INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

PANTHER AVENUE CANNABIS FACILITY CUP 23-09, LDP 23-11, & TPM 11268 APN: 0459-432-48 ADELANTO, CALIFORNIA

LEAD AGENCY:

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

REPORT PREPARED BY:

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

JANUARY 17, 2024

ADLT 076

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Panther Avenue Cannabis Facility **(**CUP 23-09, LDP 23-11, & TTM 11268).

PROJECT APPLICANT: Mike Tokatlyan, Mojave Sun LLC., 15863 Parthenia Street, North Hills, California 91343.

PROJECT LOCATION: The project site is located in the south-central portion of the City of Adelanto. No legal address has been assigned to the project site at this time though the site's assessor parcel number (APN) is 0459-432-48. The proposed project site, consisting of 2.68-acres, is located to the east of Panther Avenue, south of Air Expressway approximately 612 feet, and west of Racoon Avenue approximately 63-feet. The project site is located north of an easting electrical transmission line easement. A second SCE transmission line easement separates the project site from Racoon Avenue, located further east. The project site is located within the Adelanto CA USGS 7 ½ Minute Quadrangle, T6N, R5W, the N ½ of the SE ¼ of the NE ¼ of the NW ¼ of Section 31, S.B.B.M. The project site's geographic coordinates are 34°34'11.89" N and -117°26'45.6" W.

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

PROJECT: The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. All of the new buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The dimensions for each of the two manufacturing buildings would be 50-feet by 70-feet. The dimensions for each of the five cultivation buildings would be 62-feet by 80-feet. Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. The parking area is located in the southernmost portion of the project site and would include a total of 23 standard parking spaces including 1 ADA parking space. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The proposed project would connect to existing water and sewer mains located in Panther Avenue. The project site's current zoning is *Manufacturing Industrial (MI)*.

EVALUATION FORMAT: The attached initial study is prepared in accordance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of the attached Initial Study was guided by Section 15063 of the State CEQA Guidelines. The project was evaluated based on its effect on 21 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist includes a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

No Impact: No impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact: No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact with Mitigation: Possible significant adverse impacts have been identified or anticipated and mitigation measures are required as a condition of the project's approval to reduce these impacts to a level below significance.

Potentially Significant Impact: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in the attached Initial Study.

☐ Aesthetics	☐ Agriculture & Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology & Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology & Water Quality	☐ Land Use & Planning	☐ Mineral Resources
☐ Noise	☐ Population & Housing	☐ Public Services
☐ Recreation	☐ Transportation & Traffic	☐ Tribal Cultural Resources
☐ Utilities & Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation, the following finding is made:

☐	The proposed project *COULD NOT* have a significant effect on the environment, and a *NEGATIVE DECLARATION* shall be prepared.
✖	Although the proposed project could have a significant effect on the environment, there shall not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A *MITIGATED NEGATIVE DECLARATION* shall be prepared.
☐	The proposed project *MAY* have a significant effect on the environment, and an *ENVIRONMENTAL IMPACT REPORT* is required.
☐	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 the 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.
☐	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.

Signature _____ Date _____

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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. All of the new buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The dimensions for each of the two manufacturing buildings would be 50-feet by 70-feet. The dimensions for each of the five cultivation buildings would be 62-feet by 80-feet. Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. The parking area is located in the southernmost portion of the project site and would include a total of 23 standard parking spaces including 1 ADA parking space. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The proposed project would connect to existing water and sewer mains located in Panther Avenue. The project site's current zoning is *Manufacturing Industrial (MI)*.[1]

The City of Adelanto is the designated *Lead Agency,* and as such, the City will be responsible for the project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.[2] As part of the proposed project's environmental review, the City of Adelanto has authorized the preparation of this Initial Study.[3] The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

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

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Adelanto, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated

[1]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

[2] California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions.* as Amended 2001. §21067.

[3] Ibid. (CEQA Guidelines) §15050.

Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.[4] This Initial Study and the *Notice of Intent to Adopt (NOIA) a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.[5]Questions and/or comments should be submitted to the following contact person:

Louis Morales, Contract Planner
City of Adelanto, Planning Division
11600 Air Expressway
Adelanto, California 92301

1.2 INITIAL STUDY'S ORGANIZATION

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

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

[4] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.5, Section 21067 and Section 21069.* 2000.

[5] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.6, Section 2109(b).* 2000.

SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would include the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI)*.

2.2 PROJECT LOCATION

The proposed project site is located in the south-central portion of the City of Adelanto. The City of Adelanto is located approximately 85 miles northeast of Downtown Los Angeles and 40 miles north of the City of San Bernardino. Adelanto is bounded on the north by unincorporated San Bernardino County; on the east by Victorville and unincorporated San Bernardino County; on the south by Hesperia and unincorporated San Bernardino County; and on the west by unincorporated San Bernardino County.[6] Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15) that extends in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395 that traverses the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18) that traverses the southern portion of the City in an east to west orientation. The location of Adelanto, in a regional context, is shown in Exhibit 2-1. A citywide map is provided In Exhibit 2-2.

The project site is located in the south-central portion of the City of Adelanto. No legal address has been assigned to the project site at this time though the site's assessor parcel number (APN) is 0459-432-48. The proposed project site, consisting of 2.68-acres, is located to the east of Panther Avenue, south of Air Expressway approximately 612 feet, and west of Racoon Avenue approximately 63-feet. The project site is located north of an easting electrical transmission line easement. A second SCE transmission line easement separates the project site from Racoon Avenue, located further east. The project site is located within the Adelanto CA USGS 7 ½ Minute Quadrangle, T6N, R5W, the N ½ of the SE ¼ of the NE ¼ of the NW ¼ of Section 31, S.B.B.M. The project site's geographic coordinates are 34°34'11.89" N and -117°26'45.6" W. A local vicinity map is provided in Exhibit 2-3.[7]

2.3 ENVIRONMENTAL SETTING

The relatively level site is approximately 2,900 feet above sea level and contains no slope. The project site is currently undeveloped and vacant though transmission lines extend along both the site's south and east sides. The vegetation community present on site supports a desert scrub habitat consisting of native plants and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), rubber rabbitbrush (Ericameria nauseosa), Joshua tree (Yucca brevifolia), Nevada jointfir (Ephedra nevadensis), Asian mustard (Brassica tournefortii), Flatspine burr ragweed (Ambrosia acanthicarpa) and cheatgrass (Bromus tectorum).

[6]Blodgett Baylosis Environmental Planning. 2023.

[7] Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0.* 10/10/2022.

