

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

**CUP 21-24, LDP 21-24, & LDP 20461
SARK PROPERTIES, LLC.
SEC OF YUCCA ROAD & ASTER ROAD
APN 0459-681-18
ADELANTO, CALIFORNIA**



LEAD AGENCY:

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

REPORT PREPARED BY:

**BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
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JANUARY 4, 2022

ADLT 058

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Sark Properties LLC., CUP 21-24, LDP-21-24, and TPM 20461.

PROJECT APPLICANT: Michael Pontious. Pontious Architecture 17995 Hwy. 18 South, Suite 4 Apple Valley, California 92307

PROJECT LOCATION: The proposed project site is located on the southeast corner of Yucca Road and Aster Road in Adelanto, California 92301. There is not a current address designated to this parcel site. The corresponding Assessor Parcel Number (APN) is 0459-101-021. The project site is located in Township 6 North, Range 5 West, Section 32, USGS Adelanto, California Quadrangle, 1956.

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

PROJECT: The City of Adelanto is reviewing an application to construct five buildings on a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 131,680 square feet of floor area in five (5) phases the proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a single driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 121 parking spaces.

FINDINGS: The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any significant adverse unmitigable impacts. For this reason, the City of Adelanto determined that a *Mitigated Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may be made based on the analysis contained in the attached Initial Study:

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

The environmental analysis is provided in the attached Initial Study prepared for the proposed project. The project is also described in greater detail in the attached Initial Study.

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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

This Initial Study analyzes the environmental impacts associated with an application to construct five buildings on a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area in five phases. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a single driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.¹

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

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

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Adelanto, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to

¹ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

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

³ Ibid. (CEQA Guidelines) §15050.

Sections 15381 and 15386 of the State CEQA Guidelines.⁴ This Initial Study and the *Notice of Intent to Adopt (NOIA) a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.⁵ Questions and/or comments should be submitted to the following contact person:

Mary Blais, Contract Planner
City of Adelanto, Planning Division
11600 Air Expressway
Adelanto, California 92301

1.2 INITIAL STUDY'S ORGANIZATION

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

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



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

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

SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

This Initial Study analyzes the environmental impacts associated with an application to construct five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area and would be constructed in five phases. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁶

2.2 PROJECT LOCATION

The City of Adelanto 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.⁷ Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15), extending in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395, traversing the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), which traverses the southern portion of the City in an east to west orientation.⁸ The project site's latitude and longitude is 34°56'408"N -117°43'520"W. The location of Adelanto, in a regional context, is shown in Exhibit 2-1. A citywide map is provided in Exhibit 2-2.

The proposed project site is located on the southeast corner of Yucca Road and Aster Road in Adelanto, California 92301. There is not a current address assigned to the project site. The corresponding Assessor Parcel Number (APN) is 0459-101-021. The project site is located in Township 6 North, Range 5 West, Section 32, USGS Adelanto, California Quadrangle, 1956. Aster Road extends along the project site's west side while Yucca Road extends along the project site's north side. A local vicinity map is provided in Exhibit 2-3. An aerial photograph of the site and the surrounding area is provided in Exhibit 2-4.

2.3 ENVIRONMENTAL SETTING

The proposed project site is located on a 3.79-acre parcel that is currently vacant though it has been disturbed by off-road activity and illegal dumping. The property currently has a General Plan and Zoning land use designation of Manufacturing/Industrial (M/I). Vehicular access to the site would be provided by a single driveway connection with Yucca Road and a second driveway connection with Aster Road.

⁶ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

⁷ Blodgett Baylosis Environmental Planning. 2021.

⁸ Google Earth. Website accessed December 9, 2021.

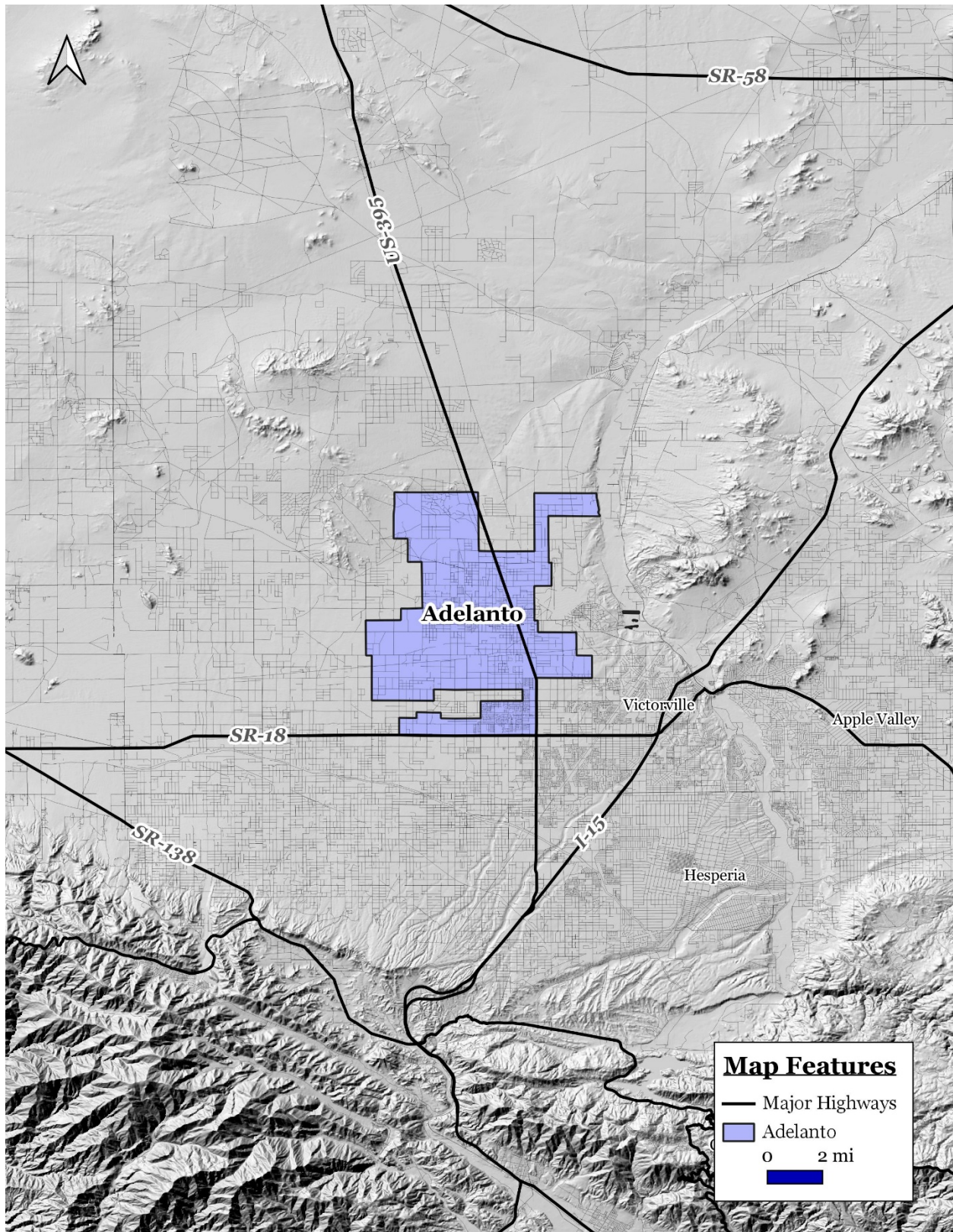


EXHIBIT 2-1 REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

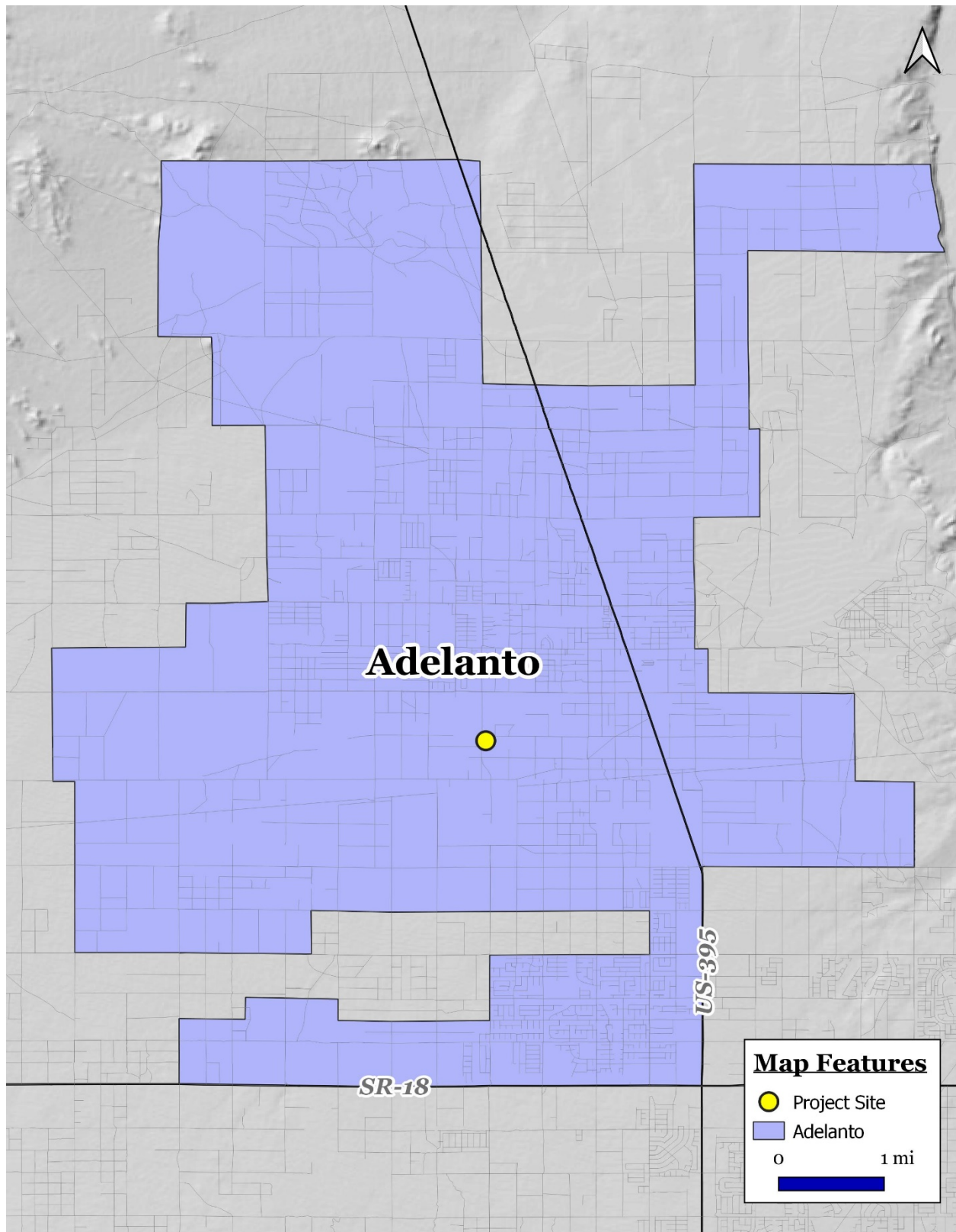


EXHIBIT 2-2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

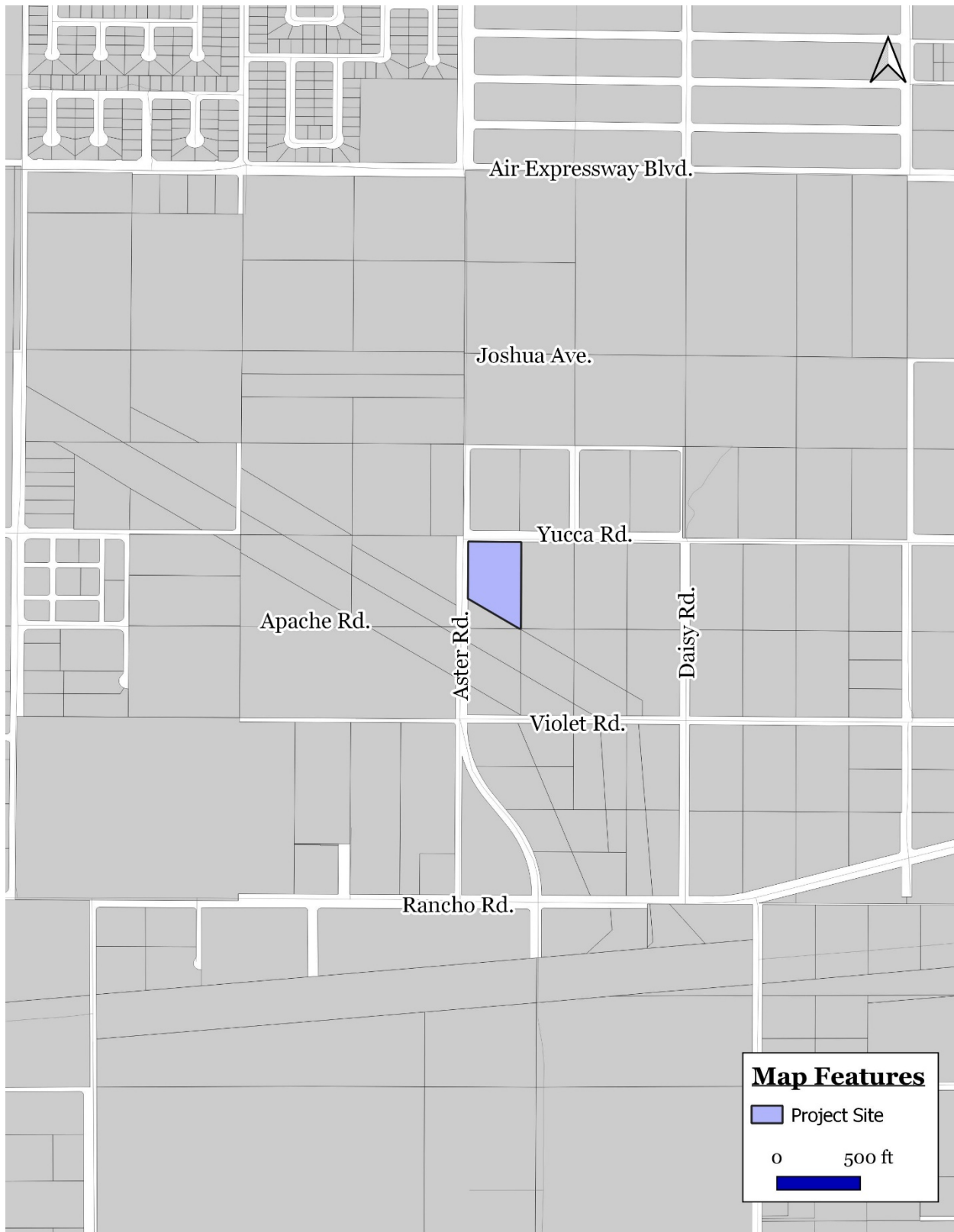


EXHIBIT 2-3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING



EXHIBIT 2-4
AERIAL IMAGE OF PROJECT SITE
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* Yucca Road extends along the project site's north side. This roadway segment is unimproved. Vacant and undisturbed lands are located directly to the north of the aforementioned roadway. These parcels are zoned as *Light Manufacturing (LM)*.⁹
- *East of the project site:* Abutting the project site to the east, is vacant and undisturbed land. This area is zoned as *Manufacturing Industrial (MI)*.¹⁰
- *South of the project site:* Vacant and undisturbed land is located to the south of the site. A transmission line utility easement is located next to the site's south side. This area is zoned as *Manufacturing Industrial (MI)*.¹¹
- *West of the project site:* Aster Road extends along the project site's west side. This roadway segment is unimproved. Vacant and undisturbed land abuts the property. This area is zoned as *Manufacturing Industrial (MI)*.¹²

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

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

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

- *Proposed Site Plan.* The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution.¹³
- *Building No. 1.* This two-level building would be located in the southwest corner of the project site. The maximum height would be 42-feet. This building would have a total floor area of 29,680 square feet and would consist of two levels. The first level would include 14,680 square feet and the second level would contain 15,000 square feet. This building would be used for cultivation and would be constructed during Phase 1. This building would be provided 27 parking spaces. The main entry would be located in the northwest corner.¹⁴

⁹ Google Maps and City of Adelanto Zoning Map. Website accessed on December 9, 2021.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

¹⁴ Ibid.

