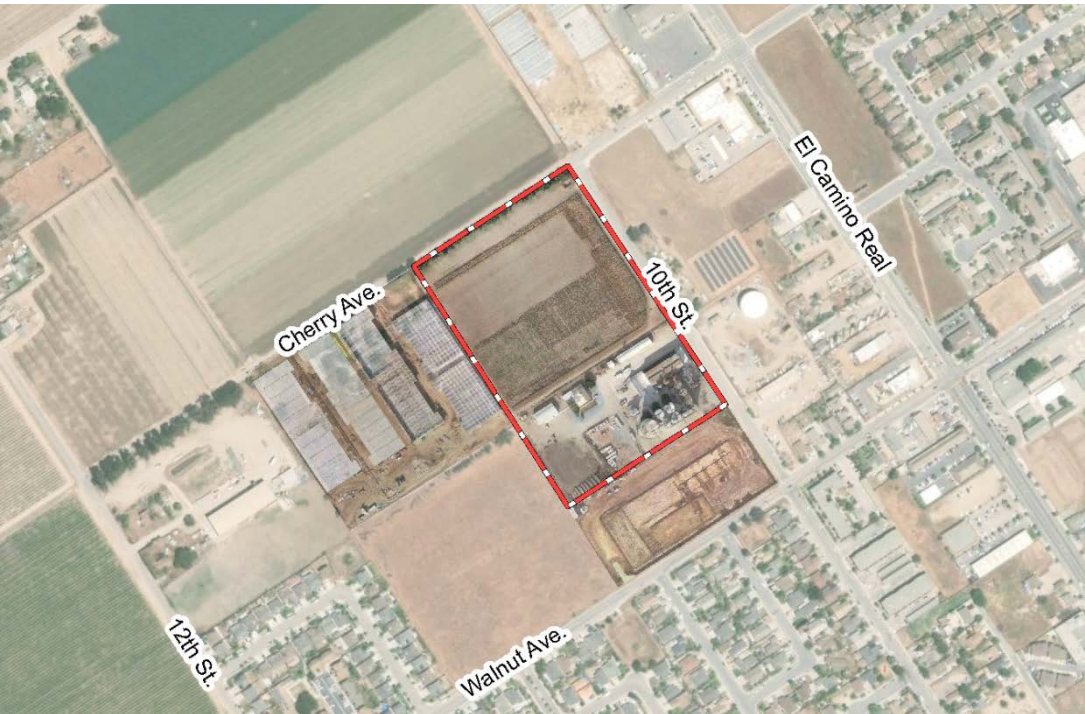


Proposed Mitigated Negative Declaration

Greenfield Organix C2 Expansion

March 15, 2019



Prepared by
EMC Planning Group



City of Greenfield

599 El Camino Real Greenfield CA 93937 831-674-5591
www.ci.greenfield.ca.us

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

In compliance with the California Environmental Quality Act (CEQA), the City of Greenfield has undertaken environmental review for the Greenfield Organix C2 Expansion project, and intends to adopt a Mitigated Negative Declaration. The City of Greenfield invites all interested persons and agencies to comment on the proposed Mitigated Negative Declaration.

Lead Agency:	City of Greenfield
Project Name and Location:	Greenfield Organix C2 Expansion Project, 525 Tenth Street, Greenfield
Project Description:	The proposed project is located on a 13.88 acre parcel at 525 Tenth Street in the City of Greenfield and involves the proposed expansion of the existing (under construction) and adjacent Organix C2 facility at 1071 Cherry Avenue. The expansion site will be subdivided into three lots and developed in two phases with the first phase consisting of renovation and reuse of the existing buildings and grain silos for the drying, trimming, testing, processing and packaging of cultivated cannabis from the adjacent cultivation facility. Phase 2 would involve construction of two 30,000 square foot buildings for cannabis research and education in the southern portion of the site and cultivation facilities in the northern portion of the project site.
Public Review Period:	Begins–3/21/19 Ends – 4/22/19
Proposed Mitigated Negative Declaration is Available for Public Review at these Locations:	City of Greenfield Website – http://ci.greenfield.ca.us/ City of Greenfield City Hall Community Services Department 599 El Camino Real, Greenfield
Address Where Written Comments May be Sent:	Jerry Hittleman, Contract Planner City of Greenfield 599 El Camino Real, Greenfield
Public Hearings:	
Planning Commission	May 7, 2019 at 6:00 PM 599 El Camino Real, Greenfield
City Council	June 11, 2019 at 6:00 PM 599 El Camino Real, Greenfield

PROPOSED MITIGATED NEGATIVE DECLARATION

GREENFIELD ORGANIX C2 EXPANSION

PREPARED FOR
City of Greenfield
Jerry Hittleman
Contract Planner
599 El Camino Real
Greenfield, CA 93927
Tel 831.674.5591

PREPARED BY
EMC Planning Group Inc.
301 Lighthouse Avenue, Suite C
Monterey, CA 93940
Tel 831.649.1799
Fax 831.649.8399
www.emcplanning.com

March 2019

This document was produced on recycled paper.





City of Greenfield

599 El Camino Real Greenfield CA 93937 831-674-5591
www.ci.greenfield.ca.us

Greenfield Organix C2 Expansion MITIGATED NEGATIVE DECLARATION

Project Description

This mitigated negative declaration addresses the expansion of an existing Greenfield Organix C2 cannabis facility onto an adjacent parcel located at 525 10th St. Through the phased re-use of existing buildings and development of new buildings, the site will be reused and developed to facilitate medical cannabis cultivation, manufacturing, drying, trimming, packaging, shipping, distribution, storage and office uses.

Project Proponents

Greenfield Development I, LLC
Dan Schuetz and Brad Termini
700 2nd Street, Encinitas, CA 92024

Initial Study

An initial study of was undertaken and prepared for the purpose of ascertaining whether these projects might have a significant effect on the environment. A copy of this study is attached.

Findings & Reasons

The initial study identified potentially significant effects on the environment. However, these impacts have been mitigated (see Mitigation Measures below which avoid or mitigate the effects) to a point where no significant effects will occur. On the basis of the whole record, there is no substantial evidence the project will have a significant effect on the environment. The following reasons will support these findings:

- The proposal is a logical expansion of the existing facility within an area zoned for its use.
- Identified adverse impacts are proposed to be mitigated on-site and a mitigation monitoring and reporting program have been prepared.
- The proposed project is consistent with the adopted goals and policies of the General Plan of the City of Greenfield.
- City staff independently reviewed the Initial Study, and this Mitigated Negative Declaration reflects the independent judgment of the City of Greenfield.
- With the application of the following Mitigation Measures the proposed projects will not have any significant impacts on the environment.
- The Greenfield Community Services Department is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based.

Mitigation Measures

Air Quality

AQ-1. To reduce dust emissions from grading, and construction activities on the project site, the following language shall be included in all grading and construction plans for the project prior to issuance of grading permits:

Dust control measures shall be employed to reduce visible dust leaving the project site. The following measures or equally effective substitute measures shall be used:

- a. Use recycled water to add moisture to the areas of disturbed soils twice a day, every day, to prevent visible dust from being blown by the wind;
- b. Apply chemical soil stabilizers or dust suppressants on disturbed soils that will not be actively graded for a period of four or more consecutive days;
- c. Apply non-toxic binders and/or hydro seed disturbed soils where grading is completed, but on which more than four days will pass prior to paving, foundation construction, or placement of other permanent cover;
- d. Cover or otherwise stabilize stockpiles that will not be actively used for a period of four or more consecutive days, or water at least twice daily as necessary to prevent visible dust leaving the site, using raw or recycled water when feasible;
- e. Maintain at least two feet of freeboard and cover all trucks hauling dirt, sand, or loose materials;
- f. Install wheel washers at all construction site exit points, and sweep streets if visible soil material is carried onto paved surfaces;
- g. Stop grading, and earth moving if winds exceed 15 miles per hour;
- h. Pave roads, driveways, and parking areas at the earliest point feasible within the construction schedule;
- i. Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours of receiving the complaint. The phone number of the Monterey Bay Air Resources District shall also be visible to ensure compliance with Rule 402 (Nuisance); and
- j. Limit the area under construction at any one time.

AQ-2. The applicant shall prepare a Construction Staging Management Plan to be reviewed and approved by the city, prior to issuance of grading permits. The plan shall include the following restrictions:

- a. Heavy-duty diesel trucks (gross vehicle weight rating over 26,000 pounds), older than 2010 model year and not retrofit for reduced particulate emissions, shall not be staged within 500 feet of nearest sensitive receptors; and
- b. Construction equipment and heavy duty diesel trucks shall not idle in excess of five minutes.

AQ-3. The following language shall be included in all construction documents, subject to review and approval by city staff, prior to issuance of grading permits: “All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications and shall be checked by a certified visible emissions evaluator. All non-road diesel construction equipment shall, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112.”

Biological Resources

BIO-1. To avoid impacts to nesting birds during the nesting season (January 15 through September 15), construction activities that include grading or grubbing, should be conducted between September 16 and January 14, which is outside of the bird nesting season. If grading or grubbing occurs during the bird nesting season, then a qualified biologist shall conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project construction.

If project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys. Two surveys for active nests of such birds shall occur within 14 days prior to start of construction, with the second survey conducted with 48 hours prior to start of construction. Appropriate minimum survey radius surrounding each work area is typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys shall be conducted at the appropriate times of day to observe nesting activities.

If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize “normal” bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g. defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. This measure shall be implemented by the developer prior to issuance of a grading permit.

BIO-2. Approximately 14 days prior to tree removal activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees to be removed, in trees within 50 feet of the development footprint, and within and surrounding any structures that may be disturbed by the project. These surveys will include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the project site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the

species level with the use of a bat echolocation detector such as an “Anabat” unit. Potential roosting features found during the survey shall be flagged or marked.

If no roosting sites or bats are found, a letter report confirming absence will be prepared and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents will be prepared prior to grading permit issuance and the following monitoring, exclusion, and habitat replacement measures will be implemented:

If bats are found roosting outside of the nursery season (May 1 through October 1), they will be evicted as described under (b) below. If bats are found roosting during the nursery season, they will be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats will be evicted as described under (b) below. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the CDFW) will be established around the roosting site within which no construction activities including tree removal or structure disturbance will occur until after the nursery season.

If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal or on any structures scheduled to be disturbed by project activities, the individuals will be safely evicted, under the direction of a qualified bat biologist. If pre-construction surveys determine that there are bats present in any trees to be removed, exclusion structures (e.g. one-way doors or similar methods) shall be installed by a qualified biologist. The exclusion structures shall not be placed until the time of year in which young are able to fly, outside of the nursery season. Information on placement of exclusion structures shall be provided to the CDFW prior to construction.

If needed, other methods conducted under the direction of a qualified bat biologist could include: carefully opening the roosting area in a tree or snag by hand to expose the cavity and opening doors/windows on structures, or creating openings in walls to allow light into the structures. Removal of any trees or snags and disturbance of any structures will be conducted no earlier than the following day

(i.e., at least one night will be provided between initial roost eviction disturbance and tree removal/structure disturbance). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

Cultural Resources

CUL-1. A historic property report shall be prepared by a qualified professional subject to review and approval by the City of Greenfield Community Services Department. If historic resources are determined to be present on site, renovation of any buildings or silos identified as historically significant must be completed in compliance with the recommendations of the report consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. These recommendations must be incorporated into renovation plans, subject to review and approval by the City of Greenfield Community Services Department.

If the silos are determined to be historically significant, they cannot be removed or demolished without preparation of an EIR.

Geology and Soils

GEO-1. Prior to the construction of the Phase 1 parking lot and any Phase 2 development, the project applicant(s) shall submit a geotechnical investigation prepared by a qualified professional for review and approval by the City of Greenfield in accordance with Policy 8.1.2 of the City of Greenfield General Plan. The geotechnical report shall include comprehensive geologic, seismic, and/or soils and engineering recommendations. Recommendations of the report and specific construction performance criteria shall be incorporated into the final building plans, subject to review and approval by the City of Greenfield Building and Planning Department.

Greenhouse Gas Emissions

GHG-1. To ensure project GHG emissions are below the threshold of significance of 4.25 MT CO₂e per year per service population, a minimum reduction of 16.05 MT CO₂e per year per service population shall be achieved through implementing one or more of the following options: incorporating on-site GHG reduction measures into the project, participating in an off-site GHG reduction program, and/or purchasing GHG off-sets.

Potentially feasible on-site GHG reduction measures could include, but may not be limited to:

- a. Design buildings to exceed Title 24 energy efficiency standards by at least five percent. The 2019 Building Energy Efficiency Standards are assumed to be the applicable standards;
- b. Provide on-site renewable energy to replace demand for grid electricity. Rooftop solar installations and/or ground-mounted installations may be feasible options for on-site energy production;
- c. Exceed higher than mandated parking lot and area energy efficient lighting standards;
- d. Incorporate low flow irrigation that exceeds requirements of the state Water Efficient Landscape Ordinance; and/or
- e. Include the necessary infrastructure in the project design (e.g. physical design, energy, and fueling) to support the deployment of zero emission technologies now and into the future, including electric vehicle charging stations for employee cars and for electric off-road equipment.
- f. If additional reductions are required, one or both of the following options can be employed to mitigate the emissions balance needed to attain the required reduction.
 - i. If the project applicant chooses to participate in an off-site GHG reduction project or program to reduce GHG emissions, evidence of such participation shall be provided to the City of Greenfield by the agency/interest that is implementing the project or program. Evidence shall describe how the applicant is participating, the expected GHG reduction volume that can be assigned to the project as a result of the applicant's participation, and

verification that the applicant has met participation requirements. The evidence shall be subject to review and approval of city staff prior to issuance of a grading permit for Phase 2.

ii. If the project applicant chooses to purchase carbon off-sets solely or in combination with either or both options above to reduce GHG emissions, the project applicant shall provide evidence to the City of Greenfield that a contract for such purchase has been executed through a credible carbon off-set registry such as the Climate Action Reserve, certified carbon off-set project developer, or a broker. The evidence shall be subject to review and approval of city staff prior to issuance of a grading permit for Phase 2.

The project applicant shall prepare a Greenhouse Gas Reduction Plan that identifies the proposed reduction measures, GHG emissions reductions volumes associated with each, and evidence to support the level of reduction calculated for each that achieve 16.05 MT CO₂e per year. The Greenhouse Gas Reduction Plan shall be subject to review and approval of city staff prior to approval of a grading permit for Phase 2a.

Hazardous Materials

HAZ-1. Prior to issuance of a permit for demolition of any silo or renovation of the existing buildings, whichever happens first, a hazardous materials report must be prepared by a qualified professional, subject to review and approval by the City of Greenfield. The report must determine whether radon, asbestos, lead based paint, or any other hazardous materials that were commonly used in construction during the time the Cornuts facility was constructed are present and identify proper remediation measures for any hazardous materials found. All recommendations from the report must be incorporated into renovation plans.

Noise

N-1. Prior to issuance of a grading permit for Phase 2a, a site specific acoustical analyses shall be conducted to determine predicted noise impacts attributable to Phase 2 taking into account site-specific conditions (e.g., site design, location of structures, building characteristics) subject to review and approval by the City of Greenfield Planning Division. The acoustical analysis shall evaluate noise attributable to the proposed use(s), exposure of noise sensitive land uses to existing noise sources, and project-related impacts to nearby noise sensitive land uses, in comparison to adopted City of Greenfield noise standards. Measures shall be identified to reduce project-related noise impacts to noise sensitive receptors.

Transportation and Traffic

T-1. The applicant shall be responsible for payment of the Greenfield Transportation Impact Fee prior to issuance of a building permit and subject to the approval of the Community Services Department, which would represent the project's contribution towards transportation improvements throughout the City of Greenfield that are funded by the fee program

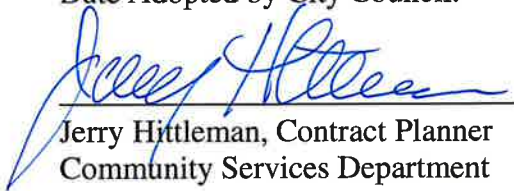
T-2. The applicant shall contribute a fair share of the cost of any improvements not covered by the fee program, prior to issuance of a building permit and subject to the approval of the Community Services Department.

T-3. The applicant shall be responsible for paying the Transportation Agency for Monterey County (TAMC) regional development impact fee prior to issuance of a building permit and subject to approval of the Community Services Department, to cover the costs for studies and construction of various regional transportation improvements throughout Monterey County.

Date Prepared: March 15, 2019

End of Review Period: April 22, 2019

Date Adopted by City Council:



Jerry Hittleman, Contract Planner
Community Services Department

INITIAL STUDY

GREENFIELD ORGANIX C2 EXPANSION

PREPARED FOR

City of Greenfield

Jerry Hittleman

Contract Planner

599 El Camino Real

Greenfield, CA 93927

Tel 831.674.5591

PREPARED BY

EMC Planning Group Inc.

301 Lighthouse Avenue, Suite C

Monterey, CA 93940

Tel 831.649.1799

Fax 831.649.8399

www.emcplanning.com

March 2019

This document was produced on recycled paper.