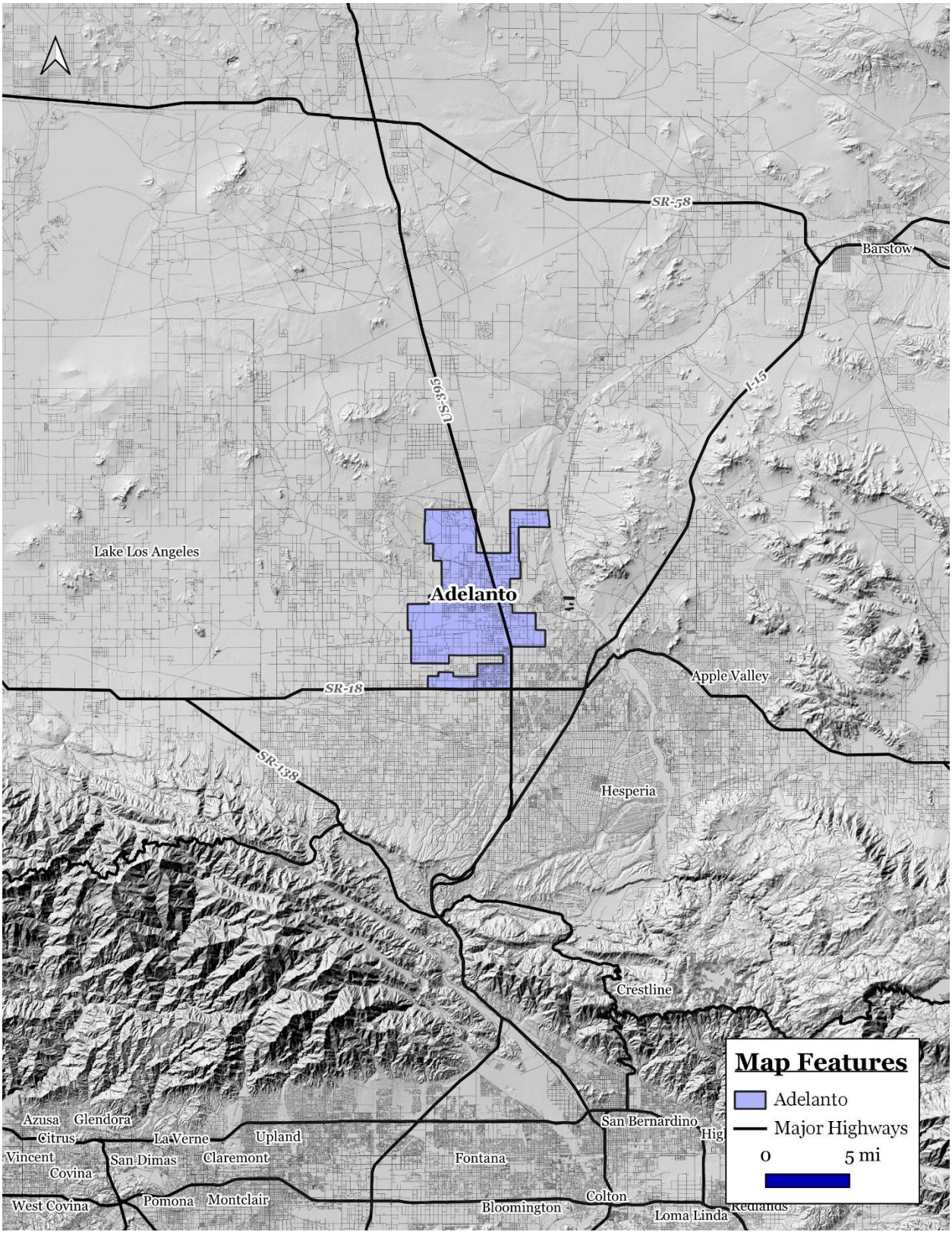

EXHIBIT 2-1 REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

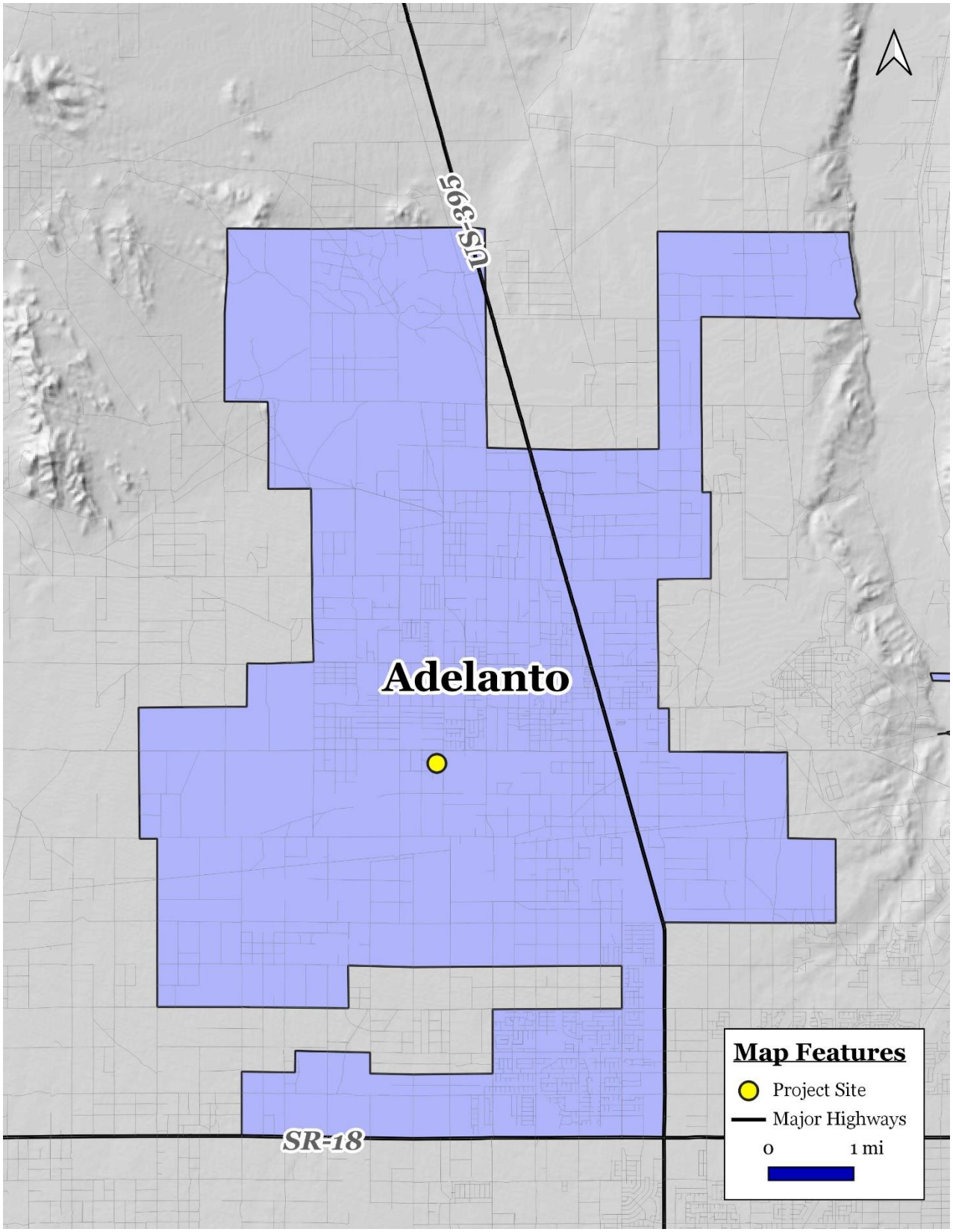

EXHIBIT 2-2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

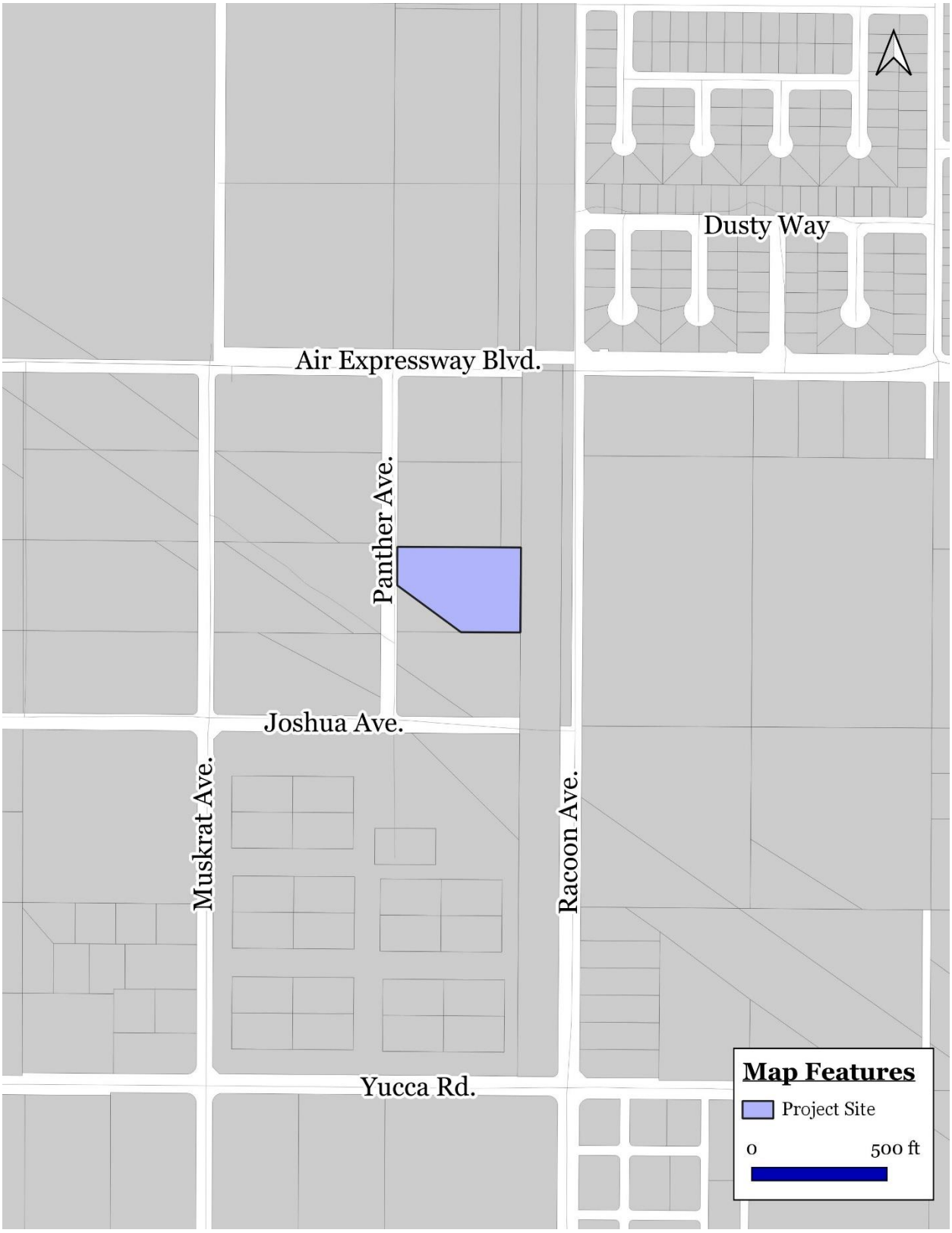

EXHIBIT 2-3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

The site and the surrounding area are illustrated in Exhibit 2-4. Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* Vacant undeveloped land is located adjacent to the project site to the north. Air Expressway is located further north. These parcels located to the north of the site are zoned as Manufacturing Industrial (MI).[8]
- *East of the project site:* A SCE transmission line easement extends along the project site's east side. Vacant, undeveloped land extends further east along the east side of Racooon Avenue. This area located to the is zoned as Manufacturing Industrial (MI).[9] Racoon Avenue, an improved two-lane road is located further east.
- *South of the project site:* Another transmission line easement extends along the project site's southerly side. Further south of this easement is vacant, undeveloped property. This area is also zoned as Manufacturing Industrial (MI).
- *West of the project site:* The Panther Avenue right-of-way (ROW) extends along the project site's west side. Panther Avenue is an unimproved roadway. Further west, west of the aforementioned roadway, is vacant undeveloped land. This area is zoned as Manufacturing Industrial (MI).

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

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

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

- *Proposed Site Plan*. The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new buildings are located in the central and northerly portions of the site while parking is located in the southerly portion. The project site's lot coverage is 27.1%.

- *Manufacturing Buildings*. The proposed project would involve the construction of two new manufacturing buildings. The new metal manufacturing buildings would have a total floor area of 7,000 square feet. Each of the manufacturing buildings would have a floor area of 3,500 square feet. All of the new buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The dimensions for each of the two manufacturing buildings would be 50-feet by 70-feet. Each manufacturing building would include a drying room (1,660 square feet), a vegetation room (244 square feet), a trim room (92 square feet), a security room (94 square feet), a clone room (67 square feet), a nutrient storage room (67 square feet), an office (163 square feet), a lunch room (116 square feet), and restrooms and locker room (210 square feet). Two doors would be provided on the south elevation for loading and unloading.

[8] Google Maps. Site Accessed January 23, 2023, and Adelanto Zoning Map, Site Accessed, January 23, 2023.

[9] Ibid.

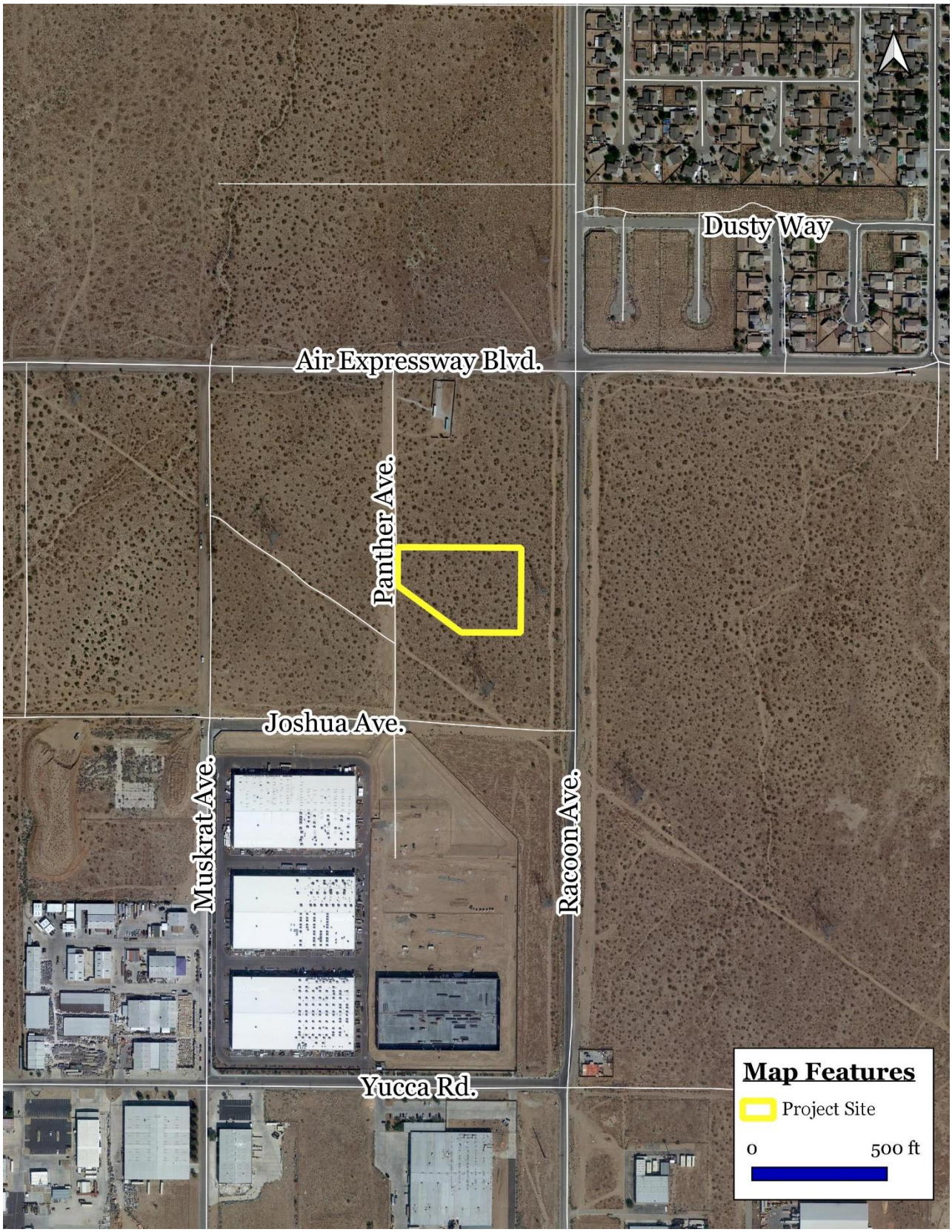

EXHIBIT 2-4 AERIAL IMAGE OF PROJECT SITE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *Cultivation Buildings*. The proposed project would involve the construction of five new cultivation (greenhouse) buildings. Each of the new cultivation buildings would have a total floor area each of the new cultivation buildings would have a floor area of 4,960 square feet. All of the new cultivation buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The dimensions for each of the five cultivation buildings would be 62-feet by 80-feet.

- *Access and Parking*. Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. The parking area is located in the southernmost portion of the project site and would include a total of 23 standard parking spaces including 1 ADA parking space. The primary access to the site would be gated.

- *Landscaping*. Landscaping would be provided along the site's north, east, and west sides and internally The vegetation would consist of drought tolerant (xeriscape) species. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site.

- *On-Site Utilities*. Power (electrical) would be met with connections to the existing Southern California Edison utility lines. A Southern California Edison transmission line easement extends along the site's south and east sides. The proposed project would connect to existing water and sewer mains located in Panther Avenue. New water and sewer connections to the existing lines would be installed.

- *Security*. On-site security will be provided twenty-four hours a day, seven days a week by security guards. In addition, security fencing, cameras, and shielded security lighting that would conform with all municipal lighting regulations would be installed on the premises. An 8-foot high security fence would surround the project site.

The proposed site plan is illustrated in Exhibit 2-5 and the building elevations are provided Exhibit 2-6.

