

NOTICE OF PREPARATION
818 INDUSTRIAL PARK DEVELOPMENT
APN 3128-291-02
ADELANTO, CALIFORNIA



LEAD AGENCY:

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

REPORT PREPARED BY:

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MAY 5, 2022

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NOTICE OF PREPARATION

This Notice of Preparation (NOP) is a brief notice sent by the City of Adelanto, which is the designated lead agency for the proposed 818 Industrial Park Development. The purpose of this NOP is to notify the responsible agencies, trustee agencies, public agencies, and the general public that the lead agency intends to prepare an Environmental Impact Report (EIR) to analyze the proposed project's environmental impacts and to identify potential mitigation. An additional purpose of this NOP is to solicit guidance from those agencies as to the scope and content of the environmental information that should be included in the EIR.

PROJECT NAME: 818 Industrial Park Development, LLC.

ADDRESS: No address has been assigned to the project site. The APN is 3128-291-02.

CITY AND COUNTY: Adelanto, San Bernardino County.

LEAD AGENCY: City of Adelanto, Planning Department, 11600 Air Expressway Adelanto, California. 92301

APPLICANT: The project Applicant is Mr. Rick Scatterday, 818 Industrial Park, LLC., 20720 Ventura Boulevard, Suite 200, Woodland Hills, California 91364.

PROJECT: The City of Adelanto, in its capacity as Lead Agency, is reviewing a proposal to construct a cannabis cultivation, manufacturing, and distribution facility. The total site area is approximately 39.1 acres. The site's Accessor Parcel Number (APN) is 3128-291-02. The proposed structural improvements would consist of three new buildings. Each building would have a total floor area of 100,000 square feet for a total floor area of 300,000 square feet for all three buildings. Access to the proposed development would be provided by two new driveway connections: one driveway would connect with the south side of Rancho Road and the second driveway would connect with the west side of Emerald Road. The site would potentially be subdivided into 21 lots. The development would provide a total of 340 parking spaces including 22 ADA parking spaces and 33 loading spaces. The project site is currently vacant and it is located in a Manufacturing Industrial (MI) Zone.

Signature
City of Adelanto Planning and Development Department

Date

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TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1 Introduction	7
2 Project Location	8
3. Environmental Setting	12
4 Project Description	12
5 Discretionary Actions	13
6 Environmental Analysis	15
 <u>Exhibits</u>	
1 Regional Location	9
2 Citywide Map	10
3 Local Map	11
4 Proposed Project Site Plan	14

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1. INTRODUCTION

The City of Adelanto, in its capacity as Lead Agency, is reviewing a proposal to construct a cannabis cultivation, manufacturing, and distribution facility. The total site area is approximately 39.1 acres. The site's Accessor Parcel Number (APN) is 0459-441-38. The site is located on the northeast corner of Violet Road and Aster Road. The proposed structural improvements would consist of three new buildings. Each building would have a total floor area of 100,000 square feet for a total floor area of 300,000 square feet for all three buildings. Access to the proposed development would be provided by two new driveway connections: one driveway will connect with the south side of Rancho Road and the second driveway would connect with the west side of Emerald Road. The site would potentially be subdivided into 21 lots. The development would provide a total of 340 parking spaces including 22 ADA parking spaces and 33 loading spaces. The project site is currently vacant and it is located in a Light Manufacturing (L/M) Zone.¹

The proposed development is considered to be a "project" under the California Environmental Quality Act (CEQA).² The City of Adelanto is the designated *Lead Agency* for the proposed "project" and the City will be responsible for the project's environmental review. Section 21067 of CEQA defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment. The project Applicant is Mr. Rick Scatterday, 818 Industrial Park, LLC., 20720 Ventura Boulevard, Suite 200, Woodland Hills, California 91364. As part of the proposed project's environmental review, the City of Adelanto authorized the preparation and circulation of this Notice of Preparation (NOP).

The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. The purpose of this NOP is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment. Pursuant to the CEQA Guidelines, additional purposes of this NOP include the following:

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

Although this NOP was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation, fully represent the independent judgment and position of the City of Adelanto, in its capacity as the *Lead Agency*. The City, also determined, as part of this NOP's preparation, that an Environmental Impact Report (EIR) is the appropriate environmental document for the project's environmental review pursuant to CEQA.

¹ Blue Engineering. [Site Plan] 300,000 Sq. Ft. Building. No Date and Adelanto Development Services Department. Comprehensive Application for Review and Land Use Approval. October 27, 2021.

² California, State of. *Title 14. California Code of Regulations. Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act.* as Amended 1998 (CEQA Guidelines). § 15060 (b).

This NOP will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. These agencies may include, but are not limited to, the following:

- The California Department of Fish and Wildlife;
- The California Department of Cannabis Control;
- The Mojave Air Quality Management District;
- The San Bernardino County Fire Department; and,
- The San Bernardino County Department of Public Health.

In addition, the surrounding cities will also be notified including the City of Hesperia, Victorville, Apple Valley, and San Bernardino County. A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this NOP. Questions and/or comments should be submitted to the following contact person:

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

2. PROJECT LOCATION

The project site is located within the east-central portion of the City of Adelanto which is located approximately 60 miles northeast of Downtown Los Angeles and 30 miles north of the City of San Bernardino. Adelanto is bounded on the north by unincorporated San Bernardino County; on the east by Victorville and unincorporated San Bernardino County; on the south by Hesperia and unincorporated San Bernardino County; and on the west by unincorporated San Bernardino County. Regional access to the City of Adelanto is provided by three area highways: Interstate 15 (I-15), which extends in a southwest to northeast orientation approximately three miles east of the City; United States Highway 395 (US-395), which traverses the eastern portion of the City in a northwest to southeast orientation; and State Route 18, which traverses the southern portion of the City in an east to west orientation.³ The location of Adelanto, in a regional context, is shown in Exhibit 1. A citywide map is provided in Exhibit 2.