TABLE OF CONTENTS

A.	BACKGROUND	1
B.	ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	23
C.	DETERMINATION	24
D.	EVALUATION OF ENVIRONMENTAL IMPACTS	25
1.	Aesthetics	27
2.	Agriculture and Forest Resources	30
3.	Air Quality	32
4.	Biological Resources	39
5.	Cultural Resources	46
6.	Geology and Soils	49
7.	Greenhouse Gas Emissions	52
8.	Hazards and Hazardous Materials	61
9.	Hydrology and Water Quality	64
10.	Land Use and Planning	69
11.	Mineral Resources	70
12.	Noise	71
13.	Population and Housing	75
14.	Public Services	76
15.	Recreation	78
16.	Transportation/Traffic	79
17.	Tribal Cultural Resources	84
18.	Utilities and Services Systems	86
19.	Energy	88
20.	Mandatory Findings of Significance	90
E.	SOURCES	92

Appendices (on CD inside back cover)

Appendix A CalEEMod Results

Appendix B Odor Management Plan

Appendix C Average Daily Traffic Table

Appendix D Traffic Impact Analysis

Appendix E EMFAC Results

Figures

Figure 1	Location Map	7
Figure 2	Aerial Photograph.....	9
Figure 3	Site Photographs	11
Figure 4	Conceptual Site Plan.....	13
Figure 5	Street Elevations.....	15
Figure 6	Preliminary Landscape Plan.....	17
Figure 7	Conceptual Site Plan.....	19
Figure 8	Street Elevations	21

Tables

Table 1	Phase 1 Unmitigated Operational Criteria Pollutant Emissions ^{1,2}	34
Table 2	Project Build-out Unmitigated Operational Criteria Pollutant Emissions ^{1,2,3}	34
Table 3	2020 California Greenhouse Gas Inventory for Land Use Driven Emissions.....	54
Table 4	Existing Agricultural Water Use.....	56
Table 5	Project GHG Emissions Summary	57

A. BACKGROUND

Project Title	Greenfield Organix C2 Expansion
Lead Agency Contact Person and Phone Number	Jerry Hittleman, Contract Planner City of Greenfield Community Services Department (831) 674-5591
Date Prepared	March 15, 2019
Study Prepared by	EMC Planning Group Inc. 301 Lighthouse Avenue, Suite C Monterey, CA 93940 Teri Wissler Adam, Senior Principal Sally Rideout, EMPA, Principal Planner Elizabeth King, Senior Planner Gail Bellenger, MS, Biologist Rachel Hawkins, JD, Associate Planner Tanya Kalaskar, MS, Assistant Planner
Project Location	525 Tenth Street Greenfield, CA 93927
Project Sponsor Name and Address	Greenfield Development I, LLC Dann Schuetz and Brad Termini 700 2nd Street, Encinitas, CA 92024
General Plan Designation	Light Industrial
Zoning	I-L – Light Industrial - Agricultural Research and Development Overlay (RDO)

Setting

The project site (Assessor's parcel number 109-171-003), is a 13.88-acre parcel located at 525 Tenth Street in Greenfield, California. The project site is within the city limits at the southwest corner of 10th Street and Cherry Avenue. [Figure 1](#), Location Map, shows the regional vicinity of the site.

The project site includes the Cornuts facility and contains eight existing structures including warehouse buildings an office building, multiple accessory structures, silos, and fencing. All of the existing development is located in the southern quadrant of the property, and the remainder of the property is active agricultural land. Access to the developed portion of the property is provided via two driveways from Tenth Street.

The site is bordered on the north by Cherry Avenue and active farmland; on the east by Tenth Street, residences, and the City Public Works Corporation Yard; on the west by the Greenfield Organix C2 Medical Cannabis Facility and fallow agriculture land; and on the south by Walnut Grove Apartments, currently under construction. [Figure 2, Aerial Vicinity Map](#) and [Figure 3, Site Photographs](#) show the site and adjacent existing uses.

Environmental Review Background

In 2007, the city certified the *Cornuts Annexation Project Environmental Impact Report* (Cornuts Annexation EIR), which analyzed the annexation and development of eight parcels totaling 51 acres, including the project site. The Cornuts Annexation EIR evaluated environmental impacts associated with developing the site and broader annexation area per the city's Medium Density Residential land use designation. Some of the environmental information and analysis in the EIR remains relevant and is referenced in this initial study where applicable. In September of 2007, the city adopted a negative declaration for the site which approved a City of Greenfield general plan amendment changing the land use designation from Medium Density Residential to Light Industrial and amending the zoning code to add an Agricultural Research and Development Overlay to the site. The negative declaration was not available and therefore, is not referenced further in this initial study.

Description of Project

The proposed project is an expansion of the existing adjacent Greenfield Organix C2 facility at 1071 Cherry Avenue for medical cannabis cultivation, manufacturing, drying, trimming, packaging, shipping, distribution, storage and office uses. The expansion will include the re-use of all existing buildings, excluding red metal silos at building H that will be removed, and construction of new buildings to be implemented in two phases. A Conditional Use Permit (CUP) approved by the Planning Commission is required for the cultivation, manufacturing and testing of Cannabis at this site and for the barbed wire fence adjacent to the R-M Residential zone to the south. The project will also require subdivision approval as it will be subdivided into three lots as part to the CUP application process.

Phase 1 will include the subdivision of the property into three lots and renovation and reuse of the existing eight buildings (delineated as buildings A-H), totaling 29,260 square feet, on Lot 3 to facilitate the manufacturing, and distribution of cannabis. The following summarizes the proposed uses for each of the buildings and their respective square footages:

- Building A – 3,000 square feet, processing finished goods, and packaging;
- Building B – 2,400 square feet, office, breakroom, conference room, shower;
- Building C- 400 square feet, x-ray;
- Building D- 3,120 square feet, testing, quality control, and bulk packaging;
- Building E- 3,185 square feet, dry rooms;

- Building F- 13,260 square feet, dry rooms;
- Building G- 1,495 square feet, trimming; and
- Building H- 2,400 square feet, restroom, coat/storage, pre-roll.

Phase 1 building and silo renovations will require design review and approval by the Planning Commission and the tentative map will require review by the Planning Commission and approval of the City Council.

Existing buildings G and H will be clad with red metal to blend with the adjacent Greenfield Organix C2 facility. [Figure 4, Cladding and Fence](#), a photograph from 1071 Cherry Avenue project site shows an example of the materials to be used. The existing fence at Lot 3 will remain as chain link with barbed wire. The new fence to be constructed along Cherry Avenue during phase 2 will be 6 foot black aluminum, also shown on cladding photo. The small red metal silo structures on Lot 3 adjacent to building H will be removed during Phase 1. [Figure 5, Silo Photograph](#), shows those silos to be removed. The remainder of the silo structures will be cleaned and remain on the site and may be used for drying and storage of Cannabis plants.

Access to the Phase 1 portion of the property will be from two existing gated access drives on Tenth Street and a new access on Tenth Street that will be constructed during this phase. The northern most access drive on Tenth Street will be the main access into the Phase 1 facility and parking. Parking to accommodate both Phases 1 and 2 will be constructed on Lots 1, 2, and 3 during Phase 1. Greenfield Municipal Code Section 17.58 requires the following on-site parking be provided: warehouse “cultivation” at one per 3,000 square feet plus one per company vehicle, warehouse at one per 1,000 square feet plus one per company vehicle, and office at three per 1,000 square feet, to insure adequate parking is provided for the proposed uses. The project includes 238 parking spaces, including six on-site ADA parking spaces to accommodate those with disabilities, which exceeds the City of Greenfield requirements. Three EV Charging Stations will be installed in Lot 3 near buildings E and F per 17.55.020 of the municipal code. As part of Phase 1, a concrete sidewalk will be installed to maintain ADA access to the existing building entrances. Bicycle parking will be constructed on Lot 3 adjacent to Building E and H for a total of 46 spaces consistent with municipal code requirements. There are existing shower facilities within Building B. Access to the existing Greenfield Organix C2 facility at 1071 Cherry Avenue will be provided via one proposed gravel driveway contracted during this phase, which will connect to a parking lot located in the southeast corner of the existing Greenfield Organix C2 facility.

Required parking:

- warehouse “cultivation” at one per 3,000 square feet plus one per company vehicle.
- warehouse at one per 1,000 square feet plus one per company vehicle.

- office at three per 1,000 square feet.

Proposed parking:

- 238 vehicle spaces (6 ADA) (3 EV).

Phase 2a of the project would include the construction of two, two story 30,000 square foot new buildings (totaling 60,000 square feet) on the southern portion of the property. The two new structures would include space for research/education for the City of Greenfield and an incubation space for entrepreneurs in the cannabis industry. Their design would be similar to the existing new buildings at 1071 Cherry Avenue. Prior to issuance of a building permit they will require design review and approval by the Planning Commission. Four storage trailers, totaling approximately 4,344 square feet, will be placed on the site during Phase 2a of the project development. Access to the Phase 2 portion of the site would be provided by two driveways from Cherry Avenue. Access to Phase 2 will also be provided from the driveways on Tenth Street, which will be utilized during Phase 1 and a driveway connection to the existing Greenfield Organix C2 facility. When the new buildings are constructed on the southern property a 20-foot-wide access driveway will be constructed along the southern property line adjacent to the 25-foot-wide landscape buffer. [Figure 6, Preliminary Landscape Plan](#), illustrates a preliminary design of how the site may be landscaped. Build-out of the proposed project (Phase 1 plus Phase 2a) is estimated to occur in the year 2022. [Figure 7, Conceptual Site Plan](#), shows the site plan and illustrates the phased approach. [Figure 8, Street Elevations](#), provides the Tenth Street side elevation and Cherry Avenue side elevation.

Foreseeable Future Uses (Phase 2)

While no development, excluding parking and access drives, is currently proposed on the northern undeveloped portion of the project site, it is foreseeable that this portion of the site could be developed in the future with cultivation facilities or other cannabis related uses. For the purposes of this analysis, it was assumed that future development of 213,444 square feet of greenhouses would occur on this portion of the site. A 20-foot-wide gravel access roadway would be constructed around the perimeter of the northern property and between the greenhouses for fire truck access. If future development is proposed that differs from what is analyzed in this initial study, additional environmental analysis may be required.

Employment

The project will require new employees including the following: five security employees (outside contract employment), 20 manufacturing/distribution employees, 10 administrative employees, and 75 potential future cultivation employees if the greenhouses in Phase 2b are built. The total number of new employees for the proposed project and foreseeable future uses are expected to be 110 full-time employees at build-out. Security guard employment will be conducted as shift work including three shifts; otherwise employment for the operations will be from 7 AM to 9 PM daily.

General Plan Land Use Designation

The project site is designated Light Industrial. The Light Industrial designation allows for uses such as processing, packaging, machining, repair, fabricating, distribution, warehousing and storage, research and development, and similar uses that do not result in significant impacts from noise, odor, vibration, smoke, or pollutants.

Land adjacent to the site is designated Medium Density Residential (south), Medium Density (north), Light Industrial (east), and Medium Density Residential and Light Industrial (west) on the 4/5/2017 General Plan updated Land Use Map.

Zoning

The site is zoned Light Industrial, which allows uses such as pharmaceutical manufacturing, retail, and agricultural processing. Ordinance 515, adopted in January of 2016, added Chapter 5.28 to the Municipal Code, which specifically allows for cultivation, dispensing, manufacturing, and testing of medical marijuana in areas zoned for light industrial use with approval of a CUP by the Planning Commission. The Agricultural Research and Development Overlay (RDO) allows for greater flexibility and creativity in the development of agriculturally related industrial sites and to encourage compatible development within the overlay district. Buildings within the district may be constructed, altered, enlarged or reconstructed for any of the following specified uses and uses customarily accessory to such uses: educational, manufacturing, assembling, packaging, agricultural research and development, processing, fabrication, warehousing, wholesaling, and accessory parking. The agricultural research and development overlay district shall limit maximum lot coverage to 50 percent. Development within this overlay district shall be subject design review and approval by the Planning Commission.

The site is adjacent to land within the city limits to the south, west, and east and land in unincorporated Monterey County to the north. The surrounding properties within the city limits include R-M, Multiple Family Residential (south and west); I-L- IPO, Light Industrial with an overlay designation of Industrial Park (west), I-L, Light Industrial and PQP, Public and Quasi Public (east) and County land includes Farmlands/40 (north).

Other Public Agencies Whose Approval is Required

Bureau of Cannabis Control (BCC)

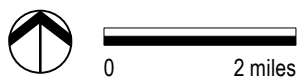
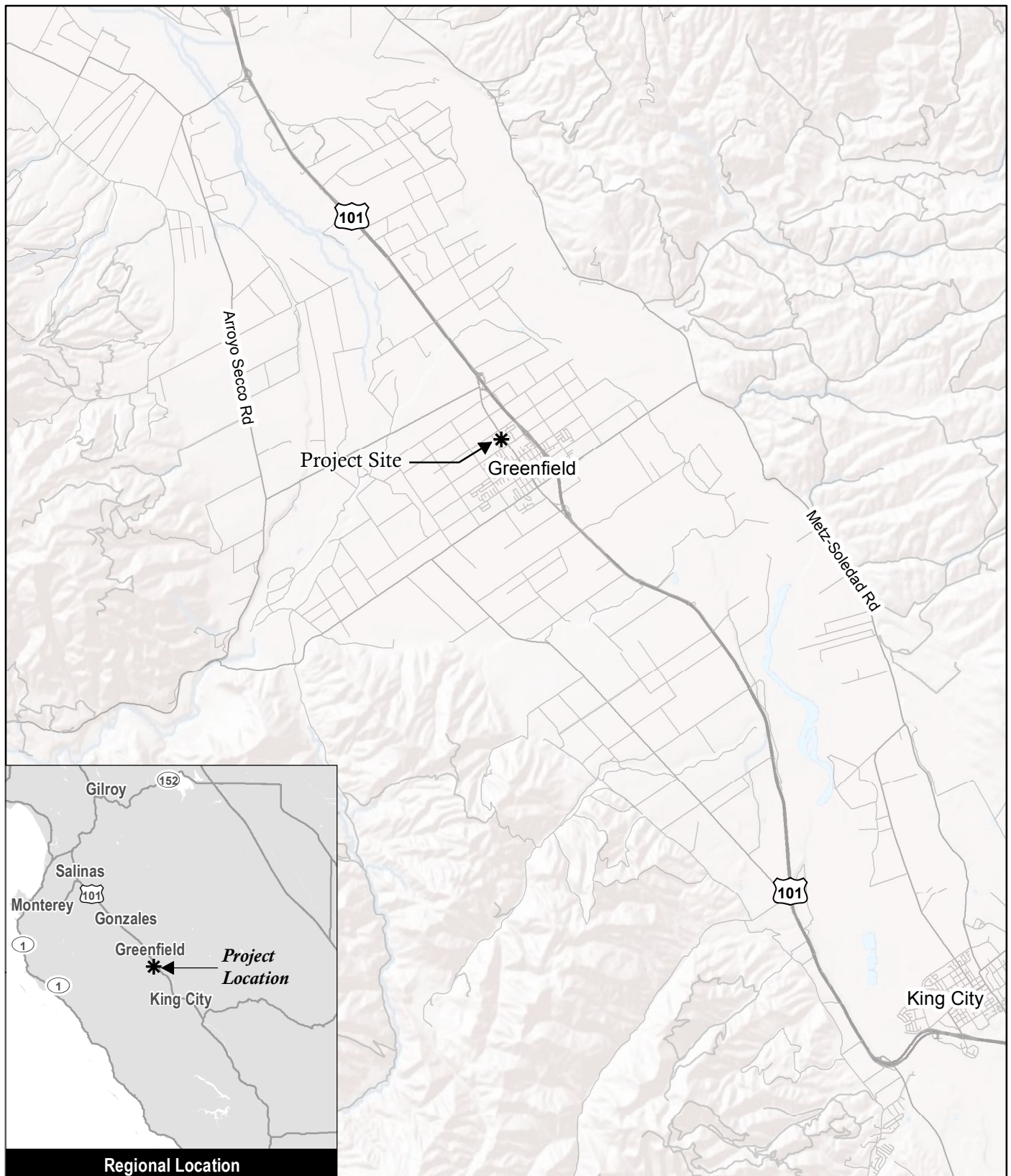
California Department of Food and Agriculture (CFDA)

California Department of Public Health (CDPH)

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

The City of Greenfield sent a letter to Ms. Louise Ramirez, the Ohlone/Coastanoan-Esselen Nation (OCEN) Tribal Chairwoman on February 12, 2019, asking if the OCEN Tribe would like to consult on the proposed project. A response letter from Ms. Ramirez was received on February 26, 2019, requesting that they be notified of all ground disturbing activities as described further in the Cultural and Tribal Consultation Sections of the Initial Study.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.



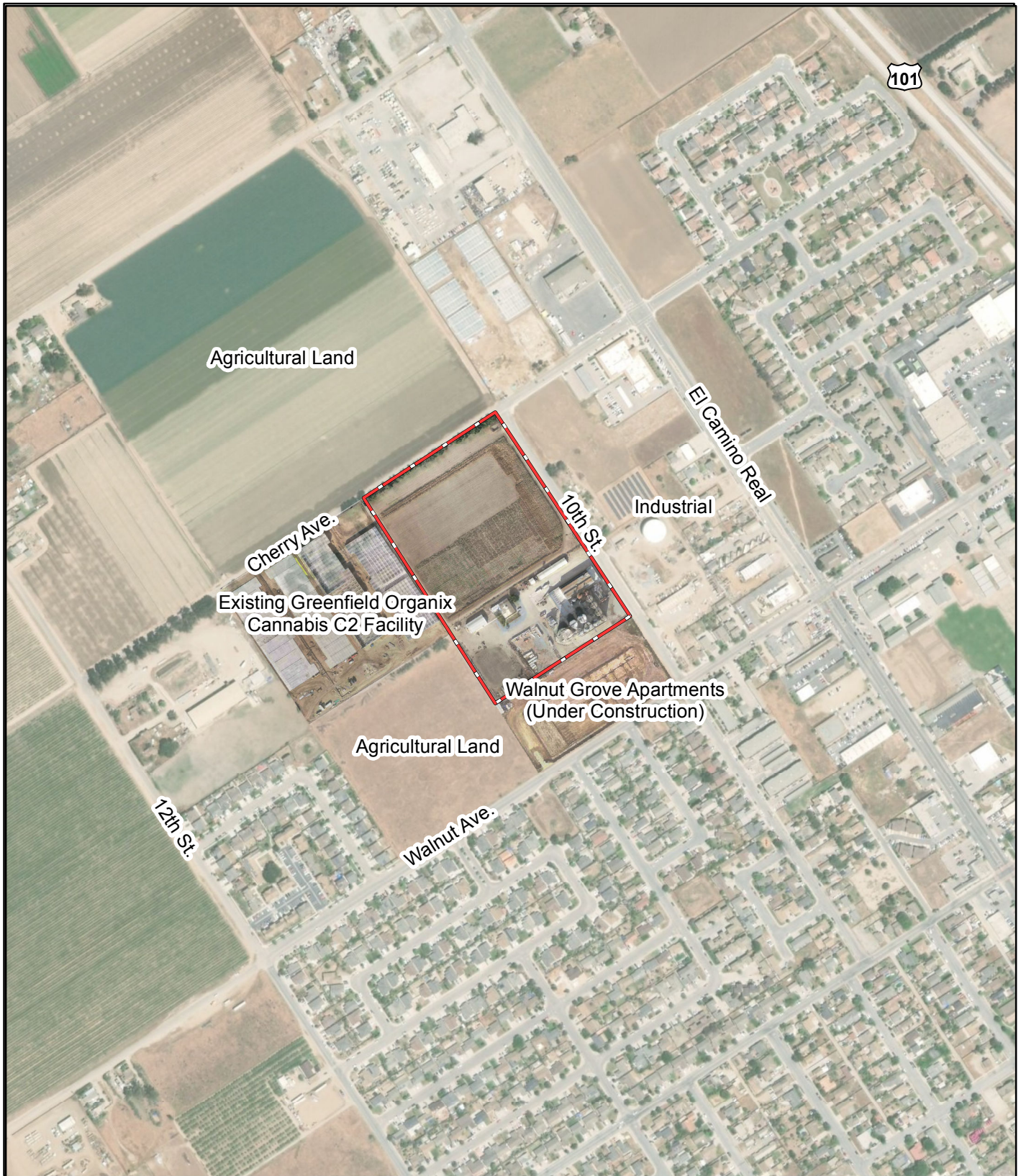
Source: ESRI 2018



Figure 1
Location Map

Greenfield Organix C2 Expansion Initial Study

This side intentionally left blank.