- *Building No. 2.* This two-level building would be located in the northwest corner of the project site. The maximum building height would be 42-feet. This building would have a total floor area of 29,680 square feet and would consist of two levels. The first level would include 14,680 square feet and the second level would contain 15,000 square feet. This building would be used for cultivation and would be constructed during Phase 2. The main entry would be located in the southwest corner. This building would be provided 29 parking spaces.¹⁵
- *Building No. 3.* This two-level building would be located in the northeast corner of the project site. The maximum building height would be 42-feet. This building would have a total floor area of 29,680 square feet and would consist of two levels. The first level would include 14,680 square feet and the second level would contain 15,000 square feet. This building would be used for cultivation and would be constructed during Phase 3. The main entry would be located in the southwest corner. This building would be provided 25 parking spaces.¹⁶
- *Building No. 4.* This two-level building would be located in the southeast corner of the project site. The maximum building height would be 42-feet. This building would have a total floor area of 29,680 square feet and would consist of two levels. The first level would include 14,680 square feet and the second level would contain 15,000 square feet. This building would be used for cultivation and would be constructed during Phase 4. The main entry would be located in the northwest corner. This building would be provided 25 parking spaces.¹⁷
- *Building No. 5.* This building will consist of a single level and would be located in the southernmost portion of the site. The maximum building height would be 35-feet. The floor area of this building would total 12,960 square feet. Of this total floor area, total floor, 10,470 square feet would be devoted to manufacturing and 2,490 square feet would be devoted to distribution. The main access to this building would be located along the north-facing elevation. This building would be provided 17 parking spaces.¹⁸
- *Access and Parking.* Access to the project site will be provided by two roadway connections. The first accessway would be a 40-footwide driveway connection with the south side of Yucca Road. The second access would be a 40-foot-wide driveway connection with the east side Aster Road. The internal roadways will consist of two travel lanes with a total aisle width of 40-feet. The new development would have a total of 125 parking spaces.¹⁹
- *On-Site Improvements.* Power (electrical) would be met with connections to the existing Southern California Edison utility lines located further south on Mountain View Road. A Southern California Edison transmission line easement extends along the project site's south side. Water lines are available in Rancho Road approximately 1,900 feet to the south and sewer lines are located in Aster Road.

¹⁵ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ibid.

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

The proposed site plan is illustrated in Exhibit 2-5.

2.4.2 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

As indicated previously, the site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution.²⁰ The estimated employment is based on the following:

- *Cultivation.* A total of 118,720 square feet of floor area would be devoted to cultivation. The cannabis will be grown and trimmed. The key positions include a grow/cultivation manager, a grower/horticulturalist, and a trimmer/post harvester. Buildings 1 through 4 will be exclusively used for cultivation. For purposes of analysis, it is assumed that one cultivation position will be required for every 2,000 square feet of floor area devoted to cultivation per shift. This translates into a total of 59 cultivation jobs during the main (first) shift.
- *Manufacturing.* A total of 10,470 square feet of floor area would be devoted to manufacturing. In this area, marijuana and CBD products are packaged and prepared for sale. A variety of items are created and prepared for retail sales. No direct sales will occur at this facility. A portion of Building 5 will be devoted to manufacturing. For purposes of analysis, it is assumed that one manufacturing position will be required for every 1,000 square feet of floor area devoted to manufacturing. This translates into a total 59 manufacturing jobs during the main shift.
- *Distribution.* A total of 2,490 square feet would be devoted to distribution. The manufactured cannabis products will be delivered to the retail establishments. The distribution component will consist of 4 drivers and 2 persons for receiving and shipping. A total of 6 employees will be assigned to distribution.
- *Support.* Other personnel will be required for management, security, maintenance, and administration. For purposes of analysis, a total of 20 employees were classified as support to correspond to the five buildings.

Based on the above assumption, a total of 95 employees would be on-site during the main day-time shift. The hours of on-site operations for the proposed new development will be Monday through Sunday, 8:00 AM to 5:00 PM and 24-hours a day security.²¹

²⁰ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

²¹ Ibid.

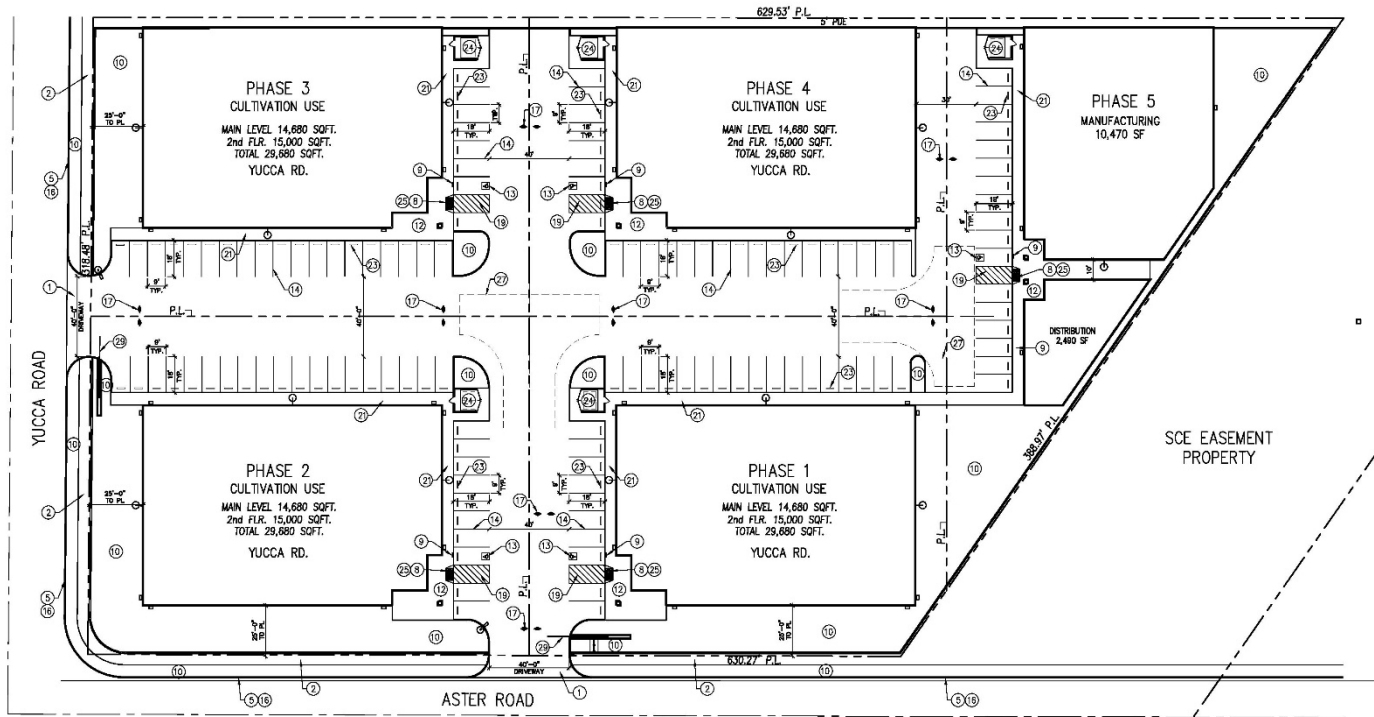


EXHIBIT 2-5
SITE PLAN OF PROJECT SITE
SOURCE: AIA PONTIOUS ARCHITECTURE

2.4.3 CONSTRUCTION CHARACTERISTICS

The construction for the proposed project is assumed to commence in January 2023 and would take approximately twelve months to complete.²² The key construction tasks that would occur for each of the five buildings are outlined in the paragraphs below.

- *Task 1 Grading.* The project site would be graded and readied for the construction. The site would be graded to a depth of approximately 3 to 6 inches. This task would require one month to complete.
- *Task 2 Site Preparation.* During this phase, the building footings, utility lines, and other underground infrastructure would be installed. This task would require one month to complete.
- *Task 3 Building Construction.* The new building would be constructed during this phase. This task will take approximately eight months to complete.
- *Task 4 Paving and Finishing.* This concluding task would involve the paving and finishing. The completion of this phase will take approximately two months to complete.

The proposed project will be constructed in five phases with each phase corresponding to each of the five buildings. Building 1 will be constructed during Phase 1, Building 2 will be constructed during Phase 2, Building 3 will be constructed during Phase 3, Building 4 will be constructed during Phase 4, and Building 5 will be constructed during Phase 5.

2.5 DISCRETIONARY ACTIONS

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

- Approval of a Conditional Use Permit (CUP 21-24);
- Approval of a Land Development Plan (LDP 21-24);
- Approval of a Tentative Parcel Map 20461; and
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).



²² Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

SECTION 3 ENVIRONMENTAL ANALYSIS

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

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

The environmental analysis included in this section reflects the Initial Study Checklist format used by the City of Adelanto in its environmental review process (refer to Section 1.3 herein). 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 four possible responses:

- *No Impact.* The proposed project *will not* have any measurable environmental impact on the environment.
- *Less Than Significant Impact.* 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.
- *Less Than Significant Impact with Mitigation.* 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.
- *Potentially Significant Impact.* The proposed project may result in environmental impacts that are significant.

This Initial Study will assist the City of Adelanto in deciding as to whether there is a potential for significant adverse impacts on the environment associated with the implementation of the proposed project.

3.1 AESTHETICS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area).²³ The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. In addition, local views are already dominated by regional Southern California Edison (SCE) transmissions towers and transmission lines located to the south of the project site. 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.

- 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.*

²³ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

According to the California Department of Transportation, none of the unimproved roads located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.²⁴ There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. 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.²⁵ 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 building 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? • No 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 property. 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 anticipated.

MITIGATION MEASURES

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

²⁴ California Department of Transportation. *Official Designated Scenic Highways*.

²⁵ MIG Hogle-Ireland. *Adelanto North 2035 Comprehensive Sustainable Plan*. August 27, 2014.

3.2 AGRICULTURE & FORESTRY RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area).²⁶

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

²⁶ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

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

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

The project site is currently zoned as Manufacturing/Industrial (MI). The property is vacant and undeveloped and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.²⁷ 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***

The existing parcel is vacant and undisturbed. 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 land under the jurisdiction of the BLM. 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.

MITIGATION MEASURES

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

²⁷ California Department of Conservation, State of California Williamson Act Contract Land.

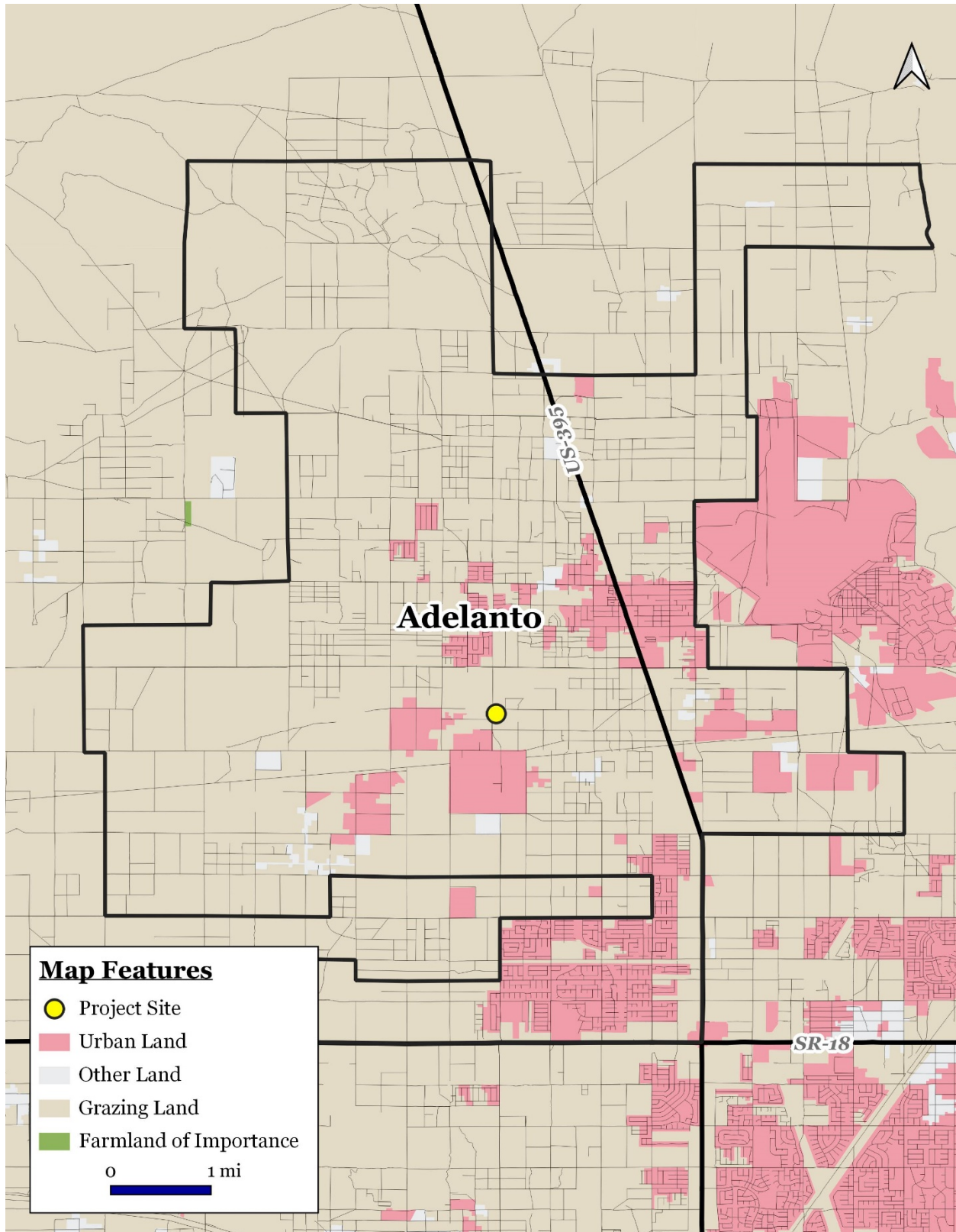


EXHIBIT 3-1
AGRICULTURE MAP
SOURCE: US DEPARTMENT OF CONSERVATION

3.3 AIR QUALITY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.²⁸

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.²⁹ The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds

²⁸ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

²⁹ Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

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

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs, 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).
- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).
- *Sulfur Dioxide (SO_2)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).
- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM_{10} and 65 pounds per day of $PM_{2.5}$.
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of “smog.” The daily threshold is 137 pounds per day of ROG.

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 2040.³⁰ The proposed project will not introduce new residents and is anticipated to employ approximately 95 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 (the project’s daily construction emissions are summarized in Table 3-1). In addition, the proposed project’s long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). As a result, no conformity impacts will occur.

³⁰ Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

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

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

- Generates total emissions (direct and indirect) that exceeds the SCAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3-1 and 3-2);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City's Zoning and General Plan); and,

The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2020.4.0). For air quality modeling purposes, a twelve-month period of construction for all construction phases were assumed.

**Table 3-1
Estimated Daily Construction Emissions**

Construction Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Site Preparation (on-site)	0.58	6.93	3.96	--	0.79	0.29
Site Preparation (off-site)	0.02	0.01	0.19	--	0.06	0.01
Total Site Preparation	0.60	6.94	4.15	--	0.85	0.30
Grading (on-site)	1.08	12.00	5.94	0.01	5.83	3.04
Grading (off-site)	0.03	0.02	0.30	--	0.09	0.02
Total Grading	1.11	12.02	6.24	0.01	5.92	3.06
Building Construction (on-site)	0.69	7.03	7.15	0.01	0.37	0.34
Building Construction (off-site)	0.07	0.32	0.70	--	0.22	0.06
Total Building Construction	0.76	7.35	7.85	0.01	0.59	0.40
Paving (on-site)	0.65	5.92	7.04	0.01	0.30	0.28
Paving (off-site)	0.06	0.04	0.68	--	0.20	0.05
Total Paving	0.71	5.96	7.72	0.01	0.50	0.33
Architectural Coating (on-site)	71.93	1.41	1.81	--	0.08	0.08
Architectural Coating (off-site)	0.01	--	0.11	--	0.03	--
Total Architectural Coating	71.94	1.41	1.92	--	0.11	0.08
Maximum Daily Emissions	71.94	12.02	7.85	0.02	5.92	3.07
Daily Thresholds	75	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod V.2020.4.0.

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. The analysis of long-term operational impacts summarized in Table 3-2 also used the CalEEMod V.2020.4.0 computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the SCAQMD daily emissions thresholds.

Table 3-2
Estimated Operational Emissions in lbs/day

Emission Source	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
Area-wide (lbs/day)	0.86	--	--	0.00	--	--
Energy (lbs/day)	--	0.04	0.03	--	--	--
Mobile (lbs/day)	0.43	0.49	4.65	0.01	1.10	0.30
Total (lbs/day)	1.29	0.53	4.68	0.01	1.10	0.30
Daily Thresholds	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod V.2020.4.0.

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

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

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

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

Cannabis cultivation directly impacts air quality in two predominant operations, plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by the generation of strong odors. The majority of the odors of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants

and vary widely between plants.¹⁶ 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. This equipment will seal the facility, except for the intake and exhaust, which creates suction when exhaust fans are turned off. The proper use of both negative air and negative ion generators will efficiently expunge odor before leaving the facilities.
- *Staff Training.* The facility's employees will be trained regarding compliance with the industry's best standards and facility regulations in order to achieve successful odor control. Employees will be trained in the use of odor control methods as well as any new techniques and technologies that may be added in the future.

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

- The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and the San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.

