects that are unlikely to have a significant

⁷⁹ Calculated as follows: 20 on-site employees x 2 daily trips (e.g. 1 trip to and 1 trip from the project site) = 40 employee trips; 2 monthly supply deliveries + 1 monthly clone delivery + 1 weekly export delivery, conservatively all assumed to occur on the same day x 2 trips (1 to and 1 from the site) = 8 delivery trips; 40 employee + 8 delivery trips = 48 total trips.

VMT impact and can be “screened” from further analysis. One screening criterion pertains to small projects, which OPR defines as generating fewer than 110 new vehicle trips per day on average.

Based on the maximum number of employees that would potentially travel to and from the project site (i.e., during harvest periods), the number of deliveries (conservatively assumed to all occur on the same day), the project could potentially generate a maximum total of 48 trips in one day.⁸⁰ Because the project would not exceed the OPR’s screening criterion of 110 trips per day, the project would not be expected to conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. The project would not involve changes to road alignments or other transportation facility design features and would not introduce incompatible uses to any roadway. All project activities, including the use of agricultural equipment (i.e., the utility tractor) would occur entirely on-site and would be compatible with both existing and proposed expanded uses at the site. Accordingly, the project would not increase hazards. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

d) Result in inadequate emergency access?

No Impact. The project would not alter the existing circulation pattern within the project area and would maintain an existing access point to the site off of N. Sanderson Avenue. Adequate access for emergency vehicles, including internal roadway widths, turn-about area, and vertical clearance currently exist at the site and would be maintained by the project. Furthermore, the Project’s proposed design, including ingress/egress and internal circulation, would be subject to review and approval by the Riverside County Fire Department and San Jacinto Police Department to ensure adequate emergency access design is satisfactorily incorporated into the Project. The Project would also introduce additional traffic in the Project vicinity, which could potentially affect emergency response to the Project Site and surrounding properties. However, as discussed under Section XVII, the Project would result in less-than-significant transportation impacts. Furthermore, emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code Section 21806. Accordingly, the project would not result in

⁸⁰ Calculated as follows: 20 on-site employees x 2 daily trips (e.g. 1 trip to and 1 trip from the project site) = 40 employee trips; 2 monthly supply deliveries + 1 monthly clone delivery + 1 weekly export delivery, conservatively all assumed to occur on the same day x 2 trips (1 to and 1 from the site) = 8 delivery trips; 40 employee +8 delivery trips = 48 total trips.

inadequate emergency access. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XVIII. TRIBAL CULTURAL RESOURCES

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

As of July 1, 2015, AB 52 of 2014 was enacted to expand CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "a Project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a Project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

The following analysis of potential tribal cultural resources impacts of the project is based, in part, on the on the information and conclusions contained within the Cultural Assessment⁸¹ prepared

⁸¹ *Cultural/Tribal Resource Records Search and Preliminary Assessment, Assessor's Parcel Numbers APN 432-130-002, 008 and 009, SRSINC At Riverwalk, February 2019.*

for the project site Cultural Agreement⁸² between the Soboba Band of Luiseño Indians and Innovative Cultivation Group, both previously discussed in Checklist Section V, Cultural Resources. The Cultural Assessment and Cultural Agreement are included as **Appendix C and Appendix D**, respectively, to this IS and their findings, conclusions, and recommendations are incorporated by reference herein. Per the AB52 consultation process the Soboba Band of Luiseño Indians has required a new Treatment and Disposition Agreement to allow the Tribe to be present for monitoring during any future development of the Project Site. Refer to **Appendix G** of this document.

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**

No Impact. Please see responses in Checklist Section V, Cultural Resources. As detailed there, the results of the official search of cultural resources records by the Eastern Information Center (EIC) located at the University of California, Riverside indicate that there are no known significant cultural resources located on the project site. The one nearby National Register site, the Casa Loma Canal, has a set-back within the State Route 79 right-of-way and would not be impacted by the proposed development plans. As all other known recorded resources located within one-mile of the project site are either outside of the project's viewshed, not considered significant, and/or would not derive any potential significance based on the project area, the project would not have the potential to significantly impact these resources. The Native American Heritage Commission (NAHC) record search of the Sacred Land File did not produce any record of Tribal Cultural Resources or sacred lands within a one-mile radius of the proposed project. In addition, parts of the project parcel and half of the parcel adjacent to the project parcel to the west have been surveyed/studied three times, and the project parcel and parcels adjacent to the west and to the southwest have been completely surveyed once, all with negative results.