The project site is located in the east-central portion of the City of Adelanto. No address has been assigned to the site. The site's APN is 3128-291-02. Rancho Road extends along the project site's north side and Emerald Way extends along the project site's east side. The site's latitude/longitude is 35°55'534"N-117°38'384"W". The project site is located approximately 1.09 miles to the east of Highway 395.⁴ local map is provided in Exhibit 3.

³ Google Maps. Website accessed May 2, 2022.

⁴ Ibid.

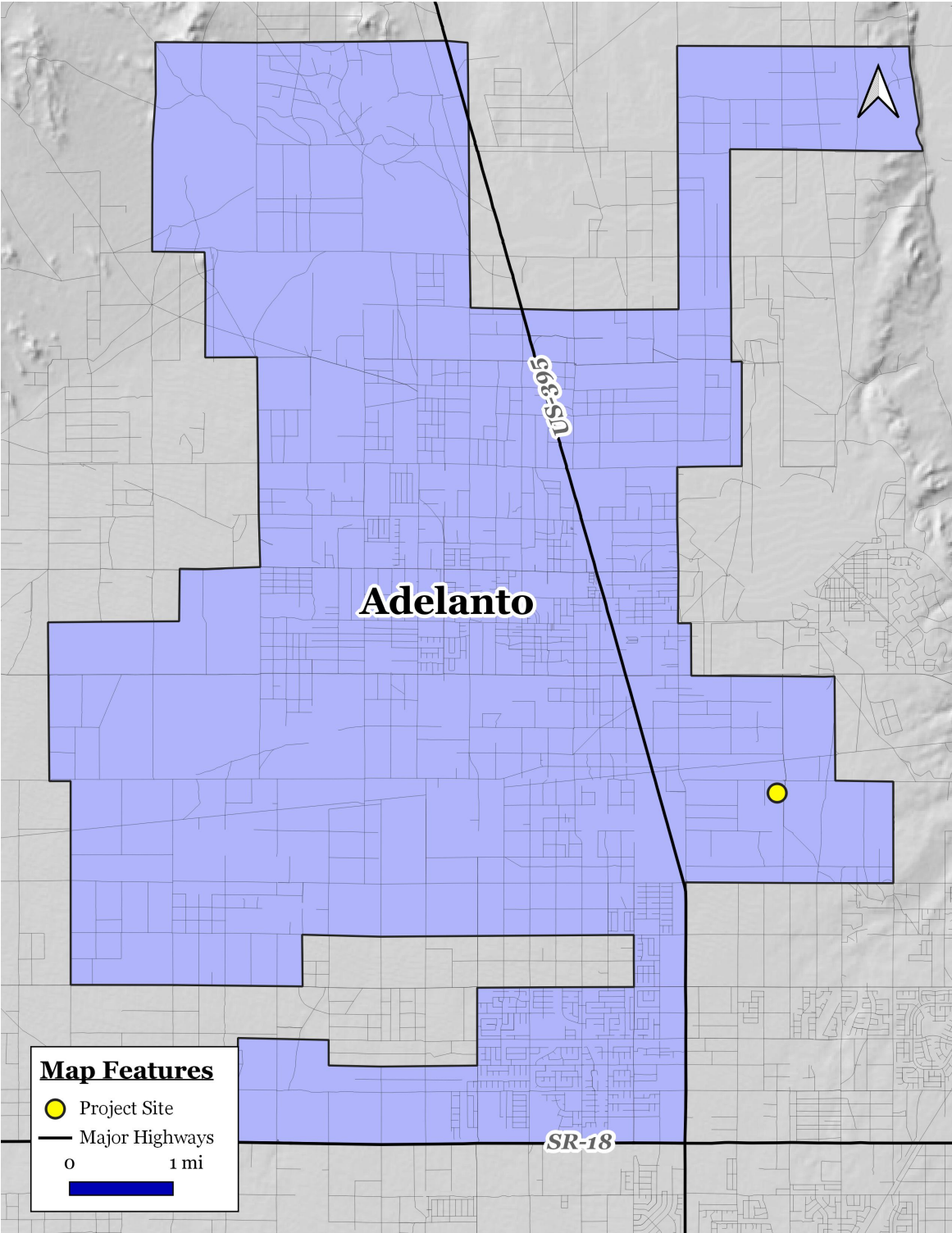


EXHIBIT 2
CITYWIDE MAP

Source: Blodgett Baylosis Environmental Planning

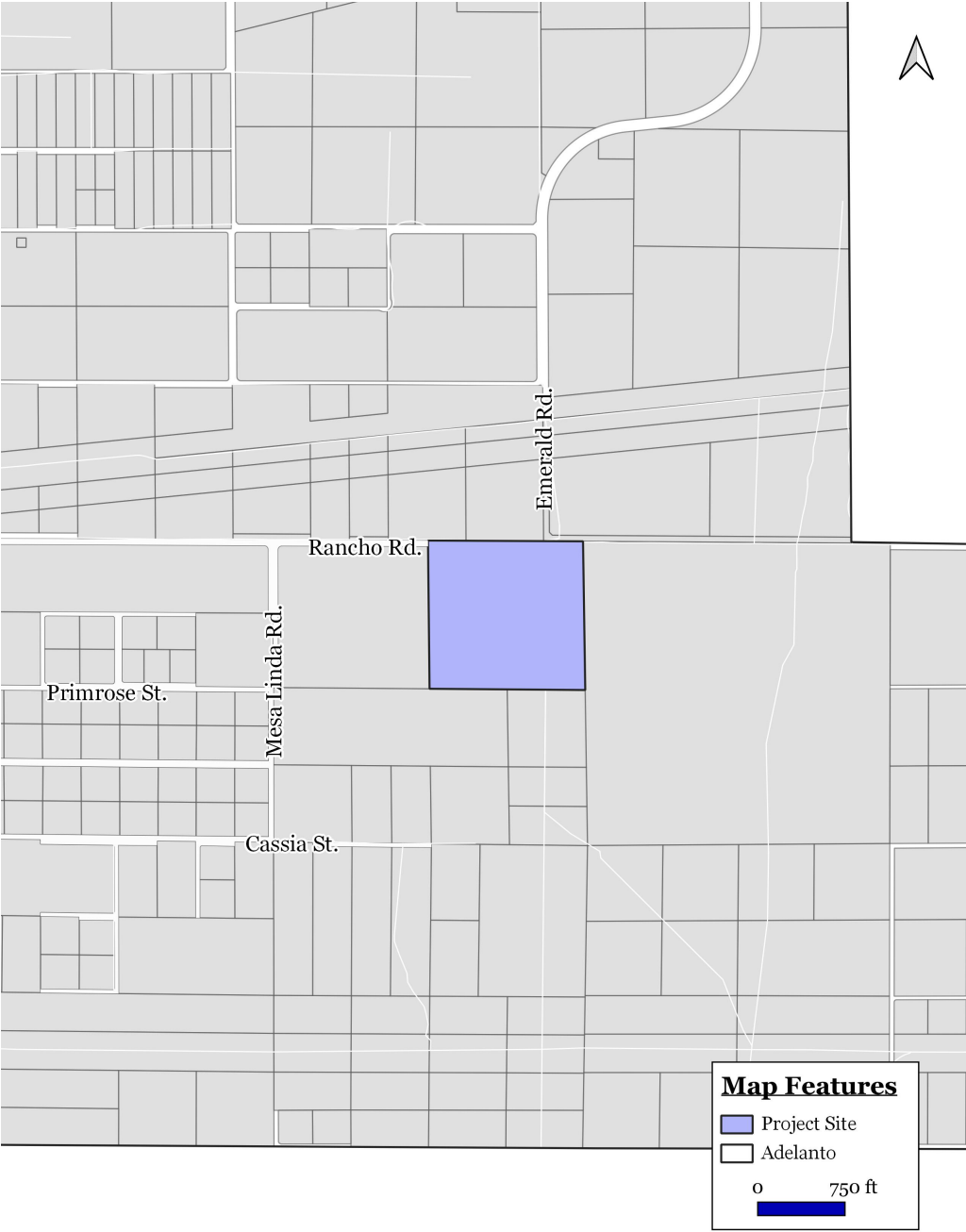


EXHIBIT 3 LOCAL MAP

Source: Blodgett Baylosis Environmental Planning

3. ENVIRONMENTAL SETTING

The project site is largely undeveloped though the southern and western portions have been graded. The eastern and northern portion of the site consists of a creosote and Joshua tree habitat. This area is designated as *Light Manufacturing (L/M)* in the City of Adelanto Zoning Map. Surrounding land uses in the vicinity of the project site are summarized below:

- *North of the Project Site.* The project site is bounded on the north by Rancho Road. North of Rancho Road is the Holiday Rock Company (12750 Rancho Road). The area is designated as *Manufacturing Industrial (M/I)* in the City of Adelanto Zoning Map.⁵
- *South of the Project Site.* The south side of the proposed project site is bounded by a vacant undeveloped property. This area is designated as *Light Manufacturing (L/M)* in the City of Adelanto Zoning Map.⁶
- *East of the Project Site.* Emerald Road extends along the project site's east side. A solar panel, field is located further east. This area is designated as *Light Manufacturing (L/M)* in the City of Adelanto Zoning Map.⁷