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

- Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

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

MITIGATION MEASURES

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

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

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

3.4 BIOLOGICAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.³²

³² Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

The property is bordered by vacant land in all directions. The site is approximately 895 meters above sea level and relatively flat with no slope, and supports a relatively disturbed desert scrub habitat common in the region. The property consists of Helendale Bryman Loamy sand and Cajon sand, which have a 2 to 5 and 0 to 2 percent slope and well drainage, with a moderate available water capacity, and no frequency of flooding. The vegetation community on site is creosote bush scrub habitat encompassing mainly native plants and some non-native grasses. The site is dominated by creosote bush (*Larrea tridentata*), Nevada jointfir (*Ephedra nevadensis*), kelch grass (*Schismus barbatus*), white bursage (*Ambrosia dumosa*), and Asian mustard (*Brassica tournefortii*).³³

The site supports a variety of wildlife, with many of them being birds. One mammal was observed on site, the desert cottontail (*Sylvilagus audubonii*). Other mammals that are expected to occur include antelope ground squirrel (*Ammospermophilus leucurus*), California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), and coyote (*Canis latrans*). Birds observed included ravens (*Corvus corax*) and house finch (*Haemorhous mexicanus*). Other species that may occur on site include rock pigeon (*Columba livia*), house sparrow (*Passer domesticus*), and horned larks (*Eremophila*). Section 5.0 provides a more detailed discussion of the various species observed during the surveys. One reptile was observed during the survey, the common side-blotched lizard (*Uta stansburiana*). Other reptiles that may occur on the site include desert spiny lizard (*Sceloporus magister*) and western whiptail lizard (*Cnemidophorus tigris*).³⁴

General biological surveys were conducted on November 22, 2021, during which biologists from RCA Associates, Inc. initially walked meandering transects throughout the property. During the surveys, data was collected on the plant and animal species present on the site. The property was also evaluated for the presence of habitats which might support sensitive species. Scientific nomenclature for this report is based on the following references: Hickman (1993), Munz (1974), Stebbins (2003), Sibley (2000) and Whitaker (1980). Following completion of the initial reconnaissance survey, habitat assessments were conducted for the desert tortoise and burrowing owl, and Mohave ground squirrel. Weather conditions consisted of wind speeds of 0 to 5 mph, temperatures in the high 70's to low 80's (°F) (AM) with clear skies, 10% cloud cover.

Meandering transects were walked on the site and in surrounding areas (i.e., the zone of influence) where accessible at a pace that allowed for careful documentation of the plant and animal species present on the site. All plants observed were identified in the field and wildlife was identified through visual observations and/or by vocalizations. Habitat assessments were conducted for the desert tortoise, burrowing owl, and Mohave ground squirrel. The site supports a slightly disturbed desert scrub plant community which sparsely covers the property. Species present on the site included kelch grass (*Schismus barbatus*), creosote bush (*Larrea tridentata*), Asian mustard (*Brassica tournefortii*), Western Joshua Tree (*Yucca brevifolia*), Nevada jointfir (*Ephedra nevadensis*), and fiddleneck (*Amsinckia tessellata*).³⁵

Birds observed included ravens (*Corvus corax*) and house finch (*Haemorhous mexicanus*). Other species that may occur on site or in the surrounding area include rock pigeon (*Columba livia*), Anna's hummingbird (*Calypte anna*), house sparrow (*Passer domesticus*), and European starling (*Sturnus vulgaris*). One reptile was observed on the property, Common side-blotched lizard (*Uta stansburiana*). Only one mammal was observed on site, the desert cottontail (*Sylvilagus audubonii*), although California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), antelope ground

³³ RCA Associates, Inc. *General Biological Resources Assessment, Adelanto, California*. APN 0459-101-21. December 1, 2021.

³⁴ Ibid.

³⁵ Ibid.

squirrel (*Ammospermophilus leucurus*), and Merriam's kangaroo rats (*Dipodomys merriami*) may also occur on the site given their wide-spread distribution in the region. Tables 1 and 2 (Appendix A) provides a compendium of the various plant and animal species identified during the field investigations and those common to the area. No distinct wildlife corridors were identified on the site or in the immediate area.³⁶

No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations. The following are the listed and special status species that have the ability to occur on the project site. It is not a comprehensive list of all the species in the quad. This information has been taken from the California Natural Diversity Database and is using the most current version.³⁷

- *Desert Tortoise*: The site is located within the documented tortoise, a state and federal threatened species, habitat according to CNDDDB (2021). The property supports very marginal habitat for the desert tortoise based on the location of the site in a semi-developed area of Adelanto. No tortoises were observed anywhere within the property boundaries during the November 22, 2021 surveys. The species is not expected to move onto the site in the near future based on the absence of any sign, absence of any recent observations in the immediate area. The protocol survey results are valid for one year as per CDFW and USFWS requirements.
- *Mohave Ground Squirrel*: The Mohave ground squirrel is a California state threatened species that have a short, flat, furred, white, underside tail, uniformly brown (with no spots or stripes). They inhabit open desert scrub, alkali desert scrub, and annual grasslands on sandy to gravelly surfaces in the Mojave Desert. Occupiable burrows were found on the site, but no Mohave ground squirrels were detected. It is the opinion of RCA Associates, Inc. that the habitat is not prime Mohave ground squirrel habitat and is very unlikely to support populations of the species based on the following criteria, that there have been two recent sightings, within 20 years, of the species in the Adelanto quadrangle.
- *Swainson's Hawk*: The site is located within documented Swainson's hawk habitat, a state threatened raptor, according to CNDDDB (2021). No hawks were seen on the property during the survey, and no suitable habitat was observed due to previous grading of the site. Swainson's hawks occupy grasslands and breed in trees that are the only ones seen for miles. Swainson's hawks are not expected to occur on the site due to lack of habitat and prime vegetation.
- *Burrowing Owl*: The site is located within documented burrowing owl habitat according to CNDDDB (2021). No owls were seen on the property during the survey, and minimal suitable habitat was observed. Burrowing owls are not expected to occur on the site due to lack of suitable vegetation and burrows.
- *Le Conte's thrasher*: Le Conte's thrashers have not been recently observed in the area according to CNDDDB (2021). Thrashers are not expected to occur on the site due to lack of critical vegetation used by the species, such as saltbush and catclaw acacia. Thrashers may be very infrequent in the area given the low population levels in the region as well as the lack of any recent sightings according to the CNDDDB.

³⁶ RCA Associates, Inc. *General Biological Resources Assessment, Adelanto, California*. APN 0459-101-21. December 1, 2021.

³⁷ Ibid.

Future development of the site will have minimal impact on the general biological resources present on the site, and most, if not all, of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. However, more mobile species (i.e., birds, large mammals) will be displaced into adjacent areas and will likely experience minimal impacts. Therefore, loss of about 3.89-acres of desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitat throughout the surrounding desert region. No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.³⁸

No federal or State-listed wildlife species were observed on the site during the field investigations including the Mohave ground squirrel and desert tortoise. In addition, there are no documented observations of these species either on the site or in the immediate area. The site is not expected to support populations of the desert tortoise based on the absence of suitable habitat. As per CDFW protocol, the burrowing owl survey results are valid for only 30 days; therefore, CDFW may require a 30-day pre-construction survey be performed prior to any clearing/grading activities to determine if owls have moved on to the site since the November 22, 2021, surveys.³⁹

Future development activities are expected to grade the property and remove the vegetation from the 3.89-acre parcel; however, cumulative impacts to the general biological resources (plants and animals) in the surrounding area are expected to be negligible. This assumption is based on the habitat containing scarce vegetation of non-native species. In addition, future development activities are not expected to have any impact on any State or Federal listed or State special status plant or animal species. As discussed above, the site does not support any desert tortoises. In addition, burrowing owls do not inhabit the site and are not expected to be impacted given the absence of any suitable burrows. The following mitigation measures are recommended:

- Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of project related ground disturbance. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged.
- A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those Joshua trees that would be removed during Project construction. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible once an ITP has been granted by the CDFW.

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

³⁸ RCA Associates, Inc. *General Biological Resources Assessment, Adelanto, California*. APN 0459-101-21. December 1, 2021.

³⁹ Ibid.

- 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.⁴⁰ 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 transmission towers. 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? • Less than Significant Impact with Mitigation.*

Joshua Trees are protected under Chapter 17.57 – Biotic Resources of the City of Adelanto's Municipal Code. In addition, the City of Adelanto enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the city to assure the Joshua tree is not a "specimen" class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006).

A mitigation measure is identified under Subsection A that calls for a Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those Joshua trees that would be removed during Project construction. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible once an ITP has been granted by the CDFW.

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

¹⁹ Ranch Life. Preliminary Site Plans Figure 4a August 4, 2021.

- 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.

MITIGATION MEASURES

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

Biological Resources Mitigation Measure No. 1. Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of project related ground disturbance. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged.

Biological Resources Mitigation Measure No. 2. A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those Joshua trees that would be removed during Project construction. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible once an ITP has been granted by the CDFW.

3.5 CULTURAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁴¹

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

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high

⁴¹ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,

- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

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

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.⁴²

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no historic resources were listed within the City of Adelanto.⁴³ The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).⁴⁴ The proposed

⁴² U. S. Department of the Interior, National Park Service. National Register of Historic Places. <http://nrhp.focus.nps.gov>. 2010.

⁴³ U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed December 6, 2020.

⁴⁴ California Department of Parks and Recreation. *California Historical Resources*. Website accessed on December 20, 2020.

project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).²² The project site is vacant and does not have any historical or cultural significance. Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

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

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

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

Therefore, the following mitigation measure is required:

- Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for

listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed.

Additional mitigation was received as part of the AB-52 process. Under AB-52, the lead agency is required to engage in consultation with various tribes who request AB-52 consultation. Formal requests for consultation were sent out to various local tribes for the mandatory 30-day review period. A representative from the San Manuel Band of Mission Indians provided project specific mitigation measures on April 29, 2019, via email communication. The requested mitigation measures are reiterated below:

- In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within the mitigation provided in Section 3.17, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.
- If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within the mitigation provided in Section 3.17. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.
- If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

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

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

There are no dedicated cemeteries located within or in the vicinity of the project site.⁴⁵ 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.

MITIGATION MEASURES

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

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

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

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

repository agreement in hand prior to initiation of mitigation activities.

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

3.6 ENERGY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁴⁶

The growing (cultivation) of cannabis is an agricultural production process where the environmental conditions, temperature, and humidity are tightly controlled to optimize the quality of the cannabis plants and to reduce crop loss. The quality and amount of light provided is the primary variable affecting crop yield and quality once air temperature and humidity needs are met. Dehumidification is generally achieved mechanically by sub-cooling the air to remove water and then reheating the air to the desired supply air temperature through traditional dehumidification units or by absorbing moisture in the air through a desiccant dehumidifier. The indoor air conditioning will also involve electrical consumption.

For indoor grow operations (as opposed to greenhouse operations), LED lighting fixtures are being successfully applied to vegetative rooms, saving up to 50% of the lighting energy compared to the standard practice. For flower rooms, double ended, high-pressure sodium (HPS) fixtures save 20-25% compared to the standard HPS fixtures. While less common, some growers are successfully applying LED fixtures or LED/HPS hybrid designs for up to 30-40% energy savings in flower rooms. For cooling and dehumidification, smaller grow operations are saving energy by using split ductless air conditioning units in place of standard rooftop units. Medium and large-sized grow operations are using chilled water systems

⁴⁶ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

to accomplish both cooling and dehumidification, with energy savings of up to 40% compared to the standard practice. By implementing all these best practices, a medium-size or larger indoor grow operation can achieve up to 30-35% energy savings compared to a standard indoor grow.²³ The total energy costs for indoor cannabis grow operations typically varies between 20-50% of total operating costs. By comparison, for a typical medium-size or larger brewery, energy use accounts for about 6-12% of total operating costs. The proposed project's electric power service would be provided by the Southern California Edison Company (SCE). SCE also maintains a transmission line adjacent to the project site.

Indoor cannabis cultivation facilities consume up to ~150 kilowatt-hours of electricity per year per square foot, which is about 10 times as much as a typical office building in the southwestern United States. Assuming this rate of consumption, the proposed project would consume approximately 65,829 kWh of electricity on a daily basis. The project Applicant will be required to closely work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. The project Applicant will be required to implement the following mitigation measures as a means to reduce electrical consumption:

- Use of glass or translucent plastic (corrugated polycarbonate .. 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural daylight in work areas and for plant growth (Conley's 2021).
- Use of 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.

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

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

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

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (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 building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned commercial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. As a result, the potential impacts will be less than significant.

²³ Trends and Observations of Energy Use in the Cannabis Industry," Jesse Remillard and Nick Collins, ERS, ACEEE Summer Study of Energy Efficiency in Industry, 2017.

MITIGATION MEASURES

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

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

Energy Mitigation Measure No. 2. The project must use 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.

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

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

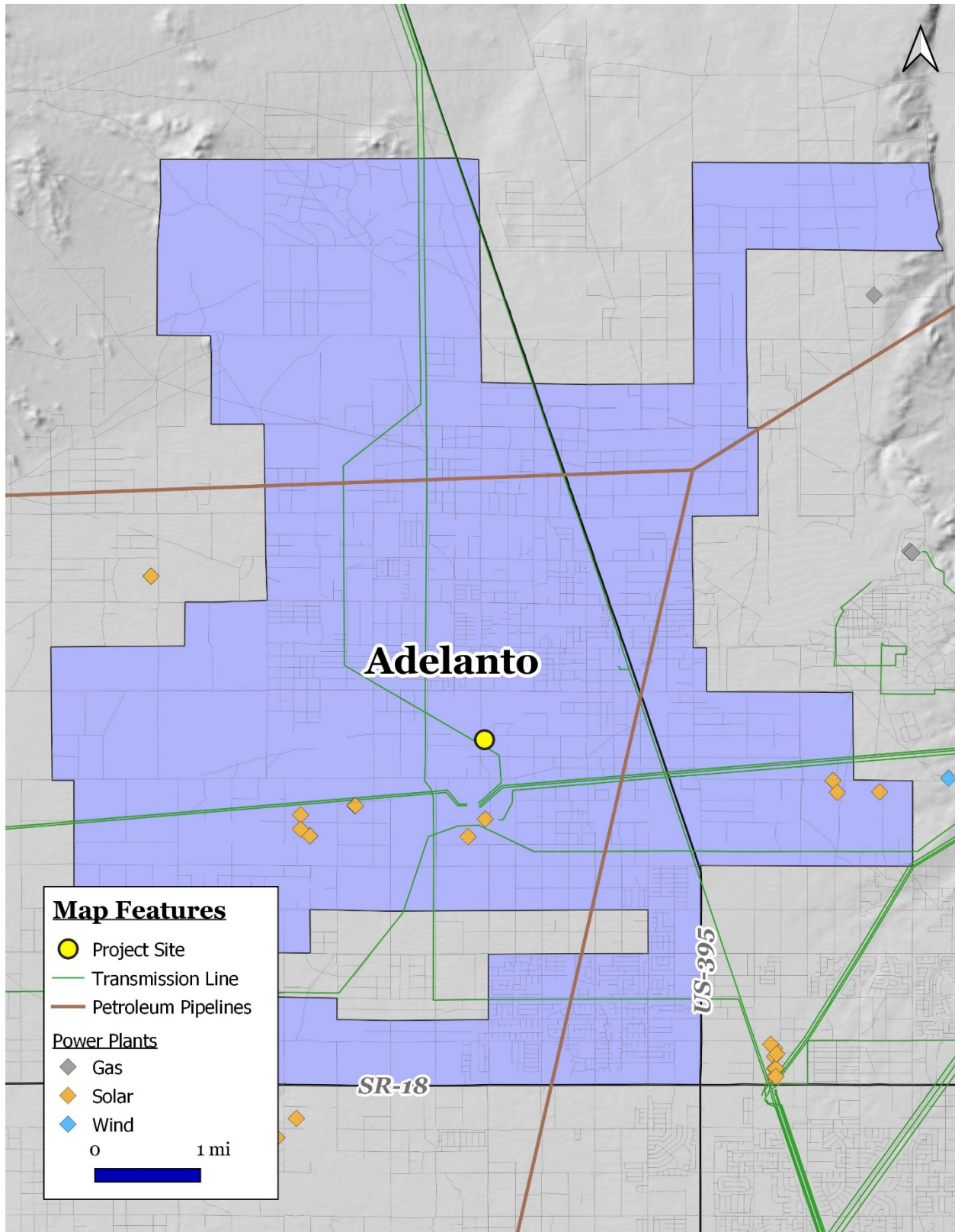


EXHIBIT 3-2 ENERGY MAP

SOURCE: CALIFORNIA ENERGY COMMISSION

3.7 GEOLOGY & SOILS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca

Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁴⁷

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The closest fault to the project site is the Mirage Valley Fault, from the Late Quaternary period, which is located approximately 1.6 miles west of the City.⁴⁸

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is in a moderate liquefaction zone.⁴⁹ 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 Bryman, Helendale, and Cajon soils associations consisting of loamy fine sand with 2 to 5 percent slopes.⁵⁰ 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

⁴⁷ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

⁴⁸ California Department of Conservation. [Fault Activity Map](#).

⁴⁹ San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

⁵⁰ UC Davis. *SoilWeb*. Website accessed December 11, 2021.