Furthermore, in accordance with AB 52 noticing requirements, SRSINC contacted 39 entities representing nearby Native American groups on February 15, 2019. SRSINC received comments back from two tribal groups: San Manuel Band of Mission Indians who stated that the project was outside of their territorial boundaries, and Agua Caliente Band of Cahuilla Indians who deferred to the Soboba Band of Luiseño Indians. On March 16, 2021, the Soboba Band of Luiseño Indians, who are the identified Most Likely Descendent (MLD) of tribal cultural resources within the project area, and Innovative Cultivation Group signed a Cultural Agreement to formalize procedures for the treatment and disposition of all Tribal Cultural Resources, ceremonial items, items of cultural patrimony, artifacts, and Native American human remains and associated grave goods in the event that any are found in conjunction with development of the project, including archeological studies, excavation, geotechnical investigation, grading, and any ground-disturbing activities. The

⁸² *Cultural Resource Treatment and Disposition Agreement, between Soboba Band of Luiseño Indians (Isaiah Vivanco, Tribal Chairman) and Innovative Cultivation Group (Clinton Wesselink), signed: March 16, 2021.*

Cultural Agreement also formalizes procedures for Native American monitoring during the course of project-related archeological studies, grading, and ground-disturbing activities.⁸³

Furthermore, the City sent letters inviting tribes to consult with the City on November 8, 2022 (refer to Appendix G of this document). The City requested a response within 30 days of receipt as specified by AB 52. Three tribes responded, the San Manuel Band of Mission Indians, which stated the Project Site was outside of their ancestral territory, the Rincon Band of Luiseno Indians, which deferred to the Soboba Band of Luiseño Indians, and the Soboba Band of Luiseño Indians, which requested consultation. The City of San Jacinto initiated consultation with the Soboba Band of Luiseño Indians and the requests were addressed through discussions with the representative and email correspondence.

The Soboba Band of Luiseño Indians requested conditions of approval in addition to the existing Cultural Agreement⁸⁴ between the Soboba Band of Luiseño Indians and Innovative Cultivation Group to address these concerns. The additional Treatment and Disposition Agreement includes the following:

Tribal Cultural Resources: Prior to grading permit issuance, the developer shall enter into a Treatment and Disposition Agreement (TDA) with the Soboba Band of Luiseño Indians to address treatment and disposition of archaeological, or Tribal Cultural Resources and human remains associated with the Soboba Band of Luiseño Indians that may be uncovered or otherwise discovered during ground-disturbing activities related to the project, if monitoring deemed necessary by Soboba Band of Luiseño Indians. The TDA will establish provisions for tribal monitoring and shall be submitted to the Planning Division once it has been executed.

Discovery of Human Remains: If human remains, grave goods, ceremonial items, and/or sacred items are encountered, work will immediately halt within the immediate area and any nearby area reasonably suspected to overlie adjacent remains, and a 100-foot ESA boundary will be established to protect the find from impact, and the Soboba Band of Luiseno Indians and the City of San Jacinto Planning Division shall be immediately notified.

In accordance with Section 7050.5 of the California Health and Safety Code and State CEQA Guidelines Section 15064.5(e), if human remains are found, the Riverside County Coroner's office shall be notified by the permittee within 24 hours of the discovery. County Coroner's determination regarding the origin of the remains and any required notification is described in Section 7050.5 of the California Health and Safety Code and State CEQA Guidelines Section 15064.5(e). No further excavation or disturbance of the potential human remains, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made, any notifications have been sent and received, and the Riverside County Coroner's Office has cleared the site.