0 500 feet



Project Boundary

Source: Monterey County GIS 2018, ESRI 2018, Whitson Engineers 2019

Figure 2



Aerial Photograph

Greenfield Organix C2 Expansion Initial Study

This side intentionally left blank.



① Looking west across the site towards existing cannabis facility



② Existing warehouse building looking northeast



③ Facing existing silos looking northwest



 Project Site

Source: ESRI 2019

Photographs: EMC Planning Group 2018



④ Facing silos and warehouse buildings looking southeast



⑤ View across agricultural land facing southeast



⑥ Facing existing warehouse building looking northeast

Figure 3 Site Photographs

This side intentionally left blank.



Source: Greenfield Development LLC 2018

Figure 4
Cladding and Fence

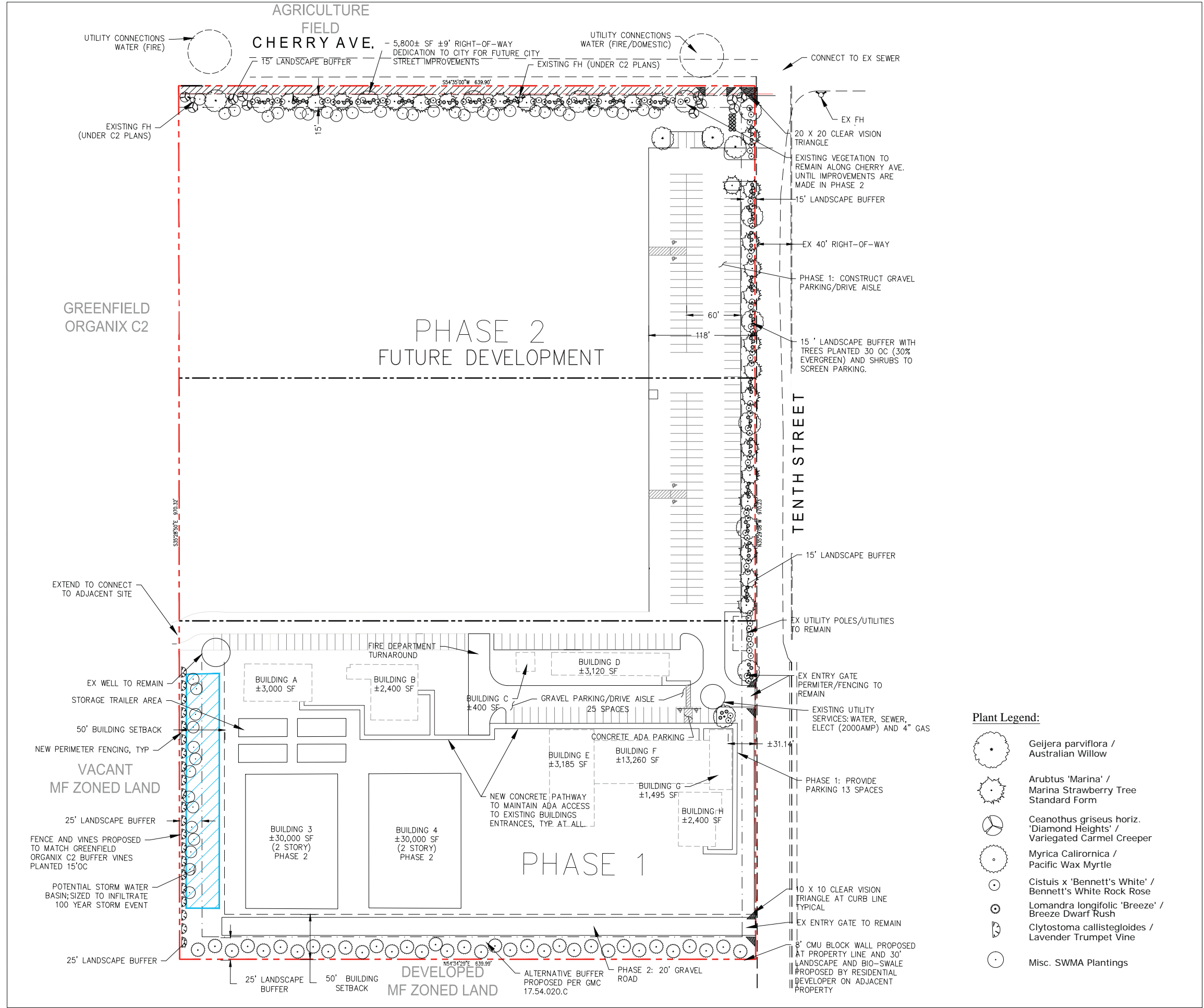
This side intentionally left blank.



Source: EMC Planning Group 2018

Figure 5
Silo Photograph

This side intentionally left blank.



Greenfield Organix C2 Expansion

525 Tenth Street

Greenfield Organix C2 Expansion Initial Study

Site Data:

Acreage: 14.25 ac / 620,730 SF
Right-of-Way Dedication: 0.13 AC / 5,759 SF
Zoning: Light Industrial IL - RDO
Minimum Lot Width: 100'
Minimum Lot Area: 10,000 SF

Building setbacks:

Front- 30'
Side at Street- 30'
Side at Residential- 50'
Rear at Other- 0'
Rear at Residential Use- 50'

Landscape Buffer:

Street- 15'
Side at Residential Use- 25'
Rear at Other- 6'
Rear at Residential Use- 25'

Building Height Limit: 30'

Landscape Area: ±41,229 SF Min., 0.95 AC
(15% of net land area)

Impervious Surface: ±345,873 SF, 7.9 AC

Access: Private Drives- 20' and 24'

Notes:

Site lighting standards shall comply with the requirements and standard of chapter 17.56 of the City of Greenfield municipal code. Detailed Security Plan, Landscape/Irrigation plan, and Lighting Plan will be prepared with the building permit application.

Water efficient landscape will be installed per city's landscape ordinance.



0 50' 100'

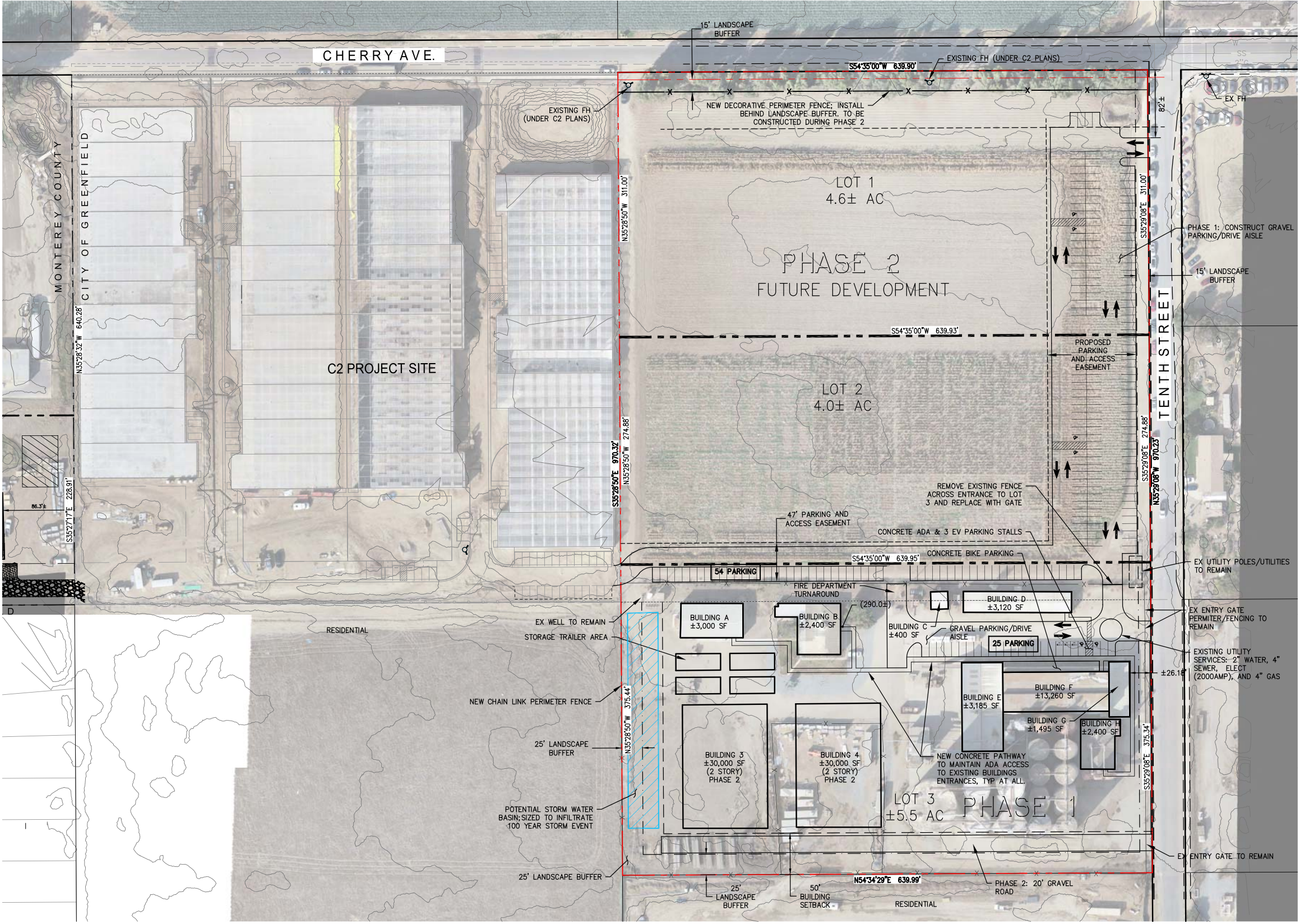
Figure 6

Preliminary Landscape Plan
Greenfield, California
January 31, 2019



EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM
Monterey, CA 831.649.1799 www.emcplanning.com

This side intentionally left blank.



Greenfield Organix C2 Expansion

525 Tenth Street

Greenfield Organix C2 Expansion Initial Study

OWNER / SUBDIVIDER
GREENFIELD DEVELOPMENT I, LLC
700 2ND STREET
ENCINITAS, CA 92024

ATTN: DANN SCHUETZ

PROJECT DATA

SITE ADDRESS:
525 10TH STREET
GREENFIELD, CA 93927

AREA: ±14.25 ACRES

APN 109-171-003

LANDUSE: LIGHT INDUSTRIAL

ZONING: LIGHT INDUSTRIAL WITH RDO OVERLAY

PARKING: 230 TOTAL
(224 STANDARD/6 ADA)

NOTE:
OUTDOOR LIGHTING LOCATIONS TO BE DETERMINED ON THE CONSTRUCTION DOCUMENTS AND WILL BE INSTALLED BY THE DEVELOPER PER CITY REQUIREMENTS.

LEGEND
- - - - - PROPOSED PROPERTY LINE
- - - - - PROPERTY BOUNDARY

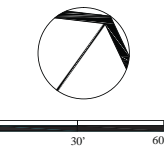


Figure 7

Conceptual Site Plan
Greenfield, California
February 22, 2019



EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM
Monterey, CA 881.649.1799 www.emcplanning.com

This side intentionally left blank.



Source: PQ Design Studio Inc. 2019

Figure 8
Street Elevations

Greenfield Organix C2 Expansion Initial Study

This side intentionally left blank.

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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


C. DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that 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.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) 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.



Jerry Hittleman, Contract Planner
Community Services Department



Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

Notes

1. A brief explanation is provided for all answers except “No Impact” answers that are adequately supported by the information sources cited in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer is explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once it has been determined that a particular physical impact may occur, then the checklist answers indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less-Than-Significant Impact with Mitigation Measures Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The mitigation measures are described, along with a brief explanation of how they reduce the effect to a less-than-significant level (mitigation measures from section XVII, “Earlier Analyses,” may be cross-referenced).
5. Earlier analyses are used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier document or negative declaration. [Section 15063(c)(3)(D)] In this case, a brief discussion would identify the following:
 - a. “Earlier Analysis Used” identifies and states where such document is available for review.
 - b. “Impact Adequately Addressed” identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. “Mitigation Measures” —for effects that are “Less-Than-Significant Impact with Mitigation Measures Incorporated,” mitigation measures are described which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances, etc.) are incorporated. Each reference to a previously prepared or outside document, where appropriate, includes a reference to the page or pages where the statement is substantiated.
7. "Supporting Information Sources" — a source list is attached and other sources used or individuals contacted are cited in the discussion.
8. This is the format recommended in the CEQA Guidelines as amended 2016.
9. The explanation of each issue identifies:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any to reduce the impact to less than significant.

1. AESTHETICS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista? (1, 3, 4, 6, 46)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings? (1, 3, 4, 46)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? (1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. Scenic vistas within Greenfield include rural landscapes, such as vineyards and agricultural fields, and views of the Gabilan Mountain Range to the east and Santa Lucia Mountain range and Arroyo Seco to the west (General Plan p. 7-13). General plan policy 7.9.1 encourages preservation and enhancement of these views to the extent possible. According to the general plan, the project site is not within a visually sensitive corridor or a clearly defined sensitive viewshed. Further, the project has a low potential to block views of the Gabilan and Santa Lucia mountain ranges from nearby public roads as scenic views of the mountain ranges are already limited due to existing development on site, which includes tall silos and large warehouse buildings (refer to Figure 3, Site Photographs and Figure 5, Street Elevations). The distance of the mountain ranges from the project site and surrounding urban uses further limit existing views. The most sensitive views around the site would be those of rural landscapes and agricultural fields from surrounding public roads including Cherry Avenue, Tenth Street, and Walnut Avenue. While development of the project may slightly obstruct views of agricultural land from these public roads, views are already limited due to existing development and the location of nearby agricultural fields and intervening urban uses. Project impacts to scenic vistas would be less than significant.

- b. U.S. Highway 101 is the only highway passing through the city and it is not listed as either a designated or eligible scenic highway. Therefore, the project would have no impact on scenic resources within a state scenic highway.
- c. The southern portion of the project site is developed with tall silos and industrial warehouses. The site is contiguous to the Greenfield Organix C2 cannabis facility to the west, Walnut Grove Apartments under construction to the southeast, and Tenth Street to the south. Additional industrial development lies to the east of Tenth Street. The northern portion of the site is undeveloped and in active agricultural use. Future development of this portion of the property could alter the visual character of the site. Both currently proposed and future development would be required to be consistent with General Plan Land Use policies 2.1.1, 2.1.5, and related programs. Policies 2.1.1 and 2.1.5 require new development to be consistent with the scale, appearance, and rural community character of Greenfield. The proposed buildings would be designed to blend with the existing surrounding uses (specifically, the adjacent cannabis facility) in scale and appearance. All on-site buildings will be reused and new buildings would be designed using materials that blend with the existing on-site uses and surrounding uses. The project will be required to undergo design review by the Planning Commission, which will ensure that aesthetically pleasing project design is implemented that adheres to general plan policies and goals. Therefore, while the proposed project would alter the visual character of the site, the impact would be less than significant. A preliminary landscape plan is included in this initial study and the landscape plants will be installed in two phases. Plant material will be used that are drought tolerant and that blend into the existing landscape as installed on the adjacent Greenfield Organix C2 property.
- d. The proposed project would introduce new sources of light and glare that are typical of light industrial development. The project site has eight existing buildings and several silo structures that are existing sources of light and glare. The proposed project includes the construction of two new buildings that would add nominal new sources of light and glare to the developed portions of the site. Future development of greenhouses on the undeveloped portion of the site would also have the potential to add new sources of light and glare. The main sources of daytime glare would be from reflective building surfaces and materials. General Plan Land Use Policy 2.8.8 and Program 2.8.D require minimization of the use of reflective materials to reduce daytime and nighttime glare to a less-than-significant level. The primary sources of nighttime light include parking lot lights and security related lighting. Light from these new sources could “spill over” onto adjacent properties and contribute to

existing “sky glow” conditions. However, required project conformance with Greenfield Municipal Code Section 17.56, which defines outdoor lighting standards including shielding requirements and illumination levels, would ensure that lighting impacts would be less than significant.