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 resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. As a result, the potential impacts 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 Bryman, Helendale, and Cajon soils associations consisting of loamy fine sand with 2 to 5 percent slopes.⁵¹ 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? • Less than Significant Impact.*

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

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

The proposed project site is located on a 3.75-acre parcel that is currently vacant and undisturbed. The proposed development will be constructed in the northwestern portion of the City of Adelanto. The surface

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

⁵¹ UC Davis. *SoilWeb*. Website accessed September 1, 2021.

³⁰ United States Department of Agriculture. Natural Resources Conservation Service. Website accessed December 11, 2021.

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 following mitigation will be applicable during earth-disturbing activities as a means to protect potential paleontological resources:

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

MITIGATION MEASURES

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

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

Paleontological Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan

sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

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

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

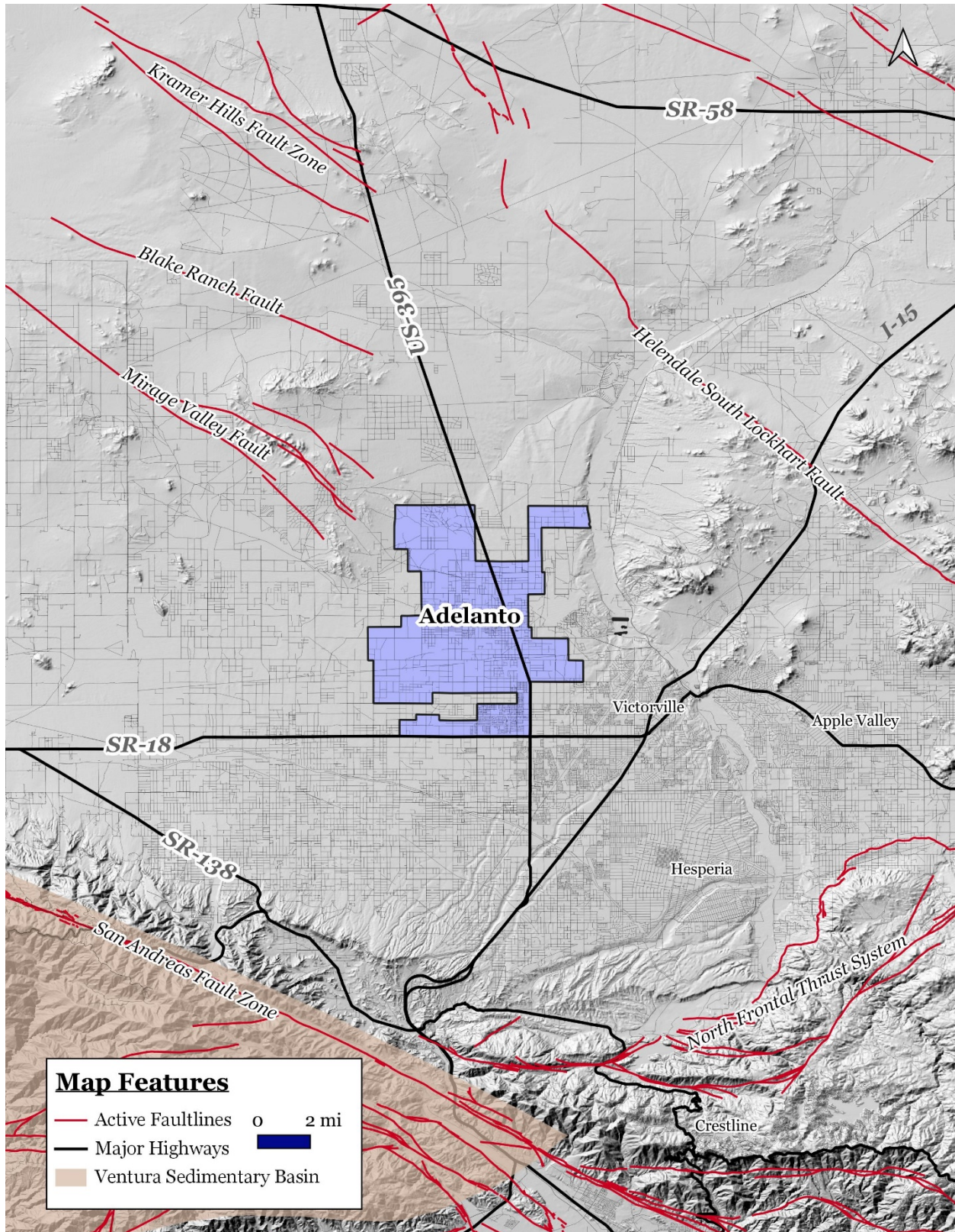


EXHIBIT 3-3 GEOLOGY MAP

SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

3.8 GREENHOUSE GAS EMISSIONS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area).⁵² 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 and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouse gases in a common and collective unit. The SCAQMD established the 10,000 MTCO₂ threshold for industrial land uses. As indicated in Table 3-4, the operational CO₂E is 1,142 pounds per day which is well below the threshold.

**Table 3-4
Greenhouse Gas Emissions (lbs./day)**

Source	GHG Emissions			
	CO ₂	CH ₄	N ₂ O	CO ₂ E
Long-Term – Area Emissions	--	--	--	--
Long-Term - Energy Emissions	42.77	--	--	43.03
Long-Term - Mobile Emissions	1,084.68	0.06	0.04	1,099.14
Long-Term - Total Emissions	1,127.45	0.06	0.04	1,142.17
Total Construction Emissions	1,446.51	0.44	0.02	1,458.18
Significance Threshold				100,000 MTCO₂E

⁵² Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

Furthermore, as mentioned in Section 3.17 Transportation, the projected vehicle trips to and from the site will not be significant given the proposed use. All vehicle, equipment and machinery sales transactions will be completed through an online auction-style website. Very few customers will visit the project site since the new business will be closed to the general public. As a result, the potential impacts are considered to be less than significant.

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

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

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 2030.⁵³ The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.

MITIGATION MEASURES

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

⁵³ Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.* September 8, 2021.

3.9 HAZARDS & HAZARDOUS MATERIALS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁵⁴

⁵⁴ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

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

- *Mold.* Marijuana production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold. Previous studies of illegal indoor cultivation operations have reported elevated levels of airborne mold spores, especially during activities such as plant removal by law enforcement personnel. Physiological effects include allergic reactions, hypersensitivity, and anaphylaxis to marijuana.
- *Skin Sensitivity.* Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes. As with most sensitizers, initial exposure results in a normal response, but over time, repeated exposures can lead to progressively strong and abnormal responses.
- *Carbon dioxide (CO₂).* CO₂ is used in the marijuana industry to increase plant growth and to produce concentrates. In addition to the liquid gas form, solid carbon dioxide or dry ice can be used for extraction processes. Compressed gases can present a physical hazard and has additional safety regulations that must be adhered to.
- *Carbon monoxide (CO).* CO is a colorless, odorless, toxic gas which interferes with the oxygen-carrying capacity of blood. At elevated concentrations, CO can overcome persons without warning. Sources of carbon monoxide exposure include furnaces, hot water heaters, portable generators/generators in buildings; concrete cutting saws, compressors; forklifts, power trowels, floor buffers, space heaters, welding, and gasoline powered pumps.
- *Indoor Air Quality.* Workers may encounter ozone as a product of the chemical reaction of nitrogen oxides and volatile organic compounds (e.g., terpenes emitted from the marijuana plant) present inside a cultivation facility. Terpenes and nitric oxides are associated with eye, skin, and mucous irritation. Ozone generators may also be found in facilities for odor control. Ozone can cause decreased lung function and/or exacerbate pre-existing health effects, especially in workers with asthma or other respiratory complications.
- *Pesticides.* Cannabis cultivation facilities may have insecticides and fungicides used within the facility. Some pesticides, including pyrethrins and neem oil are non-persistent and have low volatility (neem oil is an organic pest repellent derived from the neem tree). However, these pesticides have been associated with dermal and respiratory toxicity for the workers who apply them. Depending on the pesticide, requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.
- *Nutrients and Corrosive Chemicals.* Cannabis Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

The project 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, less than significant impacts will occur.

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

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As indicated in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Environstor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project's construction phase is remote 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 the site is not located within two miles of a public airport or public use airport.⁵⁵ The nearest airport to the city is the Southern California Logistics

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

⁵⁵ Toll-Free Airline, *Los Angeles County Public and Private Airports, California*.

Airport is located approximately 3.1 miles to the northeast of the project site.⁵⁶ The project will not introduce a structure that will interfere with the approach and take off airplanes utilizing any regional airports. As a result, no impacts related to this issue will occur.

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

At no time will any adjacent street be completely closed to traffic during the proposed project's construction. In addition, all construction staging must occur on-site. As a result, no impacts 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 is not located within a "moderate fire hazard severity zone."³³ As a result, no impacts will result.

MITIGATION MEASURES

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

⁵⁶ Google Earth. Website accessed September 1, 2021.

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

3.10 HYDROLOGY & WATER QUALITY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁵⁷

The project Applicant will be required to adhere to Chapter 17.93 - Erosion and Sediment Control, of the municipal code regulates erosion and sediment control. These regulations outlined in Section 17.93.050 – Soil Erosion and Sediment Control Plan. The project Applicant will also be required to conform to Section 17.93.060 – Runoff Control of the City's Municipal Code. In addition, stormwater discharges from

⁵⁷ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. As a result, the construction impacts will be less than significant.

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

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 water 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 construction. 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 would 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 but are located within the vicinity of the project site. 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 a flood hazard zone, labeled as "Zone X." Thus, properties located in "Zone X" are areas of minimal flood hazard.⁵⁸ The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 70 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.⁵⁹ As a result, no impacts are anticipated.

⁵⁸ FEMA. Glossary. Flood Zones. Website accessed December 12, 2021.

⁵⁹ Google Earth. Website accessed December 12, 2021.

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 since there are no active groundwater management recharge activities on-site or in the vicinity. As a result, no impacts are anticipated.

MITIGATION MEASURES

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

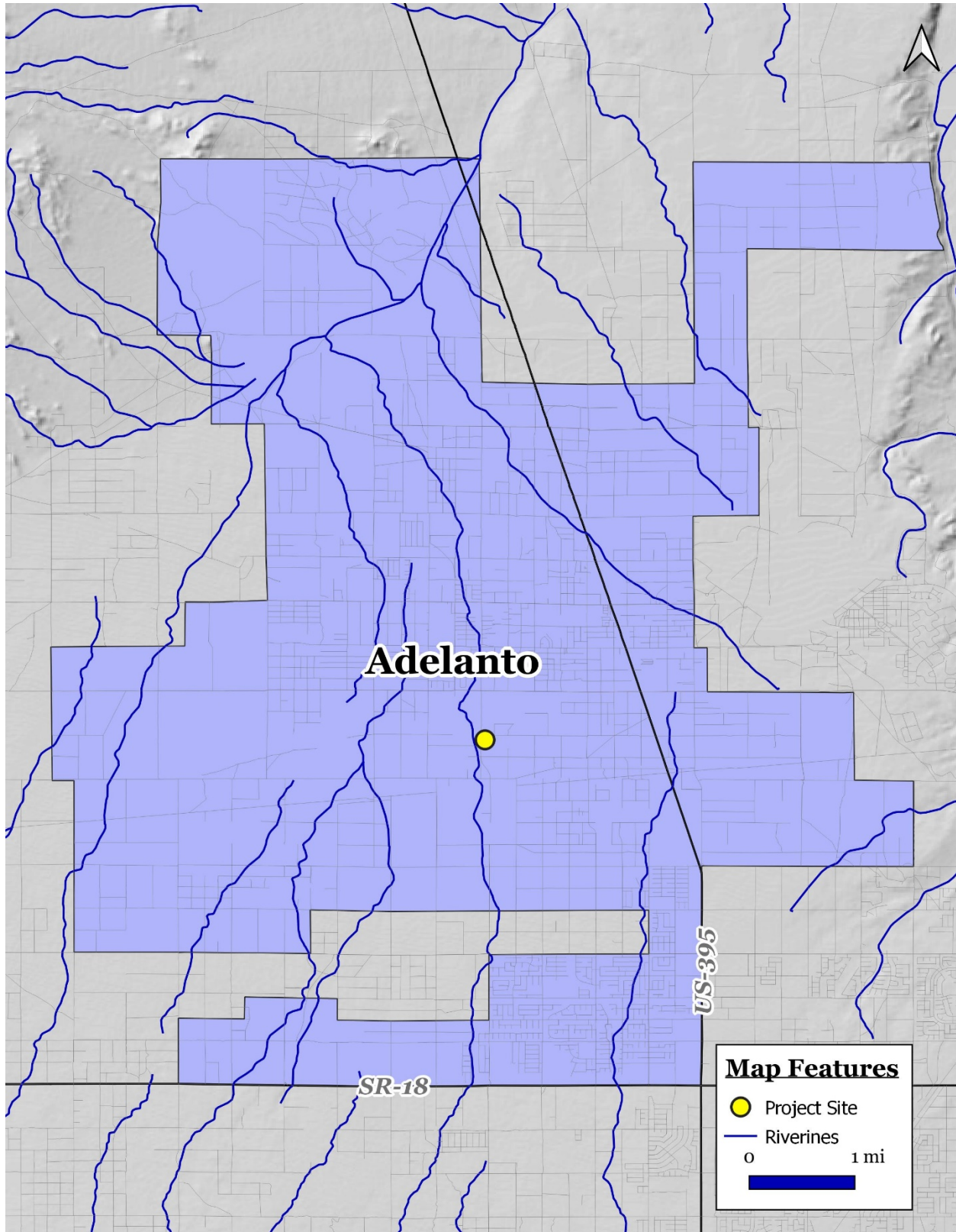


EXHIBIT 3-4
WATER RESOURCES MAP
SOURCE: CALIFORNIA DEPARTMENT OF WATER RESOURCES

3.11 LAND USE & PLANNING

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁶⁰

The proposed project site is located on a 3.79-acre parcel that is currently vacant though it has been disturbed by off-road activity and illegal dumping. The property currently has a General Plan and Zoning land use designation of Manufacturing/Industrial (M/I). Vehicular access to the site would be provided by a single driveway connection with Yucca Road and a second driveway connection with Aster Road. Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* Yucca Road extends along the project site's north side. This roadway segment is unimproved. Vacant and undisturbed land parcels are located directly to the north of the aforementioned roadway. These parcels are zoned as *Light Manufacturing (LM)*.⁶¹
- *East of the project site:* Abutting the project site to the east, is vacant and undisturbed land. This area is zoned as *Manufacturing Industrial (MI)*.⁶²

⁶⁰ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

⁶¹ Google Maps and City of Adelanto Zoning Map. Website accessed on December 9, 2021.

⁶² Ibid.

- *South of the project site:* Vacant and undisturbed land is located to the south of the site. A transmission line utility easement is located next to the site's south side. This area is zoned as *Manufacturing Industrial (MI)*.⁶³
- *West of the project site:* Aster Road extends along the project site's west side. This roadway segment is unimproved. Vacant and undisturbed land abuts the property. This area is zoned as *Manufacturing Industrial (MI)*.⁶⁴

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: Airport Development District (ADD), Light Manufacturing Cannabis Only (LMCO), Manufacturing Industrial (MI), and Airport Development District (ADD). Because the proposed project site is located within a Manufacturing Industrial (MI) zoning designation, a CUP is required. As a result, no impacts will occur.

MITIGATION MEASURES

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

⁶³ Google Maps and City of Adelanto Zoning Map. Website accessed on December 9, 2021.

⁶⁴ Ibid.