⁸³ *Cultural Resource Treatment and Disposition Agreement, between Soboba Band of Luiseño Indians (Isaiah Vivanco, Tribal Chairman) and Innovative Cultivation Group (Clinton Wesselink), signed: March 16, 2021, page 1.*

⁸⁴ *Cultural Resource Treatment and Disposition Agreement, between Soboba Band of Luiseño Indians (Isaiah Vivanco, Tribal Chairman) and Innovative Cultivation Group (Clinton Wesselink), signed: March 16, 2021.*

All proposed ground-disturbing activities proposed for the site have been completed under the monitoring requirements of the Cultural Agreement and no Tribal Cultural Resources were encountered or identified. The project would not require and does not propose additional ground-disturbing activities and would only install additional hoop-houses within the previously-graded areas of the site. Therefore, the project would not be expected to encounter Tribal Cultural Resources not previously encountered or identified. As such, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

- b) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

No Impact. Please see response to Checklist Question XVII(a) above. As detailed there, no cultural resources, including tribal cultural resources, have been recorded in cultural resource records or observed during surveys of the project site. In addition, all proposed ground-disturbing activities proposed for the site have been completed under the monitoring requirements of the Cultural Agreement and no Tribal Cultural Resources were encountered or identified. The project would not require and does not propose additional ground-disturbing activities and would only install additional hoop-houses within the previously-graded areas of the site. Therefore, the project would not be expected to encounter Tribal Cultural Resources not previously encountered or identified. As such, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

No Impact. As discussed below, the project would be adequately served by water and wastewater; therefore, no new or relocated water or wastewater treatment facilities would be required. The project site is not currently served by stormwater drainage, natural gas, or telecommunications facilities and none would be required or proposed under the project. The project site is currently served by San Jacinto Power; however, the additional cultivation activities proposed under the project would utilize sunlight and would not use artificial lights or any other equipment requiring electricity. As such, the project would not require and does not propose the construction of new or relocation of existing stormwater drainage, electric power, natural gas, or

telecommunications facilities. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The project site currently utilizes an on-site groundwater well and would continue to do so under the project. The existing well is estimated to be capable of producing approximately 300 gallons per minute.⁸⁵ As detailed in response to Checklist Question X(b), the project site overlies the San Jacinto Groundwater Basin, which is monitored by the Hemet-San Jacinto Wastewater. The existing well is permitted to withdraw from the basin under County of Riverside Department of Environmental Health Permit No. WP29087 and both groundwater levels and withdraws would continue to be monitored both in the vicinity of the well and throughout the basin during the life of the project. In addition, in accordance with the State Water Quality Control Board Cannabis General Order, the project would implement best management practices to conserve water, including drip irrigation systems for both in-ground and above-ground plantings. Therefore, the project would have sufficient water supplies. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. As discussed in response to Checklist Question VII(e), the project site currently utilizes rented portable toilets and would continue to do so under the project. The rental provider would transport wastewater to the Eastern Municipal Water District's (EMWD) San Jacinto Valley Regional Water Reclamation Facility, a permitted wastewater treatment facility, with capacity to accept 14 million gallons of wastewater per day for treatment. The current intake is approximately 7 million gallons per day of wastewater.⁸⁶ The anticipated wastewater generation from the low number of employees that would work at the site would not be expected to represent a substantial increase for a wastewater treatment provider. Therefore, impacts would be less than significant and no mitigation measures would be required.

⁸⁵ *State of California, Well Completion Report, Form DWR 188 Submitted: May 29, 2020, WCR2020-006850, Local Permit Agency: County of Riverside Department of Environmental Health, Permit Number: WP29087, Permit Date: February 27, 2020.*

⁸⁶ *Eastern Municipal Water District, Wastewater Service, <https://www.emwd.org/wastewater-service>. Accessed October 2022.*

Mitigation Measures

None required.

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

Less than Significant Impact. The majority of the solid waste generated at the project site would be organic waste, such as yard waste, green waste, and other compostable materials, which would be segregated from the solid waste and either composted on-site or deposited at an appropriate transfer facility. The minor amount of non-organic waste estimated to be produced by the project would be produced consistent with normal business and would be stored in bins with secure fitting lids until being disposed of at a Riverside County Department of Waste Resources facility. Recyclables such as scrap metal, glass, metal, and plastic containers, would be unloaded at a recycling drop-off center. The closest Riverside County Department of Waste Resources facility to the project site is the Lamb Canyon Landfill. As of 2015, the Lamb Canyon Landfill has a permitted daily throughput capacity of 5,000 tons, a remaining capacity of over 19 million tons, and an anticipated closure date in 2032.⁸⁷

Accordingly, because the landfill serving the project would have sufficient capacity to serve the project and because the project would not generate a substantial amount of solid waste due to recycling and onsite composting, the project would not generate solid waste in excess of standards or capacity or otherwise impair the attainment of solid waste goals. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

- e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

No Impact. Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to assure adequate landfill capacity through mandatory reductions in solid waste quantities (for example, through recycling and composting of green waste) and the safe and efficient transportation of solid waste. The project's compliance with all applicable regulatory requirements regarding solid waste is mandatory. As such, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁸⁷ CalRecycle, *Solid Waste Information System, Facility/Site Summary, Lamb Canyon Landfill*, available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368>.