2. AGRICULTURE AND FOREST RESOURCES

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

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use? (1, 2, 4, 8, 10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? (26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (1, 2, 4, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use? (1, 2, 4, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use? (1, 2, 4, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. According to the 2016 Monterey County Important Farmland Map, the project site consists of 8.8 acres of Prime Farmland, 1.2 acres of Grazing Land, and 3.9 acres of land classified as “Urban and Built-Up Land.” The general plan EIR identified conversion of important farmland as a significant and unavoidable impact and determined that no feasible mitigation measures were available to reduce the impact to a less-than-significant level (General Plan EIR p 10-12). Similarly, the Cornuts Annexation EIR determined that conversion of important farmland within the Cornuts Annexation area, including the project site, would be a significant and unavoidable impact. However, the City Council adopted a Statement of Overriding Considerations for the loss of permanent farmland on the project site for the general plan, and again in January 2007 for the loss of important farmland that would result from the Cornuts Annexation project. CEQA Guidelines section 15183 states, “CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review...” Therefore, the city is not required to evaluate this impact further.
- b. The project site is zoned for industrial use and does not contain land under a Williamson Act contract. Therefore, the proposed project would not conflict with existing zoning or existing Williamson Act contracts.
- c, d. The project site is not zoned as forestland or timberland and would not result in the loss or conversion of forestland or timberland. Therefore, the proposed project would not conflict with existing zoning or loss or conversion of forestland or timberland.
- e. There is active agricultural land adjacent to Cherry Avenue which borders the project site on the north. Future development of urban uses adjacent to active agricultural operations could lead to land use conflicts. Related conflicts can include nuisances associated with dust, smoke, noise, and odor from agricultural operations, restrictions on agricultural operations (such as pesticide application) along interfaces with urban uses, conflicts with farm equipment and vehicles using roadways, trespassing and vandalism on active farmlands, etc. These conflicts can lead to constraints on agricultural operations and serve as incentives for agricultural land owners to convert land to non-agricultural uses.

Nuisance conflicts are typically associated with locating sensitive residential uses adjacent to existing agricultural operations. The currently proposed project and potential future cultivation uses would not be uniquely sensitive to nuisances from agricultural operations and buffers would not be required. Cherry Avenue would act as a defacto buffer between the two activities. For these reasons, there would be no impacts associated with land use conflicts that could lead to the conversion of active farmland to non-agricultural uses.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan? (3,31,32)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (3,31,33)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)? (3,31,33)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations? (3,6,31,34)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people? (35)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. The City of Greenfield, including the project site, is located in the North Central Coast Air Basin (hereinafter "air basin"), which is under the jurisdiction of the Monterey Bay Air Resources District (hereinafter "air district"). Regional air districts must prepare air quality plans specifying how state air quality standards will be met. The air district's most recent adopted plan is *2012-2015 Air Quality Management Plan for the Monterey Bay Region*. The air district specifies Air Quality Management Plan consistency for population-related projects only. The proposed project would not result in an increase in population. Therefore, the proposed project would not conflict with or obstruct the implementation of the applicable air quality plan.
- b. An air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without significant harmful effects on people or the environment. The air basin is currently in non-attainment

status with state standards for ozone and suspended particulate matter (PM₁₀). Under federal criteria, the air basin is at attainment (8-hour standard) for ozone and particulates. The air district is responsible for monitoring air quality in the air basin. The air district has developed criteria pollutant emissions thresholds, which are used to determine whether or not the proposed project would violate an air quality standard or contribute to an existing violation during operations and/or construction. Based on the air district's *CEQA Air Quality Guidelines* (hereinafter "air district CEQA Guidelines"), a project would have a significant air quality impact if it would:

- Emit 137 pounds per day or more of direct and indirect volatile organic compounds (VOC);
- Emit 137 pounds per day or more of direct and indirect nitrogen oxides (NO_x);
- Directly emit 550 pounds per day or more of carbon monoxide (CO);
- Emit 82 pounds per day or more of suspended particulate matter (PM₁₀) on-site and from vehicle travel on unpaved roads off-site; or
- Directly emit 150 pounds per day or more of sulfur oxides (SO_x).

Operational Impacts. The proposed project would result in new sources of operational emissions. Per air district CEQA Guidelines, Table 5-4 Indirect Sources with Potentially Significant Impacts on Ozone, the screening size for industrial development is 1,040,000 square feet. The proposed project, Phase 1 and Phase 2 combined, includes approximately 307,048 square feet of buildings. Therefore, the proposed project would not likely result in significant operational criteria air pollutant emissions that would negatively impact local or regional air quality. However, emissions modeling was undertaken to evaluate greenhouse gas emissions and the criteria air pollutant emission results from this modeling were reviewed against the air district thresholds. The results are summarized in [Table 1, Phase 1 Unmitigated Operational Criteria Pollutant Emissions](#) and [Table 2, Project Build-out Unmitigated Operational Criteria Pollutant Emissions](#). Detailed emissions modeling results are included in [Appendix A](#).

As summarized in Table 2, the modeling results confirm that the proposed project at build-out would not generate operational emissions that exceed the air district thresholds for the criteria air pollutants: VOC, NO_x, SO_x, PM₁₀, or CO. Therefore the proposed project would not result in significant operational emissions of criteria air pollutants either individually or cumulatively.

Table 1 Phase 1 Unmitigated Operational Criteria Pollutant Emissions^{1,2}

Emissions	Reactive Organic Gases (ROG)	Nitrogen Oxides (NO _x)	Sulfur Oxides (SO _x)	Suspended Particulate Matter (PM ₁₀)	Carbon Monoxide (CO)
Summer	1.13	1.70	0.01	0.74	3.84
Winter	1.11	1.80	0.01	0.74	4.01
Air District Thresholds	137	137	150	82	550

SOURCE: EMC Planning Group 2019

NOTES:

1. Expressed in pounds per day.

2. Results may vary due to rounding.

Table 2 Project Build-out Unmitigated Operational Criteria Pollutant Emissions^{1,2,3}

Emissions	Reactive Organic Gases (ROG)	Nitrogen Oxides (NO _x)	Sulfur Oxides (SO _x)	Suspended Particulate Matter (PM ₁₀)	Carbon Monoxide (CO)
Summer	31.31	109.13	0.22	10.93	92.45
Winter	31.12	109.95	0.21	10.93	93.74
Air District Thresholds	137	137	150	82	550

SOURCE: EMC Planning Group 2019

NOTES:

1. Expressed in pounds per day.

2. Results may vary due to rounding.

3. Results at project build-out are the sum of Phase 1 and Phase 2 results.

Construction Impacts. Emissions produced during grading and construction activities are considered short-term as they occur only during the construction phase of the project. Sources of project-related short term construction emissions include equipment and worker vehicle exhaust, off-gassing from the curing of materials such as asphalt, concrete, and architectural coatings, as well as fugitive dust associated with earthmoving equipment. Worst-case construction phase emissions typically occur during initial site preparation, including grading and excavation, due to the increased amount of surface disturbance that can generate dust and due to construction equipment emissions with the use of heavier equipment used at this phase.

Air district CEQA Guidelines Table 5-2, Construction Activity with Potentially Significant Impacts, identifies the level of construction activity that could result in significant temporary fugitive dust impacts if not mitigated. Construction activities with grading and excavation that disturb more than 2.2 acres per day and construction activities with minimal earthmoving that disturb more than 8.1 acres per

day are assumed to potentially exceed air district threshold of 82 pounds of particulate matter per day. Construction activities on the 13.88-acre project site are likely to result in soil disturbance or other dust-generating activities that exceed the air district's threshold of 2.2 acres per day and 8.1 acres per day, which would result in a significant impact on air quality. Implementation of the following mitigation measure would reduce this potential impact to less than significant.

Mitigation Measure

AQ-1. To reduce dust emissions from grading, and construction activities on the project site, the following language shall be included in all grading and construction plans for the project prior to issuance of grading permits:

Dust control measures shall be employed to reduce visible dust leaving the project site. The following measures or equally effective substitute measures shall be used:

- a. Use recycled water to add moisture to the areas of disturbed soils twice a day, every day, to prevent visible dust from being blown by the wind;
- b. Apply chemical soil stabilizers or dust suppressants on disturbed soils that will not be actively graded for a period of four or more consecutive days;
- c. Apply non-toxic binders and/or hydro seed disturbed soils where grading is completed, but on which more than four days will pass prior to paving, foundation construction, or placement of other permanent cover;
- d. Cover or otherwise stabilize stockpiles that will not be actively used for a period of four or more consecutive days, or water at least twice daily as necessary to prevent visible dust leaving the site, using raw or recycled water when feasible;
- e. Maintain at least two feet of freeboard and cover all trucks hauling dirt, sand, or loose materials;
- f. Install wheel washers at all construction site exit points, and sweep streets if visible soil material is carried onto paved surfaces;
- g. Stop grading, and earth moving if winds exceed 15 miles per hour;

- h. Pave roads, driveways, and parking areas at the earliest point feasible within the construction schedule;
 - i. Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours of receiving the complaint. The phone number of the Monterey Bay Air Resources District shall also be visible to ensure compliance with Rule 402 (Nuisance); and
 - j. Limit the area under construction at any one time.
- c. The air district is responsible for monitoring air quality in the air basin, which is designated, under state criteria, as a nonattainment area for ozone and inhalable particulate matter (PM₁₀). Under federal criteria, the air basin is at attainment (8-hour standard) for ozone and at attainment for particulates. New emissions that contribute to cumulative non-attainment conditions would be generated by the proposed project during the operational and constructional phases.

The proposed project, Phase 1 and Phase 2 combined, includes 307,048 square feet of buildings. Emissions generated during operation of proposed project would not exceed the air district's thresholds for operational criteria pollutants (see "b" above), and would not be cumulatively considerable.

Emissions generated during construction activities are short-term because they would be limited to the periods of site development and construction. Construction emissions could exceed thresholds for particulate matter, and therefore, could be cumulatively considerable. Implementation of Mitigation Measure AQ-1 (see "b" above) would reduce construction emissions to less than cumulatively considerable with mitigation.

- d. According to the air district CEQA Guidelines, a sensitive receptor is generally defined as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. The nearest sensitive receptors are homes, located approximately 110 feet south of the project site. Additional homes are located within 1,000 feet. The proposed project could expose sensitive receptors to emissions from emergency generators and construction dust and equipment exhaust.

Greenhouse operations are not a source of substantial emissions, and emissions from the proposed use of the existing facility would be similar to emissions from the existing or past use. The applicant has indicated that the proposed project would

include diesel generators onsite for backup emergency power only. Based on consultant's familiarity with similar facilities in the City of Greenfield, it is assumed that two generators will be on the site and for maintenance purposes would be run periodically for a total of about six (6) hours per year (about 1.5 hours on a quarterly basis). Due to the intermittent operation of diesel generators, and similar operations of the existing facility, operational emissions generated by the proposed project would result in a less-than-significant impact to sensitive receptors.

Construction activities would result in localized emissions of dust and diesel exhaust that could result in temporary impacts to adjacent land uses that include sensitive receptors. The short-term air quality effects related to dust emissions during project construction would be avoided or minimized with implementation of the Mitigation Measure AQ-1 under checklist item "b" above. However, the diesel construction equipment required for the proposed project could expose these sensitive receptors to toxic air contaminants from heavy equipment diesel exhaust. Implementation of the following mitigation measures would reduce this impact to a less-than-significant level.

Mitigation Measures

- AQ-2. The applicant shall prepare a Construction Staging Management Plan to be reviewed and approved by the city, prior to issuance of grading permits. The plan shall include the following restrictions:
- a. Heavy-duty diesel trucks (gross vehicle weight rating over 26,000 pounds), older than 2010 model year and not retrofit for reduced particulate emissions, shall not be staged within 500 feet of nearest sensitive receptors; and
 - b. Construction equipment and heavy duty diesel trucks shall not idle in excess of five minutes.
- AQ-3. The following language shall be included in all construction documents, subject to review and approval by city staff, prior to issuance of grading permits: "All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications and shall be checked by a certified visible emissions evaluator. All non-road diesel construction equipment shall, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112."

- e. The cultivation and manufacture of cannabis produces heavy odors that could be a nuisance to nearby receptors.

The applicant has prepared an Odor Management Plan (included as Appendix B) for the proposed project that addresses and meets the requirements of Chapter 5.28.020 of the City of Greenfield Medical Marijuana Ordinance. According to the Odor Management Plan, the proposed project will utilize a Closed Growing Environment (CGE) or closed loop aeration system that keeps all environmental conditions contained within a production room. The treatment of air in a CGE setup helps avoid odor-related security and nuisance problems. The Odor Management Plan also addresses the proposed project's liaison with the community and local agencies regarding odor-related problems/incidents. Therefore, with implementation of the Odor Management Plan, this impact is less than significant.

4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? (9, 11, 12, 17, 20, 46)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? (11, 13, 46)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands, as defined by section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means? (13, 46)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (9, 11, 12, 17, 46)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (1, 2, 5, 46)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (1, 2, 5, 11, 46)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

A reconnaissance-level field survey of the project site was completed by EMC Planning Group senior biologist Gail Bellenger on November 7, 2018. Biological resource database searches for the project vicinity were conducted prior to the survey. The project site was formerly a Cornuts processing facility and contains a fenced portion with eight existing structures including warehouse buildings, an office building, multiple accessory structures, silos, and fencing. The northern portion of the site is agricultural land planted with corn, but there were several large, plowed areas without any crops. The field has been used for crops for many years. The biological field survey consisted of walking throughout the plowed areas, making observations of and noting habitat conditions, surrounding land uses, and plant and wildlife species. The perimeter of the site was also surveyed.

The project site ranges in elevation from approximately 290 to 292 feet above sea level. Non-native trees along the northwest boundary of the site include but are not limited to gum (*Eucalyptus sp.*) and Peruvian pepper (*Schinus molle*). The plowed areas contained non-native species that included cheeseweed (*Malva parviflora*), Russian thistle (*Salsola tragus*), and several other species that were unidentifiable due to the survey occurring at a time of year outside of the typical blooming period. Land uses surrounding the project site include residential and commercial sites.

A small, dry pond is located at the upper north corner of the site. Special-status amphibians are not expected to occur within the pond due to the lack of standing water. Wildlife habitat quality within the project site and vicinity is considered low due to the level of disturbance and active agriculture.

Common wildlife species likely to occur on the project site include raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), Virginia opossum (*Didelphis virginiana*), and California ground squirrel (*Spermophilus beecheyi*). Species of small rodents including mice (*Mus musculus*, *Reithrodontomys megalotis*, and *Peromyscus maniculatus*) and California vole (*Microtus californicus*) are likely to occur, although there were no burrows noted on the site. Common bats such as California myotis (*Myotis californicus*), little brown myotis (*Myotis lucifugus*), and hoary bat (*Lasiurus cinereus*) could roost in structures or trees, and forage in the fields. Several crows (*Corvus brachyrhynchos*) were flying over the project site.

- a. Special-Status Species. A search of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database was conducted for the Greenfield, Junipero Serra Peak, North Chalone Peak, Palo Escrito Peak, Paraiso Springs, Reliz Canyon, Soledad, Sycamore Flat, and Thompson Canyon U.S. Geological Survey quadrangles to generate a list of potentially occurring special-status species for the project vicinity. Records of occurrence for special-status plants were reviewed for those quadrangles in the California Native Plant Society (CNPS) Inventory of Rare

and Endangered Plants. A U.S. Fish and Wildlife Service (USFWS) Endangered Species Program threatened and endangered species list was also generated for Monterey County. Special-status species in this report are those listed as Endangered, Threatened, or Rare, or as Candidates for listing by the USFWS and/or CDFW; as Species of Special Concern or Fully Protected species by the CDFW; or as Rare Plant Rank 1B or 2B species by the CNPS.

Most special-status plant and wildlife species known to occur in the region are not expected to occur on the project site due to lack of suitable habitat. Special-status wildlife with potential to occur on or adjacent to the site are discussed below.

San Joaquin Kit Fox (Vulpes macrotis mutica). The San Joaquin kit fox is a federally-listed endangered species and a state-listed threatened species. The present range of the San Joaquin kit fox extends from the southern end of the San Joaquin Valley, north to Tulare County, and along the interior Coast Range valleys and foothills to central Contra Costa County. San Joaquin kit foxes typically inhabit annual grasslands or grassy open spaces with scattered shrubby vegetation, but can also be found in some agricultural habitats and urban areas. This species needs loose-textured sandy soils for burrowing, and they also need areas that provide a suitable prey base, including black-tailed hare, desert cottontails, and California ground squirrels, as well as birds, reptiles, and carrion.

The reconnaissance-level survey conducted at the project site did not observe San Joaquin kit fox and found no indication of the presence of this species on the project site. Although the project site supports a prey base, the site is considered only marginal breeding and foraging habitat for the kit fox due to its location in an agricultural area adjacent to, and nearly surrounded by, urban development. Discing also diminishes habitat suitability for the kit fox. Therefore, if this species uses the site, it likely uses it only for foraging or dispersal on rare occasions and in low numbers. The nearest observation of this species was documented approximately 2.5 miles northeast of the project site in 1975. In the off-chance that a migrating kit fox is found in the region, the marginal quality of the project site suggests that this species would not choose this site for denning or breeding. Therefore, the likelihood of this species occurring on the project site is considered low.

Burrowing Owl (Athene cunicularia). Burrowing owl is a California Species of Special Concern. Burrowing owls live and breed in burrows in the ground, especially in abandoned California ground squirrel burrows. Optimal habitat conditions include large open, dry and nearly level grasslands or prairies with short to moderate vegetation height and cover, areas of bare ground, and populations of burrowing mammals. This species is known to occur within three miles east of the site. The project site did not contain any grassland and was actively used for agriculture,

therefore would not provide suitable foraging habitat for burrowing owl. There were no small mammal burrows on the site to provide nesting habitat. Because of this lack of suitable habitat, burrowing owl is considered unlikely to occur on the site.