- *West of the Project Site.* An industrial use, the Northwest Pipe Company, is located to the west of the project site (12351 Rancho Road). This area is designated as *Light Manufacturing (L/M)* in the City of Adelanto Zoning Map.⁸

4. PROJECT DESCRIPTION

The project site consists of 39.1-acres. The proposed use would be a cannabis cultivation, manufacturing, and distribution facility. The total site area is approximately 39.1 acres. The site would potentially be subdivided into 21 lots. The key elements of the proposed project area outlined below:

- *Site Condition.* The eastern and northern portion of the site consists of a creosote and Joshua tree habitat. This area is designated as *Light Manufacturing (L/M)* in the City of Adelanto Zoning Map.
- *New Buildings.* The proposed structural improvements would consist of three new buildings. Each building would have a total floor area of 100,000 square feet for a total floor area of 300,000 square feet for all three buildings.⁹
- *Site Access.* Access to the proposed development would be provided by two new driveway connections: one driveway would connect with the south side of Rancho Road and the second driveway would connect with the west side of Emerald Road.¹⁰

⁵ Google Maps. Website accessed May 2, 2022. City of Adelanto. Zoning Map. <https://www.ci.adelanto.ca.us/DocumentCenter/View/718/ZONING-MAP-1-18-18> Website accessed May 7, 2022.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ Blue Engineering. [Site Plan] 300,000 Sq. Ft. Building. No Date and Adelanto Development Services Department. Comprehensive Application for Review and Land Use Approval. October 27, 2021.