2.4.2 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

As indicated previously, the site is zoned as Manufacturing Industrial (MI). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The estimated employment is based on the following:

- *Cultivation Method*. The cultivation method will be soil based or organic. Organic cultivation involves the use of soil and plant or manure-based composts. Organic soils are rich with living microbes that slowly break down components in the soil and release nutrients to the plant.

- *Equipment*. The cultivation and manufacturing would occur inside the individual five cultivation buildings. As a result, the equipment would be limited to that suitable for use in an indoor environment. Planting, cultivation, and trimming would be undertaken by trained staff. Organic cultivation involves the use of soil and plant or manure-based composts. Organic soils are rich with living microbes that slowly break down components in the soil and release nutrients to the plant.

- The project will be required to implement mitigation to control odors, air, and volatile organic chemicals (VOC) emissions (refer to Section 3.3 and Section 3.8).

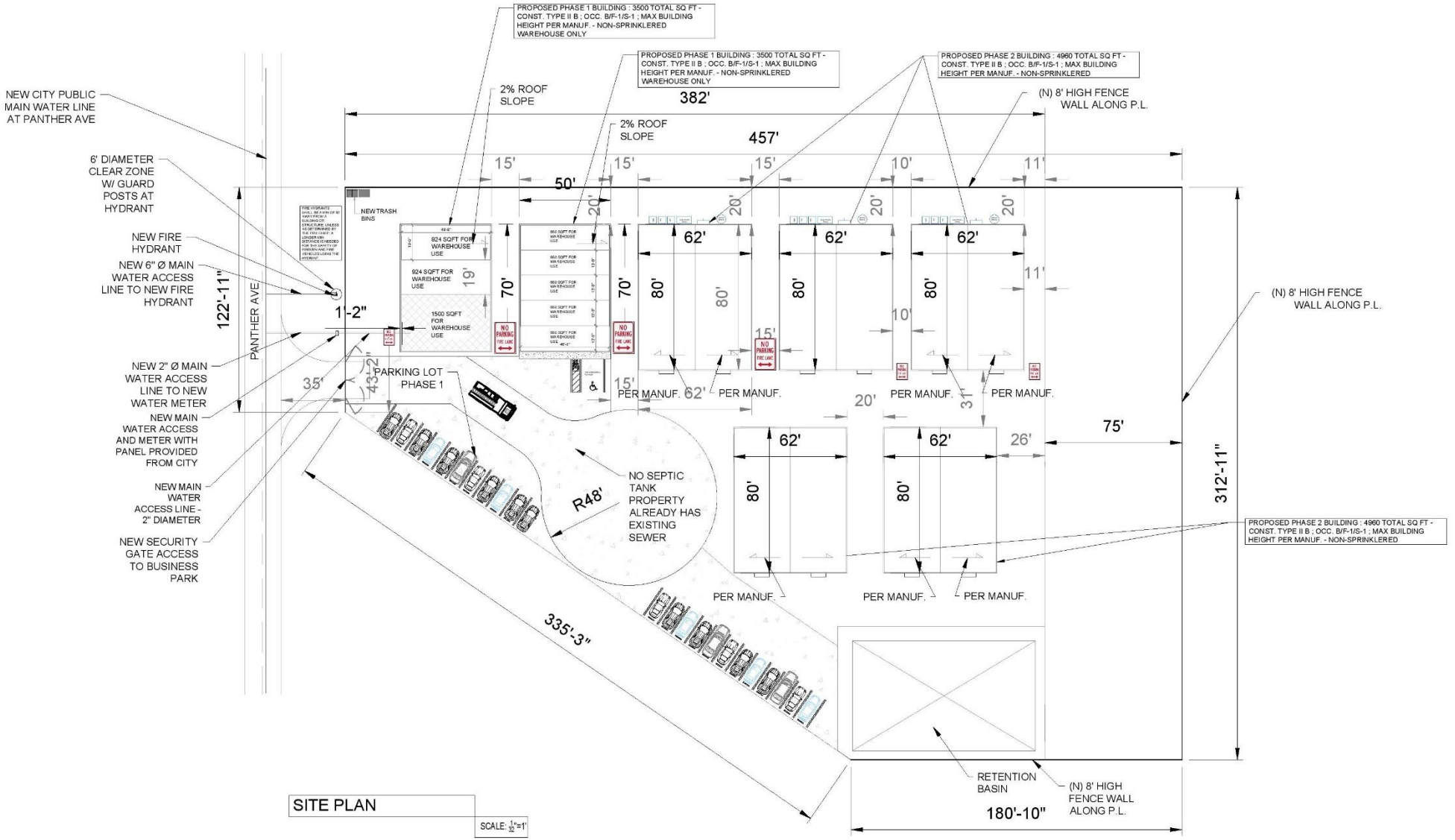

EXHIBIT 2-5 SITE PLAN

SOURCE: Phantom 992 Design; K-ROM Design

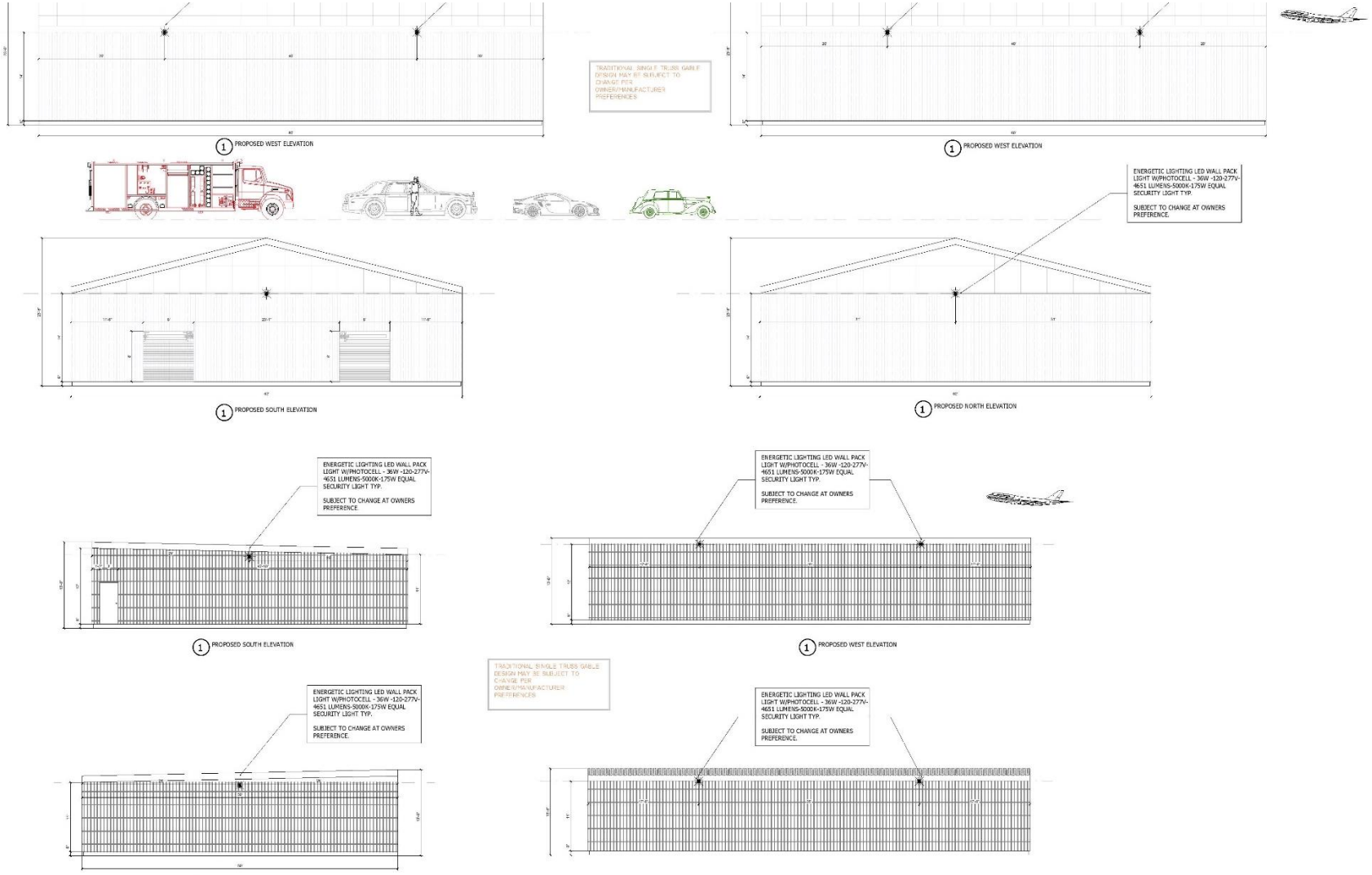

EXHIBIT 2-6 BUILDING ELEVATIONS

Source: Phantom 992 Design; K-ROM Design

- *Employment*. The new cannabis cultivation and manufacturing facility is projected to employ approximately 20 persons per day at full capacity.

- *Hours of Operation*. The hours of on-site operations for the proposed new development would be Monday through Sunday, 8:00 AM to 5:00 PM and 24-hours a day security.[10]

The entire project would employ an estimated 20 full-time equivalent employees over three shifts, seven days a week. The analysis assumes that the facility, in its entirety, will operate as a cannabis facility and will be operated by a single operator. The scope of the IS/MND addresses the construction of the proposed project in its entirety. The California Department of Cannabis Control (DCC) requires an annual-license applicant to provide operation-specific evidence of exemption from, or compliance with, CEQA (4 Cal. Code of Regs. § 15010). If a local jurisdiction prepares a site-specific CEQA compliance document, or record of decision for the conclusion that no further CEQA documentation is required, it improves the efficiency with which DCC can issue annual licenses for projects located within that jurisdiction.

2.4.3 CONSTRUCTION CHARACTERISTICS

The construction for the proposed project is assumed to commence in mid-2024 and would take approximately nine months to complete. The key construction tasks that would occur are outlined in the paragraphs below.

- *Task 1 Grading*. The project site would be graded and readied for the construction. The site would be graded to a depth of approximately 6 inches. The typical heavy equipment used during this construction phase would include graders, bulldozers, offroad trucks, back-hoes, and trenching equipment. This task would require approximately one month to complete.

- *Task 2 Site Preparation*. During this phase, the building footings, utility lines, and other underground infrastructure would be installed. The typical heavy equipment used during this construction phase would include bulldozers, offroad trucks, back-hoes, and trenching equipment. This task would require approximately one month to complete.

- *Task 3 Building Construction*. The new buildings would be constructed during this phase. The typical heavy equipment used during this construction phase would include offroad trucks, cranes, and fork-lifts. This task would require approximately six months to complete.

- *Task 4 Paving and Finishing*. This concluding task would involve the paving and finishing. The typical heavy equipment used during this construction phase would include trucks, backhoes, rollers, pavers, and trenching equipment. The completion of this phase would require approximately one month to complete.

2.5 DISCRETIONARY ACTIONS

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

- Approval of a Conditional Use Permit (CUP 23-09);

[10] Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. 10/10/2022.

- Approval of a Land Development Plan (LDP 23-11);
- Approval of a Tentative Parcel Map (TPM 11268); and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

All potentially interested tribes identified by the NAHC were also contacted pursuant to AB-52 for information regarding their knowledge of cultural resources that were within or near the project area. These groups include: the San Manuel Band of Mission Indians, the Soboba Band Luiseno Indians, and the Serrano Nation. In addition, the proposed project would require a manufacturing license, a distribution license, and one or more cultivation licenses from the State Department of Cannabis Control (DCC). The DCC is responsible for licensing, regulation, and enforcement of commercial cannabis business activities, as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and DCC regulations related to cannabis business activities (Bus. & Prof. Code, § 26012(a)).