Nesting Birds. Construction activities, including ground disturbance, can impact nesting birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code, should nesting birds be present during construction. To avoid impacts to nesting birds, the removal of trees and shrubs shall be minimized to the greatest extent feasible. Construction activities that include any tree removal, pruning, grading, or grubbing, shall be conducted outside of the bird nesting season (January 15 through September 15) to the greatest extent feasible. If this type of construction occurs during the bird nesting season, then a qualified biologist shall conduct a pre-construction surveys for nesting birds to ensure that no nests would be disturbed during project construction. Implementation of mitigation measure BIO-1 would reduce potentially significant impacts to nesting birds to a less-than-significant level.

Mitigation Measures

BIO-1. To avoid impacts to nesting birds during the nesting season (January 15 through September 15), construction activities that include grading or grubbing, should be conducted between September 16 and January 14, which is outside of the bird nesting season. If grading or grubbing occurs during the bird nesting season, then a qualified biologist shall conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project construction.

If project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys. Two surveys for active nests of such birds shall occur within 14 days prior to start of construction, with the second survey conducted with 48 hours prior to start of construction. Appropriate minimum survey radius surrounding each work area is typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys shall be conducted at the appropriate times of day to observe nesting activities.

If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be

clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize “normal” bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g. defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. This measure shall be implemented by the developer prior to issuance of a grading permit.

Special-Status Bats. The eucalyptus trees along the northern border of the site could provide roosting habitat for pallid bat (*Antrozous pallidus*) and Townsend’s big-eared bat (*Corynorhinus townsendii*), both state-listed species of special concern that have been recorded in the vicinity. Both species have been identified to the north, in proximity of the project site. Construction activities at the project site could result in the disturbance of adjacent roost and natal sites occupied by special-status bats, if present. Implementation of mitigation measure BIO-2 would reduce potentially significant impacts to a less-than-significant level.

- BIO-2. Approximately 14 days prior to tree removal activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees to be removed, in trees within 50 feet of the development footprint, and within and surrounding any structures that may be disturbed by the project. These surveys will include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the project site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an “Anabat” unit. Potential roosting features found during the survey shall be flagged or marked.

If no roosting sites or bats are found, a letter report confirming absence will be prepared and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents will be prepared prior to grading permit issuance and the following monitoring, exclusion, and habitat replacement measures will be implemented:

If bats are found roosting outside of the nursery season (May 1 through October 1), they will be evicted as described under (b) below. If bats are found roosting during the nursery season, they will be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats will be evicted as described under (b) below. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the CDFW) will be established around the roosting site within which no construction activities including tree removal or structure disturbance will occur until after the nursery season.

If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal or on any structures scheduled to be disturbed by project activities, the individuals will be safely evicted, under the direction of a qualified bat biologist. If pre-construction surveys determine that there are bats present in any trees to be removed, exclusion structures (e.g. one-way doors or similar methods) shall be installed by a qualified biologist. The exclusion structures shall not be placed until the time of year in which young are able to fly, outside of the nursery season. Information on placement of exclusion structures shall be provided to the CDFW prior to construction.

If needed, other methods conducted under the direction of a qualified bat biologist could include: carefully opening the roosting area in a tree or snag by hand to expose the cavity and opening doors/windows on structures, or creating openings in walls to allow light into the structures. Removal of any trees or snags and disturbance of any structures will be conducted no earlier than the following day

(i.e., at least one night will be provided between initial roost eviction disturbance and tree removal/structure disturbance). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

- b. Sensitive Natural Communities. No sensitive natural communities or riparian habitats occur on or adjacent to the site. Therefore no impacts to sensitive natural communities associated with the proposed project are anticipated.
- c. Wetlands and Waterways. The project site does not contain wetlands or waterways. There is a pond or depression located at the northern corner of the property that contained no water or riparian/wetland vegetation, nor did it have an inlet or outlet. Therefore, no federally protected wetlands would be affected by the proposed project, and no impacts to wetland/waterway resources within the jurisdiction of the U.S. Army Corps of Engineers (USACE), the CDFW, or the Regional Water Quality Control Board (RWQCB) are anticipated.
- d. Wildlife Movement. Wildlife movement corridors provide connectivity between habitat areas, enhancing species richness and diversity, and usually also provide cover, water, food, and breeding sites. The site did not contain any grassland and was an active agricultural site growing crops of corn. Open areas were recently plowed/disc'd and contained no evidence of wildlife or burrows. Faint skunk scent was detected near the corn crops on the northeastern side of the property. This site may allow limited movement opportunities for common, urban-adapted wildlife species to access neighboring open fields. However, alternate routes exist for wildlife movement to the surrounding areas of the project site. Therefore, the proposed project would have a less than significant impact on wildlife movement and would not impede the use of native wildlife nursery sites.
- e. Local Biological Resource Policies/Ordinances. The proposed project would not conflict with biological resource policies contained in the general plan. However, the city's municipal code regulates all trees that overhang public streets, and requires a permit prior to removal of public street trees. The project site contains non-native ornamental trees such as eucalyptus and Peruvian pepper trees that overhang the dirt shoulder or pavement of Cherry Avenue. These trees will likely be removed by the proposed project and the applicant will be required to obtain a tree removal permit prior to taking such action. The proposed project will have no impact from conflict with the city's biological resources related regulations.
- f. Conservation Plans. There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans applicable to the proposed project.

5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5? (1, 2, 4, 27, 30)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5? (1, 2, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (1, 2, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries? (1, 2, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. Archaeological and historical investigations were conducted for the Cornuts Annexation EIR. The historic evaluation did not include an evaluation of the buildings on the project site as they were less than 50 years old at the time the historic investigations were completed, and there was no proposal to modify or demolish these buildings. The Cornuts facility may now be older than 50 years and it is unknown whether the facility is a significant historic resource. None of the eight warehouses on-site are proposed for demolition; however two small silos will be removed and all of the existing eight buildings will undergo interior and exterior renovations. The exterior of the buildings will be clad with red metal. If all or any of the Cornuts buildings were historic, renovation of the buildings or removal of the silos could result in substantial adverse change in the significance of a historical resource. The following mitigation measure would ensure that impacts are less than significant.

Mitigation Measure

- CUL-1. A historic property report shall be prepared by a qualified professional subject to review and approval by the City of Greenfield Community Services Department. If historic resources are determined to be present on site, renovation of any buildings or silos identified as historically

significant must be completed in compliance with the recommendations of the report consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. These recommendations must be incorporated into renovation plans, subject to review and approval by the City of Greenfield Community Services Department.

If the silos are determined to be historically significant, they cannot be removed or demolished without preparation of an EIR.

- b. According to the general plan EIR, there are no known previously recorded archeological resources in Greenfield and the archeological sensitivity of the Greenfield area is generally low. Field inspections and reviews of maps and records conducted for the Cornuts Annexation project did not reveal any unique archaeological resources on or within the vicinity of the project site (Cornuts Annexation EIR p. 3.5-11).

However, discovery of unknown and unanticipated buried archaeological resources during site preparation and construction activities remains possible. Damage to significant archaeological resources would be considered a significant adverse environmental impact. General plan program 7.6.A requires conditions of approval on all discretionary projects regarding the discovery of prehistoric, archaeological, or paleontological artifacts to ensure that cultural resources are adequately protected should unanticipated and unknown resources be uncovered during construction activities. Implementation of this condition will ensure potential impacts to unknown archaeological resources would be less than significant.

- c. The project site has not been surveyed for paleontological resources. However, a search of the University of California Museum of Paleontology (UCMP) collections database for the proposed project site did not identify any evidence of paleontological resources (Cornuts EIR p 3.5-4). In addition, the geography and geology of the area suggest that it is not sensitive for paleontological resources. The site is located on alluvium of an age that is younger than geologic formations that typically contain fossil resources known to occur in Monterey County. It is unlikely that the site contains paleontological resources that could be disturbed by site preparation or other construction activities. However, in the unlikely discovery of paleontological resources, the project will be required to comply with general plan program 7.6A, which will ensure that impacts to paleontological resources would be less than significant. There are no unique geologic features on the surface of the project site.

- d. While no human remains are anticipated to be found on the site, there is the potential that unanticipated human remains may be discovered during construction activities, disturbance of which could be a significant impact. The project will be required to comply with general plan program 7.6A, which will ensure that impacts to human remains would be less than significant.

6. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(1) 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? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Strong seismic ground shaking? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(3) Seismic-related ground failure, including liquefaction? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(4) Landslides? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, creating substantial risks to life or property? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (1, 3, 4, 18, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. This analysis is partially based upon the Geotechnical Engineering Report (geotechnical report) prepared on May 26, 2004 by Earth Systems Pacific. This geotechnical report was prepared for the 51-acre Cornuts Annexation Project, which included the project site.

1. Fault Rupture. The project site is not located in an Alquist-Priolo Earthquake Fault Zone or in a County of Monterey Earthquake Fault Zone. Because no active or potentially active faults are known to cross the site, there is no risk of fault rupture across the site and there would be no impact from hazards related to fault rupture.
2. Seismic Ground Shaking. The nearest fault line is the Reliez/Rinconada Fault system which is approximately seven miles to the west of the project site. The San Andreas Fault is located approximately 14 miles to the northeast (Cornuts Annexation EIR p 3.7-2 and 3.7-9). An earthquake of moderate to high magnitude along these faults could cause considerable seismic ground shaking at the site and potential damage to project improvements and risk to public safety if improvements are not constructed consistent with seismic safety standards.

Mitigation Measure

- GEO-1. Prior to the construction of the Phase 1 parking lot and any Phase 2 development, the project applicant(s) shall submit a geotechnical investigation prepared by a qualified professional for review and approval by the City of Greenfield in accordance with Policy 8.1.2 of the City of Greenfield General Plan. The geotechnical report shall include comprehensive geologic, seismic, and/or soils and engineering recommendations. Recommendations of the report and specific construction performance criteria shall be incorporated into the final building plans, subject to review and approval by the City of Greenfield Building and Planning Department.

All new development within the city must be constructed to comply with seismic safety code requirements and seismic and geologic standards of the California Building Code. Implementation of mitigation measure GEO-1 and this regulatory requirement would ensure that seismic hazards risks are less than significant.

3. Liquefaction. The Estimated Liquefaction Potential Map in the general plan identifies the project site as an area of low liquefaction potential. Similarly, the geotechnical report prepared for the Cornuts Annexation Project found liquefaction potential to be low due to the presence of dense soil deposits beneath the site. General Plan Safety Element Goal 8.1 and its implementing policies and programs require future development to comply with all codes and development standards addressing seismic safety which would ensure the potential impacts of related to liquefaction are less than significant.
4. Landslide. The geotechnical report found that the project site and surrounding area had zero to two percent slopes (Cornuts Annexation EIR p 3.2-4).

Therefore, the proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving the potential for landslides at the project site. .

- b. Soil erosion/loss of topsoil. The proposed project includes minimal grading activities that may result in disruption, displacement, compaction, and over covering of the soil. The General Plan Relative Soil Erosion Hazards Map classifies the project site as an area with low risk of erosion.

The general plan EIR found that erosion resulting from a project can be successfully controlled and prevented using a variety of methods including implementation of all policies and programs of the General Plan Growth Element Goal 4.12, Drainage Facilities. These policies and programs require that drainage and erosion control plans are submitted for all future development proposals and are reviewed by the city building inspection and engineering staff for compliance with all state codes and laws. The policies require implementation of all recommendations within engineering reports and implementation of best management practices by future construction contractors on the site. All development must comply with Section 3316 of the California Building Code and Greenfield Municipal Code, which specify measures to avoid impacts from erosion, runoff, loss of topsoil, winter operations, and maintenance. Implementation of these measures will reduce potential impacts related to soil erosion and loss of topsoil to less than significant.

- c. According to the geotechnical report, the surface soils at the test pit locations on adjacent sites consisted of very stiff sandy-silty clays and medium dense sands that contained variable quantities of silt and clay which could be unstable and have a potential to collapse. Therefore, it is possible the site may have similar underlying soils with a potential for collapse. All new development within the city must be constructed to comply with seismic safety code requirements and seismic and geologic standards of the California Building Code. Implementation of this regulatory requirement would ensure that hazards risks are less than significant.
- d. According to the geotechnical report, Atterberg limits and expansion index testing of near surface soil samples found a plasticity index of seven and an expansion index of 19. These values indicate that the near-surface soil has a low expansion potential. Therefore, the project site would not be located on expansive soil creating substantial risks to life or property (Cornuts Annexation EIR p. 3.7-5).
- e. The proposed project would be connected to the city's sewer system and would not utilize septic systems. Therefore, there would be no impacts related to soil inadequacy for septic use.

7. GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (3,31,33,36,37,38,39,40,41,42)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (3,31,33,36,37,38,39,40,41,42)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. The California Legislature has enacted a series of statutes for reducing greenhouse (GHG) emissions across the State. In September 2006, the Legislature enacted the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 was amended by Senate Bill (SB) 32. Effective January 1, 2017, SB 32 requires that statewide GHG emissions be reduced to 40 percent below 1990 levels by 2030. The build-out of the proposed project is estimated to occur in the year 2022, which is beyond the AB 32 emissions reduction target date of 2020. Therefore, SB 32 is the applicable emissions reduction target.

The project site is located within the Monterey Bay Air Resources District (hereinafter “air district”). To date, the air district has not adopted CEQA guidance for analysis of GHG effects of land use projects (e.g. numerical thresholds of significance,) nor has it prepared a qualified GHG reduction plan for use/reference by local agencies located within the air district. Further, the City of Greenfield has not adopted a GHG reduction emissions plan or a climate action plan that is applicable to new development within the city limits.

In light of these circumstances, a GHG threshold of significance for the project’s expected build-out year of 2022 has been developed for the proposed project based on the SB 32 statewide emissions reduction target. The threshold is a GHG efficiency metric that represents a rate of statewide emissions generation from land use projects. It is the ratio of projected total 2022 statewide GHG emissions from the land use sector needed to achieve consistency with the SB 32 reduction goal, to the 2022 projected statewide service population, where the service population is the sum of

the projected number of jobs and the projected number of residents in 2022. If the proposed project rate of emissions at build-out is equal to or below the threshold, project emissions would remain within the trajectory needed for the state to meet the SB 32 GHG reduction target of 40 percent below 1990 levels by 2030, and the project would not conflict with SB 32, the applicable plan for reducing GHGs.

The California Air Resources Board (CARB) stated in the *First Update to the Climate Change Scoping Plan* that an average statewide GHG reduction of 5.2 percent per year from the projected statewide year 2020 GHG emissions inventory volume will be needed to stay on a trajectory to achieve state reduction targets for 2030. The first step in deriving an applicable statewide efficiency metric threshold is to determine the projected volume of statewide GHG emissions from land use driven sectors in 2022 (project build-out year) that must be achieved to stay on trajectory towards meeting the statewide 2030 reduction target of 40 percent below 1990 levels.

[Table 3, 2020 California Greenhouse Gas Inventory for Land Use Driven Emissions](#), shows the 2020 state emissions inventory for land use driven GHG emissions. Total land use driven emissions are projected at 286.70 million metric tons (MMT) CO₂e.

Applying CARB's 5.2 percent annual emissions reduction rate to the 2020 projected state inventory volume of 286.70 MMT CO₂e for two consecutive years yields a projected emissions volume of 257.66 MMT CO₂e in 2022. The projected 2022 statewide population is 41,321,565 (California Department of Finance 2018). The California Employment Development Department, California Occupational Employment Projections 2016-2026, show that the 2026 employment projection is 20,022,700 jobs (California Employment Development Department 2018). Projected 2022 employment is equivalent to 20,022,700 jobs minus the annual average rate of employment during the period 2016 to 2026, which equals 193,310 jobs per year or 773,240 for the four-year period 2022 to 2026. Therefore, 2022 employment is estimated at 19,249,460 jobs. The projected 2022 service population is 41,321,565 (population) plus 19,249,460 (jobs), for a total of 60,571,025. The 2022 GHG efficiency threshold is 257.66 MMT CO₂e per year/60,571,025 or 4.25 MT CO₂e per year per service population. This value represents the threshold of significance for the proposed project.

The southern portion of the project site is developed with eight buildings including warehouse buildings, an office building, multiple accessory structures, and silos and fencing. The remainder of the property is active agricultural land, currently used for growing corn.

Table 3 2020 California Greenhouse Gas Inventory for Land Use Driven Emissions

Land Use Type	Emissions (MMT CO ₂ e)
On-Road Transportation	
Passenger Cars	63.77
Light Duty Trucks	44.75
Motorcycles	0.43
Heavy Duty Trucks	29.03
Freight	0.02
Subtotal	138.00
Electricity Generation In-State	
Commercial Cogeneration	0.70
Merchant Owned	2.33
Transmission and Distribution	1.56
Utility Owned	29.92
Subtotal	34.51
Electricity Generation In-State	
Specified Imports	29.61
Transmission and Distribution	1.02
Unspecified Imports	30.96
Subtotal	61.59
Commercial	
CHP: Commercial	0.40
Communication	0.07
Domestic Utilities	0.34
Education	1.42
Food Services	1.89
Healthcare	1.32
Hotels	0.67
Not Specified Commercial	5.58
Offices	1.46
Retail & Wholesale	0.68
Transportation Services	0.03
Subtotal	13.86
Residential	
Household Use	29.66
Subtotal	29.66

Land Use Type	Emissions (MMT CO ₂ e)
Industrial	
Landfills	6.26
Domestic Wastewater Treatment	2.83
Subtotal	9.09
Total Emissions	286.70

SOURCE: California Air Resources Board, No date

The proposed project would result in new greenhouse gas emissions during its construction and operational phases. Construction emissions would be generated by equipment used during the site preparation, grading, and building construction processes. Operational emissions would be generated primarily by employee vehicle trips, off-road equipment, stationary equipment, and indirectly by use of electricity and natural gas on site, by use of electricity to pump water supply and treat wastewater, and from decomposition of solid waste generated by the proposed use.

GHG emissions from the existing development, project construction, and project operations have been estimated using California Emissions Estimator Model (CalEEMod) Version 2016.3.2. CalEEMod also calculates the estimated change in carbon sequestration potential that would result from converting agricultural vegetation to non-agricultural uses. Refer to Appendix A for detailed results.