- *Parking.* The development would provide a total of 340 parking spaces including 22 ADA parking spaces and 33 loading spaces.¹¹
- *Open Space and Landscaping.* Setbacks with landscaping would be provided along the property lines consistent with the Zoning Code.¹²
- *Lighting.* The proposed project would be required to comply with the City's requirements for outdoor lighting. The proposed project's lighting plan would include night lighting for the parking areas, walkways, and driveways. The project site lighting would be designed to comply with LEED™, Cal Green and California Title 24 requirements.

Exhibit 4 includes an illustration of the proposed project's site plan.

5. DISCRETIONARY ACTIONS

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

- The approval of a Conditional Use Permit (CUP 21-26);
- The approval of a Land Development Plan (LDP 21-26);
- The approval of a Tentative Tract Map 20481; and,
- The certification of the Final EIR and the adoption of the Mitigation Monitoring and Reporting Program.

Subsequent ministerial actions would also be required for the implementation of the proposed project including issuance of grading, building, and occupancy permits.

¹⁰ Blue Engineering. *[Site Plan] 300,000 Sq. Ft. Building*. No Date and Adelanto Development Services Department. Comprehensive Application for Review and Land Use Approval. October 27, 2021.

¹¹ Ibid.

¹² City of Adelanto. 2015. City of Adelanto Comprehensive Zoning Code, 11.24.060 Light and Heavy Manufacturing (M2 & M3) Zones. March. Website: <https://www.cityofsouthgate.org/DocumentCenter/View/1183>. Accessed July 28, 2021.

EXHIBIT 4
SITE PLAN
Source: Blue Engineering

6. ENVIRONMENTAL ANALYSIS

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

Aesthetics (Section 6.1);	Mineral Resources (Section 6.12);
Agricultural & Forest Resources (Section 6.2);	Noise (Section 6.13);
Air Quality (Section 6.3);	Population & Housing (Section 6.14);
Biological Resources (Section 6.4);	Public Services (Section 6.15);
Cultural Resources (Section 6.5);	Recreation (Section 6.16);
Energy (Section 6.6)	Transportation (Section 6.17);
Geology & Soils (Section 6.7);	Tribal Cultural Resources (Section 6.18);
Greenhouse Gas Emissions; (Section 6.8);	Utilities (Section 6.19); and
Hazards & Hazardous Materials (Section 6.9);	Wildfire (Section 6.20).
Hydrology & Water Quality (Section 6.10);	
Land Use & Planning (Section 6.11);	

The Environmental Analysis included in this section reflects the Initial Study Checklist format used by the City of Adelanto in its environmental review process. Under each issue area, an Analysis Of Impacts is provided in the form of questions followed by corresponding detailed responses. For the evaluation of potential impacts, questions are stated, and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are three possible responses:

- *No Impact.* The implementation of the proposed project *will not* have any measurable environmental impact on the environment.
- *Less Than Significant Impact.* The implementation of the proposed project *may have* the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Adelanto or other responsible agencies consider to be significant.
- *Impact to be Analyzed in EIR.* The implementation of the proposed project *may have* the potential to generate impacts that will have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures. The proposed project may result in environmental impacts that are significant.

This Initial Study will assist the City of Adelanto in making a determination as to whether there is a potential for significant adverse impacts on the environment associated with the construction and subsequent operation of the proposed project.

6.1 AESTHETICS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The property currently has a General Plan and Zoning land use designation of Light Manufacturing (LM).¹³ The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. In addition, local views are already dominated by regional Southern California Edison (SCE) transmissions towers and transmission lines and other man-made improvements. Views from the mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. As a result, no impacts will occur. As a result, no adverse visual impacts will occur.

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

According to the California Department of Transportation, none of the streets located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.¹⁴ There are no officially designated highways located near the city. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18),

¹³ Blue Engineering. [Site Plan] 300,000 Sq. Ft. Building. No Date and Adelanto Development Services Department. Comprehensive Application for Review and Land Use Approval. October 27, 2021.

¹⁴ California Department of Transportation. Official Designated Scenic Highways.

located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The City of Adelanto 2035 Sustainable Plan identifies prominent view sheds within the city. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.¹⁵ The site would not qualify as undeveloped desert land since the site is currently disturbed and is zoned as Light Manufacturing (LM) with adjacent land parcels disturbed and developed. Lastly, the project site does not contain any buildings listed in the State or National registrar. As a result, no impacts will occur.

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

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

D. *Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? • Less than Significant Impact.*

The proposed project would not expose any sensitive receptors to daytime or nighttime light trespass, since there are no light-sensitive land uses located adjacent to the project site. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.15.050(E)(5) – Lighting of the City of Adelanto Municipal Code. As a result, no light-related impacts are less than significant.

¹⁵ MIG Hogle-Ireland. *Adelanto North 2035 Comprehensive Sustainable Plan*. August 27, 2014.

6.2 AGRICULTURE & FORESTRY RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The property currently has a General Plan and Zoning land use designation of Light Manufacturing (LM).¹⁶ According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. As a result, no impacts will occur.¹¹

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

The project site is currently zoned as Light Manufacturing (LM). The property is vacant and undeveloped and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is

¹⁶ Davis Design Studio. *DeSoto Cannabis Cultivation Facility [Site Plan] Sheet A1.0*. November 15, 2020.