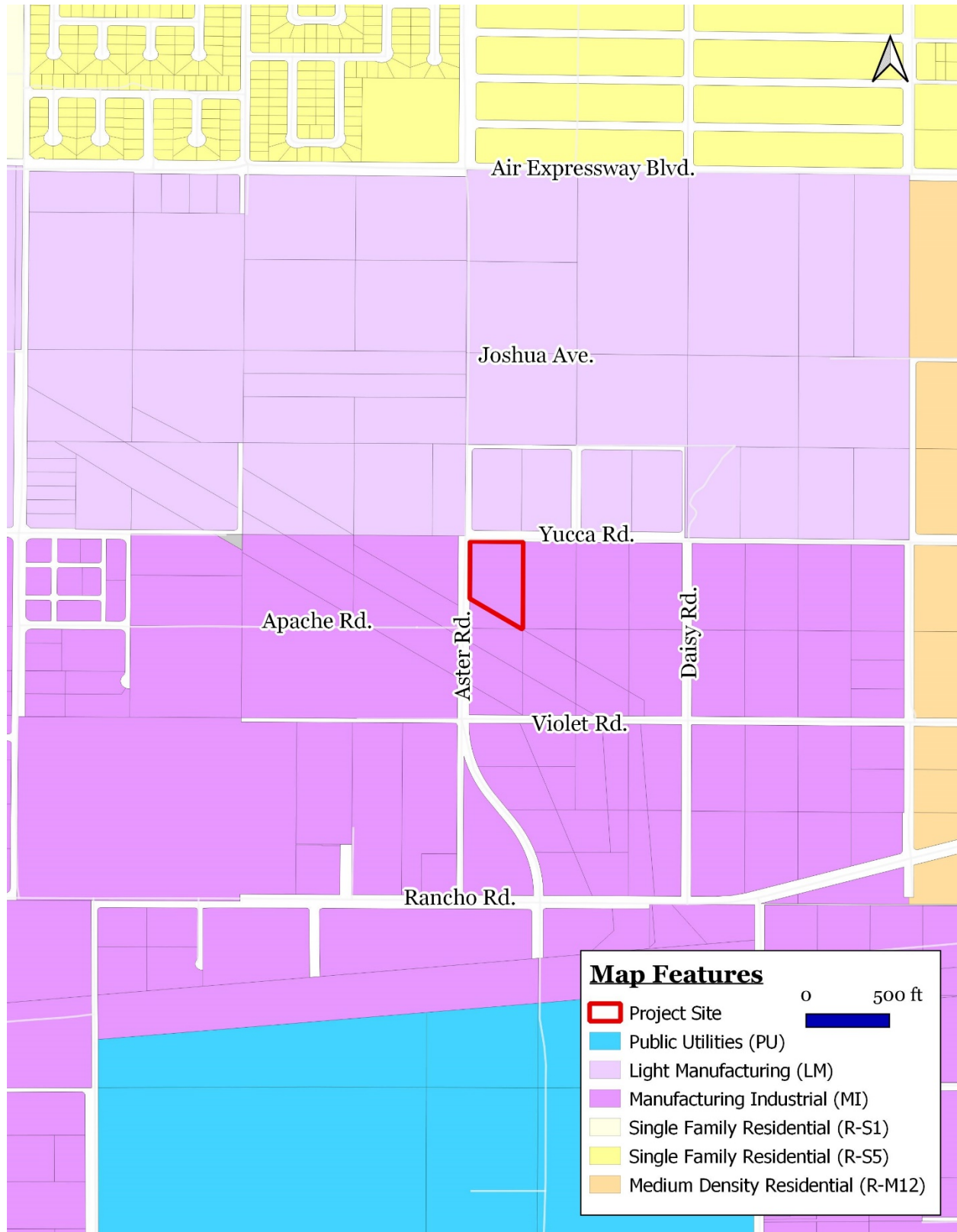


EXHIBIT 3-5
LAND USE MAP
 SOURCE: CITY OF ADELANTO

3.12 MINERAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁶⁵

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

⁶⁵ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

³⁶ California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*.

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.⁶⁶ The project site is located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.⁶⁷ As indicated previously, there are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources would occur.

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

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

MITIGATION MEASURES

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

⁶⁶ California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*.

⁶⁷ California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed December 12, 2021.

3.13 NOISE

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁶⁸

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 manufacturing of cannabis products will occur indoors. In addition, the operation of the facility will not expose any surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. Finally, there are no

⁶⁸ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

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

noise sensitive land uses located in the vicinity of the site. As a result, the proposed project will not expose sensitive receptors to excessive noise levels. As a result, the impacts would be less than significant.

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

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

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

The project site is located within an airport land use plan and is located within two miles of a public airport or public use airport.⁶⁹ The nearest airport to the city is the Southern California Logistics Airport is located approximately 3.1 miles northeast of the project site.⁷⁰ The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. As a result, no impacts would occur.

MITIGATION MEASURES

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

⁶⁹ Toll-Free Airline. *Los Angeles County Public and Private Airports, California.*

⁷⁰ Google Earth. Website accessed December 12, 2021.

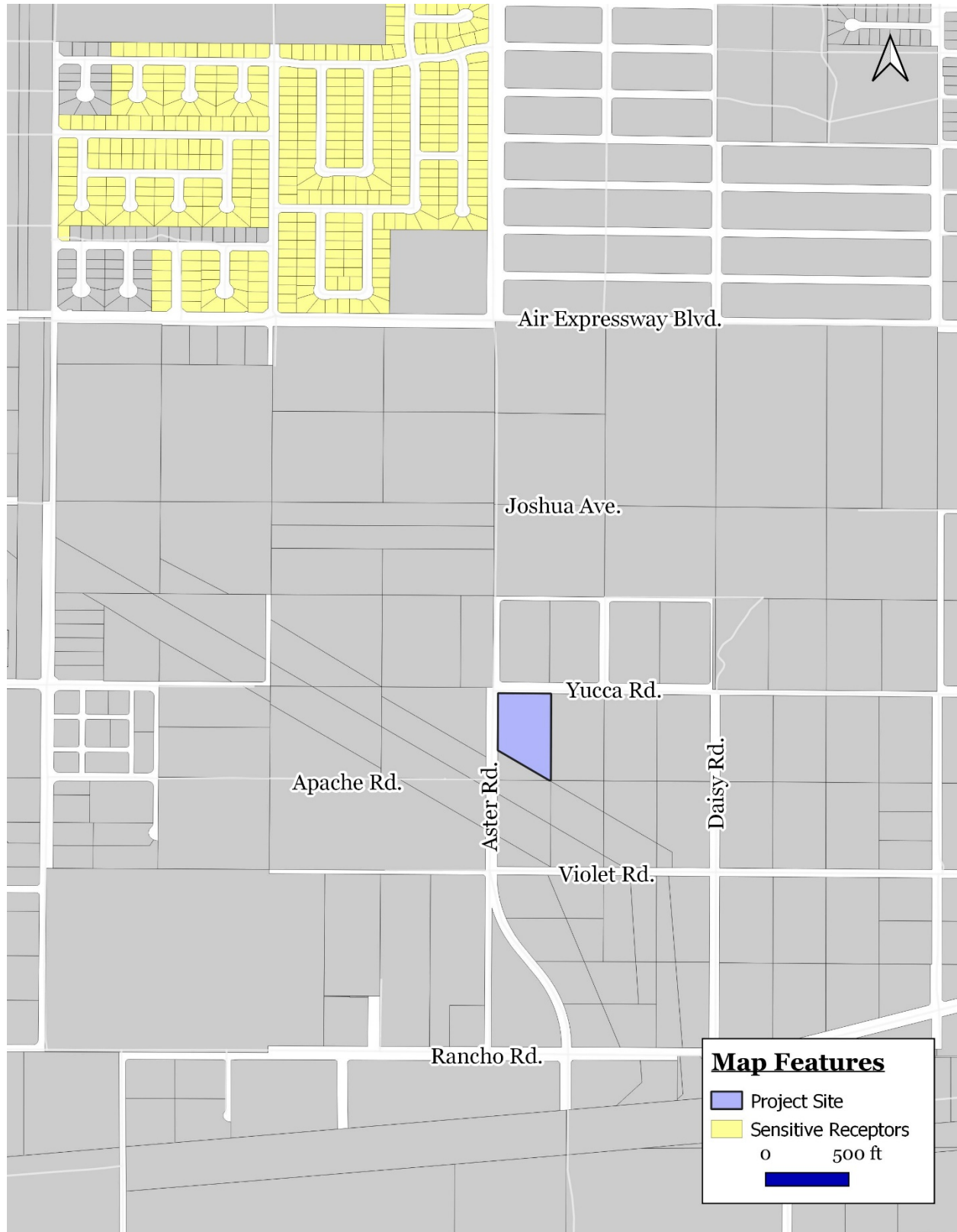


EXHIBIT 3-6
SENSITIVE RECEPTORS MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

3.14 POPULATION & HOUSING

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁷¹

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

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

⁷¹ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

plants, or wastewater treatment plants.

- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in a limited increase in employment which can be accommodated by the local labor market. The cultivation facility is projected to employ 95 persons at full capacity. The hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

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

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

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

MITIGATION MEASURES

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

3.15 PUBLIC SERVICES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area).⁷²

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. As a result, the potential impacts to fire protection services would be less than significant.

⁷² Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

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 would include security personnel, gates, cameras, and detailed background checks of employees. The facility would be closed to the public at all times. Non-employees would only be allowed to enter the facility with a permitted escort. The proposed facility will also be required to comply with the County and City security requirements. As a result, the potential impacts to law enforcement services would be less than significant.

Schools

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

Recreational Services

The proposed project would not result in any local increase in residential development (directly or indirectly) which could potentially impact the local recreational facilities. As a result, less than significant impacts on parks would result from the proposed project's implementation.

Governmental Services

The proposed project would not create direct demand for other governmental service. As a result, less than significant impacts would result from the proposed project's implementation.

MITIGATION MEASURES

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

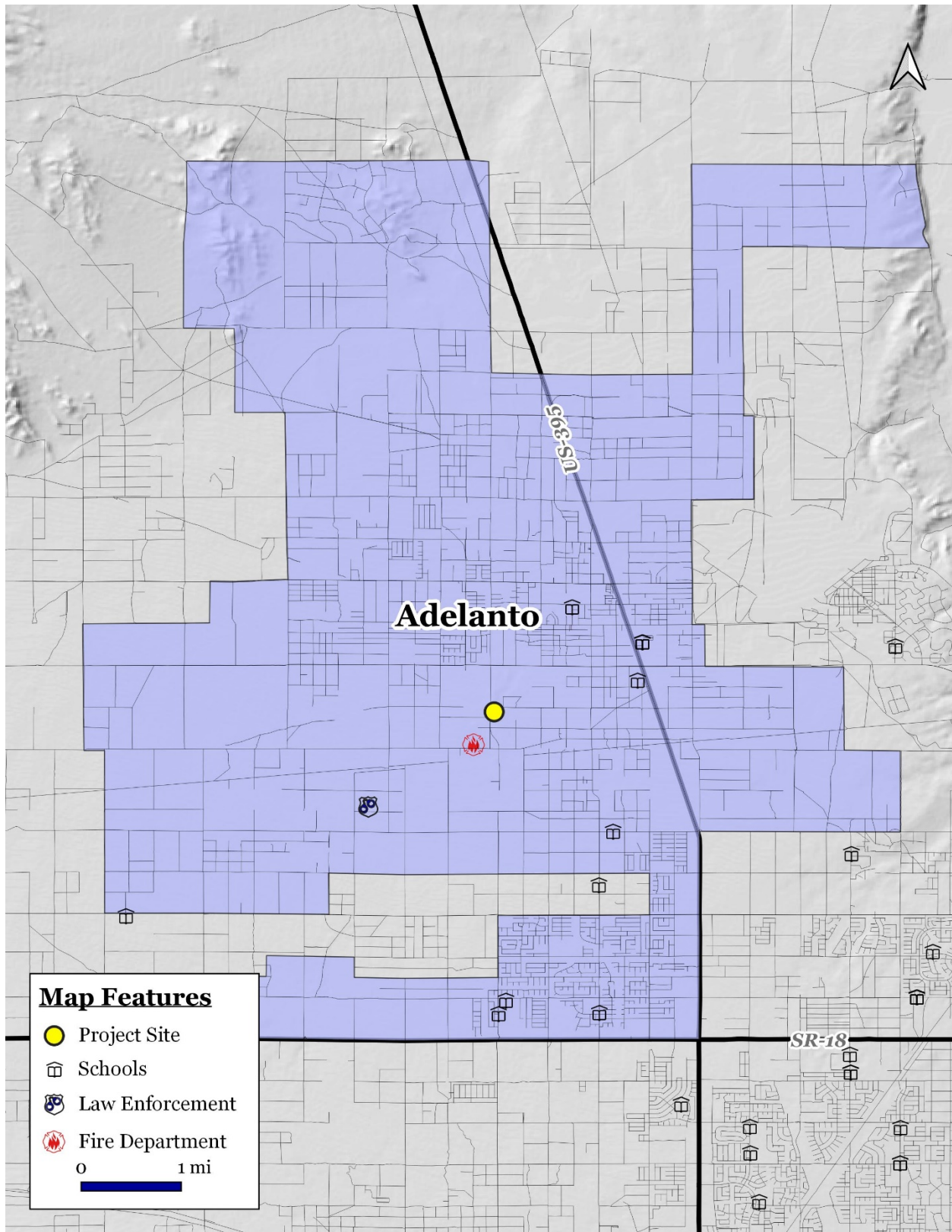


EXHIBIT 3-7
PUBLIC SERVICES MAP
SOURCE: CITY OF ADELANTO

3.16 RECREATION

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution.⁷³ 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. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. As a result, no impacts 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.

MITIGATION MEASURES

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

⁷³ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

3.17 TRANSPORTATION

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁷⁴ The key operational assumptions used in determining potential daily traffic generation are summarized below:

- The proposed project would operate the cannabis cultivation, manufacturing and distribution facility from 8:00 AM to 5:00 PM, Monday through Friday. A total of 95 full-time staff will be on-site.
- The facility will be closed to the public at all times. Non-employees such as vendors, delivery persons, and maintenance personnel, will only be allowed to enter the facility with a permitted escort.
- The existing full-time security guards will continue to be stationed at the facility 24 hours a day, seven days a week.

⁷⁴ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

The total trip generation assumed 190 trip ends (95 round trips) per day for the employees and 4 trip ends (2 round trips) per day for the vendors. A maximum of 194 new trip ends per day are anticipated for the proposed project. As a result, the impacts will be less than significant.

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

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. As previously mentioned in Subsection A, the proposed project will not create a significant amount of traffic in the surrounding area. As a result, the proposed project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impacts will occur.

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

Access to the project site will be provided by two roadway connections. The first accessway would be a 40-footwide driveway connection with the south side of Yucca Road. The second access would be a 40-footwide driveway connection with the east side Aster Road. The internal roadways will consist of two travel lanes with a total aisle width of 40-feet. The new development would have a total of 125 parking spaces.⁷⁵ The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. As a result, the potential impacts would be less than significant.

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

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

MITIGATION MEASURES

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

⁷⁵ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

3.18 TRIBAL CULTURAL RESOURCES

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking

for a total of 125 parking spaces.⁷⁶ 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 to the criteria of subdivision (a).

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

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

The project site is located on recognized Yuhaaviatam/Maarenga'yam (Serrano) ancestral territory.⁷⁷ A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no Native historic resources was listed within the City of Adelanto. Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

MITIGATION MEASURES

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

⁷⁶ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0*. July 7, 2021.

⁷⁷ [Native Land.ca](http://NativeLand.ca). Website Accessed December 12, 2021

3.19 UTILITIES AND SERVICE SYSTEMS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁷⁸ 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

⁷⁸ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

aforementioned facilities. The project site is currently undeveloped and undisturbed. As a result, the potential impacts would be less than significant.

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

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario.⁷⁹ The medicinal cannabis will be cultivated, harvested, dried, packaged, stored, and distributed from this facility. In addition, the project will be equipped with water efficient fixtures and hydroponics. As a result, the impacts will be less than significant.

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

The City operates a 1.5-million-gallons-per-day activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program. The City is currently constructing a 2.5-million-gallons-per-day upgrade that will increase wastewater treatment capabilities to 4.0 million gallons per day and produce treated water that can be used for lawn/public parks irrigation, construction and dust control and other beneficial uses. The project's implementation will require the establishment of a water well. As a result, the impacts are expected to be less than significant.

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

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

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

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

⁷⁹ City of Adelanto. 2015 Urban Water Management Plan. Report dated June 22, 2016.

MITIGATION MEASURES

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

3.20 WILDFIRE

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction of five buildings within a 3.79-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The five buildings (referred to as Buildings 1 through 5), would total 160,185 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. A total of 118,720 square feet of floor area would be devoted to cultivation, 10,470 square feet of floor area would be devoted to manufacturing, and 2,490 square feet would be devoted to distribution. Impervious paved surfaces would total 66,491 square feet (40.3% of the total site area). Landscaping would total 22,700 square feet (13.8% of the total site area). Vehicular access to the site would be provided by a driveway connection with Yucca Road and a second driveway connection with Aster Road. Each building would be provided its own parking for a total of 125 parking spaces.⁸⁰ Surface 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

⁸⁰ Pontious Architecture. *Sark Properties, LLC, Project Information, Sheet A-1.0.* July 7, 2021.

a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts will occur.