Baseline GHG Emissions. Baseline GHG emissions are those generated under existing conditions. Existing development and agricultural activity on the project site are sources of GHG emissions that would be eliminated when the site is developed.

In-Model Baseline Emissions. Existing development on the site generates approximately 234.62 MT CO₂e of GHG emissions per year.

Out-of-Model Baseline Emissions. The project site contains approximately 8.5 acres of cropland that are currently in row crop production. The primary GHG emissions sources are electricity generation to supply power for pumping irrigation water and fuel combustion in farm equipment. To be conservative and due to uncertainty about the intensity of farm equipment use, this component of baseline emissions activities is not further evaluated.

The project site is currently and has historically been used to grow corn. According to the 2010 Agricultural Land & Water Use Estimates from the California Department of Water Resources, corn demand approximately 2.83 acre-feet (AF) per acre. [Table 4, Existing Agricultural Water Use](#), presents the projected total existing water use from agricultural activity within the project site.

Table 4 Existing Agricultural Water Use

Crop	Acres	Water Demand per Acre (AF/acre)	Total Agricultural Water Demand (AF)
Corn	8.5	2.83	24.06

SOURCES: EMC Planning Group 2019, California Department of Water Resources 2010

The typical energy intensity for electricity used to supply, treat, and distribute water in northern California as referenced in California Air Pollution Control Officers Association's *Quantifying Greenhouse Gas Mitigation Measures* (page 342) is 3,500 kWh per 1,000,000 gallons of water. Since irrigation water used within the project site is sourced from local wells, the typical energy intensity value is likely lower and assumed to be 2,000 kWh per 1,000,000 gallons of water. Information obtained from utility providers, in this case, Pacific Gas and Electric, can be used to estimate electrical demand per unit of water demand and GHG emissions volumes per unit of energy consumed. At an estimated 7,839,975.06 gallons of annual agricultural water demand (24.06 AF x 325,851 gallons/AF), agricultural water pumping generates demand for approximately 15.68 megawatt hours (MWh) of electricity per year. Per Pacific Gas and Electric's *Greenhouse Gas Emission Factors: Guidance for PG&E Customers*, November 2015, 0.149 metric tons of CO₂e would be produced for each MWh of electricity produced in 2018. Applying this factor to the existing agricultural water pumping electricity demand yields a GHG emissions baseline of approximately 2.34 MT CO₂e per year.

Construction GHG Emissions. Construction activity during Phase 1 would generate an estimated 15.66 MT CO₂e of unmitigated GHG emissions. Construction activity during Phase 2 would generate an estimated 614.17 MT CO₂e of unmitigated GHG emissions. Therefore, construction activity associated with the proposed project would generate 629.83 MT CO₂e of unmitigated GHG emissions. When averaged over a thirty-year operational lifetime, the amortized construction emissions equal 20.99 MT CO₂e per year. CalEEMod defaults have been used for the number and type of construction equipment to be utilized during the construction process and for other construction emissions because project specific data is currently not available.

Operational GHG Emissions. Operations during Phase 1 will generate an estimated 236.62 MT CO₂e per year of GHG emissions. Operations during Phase 2 will generate an estimated 2,301.49 MT CO₂e per year of GHG emissions. The total unmitigated operational GHG emissions from the proposed project at build-out is the sum of Phase 1 and Phase 2 unmitigated operational emissions. Therefore, at build-out the proposed project will generate a total of 2,538.11 MT CO₂e per year of unmitigated GHG emissions.

Carbon Sequestration Potential. The one-time only loss in carbon sequestration value attributable to converting 8.5 acres of cropland to urban uses is estimated as 52.70 MT CO₂e. The loss in sequestration potential is equivalent to 1.76 MT CO₂e per year, averaged over thirty years.

Regulatory Reductions. CalEEMod Version 2016.3.2 accounts for GHG reductions that accrue to the current 2016 California Building Energy Efficiency Standards (BEES). The California Energy Commission recently adopted the 2019 BEES. The 2019 BEES become effective on January 1, 2020. The 2019 BEES will result in non-residential buildings constructed after January 1, 2020 consuming about 30 percent less energy than those constructed under the 2016 BEES. Since the construction of Phase 2 of the proposed project would not be initiated until after January 1, 2020, the energy demand from Phase 2 would be reduced by 30 percent relative to the 2016 BEES standards. Applying the 30 percent electricity demand reduction to manufacturing uses as shown in Section 5.3, Energy by Land Use – Electricity, of the CalEEMod Phase 2 results yields a 91.33 MT CO₂e per year reduction in GHG emissions.

Net GHG Emissions Attributable to the Proposed Project. [Table 5, Project GHG Emissions Summary](#), shows net GHG emissions for the proposed project at build-out in consideration of all components of its GHG inventory presented above.

Table 5 Project GHG Emissions Summary

Emission Source	Annual GHG Emissions MT/Year CO ₂ e
Amortized Construction	20.99
Annual Unmitigated Operational	2,538.11
Sequestration Potential (change)	1.76
Total Annual Unmitigated	2,560.86
In-Model Baseline Emissions ¹	(234.62)
Out-of-Model Baseline Emissions ¹	(2.34)
Regulatory Reductions ¹	(91.33)
Net Annual GHG Emissions	2,232.57
Service Population	110
GHG Emissions/Service Population	20.30
Threshold of Significance	4.25
Project Emissions Exceed Threshold?	Yes

SOURCES: EMC Planning Group 2019

Notes:

1. (Brackets) indicate deductions.

Service Population. The project service population is the new employment generated by the proposed project. The proposed project is expected to generate 110 full time employees at build-out. Therefore, the service population associated with the proposed project is 110.

Conclusion. The proposed project would generate approximately 2,232.57 MT CO₂e per year of GHG emissions. The service population is 110. As summarized in Table 3, at build-out, the proposed project would generate approximately 20.30 MT CO₂e per year per service population (2,232.57/110). This exceeds the threshold of significance of 4.25 MT CO₂e per year per service population for the year 2022. Therefore, the proposed project would generate GHG emissions that have a significant impact on the environment. This impact could result in incrementally increased air, surface, and ocean temperatures that in turn could have effects that include, but not limited to: reduced snowpack, more frequent and extreme storm events, reduced water supply availability, increased wildfire hazards, increased public health concerns, etc.

Implementation of the following mitigation measure would reduce this impact to a less-than-significant level.

Mitigation Measure

GHG-1. To ensure project GHG emissions are below the threshold of significance of 4.25 MT CO₂e per year per service population, a minimum reduction of 16.05 MT CO₂e per year per service population shall be achieved through implementing one or more of the following options: incorporating on-site GHG reduction measures into the project, participating in an off-site GHG reduction program, and/or purchasing GHG off-sets.

Potentially feasible on-site GHG reduction measures could include, but may not be limited to:

- a. Design buildings to exceed Title 24 energy efficiency standards by at least five percent. The 2019 Building Energy Efficiency Standards are assumed to be the applicable standards;
- b. Provide on-site renewable energy to replace demand for grid electricity. Rooftop solar installations and/or ground-mounted installations may be feasible options for on-site energy production;
- c. Exceed higher than mandated parking lot and area energy efficient lighting standards;

- d. Incorporate low flow irrigation that exceeds requirements of the state Water Efficient Landscape Ordinance;
- e. Include the necessary infrastructure in the project design (e.g. physical design, energy, and fueling) to support the deployment of zero emission technologies now and into the future, including electric vehicle charging stations for employee cars and for electric off-road equipment; and/or
- f. If additional reductions are required, one or both of the following options can be employed to mitigate the emissions balance needed to attain the required reduction.
 - i. If the project applicant chooses to participate in an off-site GHG reduction project or program to reduce GHG emissions, evidence of such participation shall be provided to the City of Greenfield by the agency/interest that is implementing the project or program. Evidence shall describe how the applicant is participating, the expected GHG reduction volume that can be assigned to the project as a result of the applicant's participation, and verification that the applicant has met participation requirements. The evidence shall be subject to review and approval of city staff prior to issuance of a grading permit for Phase 2.
 - ii. If the project applicant chooses to purchase carbon off-sets solely or in combination with either or both options above to reduce GHG emissions, the project applicant shall provide evidence to the City of Greenfield that a contract for such purchase has been executed through a credible carbon off-set registry such as the Climate Action Reserve, certified carbon off-set project developer, or a broker. The evidence shall be subject to review and approval of city staff prior to issuance of a grading permit for Phase 2.

The project applicant shall prepare a Greenhouse Gas Reduction Plan that identifies the proposed reduction measures, GHG emissions reductions volumes associated with each, and evidence to support the level of reduction calculated for each that achieve 16.05 MT CO₂e per year. The Greenhouse Gas Reduction Plan shall be subject to review and approval of city staff prior to approval of a grading permit for Phase 2a.

- b. As discussed in “a” above, the air district has not adopted CEQA guidance for analysis of GHG effects of land use projects (e.g. numerical thresholds of significance,) nor has it prepared a qualified GHG reduction plan for use/reference by local agencies located within the air district. Further, the City of Greenfield has not adopted a GHG reduction emissions plan or a climate action plan that is applicable to new development within the city limits. In light of these circumstances, SB 32 is considered to be the applicable plan for reducing GHG emissions. A GHG threshold of significance for the project build-out year of 2022 has been developed. The threshold is based on the rate of project emissions below which the project would not impede attainment of the SB 32 statewide emissions reduction goal for 2030. The project GHG emissions exceed the threshold of significance for the build-out year of 2022 (see “a” above), thereby conflicting with SB 32. This is a significant impact. Implementation of Mitigation Measure GHG-1 would reduce this impact to less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (1, 2, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (1, 2, 4, 27, 30)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment? (1, 2, 4, 14, 15, 27, 30, 34)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a public-use airport, result in a safety hazard for people residing or working in the project area? (1, 2, 4, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area? (1, 2, 4, 16, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (1, 2, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. Organic cultivation and manufacturing of medical cannabis products does not inherently require the use of hazardous materials. Nominal amounts of potentially hazardous materials may be stored and used for non-product cultivation purposes such as facility sanitation, but will not require the routine transport and disposal of these materials. The project will be required to comply with existing federal, state and local laws regulate the use and disposal of any hazardous or potentially hazardous materials used. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- b. Pesticides and other agricultural chemicals which are recognized environmental contaminants may have been applied to the site for decades. Therefore, residual concentrations of pesticide residues may remain in the soil which could be disturbed and released during construction activities. Compliance with local, state, and federal regulations during construction activities would reduce this impact to less than significant.

According to the Cornuts Annexation EIR, the Federal Radon Zone for Monterey County is two, which indicates an indoor average Radon level between two and four picoCuries per liter of air (pCi/L). California is ranked 32nd out of 34 states studied for the prevalence of radon problems by the Cal-EPA Department of Toxic Substance Control. Therefore, there may be the potential for radon exposure in the buildings on site. Additionally, it is unknown what year the Cornuts facility was constructed. It is possible that the buildings were constructed prior to the 1980's and may contain lead paint or asbestos. If these materials are present, they could be released during renovation activities. Implementation of the following mitigation measure would ensure impacts would be less than significant.

Mitigation Measure

- HAZ-1. Prior to issuance of a permit for demolition of any silo or renovation of the existing buildings, whichever happens first, a hazardous materials report must be prepared by a qualified professional, subject to review and approval by the City of Greenfield. The report must determine whether radon, asbestos, lead based paint, or any other hazardous materials that were commonly used in construction during the time the Cornuts facility was constructed are present and identify proper remediation measures for any hazardous materials found. All recommendations from the report must be incorporated into renovation plans.

- c. The project site is not within one-quarter mile of an existing or proposed school and therefore would not result in impacts related to the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school.
- d. Government Code Section 65962.5 requires that the Department of Toxic Substances Control compile and regularly update a list of hazardous waste facilities and sites. A search of the Envirostor and Geotracker websites did not indicate any hazardous materials sites within 1,000 feet of the site. However, according to the Cornuts Annexation EIR, the site contains unspecified oil containing waste; two 10,000-gallon regular unleaded gasoline tanks and one 6,000-gallon diesel fuel tank used for providing motor vehicle fuel. No leaks, spills or violations were reported, however, the EIR noted that correspondence with the Monterey County Health Department revealed that an area of the grounds was being used to store waste oil and soil staining was evident in the storage area. The area was excavated to the County of Monterey's satisfaction. The fuel tanks have since been removed from the site.
- e. The project is not located within an airport land use plan and there are no existing commercial airports or public air strips within two miles of the project site. The project would not result in public airport related safety hazard for people residing or working in the project area.
- f. The City of Greenfield has approved plans for the construction of an airport, which will be located at the current location of the Yanks RV Resort property approximately one mile north of the project site. Airplanes will take-off and land in a northeast or southwest direction. The project site is not located within the flight path of the proposed airport land use plan, or other existing public airports, public use airports, or private airstrips. Therefore, the proposed project would not result in any safety hazards associated with an airport land use for people residing or working in the project site and no impact is anticipated.
- g. The proposed project will comply with the Municipal Code and Fire Department standards for emergency vehicle access. The project will not interfere with emergency response or emergency evacuation plans.
- h. The Monterey County Fire Hazard Severity Zone Map designates the City of Greenfield as a Non Very High Fire Hazard Severity Area within an Incorporated Local Responsibility Area. Potential for wildfires within the city and at the site is low and the potential risk of loss, injury, or death involving wildland fires is less than significant.

9. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements? (1, 2, 4, 23, 24, 43)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., would the production rate of preexisting nearby wells drop to a level which would not support existing land uses or planned uses for which permits have been granted? (1, 2, 4, 22, 27, 44, 45)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in <i>substantial erosion or siltation on- or off-site</i> ? (1, 2, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface run-off in a manner which would result in <i>flooding on- or off-site</i> ? (1, 2, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute run-off water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted run-off? (1, 2, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality? (1, 2, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Be subject to inundation by seiche, tsunami, or mudflow? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Water Quality Standards.** The State Water Resources Control Board has implemented a National Pollution Discharge Elimination System (NPDES) Program to control and enforce storm water pollutant discharge reduction per the Clean Water Act. The Central Coast Regional Water Quality Control Board (RWQCB) issues and enforces the NPDES permits for discharges to water bodies in Monterey County, including the City of Greenfield. As part of their current NPDES Phase II Storm Water Permit, the RWQCB requires cities to reduce the volume, rate, and pollutant loading of urban runoff. The RWQCB stipulates that cities establish development standards to be used in new development and redevelopment to help achieve the goals of the NPDES permit. The city has been granted a waiver from NPDES General Permit/Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer System, City of Greenfield, WDID 327M200058. Monterey County Waivers are granted where discharges do not cause or have the potential to cause water quality impairment. Therefore, the proposed project would not violate any water quality standards.

Waste Discharge Requirements. The City of Greenfield is responsible for the maintenance and operation of the sewer collection system and wastewater treatment facilities serving the residences and businesses in Greenfield in compliance with regulatory requirements for waste discharge. The City of Greenfield Wastewater Treatment Plant is regulated by the Regional Water Quality Control Board, Central Coast Region, by Waste Discharge Requirements (WDR) Order No. R3-2002- 0062. The project will connect to the city maintained sewer system and therefore, the proposed project would not violate any waste discharge requirements.

- b. The city obtains all of its water supply from the Salinas Valley Groundwater Basin. The Salinas Valley Groundwater Basin consists of one large hydrologic unit comprised of four subareas: Upper Valley Subarea, Forebay Subarea, 180-Foot/

400-Foot Subarea, and East Side Subarea. These subareas consist of three main vertically divided aquifers: 180-foot aquifer, the 400-foot aquifer, and the Deep Zone, which extends approximately 2,000 feet below land surface. Greenfield is located in the Forebay Subarea. The subareas have different hydrogeological and recharge characteristics, but barriers to horizontal flow do not separate the subareas and allow water to move between them. Therefore, extraction of water in the Greenfield area for agricultural and urban use can affect overdraft and seawater intrusion conditions within the overall basin, including in the subareas nearest the Monterey Bay where seawater intrusion and overdraft are of significant concern. While this is the case, groundwater overdraft within the Forebay Subarea from which the city obtains its water supply has not historically been a problem. According to the Urban Water Management Plan, the Forebay Subarea has adequately met the city's water demands and it is anticipated that the sub basin will adequately meet the city's water demands in the future (Urban Water Management Plan pg. 34). Although a sustainable yield has not been estimated for the Forebay Subarea, the Urban Water Management Plan identified an average usage rate of 149,000 acre-feet per year. Given the storage available in the aquifer, and the relative lack of impact that drought conditions have on water availability, this number is conservative. The Urban Water Management Plan determined that the city's sustainable groundwater yield exceeds the projected demand during the periods of normal and dry years. Development of the project site with industrial uses was anticipated in the Urban Water Management Plan and therefore, the project would not contribute to substantial depletion of groundwater that adversely impacts groundwater supply or that results in a substantial lowering of the groundwater table.

- c. Although no natural drainages exist on the project site, the proposed project would substantially alter the existing drainage pattern of the site. Development of the project has the potential to increase the volume, rate, and pollutant loading of storm water runoff after construction due to increased impervious surfaces. This could result in substantial erosion/siltation or flooding if such development were not designed to address and mitigate these potential effects. The proposed drainage system will be designed to reduce pollutant discharges and lower the post-development storm water runoff volume and rate to predevelopment levels to the maximum extent practicable by implementing LID and BMP planning and design strategies. The project will select and design BMPs and develop a long term maintenance plan per the requirements of the city's standards or subsequently adopted standards at the time of final design.

General plan policies 4.12.1 through 4.12.7 encourage design, development, and maintenance of appropriate drainage facilities. To specifically address soil erosion during the construction process, general plan goals 4.10 and 8.2 address drainage facilities and flood protection in Greenfield. Consistent with the policies and programs that implement these goals, drainage and erosion control plans must be reviewed and approved by the Public Works Director and City Engineer as part of project review process. Best Management Practices must be identified to demonstrate control of erosion and water quality impacts during construction.