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

not subject to a Williamson Act Contract.¹⁷ As a result, no impacts on existing Williamson Act Contracts will result from the proposed project's implementation.

C. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?* • No Impact.

The project site is vacant and disturbed due to past grading. There are no forest lands or timber lands located within or adjacent to the site. Furthermore, the site's existing zoning designation does not contemplate forest land or timber land uses. As a result, no impacts will occur.

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

No forest lands are located within the project site. The proposed use will be restricted to the site and will not affect any forest lands. As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation.

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

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

¹⁷ California Department of Conservation. *State of California Williamson Act Contract Land*.
ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf.

6.3 AIR QUALITY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with or obstruct implementation of the applicable Air Quality Plan? • Less than Significant Impact.*

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The city is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and in the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.¹⁸ The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone (O₃)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).

¹⁸ Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).
- *Sulfur Dioxide (SO₂)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).
- *PM₁₀ and PM_{2.5}* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM₁₀ and 65 pounds per day of PM_{2.5}.
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of “smog.” The daily threshold is 137 pounds per day of ROG.

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Adelanto is projected to add a total of 38,900 new residents and 3,900 new employees through the year 2040.¹⁹ The proposed project will not introduce new residents and is anticipated to employ between 90 to 100 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project’s construction emissions would be below the thresholds of significance established by the MDAQMD. In addition, the proposed project’s long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact. As a result, the impacts will be less than significant.

B. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? • Impact will be Analyzed in EIR.*

The contractors will be required to adhere to all pertinent MDAQMD regulations governing the control of fugitive dust emissions. Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. EIR will analyze the air quality impacts associated with the implementation of the proposed project.

C. *Would the project expose sensitive receptors to substantial pollutant concentrations? • Impact will be Analyzed in EIR.*

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are

¹⁹ Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. The EIR will analyze the air quality impacts associated with the implementation the proposed project.

D. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? • Impact will be Analyzed in EIR.*

Cannabis cultivation directly impacts air quality in two (2) predominant operations, plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by the generation of strong odors. The majority of the odors of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants and vary widely between plants.²⁰ Cannabis produces over 140 different terpenes, and these chemicals are found in varying concentrations in different cannabis varieties. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis' psychoactivity, has no odor whatsoever. The type and potency of cannabis odors range widely from variety to variety, as do receptors' opinions regarding whether the odor is pleasant or objectionable.¹⁶ The natural growth of the cannabis plants, and other processes at cultivation facilities, emit terpenes. Terpenes, known for their strong odor, are volatile organic compounds (VOCs). At facilities such as that being considered, the evaporation of solvents, and other processes in the production cycle also result in VOC emissions. The project Applicant will employ certain technologies that will be beneficial in controlling odors including the following:

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

¹⁶Cannabis Environmental Best Management Practices Draft Section for Review: Air Quality January 9, 2020.

- *Staff Training.* The facility's employees will be trained regarding compliance with the industry's best standards and facility regulations in order to achieve successful odor control. Employees will be trained in the use of odor control methods as well as any new techniques and technologies that may be added in the future.

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

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

EIR will analyze the air quality impacts associated with the implementation the proposed project.

3.4 BIOLOGICAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Currently, there are seven wildlife species considered of special concern status in the Adelanto USGS quadrangle. These species include northern harrier, loggerhead shrike, Le Conte's thrasher, burrowing owl, southern grasshopper mouse, American badger, coast horned lizard, and prairie falcon. Implementing Biological Resources Mitigations 1,2 and 3 would reduce impacts to candidate special-status species and special status species to be less than significant with mitigations incorporated. The site contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. On September 22, 2020, CDFW has listed the western Joshua Tree as a temporary endangered candidate for one year until a final decision is made and is therefore illegal to remove or transplant a tree without an approved Incidental Take Permit (ITP) provided by CDFW. The Joshua Tree is also a protected plant in the County of San Bernardino under the Native Desert Plant Protection Plan (Ordinance Chapter 88.01.060). The EIR will evaluate the proposed project's impacts with respect to biological resources.

B. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of*

Fish and Wildlife or U.S. Fish and Wildlife Service? • No Impact.

According to the United States Fish and Wildlife Service and the results of the site visits, there are no wetland or migratory bird nesting areas located within the project site.²¹ The site in its entirety is undeveloped. In addition, there is no riparian habitat located on-site or in the surrounding areas.¹⁸ No offsite wetland or migratory bird nesting areas will be affected by the proposed development since all development will be confined to the project site. As a result, no impacts are anticipated.

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

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.¹⁹ The site in its entirety is undeveloped and disturbed due to grading and the presence of adjacent development. As a result, no impacts are anticipated.

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

The site's utility as a habitat and a migration corridor is constrained by the presence of an adjacent roadway and the development that is present in the neighboring areas. As a result, no impacts are anticipated.

E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a Tree Preservation Policy or Ordinance? • Impact to be analyzed in EIR.*

On September 22, 2020, CDFW has listed the western Joshua Tree as a temporary endangered candidate for one year until a final decision is made and is therefore illegal to remove or transplant a tree without an approved Incidental Take Permit (ITP) provided by CDFW. The Joshua Tree is also a protected plant in the County of San Bernardino under the Native Desert Plant Protection Plan (Ordinance Chapter 88.01.060). The EIR will evaluate the proposed project's impacts with respect to biological resources.