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

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

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

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

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

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

MITIGATION MEASURES

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

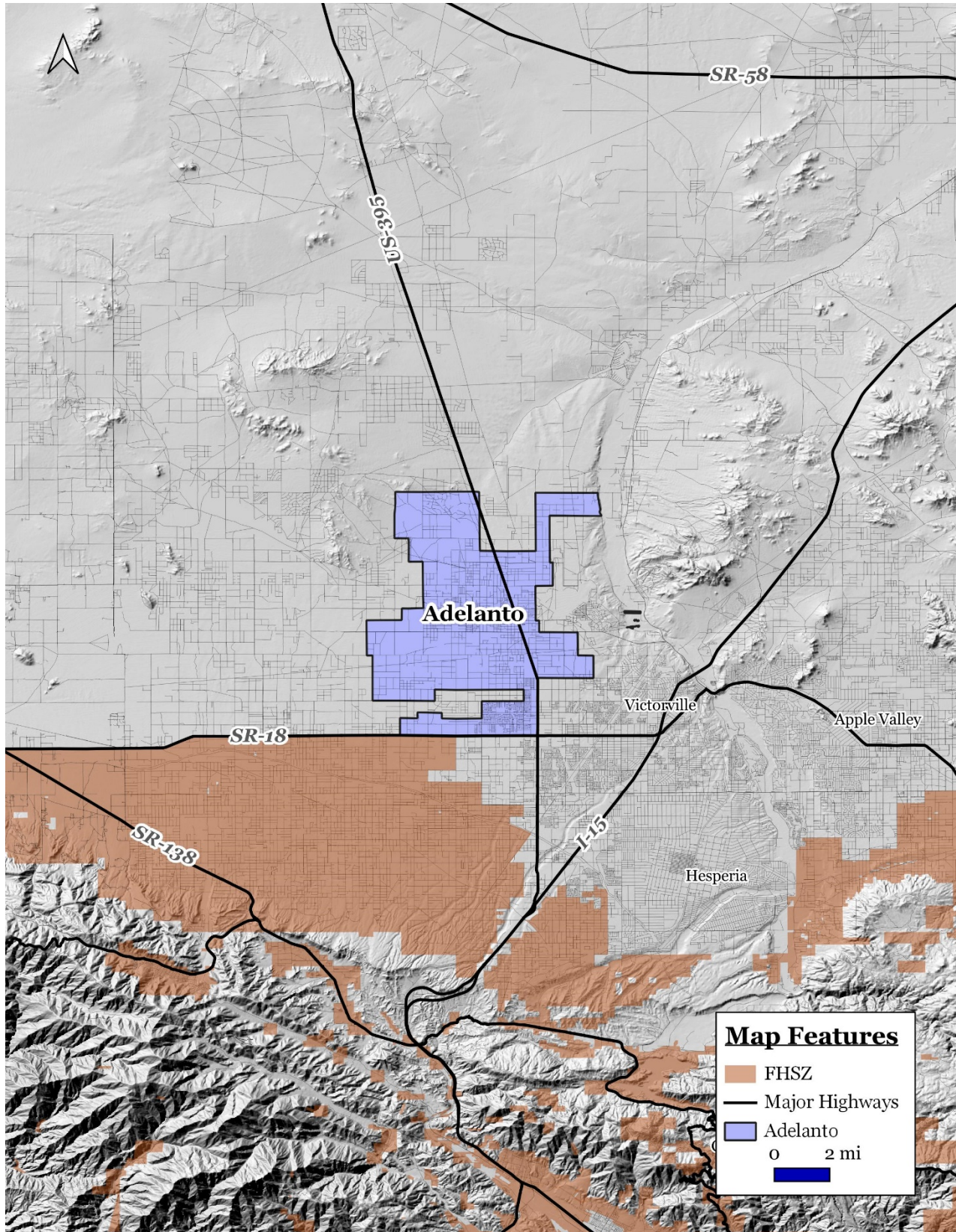


EXHIBIT 3-8
FHSZ MAP
SOURCE: CALFIRE

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

- A.** The proposed project *would not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.
- B.** The proposed project *would not* have impacts that are individually limited, but cumulatively considerable. The environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.
- C.** The proposed project *would not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.

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SECTION 4 CONCLUSIONS

4.1 FINDINGS

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

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

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Adelanto can make the following additional findings: a mitigation monitoring and reporting program will not be required.

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SECTION 5 REFERENCES

5.1 PREPARERS

Blodgett Baylosis Environmental Planning
2211 S Hacienda Boulevard, Suite 107
Hacienda Heights, CA 91745
(626) 336-0033

Marc Blodgett, Project Principal
Karla Nayakarathne, Project Manager, Project Geographer

5.2 REFERENCES

The references that were consulted have been identified using footnotes.

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APPENDIX A – AIR QUALITY WORKSHEETS

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION
SARK PROPERTIES, LLC • CUP 21-24, LDP 21-24, & TPM 20461 • SEC OF YUCCA RD. & ASTER RD.

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Auburn Ave & Montezuma St - South Coast Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Auburn Ave & Montezuma St
South Coast Air Basin, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Industrial Park	38.69	1000sqft	0.89	38,688.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	10			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Table Name	Column Name	Default Value	New Value
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2.0 Emissions Summary

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION
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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	71.9423	12.0239	7.8536	0.0149	5.4014	0.5178	5.9192	2.5923	0.4764	3.0687	0.0000	1,446.5114	1,446.5114	0.4436	0.0219	1,458.1813
Maximum	71.9423	12.0239	7.8536	0.0149	5.4014	0.5178	5.9192	2.5923	0.4764	3.0687	0.0000	1,446.5114	1,446.5114	0.4436	0.0219	1,458.1813

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	71.9423	12.0239	7.8536	0.0149	5.4014	0.5178	5.9192	2.5923	0.4764	3.0687	0.0000	1,446.5114	1,446.5114	0.4436	0.0219	1,458.1813
Maximum	71.9423	12.0239	7.8536	0.0149	5.4014	0.5178	5.9192	2.5923	0.4764	3.0687	0.0000	1,446.5114	1,446.5114	0.4436	0.0219	1,458.1813

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.8647	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003
Energy	3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261
Mobile	0.4289	0.4867	4.6446	0.0106	1.0923	7.4300e-003	1.0998	0.2911	6.9100e-003	0.2980		1,084.6819	1,084.6819	0.0642	0.0431	1,099.1429
Total	1.2975	0.5224	4.6785	0.0109	1.0923	0.0102	1.1025	0.2911	9.6300e-003	0.3007		1,127.4623	1,127.4623	0.0650	0.0439	1,142.1780

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.8647	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003
Energy	3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261
Mobile	0.4289	0.4867	4.6446	0.0106	1.0923	7.4300e-003	1.0998	0.2911	6.9100e-003	0.2980		1,084.6819	1,084.6819	0.0642	0.0431	1,099.1429
Total	1.2975	0.5224	4.6785	0.0109	1.0923	0.0102	1.1025	0.2911	9.6300e-003	0.3007		1,127.4623	1,127.4623	0.0650	0.0439	1,142.1780

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2022	1/14/2022	5	10	
2	Site Preparation	Site Preparation	1/15/2022	1/17/2022	5	1	
3	Grading	Grading	1/18/2022	1/19/2022	5	2	
4	Building Construction	Building Construction	1/20/2022	6/8/2022	5	100	
5	Paving	Paving	6/9/2022	6/15/2022	5	5	
6	Architectural Coating	Architectural Coating	6/16/2022	6/22/2022	5	5	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 58,032; Non-Residential Outdoor: 19,344; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Graders	1	6.00	187	0.41
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	16.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	3.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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3.2 Demolition - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7094	6.4138	7.4693	0.0120		0.3375	0.3375		0.3225	0.3225		1,147,902.5	1,147,902.5	0.2119		1,153,200.1
Total	0.7094	6.4138	7.4693	0.0120		0.3375	0.3375		0.3225	0.3225		1,147,902.5	1,147,902.5	0.2119		1,153,200.1

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0341	0.0241	0.3789	1.0100e-003	0.1118	6.7000e-004	0.1125	0.0296	6.2000e-004	0.0303		102.1145	102.1145	2.6700e-003	2.4400e-003	102.9078
Total	0.0341	0.0241	0.3789	1.0100e-003	0.1118	6.7000e-004	0.1125	0.0296	6.2000e-004	0.0303		102.1145	102.1145	2.6700e-003	2.4400e-003	102.9078

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7094	6.4138	7.4693	0.0120		0.3375	0.3375		0.3225	0.3225	0.0000	1,147,902.5	1,147,902.5	0.2119		1,153,200.1
Total	0.7094	6.4138	7.4693	0.0120		0.3375	0.3375		0.3225	0.3225	0.0000	1,147,902.5	1,147,902.5	0.2119		1,153,200.1

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0341	0.0241	0.3789	1.0100e-003	0.1118	6.7000e-004	0.1125	0.0296	6.2000e-004	0.0303		102.1145	102.1145	2.6700e-003	2.4400e-003	102.9078
Total	0.0341	0.0241	0.3789	1.0100e-003	0.1118	6.7000e-004	0.1125	0.0296	6.2000e-004	0.0303		102.1145	102.1145	2.6700e-003	2.4400e-003	102.9078

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Site Preparation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.5303	0.0000	0.5303	0.0573	0.0000	0.0573			0.0000			0.0000
Off-Road	0.5797	6.9332	3.9597	9.7300e-003		0.2573	0.2573		0.2367	0.2367		942.5179	942.5179	0.3048		950.1386
Total	0.5797	6.9332	3.9597	9.7300e-003	0.5303	0.2573	0.7876	0.0573	0.2367	0.2940		942.5179	942.5179	0.3048		950.1386

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0171	0.0120	0.1894	5.1000e-004	0.0559	3.3000e-004	0.0562	0.0148	3.1000e-004	0.0151		51.0572	51.0572	1.3400e-003	1.2200e-003	51.4539
Total	0.0171	0.0120	0.1894	5.1000e-004	0.0559	3.3000e-004	0.0562	0.0148	3.1000e-004	0.0151		51.0572	51.0572	1.3400e-003	1.2200e-003	51.4539

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3.3 Site Preparation - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.5303	0.0000	0.5303	0.0573	0.0000	0.0573			0.0000			0.0000
Off-Road	0.5797	6.9332	3.9597	9.7300e-003		0.2573	0.2573		0.2367	0.2367	0.0000	942.5179	942.5179	0.3048		950.1386
Total	0.5797	6.9332	3.9597	9.7300e-003	0.5303	0.2573	0.7876	0.0573	0.2367	0.2940	0.0000	942.5179	942.5179	0.3048		950.1386

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0171	0.0120	0.1894	5.1000e-004	0.0559	3.3000e-004	0.0562	0.0148	3.1000e-004	0.0151		51.0572	51.0572	1.3400e-003	1.2200e-003	51.4539
Total	0.0171	0.0120	0.1894	5.1000e-004	0.0559	3.3000e-004	0.0562	0.0148	3.1000e-004	0.0151		51.0572	51.0572	1.3400e-003	1.2200e-003	51.4539

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3119	0.0000	5.3119	2.5686	0.0000	2.5686			0.0000			0.0000
Off-Road	1.0832	12.0046	5.9360	0.0141		0.5173	0.5173		0.4759	0.4759		1,364.8198	1,364.8198	0.4414		1,375.8551
Total	1.0832	12.0046	5.9360	0.0141	5.3119	0.5173	5.8292	2.5686	0.4759	3.0445		1,364.8198	1,364.8198	0.4414		1,375.8551

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0273	0.0193	0.3031	8.1000e-004	0.0894	5.4000e-004	0.0900	0.0237	4.9000e-004	0.0242		81.6916	81.6916	2.1400e-003	1.9500e-003	82.3262
Total	0.0273	0.0193	0.3031	8.1000e-004	0.0894	5.4000e-004	0.0900	0.0237	4.9000e-004	0.0242		81.6916	81.6916	2.1400e-003	1.9500e-003	82.3262

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3.4 Grading - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3119	0.0000	5.3119	2.5686	0.0000	2.5686			0.0000			0.0000
Off-Road	1.0832	12.0046	5.9360	0.0141		0.5173	0.5173		0.4759	0.4759	0.0000	1,364.8198	1,364.8198	0.4414		1,375.8551
Total	1.0832	12.0046	5.9360	0.0141	5.3119	0.5173	5.8292	2.5686	0.4759	3.0445	0.0000	1,364.8198	1,364.8198	0.4414		1,375.8551

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0273	0.0193	0.3031	8.1000e-004	0.0894	5.4000e-004	0.0900	0.0237	4.9000e-004	0.0242		81.6916	81.6916	2.1400e-003	1.9500e-003	82.3262
Total	0.0273	0.0193	0.3031	8.1000e-004	0.0894	5.4000e-004	0.0900	0.0237	4.9000e-004	0.0242		81.6916	81.6916	2.1400e-003	1.9500e-003	82.3262

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3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422		1,103.9393	1,103.9393	0.3570		1,112.8652
Total	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422		1,103.9393	1,103.9393	0.3570		1,112.8652

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0110	0.2831	0.0947	1.1500e-003	0.0384	2.8900e-003	0.0413	0.0111	2.7600e-003	0.0138		123.9280	123.9280	4.5600e-003	0.0180	129.4053
Worker	0.0546	0.0385	0.6062	1.6200e-003	0.1788	1.0700e-003	0.1799	0.0474	9.9000e-004	0.0484		163.3831	163.3831	4.2700e-003	3.9000e-003	164.6524
Total	0.0655	0.3217	0.7009	2.7700e-003	0.2173	3.9600e-003	0.2212	0.0585	3.7500e-003	0.0622		287.3112	287.3112	8.8300e-003	0.0219	294.0577

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3.5 Building Construction - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422	0.0000	1,103.939 3	1,103.939 3	0.3570		1,112.865 2
Total	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422	0.0000	1,103.939 3	1,103.939 3	0.3570		1,112.865 2

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0110	0.2831	0.0947	1.1500e-003	0.0384	2.8900e-003	0.0413	0.0111	2.7600e-003	0.0138		123.9280	123.9280	4.5600e-003	0.0180	129.4053
Worker	0.0546	0.0385	0.6062	1.6200e-003	0.1788	1.0700e-003	0.1799	0.0474	9.9000e-004	0.0484		163.3831	163.3831	4.2700e-003	3.9000e-003	164.6524
Total	0.0655	0.3217	0.7009	2.7700e-003	0.2173	3.9600e-003	0.2212	0.0585	3.7500e-003	0.0622		287.3112	287.3112	8.8300e-003	0.0219	294.0577

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3.6 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758		1,035,824 6	1,035,824 6	0.3017		1,043,367 7
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758		1,035,824 6	1,035,824 6	0.3017		1,043,367 7

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0614	0.0434	0.6820	1.8200e-003	0.2012	1.2000e-003	0.2024	0.0534	1.1100e-003	0.0545		183.8060	183.8060	4.8100e-003	4.3900e-003	185.2340
Total	0.0614	0.0434	0.6820	1.8200e-003	0.2012	1.2000e-003	0.2024	0.0534	1.1100e-003	0.0545		183.8060	183.8060	4.8100e-003	4.3900e-003	185.2340

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3.6 Paving - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758	0.0000	1,035,824 6	1,035,824 6	0.3017		1,043,367 7
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758	0.0000	1,035,824 6	1,035,824 6	0.3017		1,043,367 7

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0614	0.0434	0.6820	1.8200e-003	0.2012	1.2000e-003	0.2024	0.0534	1.1100e-003	0.0545		183.8060	183.8060	4.8100e-003	4.3900e-003	185.2340
Total	0.0614	0.0434	0.6820	1.8200e-003	0.2012	1.2000e-003	0.2024	0.0534	1.1100e-003	0.0545		183.8060	183.8060	4.8100e-003	4.3900e-003	185.2340

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	71.7276					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.9062
Total	71.9321	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.9062

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0102	7.2300e-003	0.1137	3.0000e-004	0.0335	2.0000e-004	0.0337	8.8900e-003	1.8000e-004	9.0800e-003		30.6343	30.6343	8.0000e-004	7.3000e-004	30.8723
Total	0.0102	7.2300e-003	0.1137	3.0000e-004	0.0335	2.0000e-004	0.0337	8.8900e-003	1.8000e-004	9.0800e-003		30.6343	30.6343	8.0000e-004	7.3000e-004	30.8723

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3.7 Architectural Coating - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	71.7276					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.9062
Total	71.9321	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.9062

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0102	7.2300e-003	0.1137	3.0000e-004	0.0335	2.0000e-004	0.0337	8.8900e-003	1.8000e-004	9.0800e-003		30.6343	30.6343	8.0000e-004	7.3000e-004	30.8723
Total	0.0102	7.2300e-003	0.1137	3.0000e-004	0.0335	2.0000e-004	0.0337	8.8900e-003	1.8000e-004	9.0800e-003		30.6343	30.6343	8.0000e-004	7.3000e-004	30.8723

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4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.4289	0.4867	4.6446	0.0106	1.0923	7.4300e-003	1.0998	0.2911	6.9100e-003	0.2980		1,084.6819	1,084.6819	0.0642	0.0431	1,099.1429
Unmitigated	0.4289	0.4867	4.6446	0.0106	1.0923	7.4300e-003	1.0998	0.2911	6.9100e-003	0.2980		1,084.6819	1,084.6819	0.0642	0.0431	1,099.1429

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Industrial Park	130.38	98.27	47.97	453,441	453,441
Total	130.38	98.27	47.97	453,441	453,441

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Industrial Park	16.60	8.40	6.90	59.00	28.00	13.00	79	19	2

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Industrial Park	0.544109	0.060768	0.184625	0.129879	0.023845	0.006339	0.011719	0.008584	0.000815	0.000515	0.024285	0.000743	0.003774

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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261
NaturalGas Unmitigated	3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Industrial Park	363.561	3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261
Total		3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261

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5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Industrial Park	0.363561	3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261
Total		3.9200e-003	0.0356	0.0299	2.1000e-004		2.7100e-003	2.7100e-003		2.7100e-003	2.7100e-003		42.7719	42.7719	8.2000e-004	7.8000e-004	43.0261

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.8847	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003
Unmitigated	0.8847	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003

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6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0983					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.7660					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	3.7000e-004	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003
Total	0.8647	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003

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6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0983					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.7660					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	3.7000e-004	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003
Total	0.8647	4.0000e-005	3.9500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		8.4700e-003	8.4700e-003	2.0000e-005		9.0200e-003

7.0 Water Detail

7.1 Mitigation Measures Water

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8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

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APPENDIX B – BIOLOGICAL STUDY

GENERAL BIOLOGICAL RESOURCES ASSESSMENT

**ADELANTO, SAN BERNARDINO COUNTY, CALIFORNIA
APN 0459-101-21**

Prepared for:

**Pontious Architecture
17995 Highway 18, Suite 4
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Principal Investigators:

**Ryan Hunter, Environmental Scientist/Biologist
Jessica Hensley, Environmental Scientist/Biologist**



Project: #2021-238 BA

December 01, 2021

TITLE PAGE

Date Report Written: December 01, 2021

Date Field Work Completed: November 22, 2021

Report Title: General Biological Resources Assessment

Project Location: Adelanto, California
APN: 0459-101-21

Prepared for: Pontious Architecture
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Appendix A – Tables and Figures

1.0 INTRODUCTION AND SUMMARY

Biological surveys were conducted on a 3.89-acre parcel (approximately) located on the northeast corner of the intersection of Aster Road and Yucca Road in the City of Adelanto, California (Township 6 North, Range 5 West, Section 32, USGS Adelanto, California Quadrangle, 1956) (Figures 1, 2, and 3). The project proponent is proposing to construct 4 two story greenhouses for cannabis cultivation, each being approximately 29,680 square foot in size. The project site also includes two separate buildings for manufacturing and distribution purposes. Within the project boundaries there will be 125 parking spaces utilized by employees (Figure 4). The site is located in the manufacturing and industrial (MI) zone of the City of Adelanto.