Compliance with referenced regulations and general plan policies will ensure that potential erosion impacts during project construction and operation will be less than significant.

- d-f. The project site does not currently contain storm drainage infrastructure. Rainfall either percolates to groundwater or sheet flows from the site. As part of the project design and development review process, the applicant will be required to prepare storm drainage improvement plans for the project. The plans must meet city standards for the location, type, and sizing of improvements needed to integrate the project into the city's storm drainage infrastructure system. The system must be sized and designed to convey and dispose of storm water to avoid localized or regional flooding. A grading permit will not be approved until the applicant has demonstrated compliance with storm water improvement standards. Potential impacts from localized flooding due to alteration of site conditions and inadequate capture and disposal of post-development storm water runoff would be less than significant.

The applicant will be required to implement a range of measures to protect water quality during construction. General plan policies explicitly require implementation of water quality controls. Implementation of new development consistent with established regulatory requirements, general plan policies, and city standards will assure that the proposed project would not violate water quality standards and as a result, that its potential impacts on water quality will be less than significant.

- g, h. The project area is not within a 100-year flood hazard zone.
- i. The general plan identifies the failure of either the Nacimiento Reservoir Dam in San Luis Obispo County located 40 miles to the southwest, or the San Antonio Reservoir Dam located 30 miles to the southwest, as a low risk hazard. This is due mainly to the city's distance from the reservoirs and the opportunity for the largest volume of water to dissipate on the intervening lands before reaching the city. Both dams are regularly inspected by the state to ensure that their integrity and safety is maintained.

Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

- j. The project site is not subject to seiche or tsunami or located near hillside areas prone to mudflow. Therefore, the proposed project would not be subject to inundation by seiche, tsunami, or mudflow.

10. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Physically divide an established community? (1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. A portion of the project site is currently developed with industrial uses and the remainder is in agricultural production. The project site is surrounded by a roadway and farmland to the north, apartments under construction to the south, residences and the city public works corporation yard to the east, and the existing Greenfield Organix C2 business to the west. Development of the site would not divide an established community.
- b. The proposed project is consistent with the Light Industrial land use designation as it would involve processing and/or packaging, and distribution of finished and raw products or related uses and would not result in significant impacts from the generation of noise, odor, vibration, smoke, or pollutants. Applicable policies of the general plan were reviewed and it was determined that the proposed project would not conflict with any applicable land use plan policies adopted for the purpose of avoiding or mitigating an environmental impact.
- c. There are no habitat conservation plans or natural community conservation plans applicable to the project site.

11. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (1, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan? (1, 4, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a, b. The project site is not located in an area containing mineral resources. Therefore, the project would not result in impacts to known mineral resources or result in the loss of availability of a locally important resource recovery site.

12. NOISE

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies? (1, 2, 4, 48)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive ground-borne vibration or ground borne noise levels? (1, 2, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (1, 2, 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (1, 2, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels? (1, 2, 4, 16, 28)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project located within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels? (1, 2, 4, 16, 28)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a, c. **Traffic Noise.** Increases in traffic generation as a result of construction and operation of the proposed project will result in elevated noise levels along local roadways. Long-term, permanent increases in ambient noise levels would be primarily associated with increases in vehicle traffic on nearby roadways. According to the U.S. Department of Transportation Federal Highway Administration, doubling of the noise source produces only a 3 dB increase in sound pressure level. A 3 dB change in sound level is barely detectable by the human ear. The greatest effect of project traffic

would occur along 10th Street, between Cherry Avenue and Walnut Avenue. The existing Average Daily Traffic (ADT) along 10th Street, between Cherry Avenue and Walnut Avenue is 920 vehicles. The proposed project would add 500 trips to this roadway segment for a total ADT of 1,420 vehicles, representing an increase of in traffic volume by 54 percent. Therefore, project-generated increase in traffic volumes would result in a less than a 3 dB increase in noise which is barely detectable by the human ear. The Average Daily Traffic table is included in [Appendix C](#). Traffic noise generated from the project would not rise to the level of a substantial permanent increase in ambient noise increase noise levels in the project vicinity.

Operational Noise Phase 1: Phase 1 of the project includes reuse of the existing buildings for the operation of the cannabis facility. Noise associated with this use would mostly be indoors excluding some movement from building to building with handcarts and would not likely generate any unique or excessive noise beyond that generated by the operation of the Cornuts facility. Phase 1 is unlikely to exceed city noise thresholds or result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Impacts associated with the operation of Phase 1 would be less than significant.

Operational Noise Phase 2a. Phase 2a of the project will include the construction and utilization of two new buildings for the manufacturing of cannabis. While Phase 2a is not expected to produce significant continuous noise from on-site operations and does not include point sources of high intensity noise or sources that would significantly raise exiting ambient noise levels, it is possible that operation of the project could exceed noise standards or permanently raise ambient noise levels at the adjacent 4.27-acre housing development under construction, Walnut Grove Apartments. The Walnut Grove Apartment site abuts the southern property line. There is a 50-foot required building setback on the project site adjacent to residentially zoned land. The proposed facility would be further screened from noise with the 25-foot landscaped buffer. The Walnut Grove Apartment project, as part of its development, will install an eight-foot CMU block wall, 30 linear feet of landscaping, and a bio swale on their property adjacent to the boundary between the site and the Cornuts property. A large parking lot will sit in between the landscaping and apartments to provide additional buffer. This will help to attenuate the noise from the industrial facility. While noise impacts are not expected to be significant, a site specific acoustical analysis should be conducted to determine noise impacts for Phase 2a and identify appropriate mitigation measures if necessary, prior to a grading permit for Phase 2a. Implementation of the mitigation measure N-1 below will ensure impacts are less than significant.

Operational Foreseeable Future Use. Future development of greenhouses on the northern portion of the site would be unlikely to result in operational noise that would expose persons to or generate noise levels in excess of standards established in the general plan or noise ordinance. This portion of the site is adjacent to the existing Greenfield Organix C2 facility, active agricultural land, and roadways. There are no adjacent sensitive uses that would be likely to be impacted by operation of this portion of the site.

Mitigation Measure

- N-1. Prior to issuance of a grading permit for Phase 2a, a site specific acoustical analyses shall be conducted to determine predicted noise impacts attributable to Phase 2 taking into account site-specific conditions (e.g., site design, location of structures, building characteristics) subject to review and approval by the City of Greenfield Planning Division. The acoustical analysis shall evaluate noise attributable to the proposed use(s), exposure of noise sensitive land uses to existing noise sources, and project-related impacts to nearby noise sensitive land uses, in comparison to adopted City of Greenfield noise standards. Measures shall be identified to reduce project-related noise impacts to noise sensitive receptors.
- b. Construction of the proposed project would not require the use of equipment that generates significant periodic or continuous ground vibration and the project does not involve operations that would be a source of significant ground vibration. Therefore, impacts would be less than significant.
- d. The proposed project would generate noise during construction that would result in a short-term increase in ambient noise levels. Although construction noise is considered a temporary noise impact and is generally not significant in terms of long term noise exposure, it has a potential for disturbing nearby residences. The general plan EIR considered potential construction noise impacts of future development, including development of the project sites with light industrial uses. The general plan EIR determined that development of light industrial projects will result in potentially significant noise impacts due to their construction but found that the policies and programs of the General Plan Noise Element (General Plan Chapter 9.0) mitigate construction-related noise through enforcement of the city's noise ordinance (Greenfield Municipal Code Chapter 17.60, Performance Standards). This Ordinance specifies limitations on construction hours and other measures to reduce such noise to acceptable levels. Continued implementation of general plan policies and enforcement of the noise ordinance will ensure construction-related noise impacts are less than significant.

- e, f. The project site is located approximately one mile south of the Yanks Air Museum and airstrip site, which is located at the north end of the city, east of U.S. Highway 101. As of January 2019, plans for construction of the museum and airstrip are not available. The Federal Aviation Administration promulgates regulations for the development and function of airports. Included in the regulations are rules for noise exposure and airport safety. The rules are designed, in part, to minimize risks and hazards from noise exposure through airport land use compatibility planning. Residential or similar noise sensitive land uses are to be excluded from areas around an airstrip where noise levels from aircraft operations would exceed 65 dB CNEL. Land uses less sensitive to noise can be located within higher intensity noise contours. The noise contours for operations of the airstrip were calculated and mapped on Figure 12 in the Final Environmental Impact Report for the Yanks Air Museum and Visitor-Serving Project. The 65 dB CNEL contour is contained within the Yanks project site and lower intensity noise contours are located directly adjacent to that site. Consequently, airport operations would not adversely affect people working at the project site and noise impacts from airport operations would be less than significant.

13. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? (3, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (3, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (3, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. The currently proposed project and future greenhouse uses would generate approximately 110 new jobs which may result in a slight increase in population if new employees move to the city. However, this growth increase would be nominal and the applicant intends to institute a local employee hiring preference. Therefore, the proposed project would not induce substantial population growth in the area, either directly or indirectly.
- b, c. The proposed project site is currently developed with industrial uses and is in active farmland. Therefore, renovation of the existing buildings and construction of new industrial buildings on site will not displace people or housing necessitating the construction of replacement housing elsewhere.

14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or 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 following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Police protection? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Schools? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. The Greenfield Fire Protection District provides service to the City of Greenfield and outlying rural areas. The district currently has one station, the Greenfield Volunteer Fire Department, which is located near the corner of Oak Avenue and 4th Street. The Greenfield Fire Protection District has a mutual aid agreement for emergency response from area fire departments and, when necessary, receives assistance from the South Monterey County Fire Protection District, the California Department of Forestry and Fire Protection, and other community fire departments within the Salinas Valley, including the Gonzales Volunteer Fire Department. The will provide a security plan detailing lighting, alarms, fencing, and video cameras, to help protect the premises from theft, vandalism, and fire, for approval by the city. The site is already served by existing fire facilities and staff and would not require a substantial increase in services. Additionally, according to the general plan EIR, implementing policies and programs of Goals 4.4. and 4.5 outline a number of methods by which police and fire service providers will continue to maintain acceptable service levels at buildout of the general plan. As with other public services, policies call for fair share financing through new development to offset the cost of additional service needs with which the projects will comply. Implementation of general plan policies and programs will maintain performance standards for police facilities, and therefore, no new police facilities would be required to serve the proposed project.

- b. The Greenfield Police Department is located at 599 El Camino Real. The police department participates in a Mutual Aid Agreement with County of Monterey Sheriff's Department, which is responsible for patrolling areas around the Greenfield city limits. This program provides for sharing resources to respond to significant public safety events.

The applicant is required to provide a security plan detailing lighting, alarms, fencing, and video cameras, to ensure the safety of persons, and to protect the premises from theft, vandalism, and fire, for approval by the city. According to Chapter 5.28 of the municipal code, the city manager, police chief, or their designees would have the right to enter all medical marijuana facilities from time to time unannounced during the facility's hours of operation for the purpose of making reasonable inspections to observe and enforce compliance with this chapter, to inspect and copy records required to be maintained under this chapter, or to inspect, view, and copy recordings made by security cameras, all without requirement for a search warrant, subpoena, or court order. In January of 2016 the City Council adopted a fee schedule that will be applied to each project that will mitigate any impacts related to the need for additional law enforcement staff.

Additionally, according to the general plan EIR, implementing policies and programs of Goals 4.4. and 4.5 outline a number of methods by which police and fire service providers will continue to maintain acceptable service levels at buildout of the general plan. As with other public services, policies call for fair share financing through new development to offset the cost of additional service needs with which the projects will comply. Implementation of general plan policies and programs will maintain performance standards for police facilities, and therefore, no new police facilities would be required to serve the proposed project.

- c. The project is not population generating and would not generate school age children.
- d, e. The existing Cornuts facility and farming activities on site are served by existing public services. The project is not a population generating project and its development does not adversely affect the provision of public services and facilities. The project would not individually result in the need to construct new facilities to meet any change in demand.

15. RECREATION

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (1, 2, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (1, 2, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. The proposed project is not population generating and therefore, would not 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. The proposed project does not include recreational facilities or require the expansion of recreational facilities that might have an adverse physical effect on the environment.

16. TRANSPORTATION/TRAFFIC

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (1, 4, 47)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? (1, 4, 47)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (1, 3, 4, 47)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access? (1, 3, 4, 47)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreased the performance or safety of such facilities? (1, 3, 4, 47)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

This section is based on the *Greenfield Organix Traffic Impact Analysis* (Keith Higgins 2019) (hereinafter “traffic impact analysis”). The traffic impact analysis analyzes the potential

impacts of the currently proposed project in addition to the future development of greenhouses on the northern portion of the site which is not currently proposed. The traffic impact analysis is included as [Appendix D](#)

The impacts of the project were evaluated in accordance with the standards set forth by the city. The study included an analysis of five intersections. Traffic conditions were analyzed for the weekday AM and PM peak-hours of traffic. The weekday AM peak hour of traffic generally falls within the 7:00 to 9:00 AM period and the weekday PM peak hour is typically in the 4:00 to 6:00 PM period. It is during these times that the most congested traffic conditions occur on an average day. The study intersections are listed below.

- Twelfth Street / Cherry Avenue
- Tenth Street / Cherry Avenue
- El Camino Real / Cherry Avenue
- Tenth Street / Walnut Avenue
- El Camino Real / Walnut Avenue

Intersection Thresholds of Significance. Traffic conditions were evaluated using a level of service (LOS) analysis. Level of Service is a qualitative description of operating conditions ranging from LOS A, or free-flow conditions with little or no delay, to LOS F, or forced-flow conditions with extreme delays. A significant impact would occur if an intersection operating at LOS A, B, C or D degrades to LOS D, E or F; or for intersections and roadway segments already operating at LOS E or F, a significant impact would occur if the addition of project trips causes the intersection delay to increase by more than 5.0 seconds.

- a, b. **Performance Standards.** In order to determine potential traffic impacts associated with future development of a cannabis facility on the project site, the traffic impact analysis evaluated six study scenarios: Existing Conditions, Existing Plus Project Conditions, Background Without Project Conditions, Background Plus Project Conditions, General Plan Buildout Without Project Conditions, General Plan Buildout Plus Project Conditions. The LOS calculation sheets for each of these scenarios are included in Appendices C through H of the traffic impact analysis.

Existing Conditions and Existing Plus Project Conditions. The results of the intersection level-of-service analysis under existing conditions and existing plus project conditions show all study intersections currently operate at or better than their respective level of service standards.

Background Without Project Conditions and Background Plus Project Conditions. The results of the intersection level-of-service analysis under background without project and background plus project conditions show all study intersections currently operate at or better than their respective level of service standards.

General Plan Buildout Without Project Conditions Many of the study intersections under General Plan Without Project conditions would operate at or better than their respective level of service standards. However, the following three intersections would operate below their respective level of service standards: El Camino Real / Cherry Avenue intersection, 10th Street / Walnut Avenue intersection, and the El Camino Real/ Walnut Avenue intersection. Improvements to the intersections consistent with those recommended in the 2005 Greenfield General Plan and detailed in the traffic impact analysis (pp 15-16) would achieve an acceptable LOS for all intersections.

General Plan with Project Conditions. According to the traffic impact analysis, the study intersections will experience imperceptible increases in delay from the addition of project traffic otherwise expected from General Plan Buildout conditions. The intersection improvements described for the General Plan Without Project scenario will adequately mitigate traffic impacts and there are no significant traffic impacts identified as result of the project. However, the applicant will be responsible for impact fees and the fair share costs associated with the project's contribution to the cumulative impacts to the intersections impacted under General Plan buildout conditions. Implementation of the following mitigation measure will ensure the payment of impact fees to mitigate traffic impacts to a less- than-significant level.

Mitigation Measures

- T-1. The applicant shall be responsible for payment of the Greenfield Transportation Impact Fee prior to issuance of a building permit and subject to the approval of the Community Services Department, which would represent the project's contribution towards transportation improvements throughout the City of Greenfield that are funded by the fee program.
- T-2. The applicant shall contribute a fair share of the cost of any improvements not covered by the fee program, prior to issuance of a building permit and subject to the approval of the Community Services Department.
- T-3. The applicant shall be responsible for paying the Transportation Agency for Monterey County (TAMC) regional development impact fee prior to issuance of a building permit and subject to approval of the Community Services Department, to cover the costs for studies and construction of various regional transportation improvements throughout Monterey County.

- c. The proposed project would not result in a change in air traffic patterns. Therefore, the proposed project would not result in a safety risk associated with air traffic.
- d. The proposed project is compatible with the adjacent Greenfield Organix facility and would include adequate access and circulation. The project would not substantially increase hazards due to a design feature.
- e. The project site would have three driveways on 10th Street and one driveway on Cherry Avenue. The center driveway is proposed to be located about 680 feet south of Cherry Avenue and 610 feet north of Walnut Avenue. It will be the main driveway. Full access including left and right turns into and out of the 10th Street driveways is proposed. The northerly driveway on 10th Street is proposed to be located about 80 feet south of Cherry Avenue. This driveway would also have full access to and from 10th Street. The southern driveway on 10th Street would be located 315 feet north of Walnut Avenue. The Cherry Avenue driveway is proposed to be located about 600 feet west of 10th Street adjacent to the western boundary of the site. Both the southern 10th Street and Cherry Avenue driveways will be limited to emergency and occasional maintenance access and egress. No regular traffic activity is proposed at these locations which will ensure adequate emergency access. A 20-foot wide gravel access roadway will be constructed around the perimeter of the northern property between the greenhouses, if constructed, for emergency access. The project includes adequate emergency access.
- f. **Pedestrian.** Sidewalks are currently provided along both sides of Cherry Avenue east of 10th Street, both sides of El Camino Real (except the east side between Walnut Avenue and Cherry Avenue), the south side of Walnut Avenue east of 12th Street and the north side of Walnut Avenue east of 10th Street. Sidewalks are not provided along Cherry Avenue west of 10th Street or along the west side of 10th Street along the project frontage. The applicant proposes to dedicate approximately nine feet of property along the 639.90 linear feet Cherry Avenue frontage to construct a five-foot concrete sidewalk, curb and gutter, and a six-foot wide bike lane in the Cherry Avenue public right-of-way during Phase 2 of the development.