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SECTION 3 ENVIRONMENTAL ANALYSIS

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

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

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?				✕
B. Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✕
C. Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✕
D. Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✕

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on aesthetics if it results in any of the following:

- The proposed project would have an adverse effect on a scenic vista, except as provided in PRC Sec. 21099.
- The proposed project would have an adverse effect on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- The proposed project would 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. or,
- The proposed project would, except as provided in Public Resources Code Section 21099, create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The evaluation of aesthetics and aesthetic impacts is generally subjective, and it typically requires the identification of key visual features in the area and their importance. The characterization of aesthetic impacts involves establishing the existing visual characteristics including visual resources and scenic vistas that are unique to the area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), and existing light and glare characteristics (e.g., nighttime illumination). Changes to the existing aesthetic environment associated with the proposed project's implementation are identified and *qualitatively* evaluated based on the proposed modifications to the existing setting and the viewers' sensitivity. The

project-related impacts are then compared to the context of the existing setting, using the threshold criteria discussed above.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista? ● No Impact*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. All of the new buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The project site's current zoning is *Manufacturing Industrial (MI)*.[11]

The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. In addition, local views are already dominated by regional Southern California Edison (SCE) transmissions towers and transmission lines located to the south and east of the project site. The City of Adelanto 2035 Sustainable Plan identifies prominent view sheds within the City. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.[12] Views from the mountains would not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. *As a result, no impacts would occur.*

B. *Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ● No Impact.*

According to the California Department of Transportation, none of the unimproved roads located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.[13] There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. Lastly, the project site is currently undeveloped. As a result, the site does not contain any buildings listed in the State or National registrar. *As a result, no impacts would occur.*

[11]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

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

[13] California Department of Transportation. *Official Designated Scenic Highways.*

C. *Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ● No Impact*

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

D. *Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ● No Impact*

The nearest sensitive receptors are located approximately 860 feet to the northeast of the site. These sensitive receptors are single-family homes located to the north of Air Expressway. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.90.040 – Lighting of the City of Adelanto Municipal Code. The City's Code requirements includes the following requirements related to outdoor lighting:

- All on-site lighting shall be energy efficient, stationary, and directed away from adjoining properties and public rights-of-way.
- Light fixtures shall be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture.
- Light fixtures shall be shielded so no light above 0.5 footcandle spills over onto adjacent properties and rights-of-way. There shall be no spillover (0.0 footcandle) onto adjacent residential used or zoned properties.

The proposed project must also comply with the Department of Cannabis Control's (DCC's) applicable regulatory specifications requirements that all outdoor lighting for security purposes must be shielded and downward facing. (Cal. Code Regs., tit. 3 § 16304(a)(7). *As a result, no impacts would occur.*

MITIGATION MEASURES

The proposed project would not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.90.040 – Lighting of the City of Adelanto Municipal Code. The proposed project must also comply with the DCC's applicable regulatory specifications requirements that all outdoor lighting for security purposes must be shielded and downward facing. (Cal. Code Regs., tit. 3 § 16304(a)(7). The analysis of aesthetics concluded that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?				✖
B. Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✖
C. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✖
D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✖
E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on agriculture and forestry resources if it results in any of the following:

- The proposed project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- The proposed project would conflict with existing zoning for agricultural use, or a Williamson Act contract.
- The proposed project would conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).
- The proposed project would result in the loss of forest land or conversion of forest land to non-forest use.
- The proposed project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories of land use designation based on soil quality and existing

agriculture uses to produce maps and statistical data. These maps and data are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this analysis. The highest rated Important Farmland is Prime Farmland. The California Land Conservation Act of 1965, or the Williamson Act, allows a city or county governments to preserve agricultural land or open space through contracts with landowners. The County has areas that are currently agriculture preserves under contract with San Bernardino County through the Williamson Act of 1965. Contracts last 10 years and are automatically renewed unless a notice of nonrenewal is issued.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses? ● No Impact.*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The project site's current zoning is *Manufacturing Industrial (MI)*.[14] According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. *As a result, no impacts will occur*.[11]

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

The project site is currently zoned as Manufacturing/Industrial (MI).The property is vacant and undeveloped and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.[15] No impacts on existing Williamson Act Contracts will result from the proposed project's implementation. *As a result, no impacts would result.*

C. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section ● No Impact.*

The project site is currently vacant. There are no forest lands or timber lands located within or adjacent to the site. Furthermore, the site's existing zoning designation Manufacturing Industrial (MI) does not contemplate forest land or timber land uses. *As a result, no impacts will occur.*

[14]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

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

[15]California Department of Conservation. *State of California Williamson Act Contract Land.*

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

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

E. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use? ● No Impact.*

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use because the project site is currently vacant and does not contain any agricultural or forestry resources. *As a result, no impacts would occur.*

MITIGATION MEASURES

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

3.3 AIR QUALITY

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on air quality if it results in any of the following:

- The proposed project would conflict with or obstruct implementation of the applicable air quality plan.
- The proposed project would 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.
- The proposed project would expose sensitive receptors to substantial pollutant concentrations.
- The proposed project would result in other emissions (such as those leading to odors adversely affecting a substantial number of people.

The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

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

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

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

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

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

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI)*.[16]

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The City is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and in the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.[17]

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Adelanto is projected to add a total of 38,900 new residents and

[16]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

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

3,900 new employees through the year 2040.[18] The proposed project will not introduce new residents and is anticipated to employ approximately 20 persons per day at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project's construction emissions would be below the thresholds of significance established by the MDAQMD (the project's daily construction emissions are summarized in Table 3-1). In addition, the proposed project's long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). *As a result, no impacts would occur.*

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

According to the MDAQMD, any project is significant if it triggers or exceeds the MDAQMD daily emissions threshold identified previously and noted at the bottom of Tables 3-1 and 3-2. In general, a project would have the potential for a significant air quality impact if any of the following are met:

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

The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEModV.2022.1.1.18). For air quality modeling purposes, a nine-month period of construction for all construction phases were assumed.

Table 3-1
Estimated Daily Construction Emissions

Construction Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Maximum Daily Emissions	1.22	11.43	11.40	0.02	5.94	3.08
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2022.1.1.18

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts would continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. The analysis of long-term operational impacts summarized in Table 3-2 also used the

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

CalEEModV.2020.4.0computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the MDAQMD daily emissions thresholds.

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

Emission Source	ROG	NOx	CO	SO2	PM10	PM2.5
Total (lbs./day)	2.24	2.15	18.71	0.04	3.64	0.97
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2022.1.1.18

The analysis presented in Tables 3-1 and 3-2 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3-1 and 3-2, the impacts are considered to be less than significant. In addition, the MDAQMD Rule Book contains numerous regulations governing various activities undertaken within the district. Among these regulations is Rule 403.2 – Fugitive Dust Control for the South Coast Planning Area, which was adopted in 1996 for the purpose of controlling fugitive dust. Adherence to Rule 403.2 regulations is required for all projects undertaken within the district. Future construction truck drivers must also adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes.[3] Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will further reduce the potential impacts. *As a result, the impacts would be less than significant.*

C. *Would the project expose sensitive receptors to substantial pollutant concentrations? ● Less than Significant Impact.*

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. No sensitive receptors are located adjacent to the project site. *As a result, the impacts would be less than significant.*

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

Cannabis cultivation directly impacts air quality in two predominant operations, plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by the generation of strong odors. The majority of the odors of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants and vary widely between plants. Cannabis produces over 140 different terpenes, and these chemicals are found in varying concentrations in different cannabis varieties. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis' psychoactivity, has no odor whatsoever. The type and potency of cannabis odors range widely from variety to variety, as do receptors' opinions regarding whether the odor is pleasant or

objectionable.[19] The natural growth of the cannabis plants, and other processes at cultivation facilities, emit terpenes. Terpenes, known for their strong odor, are volatile organic compounds (VOCs). At facilities such as that being considered, the evaporation of solvents, and other processes in the production cycle, also result in VOC emissions. The project Applicant will employ certain technologies that will be beneficial in controlling odors including the following:

- *Carbon Filters*. Also known as carbon scrubbers, carbon filters are historically one of the best methods for odor control. This type of filter uses pellets of charcoal to trap the terpenes. Carbon filters are simple to install, effective, and reliable. Carbon filters will be installed at key locations in the facility and will be monitored and replaced by staff on a regular basis.
- *Air Filters*. Standard air filters, also referred to as air purifiers, are typically made of densely woven fiber screens. These filters trap particles as air circulates through the filter, which can either be a stand-alone unit or incorporated into a ventilation system depending on the exact specifications.
- *Negative Ion Generators*. The machines will use a negative charge to attract positively charged particles in the air. This equipment will be installed in areas that do not interfere with the production activities but instead can proactively treat the air in order to meet regulations.
- *Air-tight Seals*. The proposed facility will utilize air-tight seals throughout the facility. Predominately used in the exhaust system, these airtight seals will be used in order to keep the exhaust system efficient and effective.
- *Negative Air Pressure*. The Applicant will make use of negative air pressure in order to retain odor for treatment. This will help to serve as a safeguard of odor escaping into the ambient air until it can be treated using the techniques above. This equipment. Will seal the facility, except for the intake and exhaust, which creates suction when exhaust fans are turned off. The proper use of both negative air and negative ion generators will efficiently expunge odor before leaving the facilities.
- *Staff Training*. The facility's employees will be trained regarding compliance with the industry's best standards and facility regulations in order to achieve successful odor control. Employees will be trained in the use of odor control methods as well as any new techniques and technologies that may be added in the future.

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

- The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and the San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.
- Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

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

[19] Cannabis Environmental Best Management Practices Draft Section for Review: Air Quality January 9, 2020.

MITIGATION MEASURES

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

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

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

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✖		
B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
C. Would the project have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✖
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✖
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✖
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

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

- The proposed project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- The proposed project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Sensitive biological resources include a variety of plant and animal species that are specialized and endemic to a particular habitat type. Due to loss of habitat, some of these species have been designated by either, or both, the federal and state government resource agencies as threatened or endangered. Species listed as threatened include those whose numbers have dropped to such low levels and/or whose populations are so isolated that the continuation of the species could be jeopardized. Endangered species are those with such limited numbers or subject to such extreme circumstances that they are considered in imminent danger of extinction. Other government agencies and resource organizations also identify sensitive species, those that are naturally rare and that have been locally depleted and put at risk by human activities. While not in imminent danger of jeopardy or extinction, sensitive species are considered vulnerable and can become candidates for future listing as threatened or endangered.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● Less than Significant Impact with Mitigation.*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The project site's current zoning is *Manufacturing Industrial (MI).*[20]

The proposed project area was characteristic of a disturbed creosote scrub (Larrea tridentata) plant community. A total of 13 plant species were observed during the line transect survey. The dominant shrub species throughout the study area was creosote scrub. Schismus (Schismus sp.) and tumble mustard (Sisymbrium altisissiimum) were the dominant annual species throughout the study area. One Joshua tree was present within the study site but located within a 75 foot (23 m) powerline easement. Three Joshua trees were near the study site. No alkali mariposa lilies, Barstow woolly sunflowers, desert cymopterus or suitable habitat for these plant species were observed within the study area. A total of 10 wildlife species, or their sign were observed during the line transect survey. No desert tortoises or their sign were observed during the field survey. No burrowing owls or their sign were observed within the study site during the field survey. No burrowing owl cover sites were observed within the study site during the field survey. No bird nests were observed within the study area. No potential nesting sites were present within the study site. No desert kit foxes or their sign were observed within the study site. No

[20]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

suitable Mohave ground squirrel habitat was observed within the study site.[21]

It is possible that some annual species were not visible during the time the field survey was performed. The study site is missing the diversity of shrub species and number of individual shrubs which make up an intact habitat. Burro bush (Ambrosia dumosa), goldenhead (Acamptopappus sphaerocephalus), and Mormon tea (Ephedra nevadensis) were present but sparse throughout the study site. Winterfat (Eurotia lanata) and spiny hop sage (Grayia spinosa) were not present within the study site. Other than Joshua tree, no sensitive plant species are expected to exist on the study site.[22]

Habitat in the general area will continue to become degraded and fragmented. Habitat degradation due to commercial facilities and power development will continue to further degrade the habitat for wildlife within and around the study site. Burrowing animals within the proposed project area are not expected to survive construction activities. More mobile species, such as lagomorphs (rabbits and hares), coyotes (Canis latrans), and birds are more likely to survive construction activities. Development of this site will result in less cover and foraging opportunities for the common species occurring within and adjacent to the study area.

- *Desert Tortoise.* The desert tortoise is a state endangered and federally listed threatened species. The proposed project area was located within the geographic range of the desert tortoise. The proposed project site was not located in critical habitat designated for the Mojave population of the desert tortoise. No desert tortoises are present within the study site. Surveys and the CNDD have not documented any sign of desert tortoise in the general vicinity. Due to the lack of recent desert tortoise sign in the last 15 years, lack of desert tortoise sign within the study site, and the small size of the study site no minimization measures are recommended for desert tortoises.