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

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

¹⁸United States Fish and Wildlife Service. *National Wetlands Inventory*.

¹⁹ RCA Associates, Inc. *Protected Plant Preservation Plan*. Report dated January 28, 2021.

3.5 CULTURAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Historic structures and sites are generally defined by local, State, and Federal criteria. A site or structure may be historically significant if it is protected through a local general plan or historic preservation ordinance. The U.S. Department of the Interior has established specific guidelines and criteria that indicate the manner in which a site, structure, or district is to be identified as having historic significance through a determination of eligibility for listing on the National Register of Historic Places. Significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. The proposed project will not involve any removal of historically buildings. The City's General Plan does not identify any specific historical resource such as a former building or monument that may be affected by the project. As a result, no impacts are anticipated with the proposed project's implementation.

B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines? • Impact will be Analyzed in EIR.

Portions of the site are undisturbed. Therefore, a site survey along with consultation with the local Native American tribes will be required. These surveys and any recommended mitigation will be included in the EIR.

C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries? • No Impact.

There are no dedicated cemeteries located in the vicinity of the project site.²² The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

“A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.”

Additionally, Section 5097.98 of the Public Resources Code states:

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

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

3.6 ENERGY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? • Impact to be Analyzed in EIR.*

The project Applicant will work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. The EIR will analyze the air quality impacts associated with the implementation of the proposed project.

B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? • Impact to be Analyzed in EIR.*

The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ design measures to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Future improvements, including the electrical upgrades, will conform to all state and local building code and lighting regulations. The EIR will analyze the air quality impacts associated with the implementation of the proposed project.

3.7 GEOLOGY & SOILS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Adelanto is not on the list.²³ The closest fault to the project site is the Helendale Fault, which is located approximately 18 miles east of the City.²⁴ Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of

²³ California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.*

²⁴ California Department of Conservation. *The Helendale Fault.*
http://gmw.conservacion.ca.gov/SHP/EZRIM/Reports/FER/262/FER_262_Report_20160610.pdf.

the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is in a moderate liquefaction zone.²⁵ According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. As a result, the potential impacts regarding liquefaction and landslides are less than significant.

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

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Bryman, Helendale, Mohave variant, and Cajon soils associations which consist of moderate to fine and well drained soils. Slopes range from 2 to 5 percent.²⁶ The future use will involve the cultivation of medicinal cannabis. The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. Prior to initiating construction, contractors must obtain coverage under a NPDES permit, which is administered by the State. In order to obtain an NPDES permit, the project Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP). The County has identified sample construction Best Management Practices (BMPs) that may be included in the mandatory SWPPP. The use of these construction BMPs identified in the mandatory SWPPP will prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. As a result, the impacts will be less than significant.

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

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.²⁸ The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading

²⁵ San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

²⁶ UC Davis. *SoilWeb*. Website accessed February 2, 2021.

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

resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. The proposed project site is currently vacant and disturbed due to grading. As a result, the potential impacts will be less than significant.

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

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Bryman, Helendale, Mohave variant, and Cajon soil associations.²⁷ According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.³⁰ The Applicant is required to adhere to all requirements detailed by the USDA, resulting in potential impacts which will be less than significant.

E. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? • No Impact.*

No septic tanks will be used as part of any future development. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

F. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? • No Impact*

The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The closest fossil vertebrate locality is LACM 7786, between Adelanto and the former George Air Force Base. This locality produced a fossil specimen of meadow vole, *Microtus*. The next closest vertebrate fossil locality from these deposits is LACM 1224, west of Spring Valley Lake, which produced a specimen of fossil camel, *Camelops*. Additionally, on the western side of the Mojave River below the bluffs, an otherwise unrecorded specimen of mammoth was collected in 1961 from older Quaternary Alluvium deposits. Since no significant new excavation or grading will occur, no impacts are anticipated.

²⁷ UC Davis. *SoilWeb*. Website accessed February 1, 2021.

³⁰ United States Department of Agriculture. Natural Resources Conservation Service. Website accessed February 1, 2021.

3.8 GREENHOUSE GAS EMISSIONS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project generate Greenhouse Gas Emissions, either directly or indirectly, that may have a significant impact on the environment? • Impact to be Analyzed in EIR.*

Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. The major GHG that influence global warming are described below.

- *Water Vapor.* Water vapor is the most abundant GHG present in the atmosphere. While water vapor is not considered a pollutant while it remains in the atmosphere, it maintains a climate necessary for life. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to “hold” more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus facilitating further warming of the atmosphere. When water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation. This will allow less energy to reach the Earth's surface thereby affecting surface temperatures.
- *Carbon Dioxide (CO₂).* The natural production and absorption of CO₂ is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO₂ include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities (the burning of fossil fuels) have increased the atmospheric concentrations of CO₂. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC Fifth Assessment Report, 2014) emissions of CO₂ from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010.

- *Methane (CH₄)*. CH₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO₂. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO₂, N₂O, and Chlorofluorocarbons (CFCs)). CH₄ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other human-related sources of methane production include fossil-fuel combustion and biomass burning.
- *Nitrous Oxide (N₂O)*. Concentrations of N₂O also began to increase at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N₂O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant.
- *Chlorofluorocarbons (CFC)*. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C₂H₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.
- *Hydrofluorocarbons (HFC)*. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.
- *Perfluorocarbons (PFC)*. PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). Concentrations of CF₄ in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.
- *Sulfur Hexafluoride (SF₆)*. SF₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF₆ has the highest global warming potential of any gas evaluated; 23,900 times that of CO₂. Concentrations in the 1990s were about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

The State of California requires CEQA documents to include an evaluation of Greenhouse Gas (GHG) Emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural processes and human activities include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels.