Bicycle. Class II bike lanes are provided along El Camino Real between Apple Avenue and Thorne Road and along Cherry Avenue between 10th Street and El Camino Real. An eastbound Class II bike lane is provided along the south side of Walnut Avenue east of El Camino Real. Bicycle parking will be provided on site and there are existing shower facilities within Building B.

Transit. Monterey-Salinas Transit operates five express bus routes (Routes 23, 82, 84 and 86) along El Camino Real through Greenfield. They have one or two stops in each. Route 23 operates 10 round trips per weekday and extends from Salinas to San Lucas.

Route 82 operates two round trips per weekday and extends from Carmel Valley to Fort Hunter Liggett. Route 84 has four round trips per weekday and extends from Soledad to Paso Robles. Route 86 includes one round trip per weekday and extends from San Jose to King City. Weekend service is also provided by each route. Each route stops in each of the cities in the Salinas Valley. The routes all stop on El Camino at Walnut Avenue, approximately one-fourth mile from the project site, which is about a five minute walk.

According to the traffic impact analysis, the project will not noticeably increase pedestrian activity, bicycle activity, or transit demand levels above levels expected under General Plan Buildout conditions. The project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

17. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. 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, or 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:				
(1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources code section 5020.1(k), or ()	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. ()	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. The CEQA status as amended by Assembly Bill (AB) 52 (Public Resources Code Section 21073 and 21074) define “California Native American Tribe” and “Tribal Cultural Resources.” A California Native American Tribe is defined as a Native American Tribe located in California that is on the contact list maintained by the Native American Heritage Commission. “Public Resources Code Section 21080.3.1 outlines procedures for Tribal Consultation as part of the environmental review process. According to City Staff, one California Native American Tribe has requested consultation per AB 52.

On February 12, 2019, the city sent a notification to the Ohlone/Coastanoan-Esselen Nation (OCEN) Tribal Representative regarding the proposed project and offered early consultation to the Tribe. On February 26, 2019, the Tribe responded with a request for consultation and that the Tribal Leadership desires to be provided with the following:

- Archaeological reports/surveys, including subsurface testing, and presence /absence testing;
- OCEN requests to be included in mitigation and recovery programs;
- OCEN requests that Cultural and Tribal mitigation measures reflect request for OCEN Tribal monitor;
- Reburial of any of our ancestral remains, burial artifacts;
- Placement/return of all cultural items to OCEN; and
- A Native American Monitor of OCEN, approval by the OCEN Tribal Council is used within our aboriginal territory.

On March 1, 2019, City staff attempted to contact the Tribal Representative by email and phone and has not received a response to date. As described in the Cultural Resources section, the project site is not known to be a Tribal Resource or contain features that may constitute a Tribal Resource. Therefore, impacts to Cultural Tribal Resources are less than significant. However, since the project site is within cultural lands known to be occupied by the OCEN Natives, a condition will be included in the CUP requiring a Native American monitor be present for any ground-disturbing grading activities.

18. UTILITIES AND SERVICES SYSTEMS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (1, 4, 23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (1, 4, 22, 44)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (1, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (1, 2, 4, 22, 27, 44, 45)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (1, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid-waste disposal needs? (1, 3, 48)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste? (1, 2, 3, 48)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. Wastewater generated by the proposed project would be delivered to the city wastewater treatment plant, which is subject to its own waste discharge requirements. The proposed project would not affect the city's ability to continue to operate the treatment plant in compliance with those requirements.

- b, e. The City of Greenfield Water Master Plan (water master plan) includes analysis of the city's water distribution and treatment system. The water master plan concluded that the system is well planned to meet the needs of existing customers and future growth of the city. Improvements in the water master plan are sized to meet cumulative development from existing and new development. The proposed project will not individually require construction of new water system improvements that could have a significant environmental impact. System wide improvements made pursuant to the water master plan are subject to independent CEQA analysis.

The city's wastewater treatment plant is permitted to treat and dispose of 2.0 million gallons per day. The wastewater treatment plant currently receives approximately 1.0 – 1.2 million gallons per day. The proposed project would generate a nominal volume of wastewater from use of restroom facilities by employees. The treatment plant would not require an expansion to accommodate flows from the project.

- c. Construction of storm drainage infrastructure involves excavation, placement of storm drainage conveyance mains or subsurface vaults, installation of LID facilities/features, and backfilling excavations with engineered fill. The construction process does not involve unique equipment or processes that would result in significant environmental impacts that are not addressed as part of the overall project impact analyses included in other sections of this initial study.
- d. Refer to item "b" in Section 9, Hydrology and Water Quality. The city has sufficient water supplies available to serve the project from existing entitlements and resources, and no new or expanded entitlements are needed.
- f, g. The city's solid waste is sent to the Johnson Canyon landfill, about 15 miles northwest of Greenfield. Johnson Canyon Landfill is a Class III facility that accepts municipal solid waste from: Salinas, Gonzales, Soledad, Greenfield, King City, Morgan Hill and the eastern portion of Monterey County, as well as a small portion of unincorporated south Santa Clara County. Based on its design capacity and permitted maximum tonnage per day, the landfill has capacity to the year 2040, its estimated closure date. The Johnson Canyon Landfill will have sufficient capacity to accommodate solid waste from the proposed project.

The Salinas Valley Solid Waste Authority is obligated to comply with the state's solid waste diversion regulations. The state's current goal is 75 percent of waste intake diverted from landfills. At present, the Salinas Valley Solid Waste Authority is diverting an average of 72 percent of the solid waste it receives. The applicant would participate in the city's recycling program designed to assist Salinas Valley Solid Waste Authority with meeting its mandated diversion goals.

19. ENERGY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (50,51,52)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Source: 50,51,52)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a, b. For purposes of this analysis, the proposed project would be considered to result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy if it failed to comply with California energy efficiency/conservation regulations, related City of Greenfield General Plan policies, and failed to implement energy demand reduction/efficiency measures.

The proposed project will result in increased demand for energy during its construction and during its long-term operation. Primary sources of energy use will be transportation fuels, electricity, and natural gas.

Transportation Fuel. The proposed project will generate new traffic trips, especially from employee cars and trucks, which increase vehicle miles traveled (VMT). CalEEMod results included in [Appendix A](#) show that the total annual VMT associated with Phases 1 and 2 would be 265,549 miles and 2,521,067 miles, respectively. The projected total annual VMT is 2,786,616 miles. The Emissions Factor Model (EMFAC) was used to forecast annual transportation fuel use based on the projected annual VMT. Transportation fuel demand is forecast at about 135,050 gallons per year. The EMFAC model results are included in [Appendix E](#)

Electricity. According to the California Energy Commission Energy Consumption Data Management System, in 2017, total electricity consumption in Monterey County was 2,586,761,823 kWh. Section 5.3, Energy by Land Use – Electricity, in the CalEEMod results in [Appendix A](#) show that the total unmitigated electricity demand from the proposed project would be approximately 2,569,538 kWh/year. Electricity consumption at project buildout would be less than 0.1 percent of the total 2017 Monterey County consumption.

Natural Gas. According to the California Energy Commission Energy Consumption Data Management System, in 2017, total natural gas consumption in Monterey County was 110.314459 million therms. Table 5.2 Energy by Land Use – Natural Gas, in the CalEEMod results in [Appendix A](#) shows that at project buildout, the total unmitigated natural gas demand would be about 8,099,929,000 BTU/year (81,018.63 therms/year). This is less than 0.1 percent of the total Monterey County gas consumption.

Conclusion. A multitude of state regulations and legislative acts are aimed at improving vehicle fuel efficiency, energy efficiency, and enhancing energy conservation. For example, in the transportation sector, the representative legislation and standards for improving transportation fuel efficiency include, but are not limited to the Pavley I, the Advanced Clean Car standards, and Senate Bill 375. The gradual increased usage of electric cars powered with cleaner electricity will also reduce fossil fuel usage associated with transportation. In the renewable energy use sector, representative legislation for the use of renewable energy includes, but is not limited to Senate Bill 350 and Executive Order B-16-12. In the building energy use sector, representative legislation and standards for reducing natural gas and electricity consumption include, but are not limited to Assembly Bill 2021, CALGreen, and Title 24 building standards. The City of Greenfield enforces the California Building Code Standards through the development process. As discussed above, the proposed project would represent a small fraction of Monterey County's long-term energy consumption. Conformance with applicable energy conservation/efficiency regulations and standards would ensure that the proposed project would not result directly or indirectly result in inefficient, wasteful, and unnecessary consumption of energy.

20. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Does the project have the potential to 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? (9, 11, 12, 17, 20)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) (3,31,33,36,37,38,39,40,41,42)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? (1, 2, 4, 14, 15, 27, 30)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. As discussed in the Biological Resources section above, with two potential exceptions, the proposed project would not have significant impacts on biological resources, either individually or cumulatively. The exceptions could be potential impacts to nesting birds and bats. With the implementation of mitigation measures BIO-1 and BIO-2 these potential impacts would be reduced to a less-than-significant level.

The project site does not contain habitat for special-status plant species or other special-status animal species.

As described in the Cultural Resources section, the existing Cornuts facility on site could be a potentially significant historic resource. Implementation of CUL-1 would require preparation of a historic evaluation and implementation of any recommendations contained therein during renovation in the event any of the buildings are determined to be historic. This would ensure impacts are less than significant.

- b. The proposed project would generate approximately 2,232.57 MT CO₂e per year of GHG emissions. This exceeds the threshold of significance of 4.25 MT CO₂e per year per service population for the year 2022 which is an individual and cumulative impact. Implementation of mitigation measure GHG-1 would reduce the cumulative and individual impacts to a less-than-significant level.

The project would contribute to decline in LOS for several intersections under General Plan Buildout conditions. Mitigation measures T-1, T-2, and T-3 will require payment of impact fees and the fair share costs associated with the project's contribution to the cumulative impacts to the intersections. Implementation of these mitigation measures will ensure impacts are less than significant.

- c. It is possible that the existing buildings contain lead based paint, asbestos, radon, or other hazardous materials that could be released during demolition or renovation activities. Implementation of HAZ-1 would ensure impacts were less than significant.

E. SOURCES

1. **City of Greenfield. 2005- 2025 General Plan. July 2005.**
2. City of Greenfield. Municipal Code.
3. Whitson Engineers. Conceptual Site Plan. November 7, 2018
4. **City of Greenfield. General Plan Environmental Impact Report. July 2005.**
5. County of Monterey. 2010 Monterey County General Plan. October 2010.
6. Google Inc. Google Maps. <https://www.google.com/maps>. Accessed November 28, 2018.
7. California Department of Transportation. Scenic Highways website: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.
8. California Department of Conservation. 2016 Important Farmlands Map Monterey County. June 2018.
9. U.S. Fish and Wildlife Service (USFWS). Endangered Species Program. Species list for Monterey County. Washington, D.C., Accessed online November 2018 at: <http://www.fws.gov/endangered/>.
10. **City of Greenfield. Findings of Fact and Statement of Overriding Considerations for the Cornuts Annexation Project. January 2007.**
11. California Department of Fish and Game. 1989. 1988 annual report on the status of California's state listed threatened and endangered plants and animals. Sacramento. 129pp.
12. California Department of Fish and Game. 1981. California Wildlife Habitat Relationships Systems-bank Swallow. California Interagency Wildlife Task Group.
13. U.S. Fish and Wildlife Service. National Wetlands Inventory. November 2018. <http://www.fws.gov/wetlands/>.
14. Envirostor. <https://www.envirostor.dtsc.ca.gov/public/>. Accessed December 26, 2018.
15. Geotracker. <http://geotracker.waterboards.ca.gov/>. Accessed December 26, 2018.
16. "Air Museum Breaks Ground in Greenfield." <http://www.kionrightnow.com>. December 31, 2010.

17. California Department of Fish and Wildlife (CDFW). California Natural Diversity California Records of Occurrence for Palo Escrito Peak, Soledad, North Chalone Peak, Sycamore Flat, Paraiso Springs, Greenfield, Junipero Serra Peak, Reliz Canyon, and Thomson Canyon USGS quadrangles. Sacramento, California. Accessed online November 2018 at: <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>.
18. U.S. Department of Agriculture, Soil Conservation Service. Soil Survey of Monterey County, California. April 1993.
19. Cal Fire. Monterey County Fire Hazard Severity Zones. November 2008.
20. California Native Plant Society (CNPS). Inventory of Rare and Endangered Plants. Records of Occurrence for Palo Escrito Peak, Soledad, North Chalone Peak, Sycamore Flat, Paraiso Springs, Greenfield, Junipero Serra Peak, Reliz Canyon, and Thomson Canyon USGS quadrangles. Sacramento, California. Accessed online November 2018 at: <http://www.cnps.org/inventory>.
21. State Water Resources Control Board. Water Quality Order No. 2013-0001-DWQ National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004 Waste Discharge Requirements (WDRs) For Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4s). http://www.swrcb.ca.gov/water_issues/programs/stormwater/docs/phsii2012_5th/order_final.pdf. 2016.
22. Wallace Group. Potable Water Distribution Master Plan (Water Master Plan). July 2016.
23. City of Greenfield. Wastewater Master Plan. July 2016.
24. Ruggeri Jensen Azar. Preliminary Engineer's Report for Walnut Avenue Specific Plan. Updated April 11, 2012.
25. Google Inc. Google Earth Historical Site Photos. Accessed November 28, 2018.
26. California Department of Conservation. Monterey County Williamson Act FY 2015/2106. 2016.
27. PMC. Cornuts Annexation Project Draft Environmental Impact Report. October 2006.
28. Denise Duffy & Associates. Final Environmental Impact Report for the Yanks Air Museum and Visitor-Serving Project. 1997.
29. Earth Systems Pacific. Geotechnical Engineering Report. May 26, 2004.

30. Parcel Quest. Monterey County Assessors General Information on APN 109-171-003-000. <https://assr.parcelquest.com/Home/Details/0>. Accessed November 29, 2018.
31. Monterey Bay Unified Air Pollution Control District. February 2008. *CEQA Air Quality Guidelines*. Monterey, CA. [http://mbuapcd.org/pdf/CEQA_full%20\(1\).pdf](http://mbuapcd.org/pdf/CEQA_full%20(1).pdf)
32. Monterey Bay Air Resources District. March 2017. *2012-2015 Air Quality Management Plan*. Monterey, CA. <http://www.co.monterey.ca.us/home/showdocument?id=62318>
33. EMC Planning Group. January 15, 2019. *Greenfield Organix C2 Expansion – Air Quality (AQ) and Greenhouse Gas (GHG) Emissions Assessment*. Monterey, CA.
34. Schuetz, Dann, Greenfield Development LLC. Email message to consultant, 2 January 2019 and 13 February 2019.
35. Greenfield Development LLC. December 21, 2018. Odor Management Plan for Greenfield Organix.
36. California Air Resources Board. May 2014. *First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 The California Global Warming Solutions Act of 2006*. https://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf
37. California Department of Finance. 2018. *Table P-1: Total Estimated and Projected Population for California and Counties: July 1, 2010 to July 1, 2060 in 1-year Increments*; Accessed December 7, 2018. <http://www.dof.ca.gov/Forecasting/Demographics/Projections>
38. California Employment Development Department. 2018. *California Occupational Employment Projections 2016-2026*; Accessed December 7, 2018. <https://www.labormarketinfo.edd.ca.gov/data/employment-projections.html>
39. California Department of Water Resources. *Agricultural Land & Water Estimate: Statewide 2010*; Accessed January 9, 2019. <https://www.water.ca.gov/Programs/Water-Use-And-Efficiency/Land-And-Water-Use/Agricultural-Land-And-Water-Use-Estimates>
40. California Air Pollution Control Officers Association. August 2010. *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emissions Reductions from Greenhouse Gas Mitigation Measures*; Accessed January 9, 2019. <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

41. Pacific Gas and Electric. November 2015. *Greenhouse Gas Emissions Factors: Guidance for PG&E Customers*; Accessed January 9, 2019. https://www.pge.com/includes/docs/pdfs/shared/environment/calculator/pge_ghg_emission_factor_info_sheet.pdf
42. California Energy Commission. March 2018. 2019 Building Energy Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf
43. United States Environmental Protection Agency. Stormwater Phase II Rule: Who's Covered? Designation and Waivers of Regulated Small MS4s. 2005.
44. City of Greenfield. *2015 Urban Water Management Plan*.
<https://ci.greenfield.ca.us/DocumentCenter/View/839/2015-DRAFT-CITY-OF-GREENFIELD-UWMP?bidId=>
45. Central Coast Regional Water Board. Phase II Regulated MS4s.
https://www.waterboards.ca.gov/centralcoast/water_issues/programs/stormwater/muni_phase2.html
46. Site Visit by EMC Planning Group on November 7, 2018.
47. Keith Higgins. *Greenfield Organix Traffic Impact Analysis Draft Report*. January 18, 2019.
48. CalRecycle, Johnson Canyon Landfill Facility/Site Summary.
<http://www.calrecycle.ca.gov/SWFacilities/Directory/27-AA-0005/Detail/>
49. U.S. Department of Transportation Federal Highway Administration. "*High Traffic Noise Analysis and Abatement Policy and Guidance*." Last modified August 24, 2017.
https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm
50. EMC Planning Group. February 11, 2019. *EMFAC Results*. Monterey, CA.
51. California Energy Commission. *Electricity Consumption by County*; Accessed February 8, 2019. <http://www.ecdms.energy.ca.gov/elecbycounty.aspx>.
52. California Energy Commission. *Gas Consumption by County*; Accessed February 8, 2019.
<http://www.ecdms.energy.ca.gov/gasbycounty.aspx>.

All documents in bold are available for review at the **City of Greenfield, 599 El Camino Real, (831) 674-5591** during normal business hours.

All documents listed above are available for review at EMC Planning Group Inc., 301 Lighthouse Avenue, Suite C, Monterey, California 93940, (831) 649-1799 during normal business hours.

This side intentionally left blank.