- *Burrowing Owls.* Burrowing owls are considered a species of special concern by the California Department of Fish and Wildlife (CDFW). No burrowing owls or their sign were observed within the study site. A major element which defines burrowing owl habitat is the presence of suitable burrows. Suitable burrows are considered to be those >4.3 inches (>11 cm) in both height/width and >59 inches (>150 cm) long. These are typically formed by coyotes, desert kit foxes, badgers, or California ground squirrels that are present within a site. No potential cover sites for burrowing owls were observed within the study area. Although these common desert wildlife could move in at any time burrowing owls would not likely occupy them until the host wildlife has abandoned them. Therefore, there is no expectation that burrowing owls would immigrate into this site in the next few years. No minimization measures are recommended for burrowing owls.

- *Other Avian Species.* Many species of birds and their active nests are protected under the Migratory Bird Treaty Act. A prairie falcon (Falco mexicanus) was observed on an adjacent transmission tower. Prairie falcons and other raptors may fly over the site, but there are no nesting or roosting opportunities available within the study site. Smaller migratory birds would not be expected to nest in the limited vegetation within the study site. No minimization measures are recommended for nesting migratory birds.

- *Joshua Trees.* Joshua trees are currently being considered for listing under the California Endangered Species Act. A petition for listing was accepted in November 2019 and on 22 September 2020 the California Department of Fish and Game Commission decided that listing may be warranted. This started a one year listing review. The decision made the Joshua tree a candidate species until the listing

[21] Mark Hagan. *Biological Resource Assessment of APN 0459-432-48 Adelanto, California*. January 10, 2022.
[22] Mark Hagan. *Biological Resource Assessment of APN 0459-432-48 Adelanto, California*. January 10, 2022.

review is completed. Based on Section 2085 of the Fish and Game Code candidate species are to be treated as listed during the review period. No final decision has been made as of this date. Joshua trees can be avoided within the study site therefore, consultation with the CDFW would not be necessary. Based on the project boundaries set up by the owner only one juvenile Joshua tree (3 foot (0.9 m)) is within the project site. However, the Joshua tree is within a 75 foot (24 m) easement which would not be impacted by this development. No mitigation measures are recommended

- *Mojave Ground Squirrel.* The Mohave ground squirrel (MGS) is a state listed threatened species. The study area was located within the geographic range of MGS. Research of the California Natural Diversity Database indicated two MGS sightings were present within 2.5 miles of the project site (2019). One sighting was in 2005 north of the study site and one in 2011 to the southeast of the study site. The 2011 sighting has been developed. Dr Phil Leitner updated the status of MGS in the area based on trapping studies from 2008 to 2012 in Adelanto. Within this document Dr Leitner noted "Since 2008, there have been a number of protocol surveys in this area, but only one Mohave Ground Squirrel occurrence has been documented. This occurrence was recorded near Adelanto, in an area that is known to support a relict population." The area of this occurrence was subsequently developed. In 2018 an MGS trapping study was completed within 7 miles of the study site with negative results (Panorama Environmental, Inc. 2018). 11 MGS habitat consists of a variety of desert scrub habitats, none of which occur any longer within, or in proximity to the project site. MGS habitat consists of a variety of desert scrub habitats, none of which occur any longer within, or in proximity to the project site. A table listing MGS habitats and a discussion of required shrubs and annuals can be found in the publication titled "A Conservation Strategy for the Mohave Ground Squirrel". MGS require a diversity of perennial shrubs to carry them through the period when annuals are unavailable. The fewer shrubs the less likely an MGS population would be present. The plant community on the study site is missing all elements that define Mohave ground squirrel habitat. The 2019 CDFW publication notes on page 34 that unpublished data from P. Leitner suggests abundance of winterfat and spiny hopsage positively relates to the presence of MGS. These shrub species are not present within the study site. CDFW did not include the Adelanto and Victorville area within the MGS population area documented in their Mohave ground squirrel conservation strategy. Although this does not mean MGS do not occur, it does appear to indicate a low probability of viable MGS populations in the area of the study site based on available data at this time. There is no MGS habitat present on site, therefore no loss of potential MGS or their habitat can occur. This was determined through an assessment of the inter-relationship of the following factors: lack of requisite habitat elements necessary for forage, and reproduction, no likelihood of immigration from adjacent areas, existing fragmentation of habitat, and no suitable connective corridors in relationship to the distance from the nearest potentially persisting MGS populations/observations. The risk of MGS "take" on this study site during construction and operation of the planned development is infinitesimal. No protocol surveys are required for MGS due to lack of suitable MGS habitat. No protection measures are recommended for MGS.

- *Sensitive Plant Species.* No suitable habitat for alkali mariposa lily, Barstow woolly sunflower or desert cymopterus was observed within the study site. Based on the results of the field survey these species are not expected to occur within the study area and no protection measures are recommended. No other state or federally listed species are expected to occur within the proposed project area (California Department of Fish and Wildlife 2020, 2021, Smith and Berg 1988, U.S. Fish & Wildlife Service 2016). Landscape design should incorporate the use of native plants to the maximum extent feasible. Native plants that have food and cover value to wildlife should be used in landscape design. Diversity of native plants should be maximized in landscape design.

The following mitigation measures are recommended:

- Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of project related ground disturbance. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged.

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.

- If construction occurs during the non-nesting season (typically September 16 through December 31), a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the project areas (including access routes) and a 300-foot buffer surrounding the project areas, within 2 hours prior to initiating project activities. If project activities are planned during bird nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1, a nesting bird survey shall be conducted by a qualified biologist within no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist around each nest. The buffer shall be a minimum of 300 feet for raptors and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. If there is no nesting activity, then no further action is needed for this measure.

- Prior to grading or any other ground-disturbing activity, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 30 days prior to the beginning of project activities. A secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey.

- If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist shall be no less than 300 feet If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on

Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project Site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.

- Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010) or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50-foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.

- Prior to construction and issuance of any grading permit, the City of Adelanto shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.

Cannabis cultivation operations often use artificial lighting or "mixed-light" techniques in greenhouse structures and indoor operations to increase yields. If not disposed of properly, these lighting materials pose significant environmental risks because they contain mercury and other toxins (O'Hare et al. 2013). In addition to containing toxic substances, artificial lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Night lighting can disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication, determining when to begin foraging (Stone et al. 2009), behavioral thermoregulation, and migration. Phototaxis, a phenomenon that results in attraction and movement toward light, can disorient, entrap, and temporarily blind wildlife species that experience it. The ISMND indicates that project activities will involve glass or translucent plastic on building roofs and gables for greenhouses to allow natural daylight use. Because of the potential for artificial light to impact nocturnal wildlife species and migratory birds that fly at night, CDFW recommends the following mitigation measure:

- Light shall not be visible outside of any structure used for cannabis cultivation. This shall be accomplished by: employing blackout curtains where artificial light is used to prevent light escapement, eliminating all nonessential lighting from cannabis sites and avoiding or limiting the use of artificial light during the hours of dawn and dusk when many wildlife species are most active, ensuring that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/), and using LED lighting with a correlated color temperature of 3,000 Kelvins or less. All hazardous waste associated with lighting shall be disposed of properly and lighting that contains toxic compounds shall be recycled with a qualified recycler.

Construction and operation of cannabis facilities may result in a substantial amount of noise through road use, equipment, and other project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 decibels (Barber et al. 2009). (For reference, normal conversation is approximately 60 decibels, and natural ambient noise levels [e.g., forest habitat] are generally measured at less than 50 decibels.). Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cures (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise. Noise has also been shown to reduce the density of nesting birds and cause increased stress that results in decreased immune responses. Considering the above, CDFW recommends MM No. 11 below to restrict the use of equipment to hours least likely to disrupt wildlife and to suppress device noise.

- Project construction shall not occur during the hours of dawn and dusk when many wildlife species are most active. To suppress Project noise, the Project shall implement the use of mufflers and all generators shall be enclosed.

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

B. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● No Impact.*

No drainage channels were observed within the site boundaries. *As a result, no impacts would occur.*

C. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ● No Impact.*

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.[19] The site in its entirety is undeveloped. *As a result, no impacts would occur.*

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

The site's utility as a habitat and a migration corridor is constrained by the presence of an adjacent roadways, the existing utility easements and transmission lines, and the fencing. *As a result, no impacts would occur.*

E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ● No Impact.*

Joshua Trees are protected under Chapter 17.57 – Biotic Resources of the City of Adelanto's Municipal Code. In addition, the City of Adelanto enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the city to assure the Joshua tree is not a "specimen"

[19] Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006).

Joshua trees are currently being considered for listing under the California Endangered Species Act. A petition for listing was accepted in November 2019 and on 22 September 2020 the California Department of Fish and Game Commission decided that listing may be warranted. This started a one year listing review. The decision made the Joshua tree a candidate species until the listing review is completed. Based on Section 2085 of the Fish and Game Code candidate species are to be treated as listed during the review period. No final decision has been made as of this date. Joshua trees can be avoided within the study site therefore, consultation with the CDFW would not be necessary. Based on the project boundaries set up by the owner only one juvenile Joshua tree (3 foot (0.9 m)) is within the project site. The Joshua tree is located within a 75 foot (24 m) easement which would not be impacted by this development. *No mitigation measures are recommended*

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

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

MITIGATION MEASURES

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.

Biological Resources Mitigation Measure No. 1.-Regardless of the time of year, a pre-construction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure.

Biological Resources Mitigation Measure No. 2. Prior to grading or any other ground-disturbing activity, a

pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 30 days prior to the beginning of project activities. A secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Biological Resources Mitigation Measure 3 shall also apply.

Biological Resources Mitigation Measure No. 3. If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist shall be no less than 300 feet If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the project site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.

DFW has concerns that the Project is within the range of the CESA threatened Mohave ground squirrel (MGS), and the ISMND confirms the presence of burrows suitable for the species. However, the ISMND does not anticipate the presence of Mohave ground squirrel due to urbanization. Because CDFW is aware of an occurrence of Mohave ground squirrel burrow in the vicinity of the project, CDFW is concerned that surveys were not performed to confirm presence. Therefore, CDFW recognizes the potential for Mohave ground squirrel at the start of construction and recommends pre-construction Mohave ground squirrel surveys and observations and requests the City adopt the following mitigation measures:

Biological Resources Mitigation Measure No. 4. Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010) or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50-foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.

Desert Tortoise is a state-threatened, proposed endangered species, as such CDFW is concerned that the ISMND lacks a mitigation measure for pre-construction desert tortoise surveys, because the Project site is within the desert tortoise range and contains suitable habitat for desert tortoise: creosote bush scrub. To address potential

direct/indirect impacts to desert tortoise, CDFW recommends the inclusion of the following mitigation measure prior to the City adopting the ISMND:

Biological Resources Mitigation Measure No. 5. Prior to construction, a CDFW-approved biologist shall conduct a protocol level presence or absence survey within the project area and 50-foot buffer no more than 48 hours prior to Project activities and after any pause in project activities lasting 30 days or more during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends the project proponent not undertake project activities and project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.

Biological Resources Mitigation Measure No. 6. Prior to project implementation, and during the appropriate season, the City shall conduct botanical field survey following protocols set forth in the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any rare plants or sensitive vegetation communities are identified, the City shall either avoid the occurrence, with an appropriate buffer, or mitigate the loss of the occurrence through the purchase of mitigation credits from a CDFW-approved bank or land acquisition and conservation at a minimum 3:1 (replacement-to-impact) ratio. Note that a higher ratio may be warranted if the proposed mitigation lands are located far away from the Project site (i.e., within a separate watershed) or is not occupied by or available to special status species. If the Project has the potential to impact a State-listed species, the City should apply for a California Endangered Species Act Incidental Take Permit with the California Department of Fish and Wildlife.

Biological Resources Mitigation Measure No. 7. Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the project, or the project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

Biological Resources Mitigation Measure No. 8. Prior to construction and issuance of any grading permit, the City of Adelanto shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where

toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.

Biological Resources Mitigation Measure No. 9. Light shall not be visible outside of any structure used for cannabis cultivation. This shall be accomplished by: employing blackout curtains where artificial light is used to prevent light escapement, eliminating all nonessential lighting from cannabis sites and avoiding or limiting the use of artificial light during the hours of dawn and dusk when many wildlife species are most active, ensuring that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/), and using LED lighting with a correlated color temperature of 3,000 Kelvins or less. All hazardous waste associated with lighting shall be disposed of properly and lighting that contains toxic compounds shall be recycled with a qualified recycler.