GHG differ from criteria or toxic air pollutants in that the GHG emissions do not cause direct adverse human health effects. Rather, the direct environmental effect of GHG emissions is the increase in global temperatures, which in turn has numerous impacts on the environment and humans. Some examples of observed changes include shrinking glaciers, thawing permafrost, late freezing, early break-up of ice on rivers and lakes, a lengthened growing season, shifts in plant and animal ranges, and earlier flowering of trees. The EIR will analyze the greenhouse gas and air quality impacts associated with the implementation of the proposed project.

B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Impact to be Analyzed in EIR.*

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.²⁸ The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. The EIR will analyze the greenhouse gas and air quality impacts associated with the implementation of the proposed project.

²⁸ Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.* <http://gov.ca.gov/news>. May 2, 2020.

3.9 HAZARDS & HAZARDOUS MATERIALS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Impact to be Analyzed in EIR.

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

- *Mold.* Marijuana production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold.
- *Skin Sensitivity.* Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes.

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

The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of Riverside Fire Department prior to the issuance of the Occupancy Permit. The EIR will characterize the potential impacts and the mitigation measures that will be applicable to the proposed project.

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

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

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

There are no schools located within one-quarter of a mile from the project site. As a result, the proposed project will not create a hazard to any local school and no impacts are anticipated.

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

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.³² Therefore, no impacts will occur.

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

The project site is not located within an airport land use plan and is not located within two miles of a public airport or public use airport.²⁹ The nearest airport to the site is the Southern California Logistics Airport is located approximately 2.14 miles north of the project site.³⁰ As a result, no impacts related to this issue will occur.

F. *Would the project impair implementation of or physically interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan? • No Impact.*

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

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

The project site and the adjacent properties are developed. The project site is not located within a "moderate fire hazard severity zone."³³ As a result, no impacts will result.

³² CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm.

²⁹ Toll-Free Airline. *Los Angeles County Public and Private Airports, California*. <http://www.tollfreeairline.com/california/losangeles.htm>.

³⁰ Google Earth. Website accessed May 5, 2022.

³³ CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County*. http://frap.fire.ca.gov/webdata/maps/san_bernardino_sw/

3.10 HYDROLOGY & WATER QUALITY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? • Impact to be Analyzed in EIR.*

The major source of potential water pollution is related to sheet runoff capturing surface pollutants that are then conveyed into the local storm water system that is composed of gutters, drains, catch basins, and pipes. This storm water infrastructure collects the rainwater runoff and ultimately deposits everything it gathers, including contaminants and debris, into the ocean. The proposed project calls for the use of operational Best Management Practices (BMPs) including bioswales. bioswale corridor is proposed under the current proposed project. This Bioswale corridor will treat water runoff from adjacent streets and development. Bioswales are typically shallow trenches with gently sloping slopes that are lined with dense low-lying vegetation. Under drains may be installed if the underlying soils are not conducive to stormwater percolation. The EIR will characterize the potential impacts and the mitigation measures that will be applicable to the proposed project.

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

No new direct construction related impacts to groundwater supplies, or groundwater recharge activities would occur as part of the proposed project's implementation. Water used to control fugitive dust will be transported to the site via truck. No direct ground water extraction will occur. Furthermore, the construction and post-

construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. As a result, there would be no direct groundwater withdrawals associated with the proposed project's implementation. As a result, the impacts are considered to be less than significant.

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

The proposed project's location will be restricted to the proposed project site and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site is presently undeveloped though there are no stream channels or natural drainages that occupy the property. The site would be designed so the proposed hardscape surfaces (the building and paved areas) will percolate into the landscape parkway areas. As a result, the potential impacts will be less than significant.

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

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Adelanto, the proposed project site is located in an Undetermined Flood Hazard zone.³⁴ Thus, properties located in this zone are areas of undetermined but minimal flood hazard may exist. The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 65 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.³¹

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

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

³⁴ Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2020.

³¹ Google Earth. Website accessed January 3, 2021.

3.11 LAND USE & PLANNING

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood and no impacts will occur.

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

The City of Adelanto permits and regulates Medicinal and Adult Use Cannabis activities in designated zones. Cannabis activity is permitted with a Conditional Use Permit (CUP) in the following zones: Light Manufacturing (LM), Light Manufacturing Cannabis Only (LMCO), Manufacturing Industrial (MI), and Airport Development District (ADD). Because the proposed project site is located within a Light Manufacturing zoning designation in the southeasterly portion of the City, a CUP is required. As a result, no impacts will occur.

3.12 MINERAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.³⁶ The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

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

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.³² The project site is

³⁶ California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14>.

³² California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14>.

located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.³³ As indicated previously, the site develop and there are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur.

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

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

³³ California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed January 11, 2021.

3.13 NOISE

Environmental Issue Areas Examined	Impact to be Analyzed in EIR	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	✗		
B. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?	✗		
C. For a project located within the vicinity of a private airstrip or- an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			✗

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? • Impact to be Analyzed in EIR.

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.³⁸ Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. All of the cultivation and manufacture of cannabis products will occur indoors. In addition, the operation of the facility will not expose surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. The EIR will analyze the noise impacts associated with the implementation of the proposed project.