XX. WILDFIRE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No Impact. The project site is not located within or near State Responsibility Areas (SRA) or within a VHFHSZ.⁸⁸ Furthermore, as discussed in response to Checklist Question IX(f), the project would not alter the existing circulation pattern within the project area and would maintain an existing access point to the site off of N. Sanderson Avenue. Adequate access for emergency vehicles, including internal roadway widths, turn-about area, and vertical clearance currently exist at the site and would be maintained by the project. Accordingly, the project would not impair an emergency response or evacuation plans. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

⁸⁸ California Department of Forestry and Fire Protection, Fire and Resource Assessment Program, Map of Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE, San Jacinto.

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

No Impact. As discussed above, the project site is not located within or near SRAs or within a VHFHSZ. Furthermore, the project site is relatively flat and is not located downwind of a VHFHSZ. The project would not exacerbate wildfire risks. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. As discussed above, the project site is not located within or near SRAs or within a VHFHSZ. Therefore, the project would not require and does not propose new public roads, fuel breaks, or emergency water sources. In addition, the project would be served by existing power lines and other utilities. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. As discussed above, the project site is not located within or near SRAs or within a VHFHSZ. Therefore, the project would not expose people or structures to risks associated with post-fire conditions. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				

Less than Significant Impact. *State CEQA Guidelines* Section 15065(a) requires a finding of significance if a project “has the potential to substantially degrade the quality of the environment.” In practice, this is the same standard as a significant effect on the environment, which is defined in *State CEQA Guidelines* Section 15382 as “a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”

As indicated by the analysis in Checklist Section IV, Biological Resources, the project would not significantly impact biological resources, including candidate, sensitive, or special status species; riparian habitat or other sensitive natural community; state or federally protected wetlands; native resident or migratory wildlife corridors or nursery sites; or protected trees. As such, the project would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife

population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of a rare or endangered plant or animal. In addition, as discussed in Checklist Sections V, Cultural Resources, VII, Geology and Soils, and XVIII, Tribal Cultural Resources, the project would have less than significant impacts on cultural resources, including historic resources, archaeological resources, human remains, paleontological resources, and tribal cultural resources. As such, the project would not eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant and no further mitigation would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Cumulative impacts refer to two or more individual effects which, when evaluated together, are considerable or would compound or increase other environmental effects. In the preceding topical analyses, cumulative impacts of the project have been considered where appropriate. For example, the evaluation of air quality and impacts considered the project’s cumulative contribution to federal or State nonattainment pollutants within the South Coast Air Basin. As discussed throughout this IS, no potentially significant impacts are identified for the project. In addition, any successive projects of the same type and nature would reflect a development that is consistent with the underlying land use designation and the San Jacinto Municipal Code, and thus would be subject to the same regulations and requirements, including development standards and conditions of approval. The impacts of each subsequent project would be mitigated if necessary, and thus will not result in a cumulative impact. As such, the project would not have the potential to contribute to significant cumulative impacts. Therefore, cumulative impacts would be less than significant, and no mitigation would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. As required by *State CEQA Guidelines* Section 15065(a)(4), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology and soils, greenhouse

gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation, utilities and service systems, and wildfire. These changes are addressed in Checklist Sections III, Air Quality; VII, Geology and Soils; VIII, Greenhouse Gas Emissions; IX, Hazards and Hazardous Materials; X, Hydrology and Water Quality; XIII, Noise; XIV, Population and Housing; XV, Public Services; XVII, Transportation; XIV, Utilities and Service Systems; and XX, Wildfire of this IS.

As detailed in these sections, potential impacts of the project have been identified and were determined to be less than significant. Through compliance with existing regulations, the project would not have the potential to result in substantial adverse impacts on human beings, either directly or indirectly. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.