Biological Resources Mitigation Measure No. 10. Project construction shall not occur during the hours of dawn and dusk when many wildlife species are most active. To suppress Project noise, the Project shall implement the use of mufflers and all generators shall be enclosed.

3.5 CULTURAL RESOURCES

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- The proposed project would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- The proposed project would disturb any human remains, including those interred outside of formal cemeteries.

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

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

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

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.[23]

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The project site's current zoning is *Manufacturing Industrial (MI)*.[24]

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no historic resources were listed within the City of Adelanto.[25] The proposed project will not affect any structures or

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

[24] Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

[25] U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed August 23, 2023

historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[26] The proposed project will be limited to the project site and would not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO). The project site is vacant and does not have any historical or cultural significance. The project's implementation would not impact any Federal, State, or locally designated historic resources. *As a result, no impacts would occur.*

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

The project is considered to have a low potential to impact paleontological resources. The project is located on Holocene age sediments. If previously unidentified cultural and/or paleontological materials are unearthed during construction, work shall be halted in that area until a qualified archaeologist/paleontologist can assess the significance of the find. If human remains are encountered during grading, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Future ground disturbing activities have the potential to reveal buried deposits not observed on the surface during previous surveys. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

- Historic artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
- Historic structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
- Prehistoric flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and or cryptocrystalline silicates;
- Ground stone artifacts, including mortars, pestles, and grinding slabs;
- Dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, ground stone, and fire affected rocks.

Data from the South Central Coastal Information Center (SCCIC) revealed that four previous cultural resource studies have taken place, and four cultural resources have been identified within the records search radius. The project site has never been subject to a previous cultural resources assessment, and no cultural resources have been identified within its boundaries.

During the field survey, BCR Consulting archaeologists identified no cultural resources (including historic-period or prehistoric archaeological sites, or historic-period architectural resources) within the project site boundaries. The project has been subject to minimal artificial disturbances associated with natural

[26] California Department of Parks and Recreation. *California Historical Resources.* Website accessed on January 23, 2023.

sheetwashing that occurs from south to north across the project site. Vegetation consists of creosote scrub and Joshua tree woodland, and afforded surface visibility of approximately 80 percent. Sediments were dominated by silty sand with poorly sorted granitic and quartz gravels. BCR Consulting conducted a cultural resources assessment of Assessor Parcel Number 0459-432-48 in the City of Adelanto, San Bernardino County, California. No cultural resources (including historic-period or prehistoric archaeological resources, or historic-period architectural resources) or cultural resource sensitivity were identified on or near the project site. Therefore, no significant impact related to historical resources is anticipated and no further investigations are recommended..

Additional mitigation was received as part of the AB-52 process. Under AB-52, the lead agency is required to engage in consultation with various tribes who request AB-52 consultation. Formal requests for consultation were sent out to various local tribes for the mandatory 30-day review period. The requested mitigation measures are reiterated below:

- In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within the mitigation provided in Section 3.17, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.
- If significant pre-contact cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within the mitigation provided in Section 3.17. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.
- If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

Adherence to the above-mentioned mitigation will reduce potential impacts to levels that are less than significant.

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

There are no dedicated cemeteries located within or in the vicinity of the project site.[27] The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following standard condition is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4): "A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures." Additionally, Section 5097.98 of the Public Resources Code states:

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

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

MITIGATION MEASURES

The following mitigation measures will be required to address potential cultural resources impacts:

Cultural Resources Mitigation Measure No. 1. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow the removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

Cultural Resources Mitigation Measure No. 2. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

Cultural Resources Mitigation Measure No. 3. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final.

3.6 ENERGY

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on energy resources if it results in any of the following:

- The proposed project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during the proposed project's construction or operation.
- The proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod. In addition, it was assumed the new buildings would be constructed pursuant to the 2022 CALGreen standards, which was considered in the CalEEMod inputs.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The project site's current zoning is *Manufacturing Industrial (MI)*.[28]

The growing (cultivation) of cannabis is an agricultural production process where the environmental conditions, temperature, and humidity are tightly controlled to optimize the quality of the cannabis plants and to reduce crop loss. The quality and amount of light provided is the primary variable affecting crop yield and quality once

[28]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

air temperature and humidity needs are met. Dehumidification is generally achieved mechanically by sub-cooling the air to remove water and then reheating the air to the desired supply air temperature through traditional dehumidification units or by absorbing moisture in the air through a desiccant dehumidifier. The indoor air conditioning will also involve electrical consumption.

For indoor grow operations (as opposed to greenhouse operations), LED lighting fixtures are being successfully applied to vegetative rooms, saving up to 50% of the lighting energy compared to the standard practice. For flower rooms, double ended, high-pressure sodium (HPS) fixtures save 20-25% compared to the standard HPS fixtures. While less common, some growers are successfully applying LED fixtures or LED/HPS hybrid designs for up to 30-40% energy savings in flower rooms. For cooling and dehumidification, smaller grow operations are saving energy by using split ductless air conditioning units in place of standard rooftop units. Medium and large-sized grow operations are using chilled water systems to accomplish both cooling and dehumidification, with energy savings of up to 40% compared to the standard practice. By implementing all these best practices, a medium-size or larger indoor grow operation can achieve up to 30-35% energy savings compared to a standard indoor grow.[29] The total energy costs for indoor cannabis grow operations typically varies between 20-50% of total operating costs. By comparison, for a typical medium-size or larger brewery, energy use accounts for about 6-12% of total operating costs. The proposed project's electric power service would be provided by the Southern California Edison Company (SCE). SCE also maintains a transmission line adjacent to the project site.

Indoor cannabis cultivation facilities consume up to ~150 kilowatt-hours of electricity per year per square foot, which is about 10 times as much as a typical office building in the southwestern United States. Assuming this rate of consumption, the proposed project would consume approximately 13,068 kWh of electricity on a daily basis. This rate will be reduced by 35% by employing the energy conservation measures discussed previously. The project Applicant will be required to closely work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. The project Applicant will be required to implement the following mitigation measures as a means to reduce electrical consumption:

- Use of glass or translucent plastic (corrugated polycarbonate 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural day light in work areas and for plant growth.
- Use of 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.

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

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

The impacts would be less than significant with mitigation.

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

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

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

(CCR) Title24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned commercial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. *As a result, the potential impacts would be less than significant.*

MITIGATION MEASURES

The analysis determined that the following mitigation measures will be required to reduce potential energy consumption:

Energy Mitigation Measure No. 1. The project must employ, as much as possible, the use of glass or translucent plastic (corrugated polycarbonate 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural day light in work areas and for plant growth.

*Energy Mitigation Measure No. 2.*The project must use 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use. Since some operations and security functions may be carried out during non-daylight hours, an additional mitigation measure is suggested to reduce energy consumption during those times.

Energy Mitigation Measure No. 3. The project must use motion activated lighting in the greenhouse areas to reduce energy use at night.

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?			✖	
B. Would the project result in substantial soil erosion or the loss of topsoil?			✖	
C. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✖	
D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property?			✖	
E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			✖	
F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✖		

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on geology and soils if it results in any of the following:

- The proposed project would, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides?
- The proposed project would result in substantial soil erosion or the loss of topsoil.
- The proposed project would 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.
- The proposed project would 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.
- The proposed project would 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.

- The proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed project's potential seismic and soils risk was evaluated in terms of the site's proximity to earthquake faults and unstable soils.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides? ● Less than Significant Impact.*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. All of the new buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The project site's current zoning is *Manufacturing Industrial (MI)*.[30]

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The closest fault to the project site is the Mirage Valley Fault, from the Late Quaternary period, which is located approximately 1.6 miles west of the City.[31]

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is in a moderate liquefaction zone.[32]According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. *As a result, the potential impacts would be less than significant.*

[30]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

[31]California Department of Conservation. Mirage Valley Fault.

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

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

According to the geotechnical study that was prepared for the project site, the property is underlain by light brown silty sand soil associations consisting of loamy fine sand with 0 to 2 percent slopes.[33] The proposed project's contractors would be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program.

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

C. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? ● Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction best management practices (BMPs) identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.[28] The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. *As a result, the potential impacts would be less than significant.*

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

According to the geotechnical report that was prepared for the project site, the site is underlain by the light-brown silty sand soils association. According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.[34] *As a result, the potential impacts which would be less than significant.*

[33] UC Davis. *SoilWeb*. Website accessed January 23, 2023.

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

[34] United States Department of Agriculture. Natural Resources Conservation Service. Website accessed August 23, 2023.

E. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?● Less than Significant Impact.*

The proposed project will be required to connect to and utilize the sanitary sewer system. No septic tanks systems will be used. *As a result, impacts would be less than significant.*

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

The proposed project site is located on a 2.68-acre parcel that is currently vacant. The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The closest fossil vertebrate locality is LACM7786, between Adelanto and the former George Air Force Base. This locality produced a fossil specimen of meadow vole, *Microtus*. The following mitigation will be applicable during earth-disturbing activities as a means to protect potential paleontological resources:

- Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.
- The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow the removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.
- Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.
- A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the San Bernardino County Museum prior to building final.

MITIGATION MEASURES

The following mitigation measures will be required to address potential paleontological resources impacts:

Paleontological Mitigation Measure No. 1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

Paleontological Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow the removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

Paleontological Mitigation Measure No. 3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

Paleontological Mitigation Measure No.4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the San Bernardino County Museum prior to building final.

3.8 GREENHOUSE GAS EMISSIONS

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The proposed project site is located on a 27.35-acre (1,191,358 square feet) parcel that is currently vacant and undisturbed. The proposed development will be constructed in the southwestern portion of the City of Victorville. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. They major GHG that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. While water vapor is not considered a pollutant, while it remains in the atmosphere it maintains a climate necessary for life. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to "hold" more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. When water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation. This will allow less energy to reach the Earth's surface thereby affecting surface temperatures.
- *Carbon Dioxide (CO_2)*. The natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO_2 include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities have increased

the atmospheric concentrations of CO_2. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC Fifth Assessment Report, 2014) Emissions of CO_2 from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010.

- *Methane (CH_4).* CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO_2. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO_2, N_2O, and Chlorofluorocarbons (CFCs). CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other human-related sources of methane production include fossil-fuel combustion and biomass burning.
- *Nitrous Oxide (N_2O).* Concentrations of N_2O also began to increase at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant.
- *Chlorofluorocarbons (CFC).* CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.
- *Hydrofluorocarbons (HFC).* HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.
- *Perfluorocarbons (PFC).* PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). Concentrations of CF_4 in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.
- *Sulfur Hexafluoride (SF_6).* SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO_2.

Concentrations in the 1990s where about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

The MDAQMD mass emissions threshold is 100,000 tons (90,720 metric tons (MT)) CO2e per year.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI)*.[35]

The State of California requires CEQA documents to do an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Carbon dioxide equivalent, or CO2E, is a term that is used for describing different greenhouses gases in a common and collective unit. The MDAQMD established the 10,000 MTCO2 threshold for industrial land uses. As indicated in Table 3-3, the operational CO2E is 643.66 metric tons per year of CO2E which is well below the threshold.

Table 3-3
Greenhouse Gas Emissions (Metric Tons/year)

Source	GHG Emissions			
	CO2	**CH4**	**N2O**	**CO2E**
Total Construction Emissions	84.42	0.003	0.0019	85.01
Long-Term – Mobile Emissions	456.19	0.0135	0.02	463.22
Long-Term – Area Emissions	0.4644	--	--	0.4660
Long-Term – Energy Emissions	145.55	0.011	0.0007	146.03
Long-Term – Total Emissions	618.28	0.616	0.026	643.66
Significance Threshold				**10,000 MTCO2E**

Source: CalEEModV.2022.1.1.18

No public customers will visit the project site since the new business will be closed to the general public. Because of security protocols, the mobile emissions related to operations will be limited to employees, vendors, deliveries, and repair/maintenance personnel. As indicated in Table 3-3, the majority of the GHG

[35]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

emissions (463.22 MTCO2E) will originate from mobile sources. *As a result, the potential impacts would be less than significant.*

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

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was completed and finalized in March 0f 2014. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. It is important to note that the California Department of Transportation as well as the Counties of Los Angeles and San Bernardino are engaged in an effort to construct a multi-modal transportation corridor consisting of public transit, a new freeway, and bicycle lanes known as the High Desert Corridor (HDC).