B. Would the project result in generation of excessive ground borne vibration or ground borne noise levels? • Impact to be Analyzed in EIR.

Once in operation, the proposed project will not significantly raise ground borne noise levels. Slight increases in ground borne noise levels could occur during the construction phase. The limited duration of construction activities and the City's construction-related noise control requirements will reduce the potential impacts project's operation will not require the use of equipment capable of creating ground-borne noise. Future sources Composite construction noise is best characterized by Bolt, Beranek, and Newman.³⁴ In this study, the noisiest phases of construction for non-residential development is presented as 89 dBA as measured at a distance of 50 feet from the

³⁸ Bugliarello, et. al. *The Impact of Noise Pollution*, Chapter 127, 1975.

³⁴ USEPA, Protective Noise Levels. 1971

construction effort. In later phases during building erection, noise levels are typically reduced from these values and the physical structures further break up line-of-sight noise. However, as a worst-case scenario the 89 dBA value was used as an average noise level for the construction effort. The construction noise levels will decline as one moves away from the noise source. This effect is known as *spreading loss*. In general, the noise level adjustment that takes the spreading loss into account calls for a 6.0 dBA reduction for every doubling of the distance beginning with the initial 50-foot distance. The EIR will analyze the construction noise impacts associated with the implementation of the proposed project.

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

The project site is not located within an airport land use plan and is not located within two miles of a public airport or private airport. The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. As a result, no impacts will occur.

3.14 POPULATION & HOUSING

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently undeveloped and disturbed due to grading and adjacent telecommunication towers. All land use surrounding the property has been previously designated as Light Manufacturing (LM) zoning by the City of Adelanto.
- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only.
- *Extension of infrastructure and other improvements.* The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.
- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in a limited increase in employment which can be accommodated by the local labor market.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

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

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

The project site is vacant and disturbed due to grading and adjacent development. This property and surrounding areas have a General Plan and zoning designations of Light Manufacturing (LM). No housing units will be permitted, and none will be displaced as a result of the proposed project's implementation. Therefore, no impacts will result.

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Impact to be Analyzed in EIR	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for: fire protection; police protection; schools; parks; or other public facilities?	X		

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Fire Department

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

Law Enforcement

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

Schools

Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. As a result, the impacts on school-related services will be less than significant.

Governmental Services

The proposed project will not create direct local population growth which could potentially create demand for other governmental service. As a result, less than significant impacts will result from the proposed project's implementation.

3.16 RECREATION

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

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

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

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

3.17 TRANSPORTATION

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? • Impact to be Analyzed in EIR.

The project site is zoned as Light Manufacturing (LM). Access to the project site would be provided by an improved road that would be located along the site's southern side (Hopland Street). The proposed project will operate the cannabis cultivation, manufacturing and distribution facility from 8:00 AM to 5:00 PM, Monday through Friday. A total of 21 full-time staff will be on-site. The facility will be closed to the public at all times. Non-employees such as vendors, delivery persons, and maintenance personnel, will only be allowed to enter the facility with a permitted escort. The full-time security guards will be stationed at the facility 24 hours a day, seven days a week. The EIR will analyze the traffic impacts associated with the implementation of the proposed project.

B. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? • Impact to be Analyzed in EIR.

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. The EIR will analyze the traffic impacts associated with the implementation of the proposed project.

C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? • No Impact.

The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. As a result, no impacts are anticipated.

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

The proposed project would not affect emergency access to any adjacent parcels. At no time during construction will adjacent streets be completely closed to traffic except when these roadways undergo the required improvements. All construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

3.18 TRIBAL CULTURAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

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

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

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

As part of the AB-52 consultation with the tribal representatives, review of the project will be completed. The EIR will analyze the tribal/cultural resources impacts associated with the implementation of the proposed project.

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

As part of the AB-52 consultation with the tribal representatives, review of the project will be completed. The EIR will analyze the tribal/cultural resources impacts associated with the implementation of the proposed project.

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3.19 UTILITIES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? • No Impact.*

The proposed development will be used for cannabis cultivation, manufacturing, and distribution. The proposed project site is currently vacant and disturbed due to grading and surrounding development. There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities and no impacts will result.

B. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? • Impact to be Analyzed in EIR.*

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the

City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario.³⁵ The project's implementation will require the establishment of a water well and sewer septic tank. To ensure that adequate fire flow is maintained for the indoor sprinkler system, a diesel generator will be required at the well. The indoor agricultural areas will utilize an automated irrigation system. The EIR will analyze the utility (water) impacts associated with the implementation of the proposed project.

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

The City operates a 1.5-million-gallons-per-day activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program. The City is currently constructing a 2.5-million-gallons-per-day upgrade that will increase wastewater treatment capabilities to 4.0 million gallons per day and produce treated water that can be used for lawn/public parks irrigation, construction and dust control and other beneficial uses. The EIR will analyze the utility (wastewater) impacts associated with the implementation of the proposed project.

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

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

E. *Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals? • No Impact.*

The proposed project, like all other development in San Bernardino County and the City of Adelanto, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

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

The proposed project, like all other development in Adelanto and San Bernardino County, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

³⁵ City of Adelanto. 2015 *Urban Water Management Plan*. Report dated June 22, 2016.

3.20 WILDFIRE

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The project site is located in a Light Manufacturing (LM) zone. The project site is not located in an area that is classified as a moderate fire risk severity within a State Responsibility Area (SRA). The streets that will be improved at construction will serve the project site and adjacent area. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts will occur.

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

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

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

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

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

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