As part of the environmental process, California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) data sources were reviewed. Following the data review, surveys were performed on the site on November 22, 2021, during which the biological resources on the site and in the surrounding areas were documented by biologists from RCA Associates, Inc. As part of the surveys, the property and adjoining areas were evaluated for the presence of native habitats which may support populations of sensitive wildlife species. The property was also evaluated for the presence of sensitive habitats including wetlands, vernal pools, riparian habitats, and jurisdictional areas.

Habitat assessments were also conducted for the desert tortoise, burrowing owl, and Mohave ground squirrel. Based on data from USFWS, CDFW, and a search of the California Natural Diversity Database (CNDDDB, 2021). Scientific nomenclature for this report is based on the following references: Hickman (1993), Munz (1974), Stebbins (2003), Sibley (2000) and Whitaker (1980).

2.0 EXISTING CONDITIONS

The property is approximately 3.89-acres in size and is located on the southeast corner of the intersection of Aster Road and Yucca Road in the City of Adelanto, California (Township 6 North, Range 5 West, Section 32, USGS Adelanto, California Quadrangle, 1956) (Figures 1, 2, and 3). The property is bordered by vacant land in all directions.

The site is approximately 895 meters above sea level and relatively flat with no slope, and supports a relatively disturbed desert scrub habitat common in the region. The property consists of Helendale Bryman Loamy sand and Cajon sand, which have a 2 to 5 and 0 to 2 percent slope and well drainage, with a moderate available water capacity, and no frequency of flooding. The vegetation community on site is creosote bush scrub habitat encompassing mainly native plants and some non-native grasses. The site is dominated by creosote bush (*Larrea tridentata*), Nevada jointfir (*Ephedra nevadensis*), kelch grass (*Schismus barbatus*), white bursage (*Ambrosia dumosa*), and Asian mustard (*Brassica tournefortii*). Section 5.0 provides a more detailed discussion of the various plant species observed during the surveys.

The site supports a variety of wildlife, with many of them being birds. One mammal was observed on site, the desert cottontail (*Sylvilagus audubonii*). Other mammals that are expected to occur include antelope ground squirrel (*Ammospermophilus leucurus*), California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), and coyote (*Canis latrans*).

Birds observed included ravens (*Corvus corax*) and house finch (*Haemorhous mexicanus*). Other species that may occur on site include rock pigeon (*Columba livia*), house sparrow (*Passer domesticus*), and horned larks (*Eremophila*). Section 5.0 provides a more detailed discussion of the various species observed during the surveys.

One reptile was observed during the survey, the common side-blotched lizard (*Uta stansburiana*). Other reptiles that may occur on the site include desert spiny lizard (*Sceloporus magister*) and western whiptail lizard (*Cnemidophorus tigris*). Table 2 provides a compendium of wildlife species.

In addition, no sensitive habitats (e.g., sensitive species critical habitats, etc.) have been documented in the immediate area according to the CNDDB (2021) and none were observed during the field investigations.

3.0 METHODOLOGIES

General biological surveys were conducted on November 22, 2021, during which biologists from RCA Associates, Inc. initially walked meandering transects throughout the property. During the surveys, data was collected on the plant and animal species present on the site. All plants and animals detected during the surveys were recorded and are provided in Tables 1 & 2 (Appendix A). The property was also evaluated for the presence of habitats which might support sensitive species. Scientific nomenclature for this report is based on the following references: Hickman (1993), Munz (1974), Stebbins (2003), Sibley (2000) and Whitaker (1980). Following completion of the initial reconnaissance survey, habitat assessments were conducted for the desert tortoise and burrowing owl, and Mohave ground squirrel. Weather conditions consisted of wind speeds of 0 to 5 mph, temperatures in the high 70's to low 80's (°F) (AM) with clear skies, 10% cloud cover. The applicable methodologies are summarized below.

General Plant and Animal Surveys: Meandering transects were walked on the site and in surrounding areas (i.e., the zone of influence) where accessible at a pace that allowed for careful documentation of the plant and animal species present on the site. All plants observed were identified in the field and wildlife was identified through visual observations and/or by vocalizations. Habitat assessments were conducted for the desert tortoise, burrowing owl, and Mohave ground squirrel. Tables 1 and 2 (Appendix A) provides a comprehensive compendium of the various plant and animal; species observed during the field investigations.

4.0 LITERATURE SEARCH

As part of the environmental process, a search of the California Natural Diversity Database (CNDDB) search was performed. Based on this review, it was determined that five special status species have been documented within the Adelanto quad of the property. The following tables provide data on each special status species which has been documented in the area.

Table 4-1: Federal and State Listed Species and State Species of Special Concern.

E = Endangered; T = Threatened; SSC = Species of special concern; CNPS = California Native Plant Society; CNDDB = California Natural Diversity Data Base

NAME	STATUS	HABITAT REQUIREMENTS	PRESENCE/ ABSENCE ON PROPERTY
Wildlife Species			
Within Adelanto Quadrangle			
Desert tortoise (<i>Gopherus agassizii</i>)	Federal: Threatened State: Threatened	Desert scrub	The site is located within the known distribution of the species. An evaluation of the area and property was conducted and no tortoises or suitable habitat was observed.
Burrowing owl (<i>Athene cunicularia</i>)	Federal: None State: None CDFW: SSC	Grasslands and desert habitats	The site does support suitable habitat for the species; however, no owls or owl sign were observed during field surveys.
Mohave ground squirrel (<i>Xerospermophilus mohavensis</i>)	Federal: None State: Threatened	Desert scrub	The site supports somewhat suitable habitat for the species. Species has not been identified in the area; therefore, species are not likely to inhabit the site.
Swainson's Hawk (<i>Buteo swainsoni</i>)	Federal: None State: Threatened	Open grasslands	Site does not support suitable habitat for the species; and no Swainson's hawks were observed during the field survey.
Le Conte's thrasher (<i>Toxostoma lecontei</i>)	Federal: None State: None CDFW: SSC	Desert scrub	Site does not support suitable habitat for the species; and no thrashers were observed during the field survey.

5.0 RESULTS

5.1 General Biological Resources

The site supports a slightly disturbed desert scrub plant community which sparsely covers the property (Figure 3). Species present on the site included kelch grass (*Schismus barbatus*), creosote bush (*Larrea tridentata*), Asian mustard (*Brassica tournefortii*), Western Joshua Tree (*Yucca brevifolia*), Nevada jointfir (*Ephedra nevadensis*), and fiddleneck (*Amsinckia tessellata*). Table 1 provides a compendium of all plants occurring on the site and/or in the immediate surrounding area.

Birds observed included ravens (*Corvus corax*) and house finch (*Haemorrhous mexicanus*). Other species that may occur on site or in the surrounding area include rock pigeon (*Columba livia*), Anna's hummingbird (*Caylpte anna*), house sparrow (*Passer domesticus*), and European starling (*Sturnus vulgaris*). One reptile was observed on the property, Common side-blotched lizard (*Uta stansburiana*). Only one mammal was observed on site, the desert cottontail (*Sylvilagus audubonii*), although California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), antelope ground squirrel (*Ammospermophilus leucurus*), and Merriam's kangaroo rats (*Dipodomys merriami*) may also occur on the site given their wide-spread distribution in the region. Tables 1 and 2 (Appendix A) provides a compendium of the various plant and animal species identified during the field investigations and those common to the area. No distinct wildlife corridors were identified on the site or in the immediate area.

No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.

The following are the listed and special status species that have the ability to occur on the project site. It is not a comprehensive list of all the species in the quad. This information has been taken from the California Natural Diversity Database and is using the most current version.

5.2 Federal and State Listed Species

Desert Tortoise: The site is located within the documented tortoise, a state and federal threatened species, habitat according to CNDDB (2021). The property supports very marginal habitat for the

desert tortoise based on the location of the site in a semi-developed area of Adelanto. No tortoises were observed anywhere within the property boundaries during the November 22, 2021 surveys. The species is not expected to move onto the site in the near future based on the absence of any sign, absence of any recent observations in the immediate area. The protocol survey results are valid for one year as per CDFW and USFWS requirements.

Mohave Ground Squirrel: The Mohave ground squirrel is a California state threatened species that have a short, flat, furred, white, underside tail, uniformly brown (with no spots or stripes). They inhabit open desert scrub, alkali desert scrub, and annual grasslands on sandy to gravelly surfaces in the Mojave Desert. Occupiable burrows were found on the site, but no Mohave ground squirrels were detected. It is the opinion of RCA Associates, Inc. that the habitat is not prime Mohave ground squirrel habitat and is very unlikely to support populations of the species based on the following criteria, that there have been two recent sightings, within 20 years, of the species in the Adelanto quadrangle.

Swainson's Hawk: The site is located within documented Swainson's hawk habitat, a state threatened raptor, according to CNDDDB (2021). No hawks were seen on the property during the survey, and no suitable habitat was observed due to previous grading of the site. Swainson's hawks occupy grasslands and breed in trees that are the only ones seen for miles. Swainson's hawks are not expected to occur on the site due to lack of habitat and prime vegetation.

5.3 Wildlife Species of Special Concern

Burrowing Owl: The site is located within documented burrowing owl habitat according to CNDDDB (2021). No owls were seen on the property during the survey, and minimal suitable habitat was observed. Burrowing owls are not expected to occur on the site due to lack of suitable vegetation and burrows.

Le Conte's thrasher: Le Conte's thrashers have not been recently observed in the area according to CNDDDB (2021). Thrashers are not expected to occur on the site due to lack of critical vegetation used by the species, such as saltbush and catclaw acacia. Thrashers may be very infrequent in the area given the low population levels in the region as well as the lack of any recent sightings according to the CNDDDB.

5.4 Jurisdictional Waters and Riparian Habitat

No riparian vegetation (e.g., cottonwoods, willows, etc.) exist on the site or in the adjacent habitats.

5.5 Protected Plants

As of September 22, 2020, the California Department of Fish and Wildlife temporarily listed the western Joshua tree (*Yucca brevifolia*) as an endangered species for one year until a final decision is made in 2021. Due to the presence of Joshua trees on the site, the project proponent has retained RCA Associates, Inc. to perform a “Protected Plant Plan” and any attempt to remove a Joshua tree from its current position will require an Incidental Take Permit (ITP).

6.0 IMPACTS AND MITIGATION MEASURES

6.1 General Biological Resources

Future development of the site will have minimal impact on the general biological resources present on the site, and most, if not all, of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. However, more mobile species (i.e., birds, large mammals) will be displaced into adjacent areas and will likely experience minimal impacts. Therefore, loss of about 3.89-acres of desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitat throughout the surrounding desert region. No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.

6.2 Federal and State Listed and Species of Special Concern

No federal or State-listed wildlife species were observed on the site during the field investigations including the Mohave ground squirrel and desert tortoise. In addition, there are no documented observations of these species either on the site or in the immediate area. The site is not expected to support populations of the desert tortoise based on the absence of suitable habitat.

As per CDFW protocol, the burrowing owl survey results are valid for only 30 days; therefore, CDFW may require a 30-day pre-construction survey be performed prior to any clearing/grading activities to determine if owls have moved on to the site since the November 22, 2021, surveys.

Joshua trees were the only listed plant species observed on site during the November 2021 field investigations. As per CDFW protocol, additional surveys may need to be performed as stated in section 5.5.

7.0 CONCLUSIONS AND RECOMMENDATIONS

Future development activities are expected to grade the property and remove the vegetation from the 3.89-acre parcel; however, cumulative impacts to the general biological resources (plants and animals) in the surrounding area are expected to be negligible. This assumption is based on the habitat containing scarce vegetation of non-native species. In addition, future development activities are not expected to have any impact on any State or Federal listed or State special status plant or animal species. As discussed above, the site does not support any desert tortoises. In addition, burrowing owls do not inhabit the site and are not expected to be impacted given the absence of any suitable burrows. The following mitigation measures are recommended:

1. Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of Project-related ground disturbance.
 - a. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged.
2. A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those trees that would be removed during Project construction.
 - a. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible once an ITP has been granted by the CDFW.

If any sensitive species are observed on the property during future activities, CDFW and USFWS (as applicable) should be contacted to discuss specific mitigation measures which may be required for the individual species. CDFW and USFWS are the only agencies which can grant authorization for the “take” of any sensitive species and can approve the implementation of any applicable mitigation measures

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CERTIFICATION

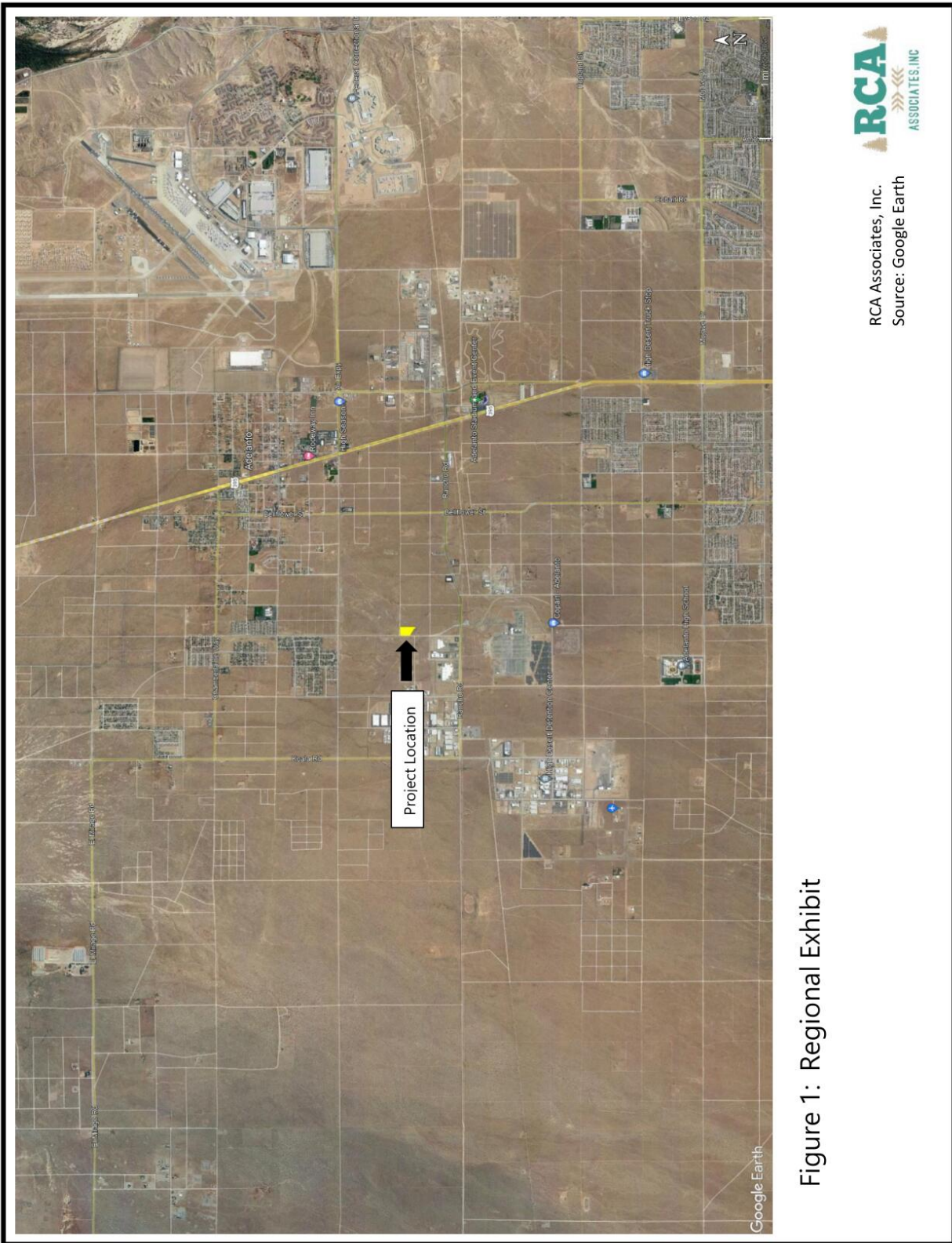
I hereby certify that the statements furnished above and in the attached exhibits, presents the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. Fieldwork conducted for this assessment was performed by Ryan Hunter and Jessica Hensley. I certify that I have not signed a non-disclosure or consultant confidentiality agreement with the project applicant or applicant's representative and that I have no financial interest in the project.