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was adopted in March 2021. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. Those Partnership jurisdictions, including Adelanto, choosing to complete and adopt local CAPs that are consistent with the County's GHG Reduction Plan and with the prior Regional Plan Program EIR and the addendum or supplemental CEQA document prepared by SBCOG will be able to tier their future project-level CEQA analyses of GHG emissions from their CAP. This can help to streamline project-level CEQA review. The City of Adelanto selected a goal to reduce its community GHG emissions to a level that is 40% below its 2020 GHG emissions level by 2030. The City will meet and exceed this goal subject to reduction measures that are technologically feasible and cost effective through a combination of state (~60%) and local (~40%) efforts. The Pavley vehicle standards, the state's LCFS, the RPS, and other state measures will reduce GHG emissions in Adelanto's on-road, off-road, and building energy sectors in 2030. An additional reduction of 59,812 MTCO2e will be achieved primarily through the following local measures, in order of reductions achieved: GHG Performance Standard for New Development (PS-1); solar installation for existing commercial/industrial facilities (Energy-8); and waste diversion and reduction (Waste-2).[36]

Adelanto's reduction plan has the greatest effect on GHG emissions in the building energy, waste, and on-road transportation. The City of Adelanto adopted the North Adelanto Sustainable Community Plan which is a City planning framework that contains many transportation and land use-related actions to reduce vehicle-related GHG emissions throughout the region. This community plan supports the goals of SB 375 and the Sustainable Communities Strategy (On Road-STATE-SCS) through a wide range of actions which include the following.

- Integrate state, regional, and local sustainable community/smart growth principles into the development and entitlement process.
- Develop a system of trails and corridors that facilitates and encourages bicycling and walking.

[36] San Bernardino County. *San Bernardino County Regional Greenhouse Gas Reduction Plan (SBCRGGRP).* March 2021.

- Require new development to provide transit facilities, such as bus shelters, transit bays, and turnouts, as necessary.
- Require the future development of community-wide servicing facilities to be sites in transit-ready areas that can be served and made accessible by public transit.
- Provide development-related incentives for projects that promote transit use.
- Designate and maintain a network of City truck routes that provide for the effective transport of goods while minimizing negative impacts on local circulation and noise sensitive land uses.
- Transition the City fleet to low emission/fuel-efficient vehicles as they are retired from service. λ Encourage carpooling.
- Work with the regional transit provider to provide shade, weather protection, seating, and lighting at all stops.

Key general plan policies that support the City of Adelanto's GHG reduction measures or would contribute to GHG reductions and sustainable practices in the City are listed below:

- *Policy NR 1.4:* All new developments will be required to implement energy conservation techniques into the development design.
- *Policy NR 1.6:* Conservation techniques shall be required for proposed development (both domestic and industrial) to minimize consumption levels of renewable and non-renewable natural resources including water resources.
- *Policy NR 1.1:* The City shall promote the development and use of alternative energy sources, such as passive solar in industrial, commercial, and residential developments.
- *Policy NR 1.1:* The City shall promote the development and use of alternative energy sources, such as passive solar in industrial, commercial, and residential developments.
- *Policy NR 1.6:* Conservation techniques shall be required for proposed development (both domestic and industrial) to minimize consumption levels of renewable and non-renewable natural resources including water resources.
- *Policy AQ 1.1:* The City shall continue to work with the Mojave Desert Air Quality Management District and any other agencies in order to enforce and implement regional air quality plans.
- *Policy WQ 1.1:* The City will require that development be designed and constructed to conserve water utilizing low flow irrigation and plumbing fixtures and facilities.
- *Policy WQ 1.5:* The City will require that all new development utilize water conservation techniques to conserve water resources, such as the use of low-flow irrigation and plumbing systems in new and existing development.

The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. *As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.*

MITIGATION MEASURES

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

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✖	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✖	
C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✖
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✖
E. Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✖
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✖
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hazards and hazardous materials if it results in any of the following:

- The proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project would 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.
- The proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- The proposed project would 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.
- The proposed project would result in a safety hazard or excessive noise for people residing or working in the project area 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.

- The proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- The proposed project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI)*.[37]

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phases include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. Once operational, the potentially hazardous materials that are often associated with the new development that involves the cultivation of cannabis are outlined below.

- *Mold*. Marijuana production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold. Previous studies of illegal indoor cultivation operations have reported elevated levels of airborne mold spores, especially during activities such as plant removal by law enforcement personnel. Physiological effects include allergic reactions, hypersensitivity, and anaphylaxis to marijuana.
- *Skin Sensitivity*. Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes. As with most sensitizers, initial

[37]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

exposure results in a normal response, but over time, repeated exposures can lead to progressively strong and abnormal responses.

- *Carbon dioxide (CO2).* CO2 is used in the marijuana industry to increase plant growth and to produce concentrates. In addition to the liquid gas form, solid carbon dioxide or dry ice can be used for extraction processes. Compressed gases can present a physical hazard and has additional safety regulations that must be adhered to.
- *Carbon monoxide (CO).* CO is a colorless, odorless, toxic gas which interferes with the oxygen-carrying capacity of blood. At elevated concentrations, CO can overcome persons without warning. Sources of carbon monoxide exposure include furnaces, hot water heaters, portable generators/generators in buildings; concrete cutting saws, compressors; forklifts, power trowels, floor buffers, space heaters, welding, and gasoline powered pumps.
- *Indoor Air Quality.* Workers may encounter ozone as a product of the chemical reaction of nitrogen oxides and volatile organic compounds (e.g., terpenes emitted from the marijuana plant) present inside a cultivation facility. Terpenes and nitric oxides are associated with eye, skin, and mucous irritation. Ozone generators may also be found in facilities for odor control. Ozone can cause decreased lung function and/or exacerbate pre-existing health effects, especially in workers with asthma or other respiratory complications.
- *Pesticides.* Cannabis cultivation facilities may have insecticides and fungicides used within the facility. Some pesticides, including pyrethrins and neem oil are non-persistent and have low volatility (neem oil is an organic pest repellent derived from the neem tree). However, these pesticides have been associated with dermal and respiratory toxicity for the workers who apply them. Depending on the pesticide, requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.
- *Nutrients and Corrosive Chemicals.* Cannabis Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

The Applicant will be required to prepare a safety and hazard mitigation plan (SHMP) that indicates those protocols that must be adhered to in the event of an accident. The SHMP would first identify the initial steps that can be performed to establish a safety and health program within the proposed facility. The SHMP would consist of the following elements:

- The SHMP would outline the hazards for the facility by category (biological, chemical, and physical).
- For each hazard, a general description is given followed by information on the job role that might be specifically affected by the hazard, considerations for a hazard assessment, best practices for eliminating or managing the hazard, Federal, state, or local regulations that may apply to that hazard, and additional resources to assist in hazard recognition and management.
- A detailed outline of safety and health programs that should be implemented within the facility and provides examples and tools to help develop these programs.

The SHMP will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. *As a result, less than significant impacts would occur.*

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

Cannabis "manufacturer" refers to the production, preparation, propagation, or compounding of cannabis products, including extraction processes, infusion processes, the packaging or repackaging of manufactured medical cannabis or medical cannabis products, and labeling or relabeling the packages of manufactured medical cannabis or medical cannabis products. In addition, the facility's use of nonvolatile or volatile solvents will determine what kind of California cannabis manufacturing license will be required. "Nonvolatile solvent" refers to any solvent used in the extraction process that is not a volatile solvent, including carbon dioxide. "Volatile solvent" refers to any solvent that is or produces a flammable gas or vapor that, when present in the air in sufficient quantities, will create explosive or ignitable mixtures. Examples of volatile solvents include butane, hexane, propane, and ethanol. A Type 6 cannabis manufacturing licensee can only use nonvolatile solvents while a Type 7 licensee can use both nonvolatile and volatile solvents in its extractions and infusions. For purposes of this analysis, it has been assumed that the facility's operation would require a Type 7 license. All chemical extractions must take place within a professional, closed-loop system, which also has its own state law requirements. The rules also contain strict packaging and labeling requirements, require all personnel to be trained, and mandates that the manufacturing licensee to adhere to strict quality control requirements.

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

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

The nearest school to the project site is Harold George [school] of the Visual and Performing Arts. This school is located approximately 4,900 feet northeast of the project site. As a result, there are no schools located within one-quarter of a mile from the project site. The proposed project will not create a hazard to any local school. *As a result, no impacts would occur.*

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

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor website

to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.[32] *Therefore, no impacts would occur.*

E. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ● No Impact.*

The project site is not located within an airport land use plan and the site is not located within two miles of a public airport or public use airport.[38] The nearest airport to the city is the Southern California Logistics Airport (SCLA) is located approximately 3.3 miles to the northeast of the project site.[39] The project would not introduce a structure that will interfere with the approach and take off airplanes utilizing any regional airports. *As a result, no impacts related to this issue will occur.*

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

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

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

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

MITIGATION MEASURES

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

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

[38] Toll-Free Airline. *Los Angeles County Public and Private Airports, California*.

[39] Google Earth. Website accessed January 23, 2023.

[33] CalFire. *Very High Fire Hazard Severity Zone Map*.

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✖	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✖	
C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows?			✖	
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				✖
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hydrology and water quality if it results in any of the following:

- The proposed project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- The proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- The proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows.
- The proposed project would risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.
- The proposed project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. The parking area is located in the southernmost portion of the project site. The project site's current zoning is *Manufacturing Industrial (MI)*.[40]

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

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

Water used to control fugitive dust will be transported to the site via truck. No direct ground water extraction will occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. These BMP controls may include, but not be limited to, the following:

- Stabilization practices for all areas disturbed by construction and grading.
- Structural practices for all drainage/discharge locations.
- Stormwater management controls, including measures used to control pollutants occurring in stormwater discharges after construction activities are complete.
- Velocity dissipation devices to provide nonerosive flow conditions from the discharge point along the length of any outfall channel.
- Other controls, including waste disposal practices that prevent discharge of solid materials.

In addition, there would be no direct groundwater withdrawals associated with the proposed project's implementation. *As a result, the impacts would be less than significant.*

[40]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

C. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows? ● Less than Significant Impact.*

The proposed project's location would be restricted to the proposed project site and would not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. *As a result, the potential impacts would be less than significant.*

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

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Adelanto, the proposed project site is located in a flood hazard zone, labeled as "Zone X." Thus, properties located in "Zone X" are areas of minimal flood hazard.[41]The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 70 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.[42]*As a result, no impacts would occur.*

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

The proposed project is required to be in compliance with Chapter 17.93 the City of Adelanto Municipal Code. Chapter 17.93 of the City of Adelanto Municipal Code is responsible for implementing the NPDES and MS4 stormwater runoff requirements. In addition, the project's operation will not interfere with any groundwater management or recharge plan since there are no active groundwater management recharge activities on-site or in the vicinity. *As a result, no impacts would occur.*

MITIGATION MEASURES

As indicated previously, no natural off-site streams will be impacted by the proposed project's implementation. In addition, no water quality impacts are anticipated. As a result of the proposed project. As a result, no mitigation is required.

[41]FEMA. Glossary. Flood Zones. Website accessed August 23, 2023.

[42] Google Earth. Website accessed August 23, 2023.

3.11 LAND USE & PLANNING

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would physically divide an established community.
- The proposed project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The project site's current zoning is *Manufacturing Industrial (MI).*[43]

The proposed project site is located on a site that is currently vacant though it has been disturbed by off-road activity and illegal dumping. Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* Vacant undeveloped land is located adjacent to the project site to the north. Air Expressway is located further north. These parcels located to the north of the site are zoned as Manufacturing Industrial (MI).[44]
- *East of the project site:* A SCE transmission line easement extends along the project site's east side. Vacant, undeveloped land extends further east along the east side of Racooon Avenue. This area located

[43]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0.* October 10, 2022.

[44] Google Maps. Site Accessed January 23, 2023, and Adelanto Zoning Map, Site Accessed, August 23, 2023.

to the is zoned as Manufacturing Industrial (MI).[45] Racoon Avenue, an improved two-lane road is located further east.

- *South of the project site:* Another transmission line easement extends along the project site's southerly side. Further south of this easement is vacant, undeveloped property. This area is also zoned as Manufacturing Industrial (MI).
- *West of the project site:* The Panther Avenue right-of-way (ROW) extends along the project site's west side. Panther Avenue is an unimproved roadway. Further west, west of the aforementioned roadway, is vacant undeveloped land. This area is zoned as Manufacturing Industrial (MI).

An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4. The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood. *As a result, no impacts will occur*.

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

The City of Adelanto permits and regulates medicinal and adult use cannabis activities in designated zones. Cannabis activity is permitted with a Conditional Use Permit (CUP) in the following zones: Airport Development District (ADD), Light Manufacturing Cannabis Only (LMCO), Manufacturing Industrial (MI), and Airport Development District (ADD). Because the proposed project site is located within a Light Manufacturing designation, a CUP is required. The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood. *As a result, no impacts would occur*.

MITIGATION MEASURES

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

[45] Google Maps. Site Accessed August 23, 2023, and Adelanto Zoning Map, Site Accessed, August 23, 2023.

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✖
B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would 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.
- The proposed project would 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.

The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI)*.[46]

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[47] The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[48] The project site is located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.[49]As indicated previously, there are no active mineral extraction activities occurring on-site or in the adjacent properties. *As a result, no impacts to mineral resources would occur.*

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

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

MITIGATION MEASURES

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

[46]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

[47] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*.

[48]Ibid.

[49] California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed August 23, 2023.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✖	
B. Would the project result in generation of excessive ground borne vibration or ground borne 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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on noise if it results in any of the following:

- The proposed project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- The proposed project would result in the generation of excessive ground borne vibration or ground borne noise levels.
- For a proposed 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?

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ● Less than Significant Impact.*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site (116,769 square feet). The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The project site's current zoning is *Manufacturing Industrial (MI)*.[50] Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, HVAC units, and other equipment. All of the cultivation and manufacturing of cannabis products will occur indoors. In addition, the operation of the facility will not expose any surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. Finally, there are no noise sensitive land uses located in the vicinity of the site. As a result, the proposed project will not expose sensitive receptors to excessive noise levels. *As a result, the impacts would be less than significant.*

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

Once in operation, the proposed project would not significantly raise ground-borne noise levels. Slight increases in ground borne noise levels could occur during the construction phase. The limited duration of construction activities and the City's construction-related noise control requirements will reduce the potential impacts to levels that are less than significant. *As a result, the impacts would be less than significant.*

C. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? ● No Impact.*

The project site is located within an airport land use plan and is located within two miles of a public airport or public use airport.[51] The nearest airport to the City is the Southern California Logistics Airport is located approximately 3.3 miles northeast of the project site.[52] The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. *As a result, no impacts would occur.*

MITIGATION MEASURES

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

[50] Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

[51] Toll-Free Airline. San Bernardino, *California.*

[52] Google Earth. Website accessed August 23, 2023.

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✖
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on population and housing if it results in any of the following:

- The proposed project would induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- The proposed project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI).*[53] Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development*. The site is currently undeveloped and undisturbed. All land use surrounding the property has been designated for industrial uses.

[53]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only.
- *Extension of infrastructure and other improvements*. The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.
- *The removal of housing requiring replacement housing elsewhere*. The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in a limited increase in employment which can be accommodated by the local labor market. The cultivation facility is projected to employ 124 persons at full capacity. The normal peak hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

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

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

The project site is undeveloped though it exhibits some disturbance. This property and surrounding areas have a General Plan and zoning designations for manufacturing and industrial uses. No housing units would be permitted, and none will be displaced as a result of the proposed project's implementation. *Therefore, no impacts would result*.

MITIGATION MEASURES

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

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			✖	
i). Would the project result in substantial adverse physical impacts associated with Fire protection?			✖	
ii). Would the project result in substantial adverse physical impacts associated with Police protection?			✖	
iii). Would the project result in substantial adverse physical impacts associated with Schools?			✖	
iv). Would the project result in substantial adverse physical impacts associated with Parks?			✖	
v). Would the project result in substantial adverse physical impacts associated with Other public facilities?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- The proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks or other public facilities.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in* fire protection; police protection; schools; parks; or other public facilities? ● *Less than Significant Impact.*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each

building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. All of the new buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The dimensions for each of the two manufacturing buildings would be 50-feet by 70-feet. The dimensions for each of the five cultivation buildings would be 62-feet by 80-feet. Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. The parking area is located in the southernmost portion of the project site and would include a total of 23 standard parking spaces including 1 ADA parking space. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The proposed project would connect to existing water and sewer mains located in Panther Avenue. The project site's current zoning is *Manufacturing Industrial (MI)*.[54]

i). *Would the project have fire protection? Less than Significant Impact.*

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

ii). *Would the project have police protection? Less than Significant Impact.*

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

iii). *Would the project be near schools? Less than Significant Impact.*

The nearest school to the project site is Harold George [school] of the Visual and Performing Arts. This school is located approximately 4,900 feet northeast of the project site. Due to the nature of the proposed project, no direct enrollment impacts regarding school services would occur. The proposed project would not directly increase demand for school services. In addition, the proposed project would be required to pay school impact fees. *As a result, the impacts will be less than significant.*

[54]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0.* October 10, 2022.

iv). *Would the project be near parks? Less than Significant Impact.*

The nearest park to the project site is Westside Park, located 1.42 miles to the northeast. The proposed project would not result in any local increase in residential development (directly or indirectly) which could potentially impact the local recreational facilities. *As a result, the impacts would be less than significant.*

v). *Would the project have other public facilities? Less than Significant Impact.*

The proposed project would not create direct demand for other governmental service. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

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

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✖
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on recreation if it results in any of the following:

- The proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- The proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ● No Impact.*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI)*.[55]

Due to the use of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. *As a result, no impacts would occur.*

[55]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

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

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

MITIGATION MEASURES

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

3.17 TRANSPORTATION

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on transportation and circulation if it results in any of the following:

- The proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- The proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- The proposed project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- The proposed project would result in inadequate emergency access.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. The parking area is located in the southernmost portion of the project site and would include a total of 23 standard parking spaces including 1 ADA parking space. The project site's current

zoning is *Manufacturing Industrial (MI)*.[56] The key operational assumptions used in determining potential daily traffic generation are summarized below:

- The proposed project would operate the cannabis cultivation, manufacturing and distribution facility from 8:00 AM to 5:00 PM, Monday through Friday. A total of 20 full-time staff will be on-site.

- The facility will be closed to the public at all times. Non-employees such as vendors, delivery persons, and maintenance personnel, will only be allowed to enter the facility with a permitted escort.

- The existing full-time security guards will continue to be stationed at the facility 24 fours a day, seven days a week.

The total trip generation assumed 40 trip ends (20 round trips) per day for the 20 employees, 40 trip ends for the deliveries (20 round trips) and 40 trip ends (20 round trips) per day for the vendors. A maximum of 120 new trip ends per day are anticipated for the proposed project. *As a result, the impacts would be less than significant.*

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

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. As previously mentioned in Subsection A, the proposed project will not create a significant amount of traffic in the surrounding area. As a result, the proposed project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impacts will occur. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should also be presumed to have a less than significant transportation impact. The project site is located within 2.02 miles west of Highway 395.

The City of Adelanto has also adopted the following VMT thresholds utilizing the San Bernardino County Travel Demand Model (SBTAM) as its preferred methodology to measure average trip lengths and the California Emission Estimator Model (CalEEMod) as its preferred method to calculate greenhouse gas emissions so as to establish the 3,000 MTCO2e as a threshold for determining new VMT development threshold with a less than significant impact to the environment. As indicated herein in Section 3.8, the Greenhouse gas emissions will be below this threshold. *As a result, the impacts would be less than significant.*

[56]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

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

Access to the project site would be provided by a new 34-foot, 2-inch driveway connection with the east side of Panther Avenue. Access to the individual buildings would be provided by an internal, 26-foot wide, drive aisle.[57] The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. *As a result, the impacts would be less than significant.*

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

The proposed project would not affect emergency access to any adjacent parcels. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts would occur.*

MITIGATION MEASURES

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

[57] Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place?			✖	
B. Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k)?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- The proposed project would 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).
- The proposed project would 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place?, or object with cultural value to a California Native American Tribe, and that is: listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? ● Less than Significant Impact.*

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The project site's current zoning is *Manufacturing Industrial (MI)*.[58]

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Section 5024.1. In applying the criteria set forth in subdivision I of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

In accordance with Public Resources Code Section 21080.3.1, subs. (b), the City of Adelanto formally requested AB-52 consultation with the following tribes:

- Denise Torres, Cultural Resources Manager, *Morongo Band of Mission Indians;*
- Ryan Nordness, San Manuel Director of Cultural Resources Management, San Manuel Band of Mission Indians;

[58]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

- Wayne Walker, Co-Chairperson, Serrano Nation; and,
- Joseph Ontiveros, Tribal Historic Preservation Officer, *Soboba* Band of Luiseño Indians.

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant.

B. *Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k)?● Less than Significant Impact.*

The project site is located on recognized Yuhaaviatam/Maarenga'yam (Serrano) ancestral territory.[59]A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no Native historic resources was listed within the City of Adelanto. Since the project's implementation will not impact any Federal, State, or locally designated historic resources. *As a result, no impacts would occur.*

MITIGATION MEASURES

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

[59]Native Land.ca. Website Accessed August 23, 2023

3.19 UTILITIES AND SERVICE SYSTEMS

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The proposed project would 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.
- The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- The proposed project would 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.
- The proposed project would negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals.
- The proposed project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. All of the new buildings would consist of a single level with a maximum height of 23-feet, 6-inches. The proposed project would connect to existing water and sewer mains located in Panther Avenue. The project site's current zoning is *Manufacturing Industrial (MI).*[60]

There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The project site is currently undeveloped. *As a result, the potential impacts would be less than significant.*

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

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario.[61]The medicinal cannabis will be cultivated, harvested, dried, packaged, stored, and distributed from this facility. In addition, the project will be equipped with water efficient fixtures and hydroponics. *As a result, the impacts would be less than significant.*

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

The City operates a 1.5-million-gallons-per-day activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program. The City is currently constructing a 2.5-million-gallons-per-day upgrade that will increase wastewater

[60]Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

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

treatment capabilities to 4.0 million gallons per day and produce treated water that can be used for lawn/public parks irrigation, construction and dust control and other beneficial uses. The project's implementation will require the establishment of a water well. *As a result, the impacts would be less than significant.*

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

The cannabis waste will be controlled using a "track and trace" system. In addition, licensed waste haulers must remove the organic waste. Other conventional solid waste may be handled by commercial waste disposal companies. *As a result, the potential impacts would be less than significant.*

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

The proposed project, like all other development in Adelanto and San Bernardino County, would be required to adhere to City and County ordinances with respect to waste reduction and recycling. *As a result, no impacts would occur.*

MITIGATION MEASURES

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

3.20 WILDFIRE

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on wildfire risk and hazards if it results in any of the following:

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan.
- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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.
- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project would involve the construction and operation of a proposed cannabis cultivation and manufacturing facility within the 2.68-acre site. The proposed project would involve the construction of cannabis related uses that would include distribution, manufacturing, and cultivation activities. The total site area is approximately 2.68 acres. The proposed project would involve the construction of seven new buildings totaling 31,800 square feet of floor area. The new metal buildings would include two manufacturing buildings, each building consisting of 3,500 square feet, and five new greenhouse (cultivation) buildings, each consisting of 4,960 square feet each. The primary access to the site would be gated and an 8-foot high security fencing would surround the project site. In addition, a retention basin, consisting of approximately 5,000 square feet, would be provided in the southeast corner of the site. The proposed project would connect to existing water and sewer mains located in Panther Avenue. The project site's current zoning is *Manufacturing Industrial (MI)*.[62]

The proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts will occur.*

B. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ● No Impact.*

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

C. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ● No Impact.*

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

[62] Phantom 992 Design; K-ROM Design. *APM 0459-432-48. Panther Avenue, Adelanto, California (Site Plan). Sheet A-0.0*. October 10, 2022.

D. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ● No Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the site is not located within a moderate fire risk and state responsibility area. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes. *As a result, no impacts would occur.*

MITIGATION MEASURES

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

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

A. The proposed project *would not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. *As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.*

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

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

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SECTION 4 CONCLUSIONS

4.1 FINDINGS

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

- The proposed project *would not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *would not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *would not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

4.2 MITIGATION MONITORING

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

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SECTION 5 REFERENCES

5.1 PREPARERS

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Marc Blodgett, Project Principal
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5.2 REFERENCES

The references that were consulted have been identified using footnotes.

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