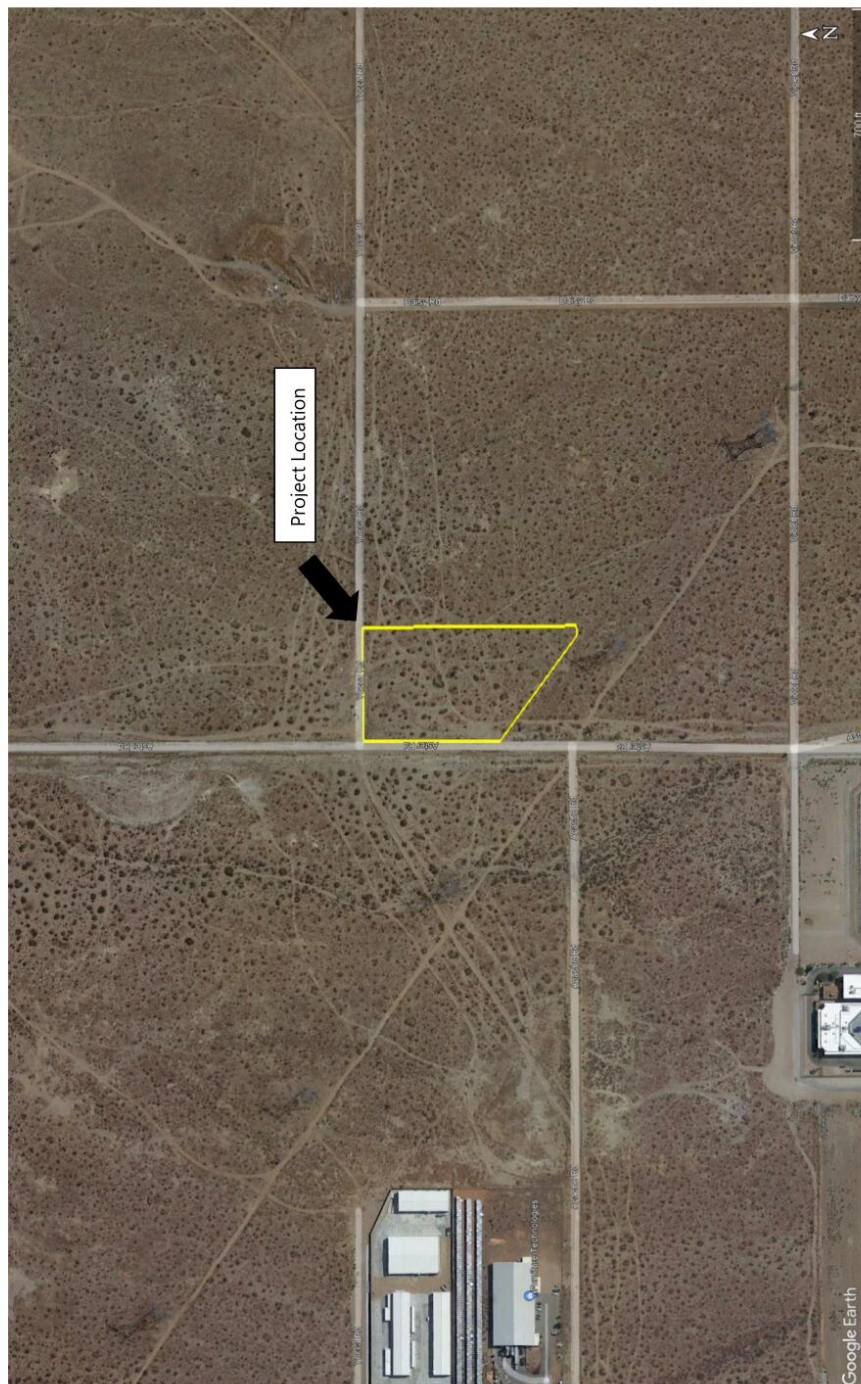
Date: 12/01/2021 Signed: *Ryan Hunter*
Jessica Hensley

Field Work Performed By: Ryan Hunter
Environmental Scientist/Biologist

Field Work Performed By: Jessica Hensley
Environmental Scientist/Biologist

Appendix A
Tables and Figures





RCA Associates, Inc.
Source: Google Earth

Figure 2: Vicinity Exhibit

CENTER OF SITE LOOKING NORTH



CENTER OF SITE LOOKING EAST



FIGURE 3: PHOTOGRAPHS OF SITE

CENTER OF SITE LOOKING SOUTH



CENTER OF SITE LOOKING WEST



FIGURE 3, cont: PHOTOGRAPHS OF SITE

[illegible]

Table 1 - Plants observed on the site and known to occur in the immediate surrounding area.

Common Name	Scientific Name	Location
Asian mustard	<i>Brassica tournefortii</i>	On Site
Creosote bush	<i>Larrea tridentata</i>	“
Tumbleweed	<i>Kali tragus ssp. tragus</i>	“
White bursage	<i>Ambrosia dumosa</i>	“
Kelch Grass	<i>Schismus barbatus</i>	“
Rubber rabbitbrush	<i>Chrysothamnus nauseosus</i>	“
Joshua tree	<i>Yucca brevifolia</i>	“
Cheatgrass	<i>Bromus tectorum</i>	“
Fiddleneck	<i>Ansickia tessellata</i>	“
Ephedra	<i>Ephedra nevadensis</i>	“
Silver cholla	<i>Cylindropuntia echinocarpa</i>	“
Common burrobrush	<i>Ambrosia salsola</i>	“
Burro grass	<i>Scleropogon brevifolius</i>	“
Western tansymustard	<i>Descurainia pinnata</i>	“
Flatspine bur wagweed	<i>Ambrosia acanthicarpa</i>	“
Four-wing saltbush	<i>Atriplex canescens</i>	“

Note: The above list is not intended to be a comprehensive list of every plant which may occur on the site or in the zone of influence.

Table 2 - Wildlife observed on the site during the field investigations.

Common Name	Scientific Name	Location
Common raven	<i>Corvus corax</i>	On-site and in the surrounding area.
House sparrow	<i>Passer domesticus</i>	“
House finch	<i>Haemorhous mexicanus</i>	“
Horned Lark	<i>Eremophila alpestris</i>	“
Mourning dove	<i>Zenaida macroura</i>	“
Antelope ground squirrel	<i>Ammospermophilus leucurus</i>	“
Common side-blotched lizard	<i>Uta stansburiana</i>	“
Long nose leopard lizard	<i>Gambelia wislizenii</i>	“

Note: The above Table is not a comprehensive list of every animal species which may occur in the area, but is a list of those common species which were identified on the site or which have been observed in the region by biologists from RCA Associates, Inc.

REGULATORY CONTEXT

The following provides a summary of federal and state regulatory jurisdiction over biological and wetland resources. Although most of these regulations do not directly apply to the site, given the general lack of sensitive resources, they provide important background information.

Federal Endangered Species Act

The USFWS has jurisdiction over federally listed threatened and endangered plant and animal species. The federal Endangered Species Act (ESA) and its implementing regulations prohibit the take of any fish or wildlife species that is federally listed as threatened or endangered without prior approval pursuant to either Section 7 or Section 10 of the ESA. ESA defines “take” as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Federal regulation 50CFR17.3 defines the term “harass” as an intentional or negligent act that creates the likelihood of injuring wildlife by annoying it to such an extent as to significantly disrupt normal behavior patterns such as breeding, feeding, or sheltering (50CFR17.3). Furthermore, federal regulation 50CFR17.3 defines “harm” as an act that either kills or injures a listed species. By definition, “harm” includes habitat modification or degradation that actually kills or injures a listed species by significantly impairing essential behavior patterns such as breeding, spawning, rearing, migrating, feeding, or sheltering (50CFR217.12).

Section 10(a) of the ESA establishes a process for obtaining an incidental take permit that authorizes non federal entities to incidentally take federally listed wildlife or fish. Incidental take is defined by ESA as take that is “incidental to, and not the purpose of, the carrying out of another wise lawful activity.” Preparation of a habitat conservation plan, generally referred to as an HCP, is required for all Section 10(a) permit applications. The USFWS and National Oceanic and Atmospheric Administration’s National Marine Fisheries Service (NOAA Fisheries Service) have joint authority under the ESA for administering the incidental take program. NOAA Fisheries Service has jurisdiction over anadromous fish species and USFWS has jurisdiction over all other fish and wildlife species.

Section 7 of the ESA requires all federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of any species listed under the ESA, or result in the destruction or adverse modification of its habitat. Federal agencies are also required

to minimize impacts to all listed species resulting from their actions, including issuance or permits or funding. Section 7 requires consideration of the indirect effects of a project, effects on federally listed plants, and effects on critical habitat (ESA requires that the USFWS identify critical habitat to the maximum extent that it is prudent and determinable when a species is listed as threatened or endangered). This consultation results in a Biological Opinion prepared by the USFWS stating whether implementation of the HCP will result in jeopardy to any HCP Covered Species or will adversely modify critical habitat and the measures necessary to avoid or minimize effects to listed species.

Although federally listed animals are legally protected from harm no matter where they occur, Section 9 of the ESA provides protection for endangered plants by prohibiting the malicious destruction on federal land and other “take” that violates State law. Protection for plants not living on federal lands is provided by the California Endangered Species Act.

California Endangered Species Act

CDFW has jurisdiction over species listed as threatened or endangered under Section 2080 of the California Fish and Wildlife Code. Section 2080 prohibits the take of a species listed by CDFW as threatened or endangered. The state definition of take is similar to the federal definition, except that Section 2080 does not prohibit indirect harm to listed species by way of habitat modification. To qualify as take under the state ESA, an action must have direct, demonstrable detrimental effect on individuals of the species. Impacts on habitat that may ultimately result in effects on individuals are not considered take under the state ESA but can be considered take under the federal ESA.

Proponents of a project affecting a state-listed species must consult with CDFW and enter into a management agreement and take permit under Section 2081. The state ESA consultation process is similar to the federal process. California ESA does not require preparation of a state biological assessment; the federal biological assessment and the CEQA analysis or any other relevant information can provide the basis for consultation. California ESA requires that CDFW coordinate consultation for joint federally listed and state-listed species to the extent possible; generally, the state opinion for the listed species is brief and references provisions under the federal opinion.

Clean Water Act, Section 404

The COE and the U.S. Environmental Protection Agency regulate the placement of dredged or fill material into “Waters of the United States” under Section 404 of the Clean Water Act. Waters of the United States include lakes, rivers, streams, and their tributaries, and wetlands. Wetlands are defined for regulatory purposes as “areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 Code of Federal Regulations [CFR] 328.3, 40 CFR 230.3).

The COE may issue either individual permits on a case-by-case basis or general permits on a program level. General permits are pre-authorized and are issued to cover similar activities that are expected to cause only minimal adverse environmental effects. Nationwide permits (NWP’s) are general permits issued to cover particular fill activities. All NWP’s have general conditions that must be met for the permits to apply to a particular project, as well as specific conditions that apply to each NWP.

Clean Water Act, Section 401

Section 401 of the Clean Water Act requires water quality certification and authorization of placement of dredged or fill material in wetlands and Other Waters of the United States. In accordance with Section 401 of the Clean Water Act, criteria for allowable discharges into surface waters have been developed by the State Water Resources Control Board, Division of Water Quality. As such, proponents of any new project which may impair water quality as a result of the project are required to create a post construction stormwater management plan to ensure offsite water quality is not degraded. The resulting requirements are used as criteria in granting National Pollution Discharge Elimination System (NPDES) permits or waivers, which are obtained through the Central Valley Regional Water Quality Control Board (RWQCB). Any activity or facility that will discharge waste (such as soils from construction) into surface waters, or from which waste may be discharged, must obtain an NPDES permit or waiver from the RWQCB. The RWQCB evaluates an NPDES permit application to determine whether the proposed discharge is consistent with the adopted water quality objectives of the basin plan.

California Fish and Wildlife Code, Sections 1600-1616

Under the California Fish and Wildlife Code, Sections 1600-1616 CDFW regulates projects that divert, obstruct, or change the natural flow or bed, channel, or bank of any river, stream, or lake. Proponents of such projects must notify CDFW and enter into a streambed alteration agreement with them.

Section 1602 of the California Fish and Wildlife Code requires a state or local government agency, public utility, or private entity to notify CDFW before it begins a construction project that will: (1) divert, obstruct, or change the natural flow or the bed, bank, channel, or bank of any river, stream, or lake; (2) use materials from a streambed; or (3) result in the disposal or deposition of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into any river, stream, or lake. Once the notification is filed and determined to be complete, CDFW issues a streambed alteration agreement that contains conditions for construction and operations of the proposed project.

California Fish and Wildlife Code, Section 3503.5

Under the California Fish and Wildlife Code, Section 3503.5, it is unlawful to take, possess, or destroy any birds in the order Falconiformes (hawks, eagles, and falcons) or Strigiformes (owls). Take would include the disturbance of an active nest resulting in the abandonment or loss of young.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits the taking, hunting, killing, selling, purchasing, etc. of migratory birds, parts of migratory birds, or their eggs and nests. As used in the MBTA, the term “take” is defined as “to pursue, hunt, shoot, capture, collect, kill, or attempt to pursue, hunt, shoot, capture, collect, or kill, unless the context otherwise requires.” Most bird species native to North America are covered by this act.

Sensitive Natural Communities

The California Office of Planning and Research and the Office of Permit Assistance (1986) define project effects that substantially diminish habitat for fish, wildlife, or plants, or that disrupt or divide the physical arrangement of an established community as significant impacts under CEQA.

This definition applies to certain natural communities because of their scarcity and ecological values and because the remaining occurrences are vulnerable to elimination. For this study, the term “sensitive natural community” includes those communities that, if eliminated or substantially degraded, would sustain a significant adverse impact as defined under CEQA. Sensitive natural communities are important ecologically because their degradation and destruction could threaten populations of dependent plant and wildlife species and significantly reduce the regional distribution and viability of the community. If the number and extent of sensitive natural communities continue to diminish, the status of rare, threatened, or endangered species could become more precarious, and populations of common species (i.e., not special status species) could become less viable. Loss of sensitive natural communities also can eliminate or reduce important ecosystem functions, such as water filtration by wetlands and bank stabilization by riparian woodlands for example.

Protected Plants

The California Desert Native Plant Act was passed in 1981 to protect non-listed California desert native plants from unlawful harvesting on both public and privately-owned lands. Harvest, transport, sale, or possession of specific native desert plants is prohibited unless a person has a valid permit. The following plants are under the protection of the California Desert Native Plants Act:

- Dalea spinnosa (smoketree)
- All species of the genus Prosopis (mesquites)
- All species of the family Agavaceae (century plants, nolinias, yuccas)
- All species of Cactus
- Creosote Rings, ten feet in diameter or greater
- All Joshua Trees

The project would be required to comply with the County of San Bernardino Desert Native Plant Protection Ordinance. The removal of any trees listed under Section 88.01.060 would be required to comply with Section 88.01.050, which requires the project applicant to apply for a Tree or Plant Removal Permit prior to removal from the project site.

APPENDIX C— CULTURAL STUDY

CULTURAL RESOURCES ASSESSMENT

**Sark Project (Tentative Parcel Map 20462)
Adelanto, San Bernardino County, California**

Prepared for:

Linda McCurdy
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17995 Highway 18 South, Suite 4
Apple Valley, California 92307

Prepared by:

David Brunzell, M.A., RPA
BCR Consulting LLC
Claremont, California 91711
Project No. PON2201

Data Base Information:

Type of Study: Intensive Survey

Resources: None

Keywords: None

USGS Quadrangle: 7.5-minute Adelanto, California (1993)



BCRCONSULTING LLC

March 31, 2022

MARCH 31, 2022

BCR CONSULTING LLC
CULTURAL RESOURCES ASSESSMENT
SARK PROJECT

MANAGEMENT SUMMARY

BCR Consulting LLC (BCR Consulting) is under contract to Pontious Architecture to complete a Cultural Resources Assessment of the Sark Project (Tentative Parcel Map 20461; the project) located in the City of Adelanto (City), San Bernardino County, California. A cultural resources records search, intensive-level pedestrian field survey, Native American Heritage Commission (NAHC) Sacred Lands File Search, and vertebrate paleontological resources overview were conducted for the project in partial fulfillment of the California Environmental Quality Act (CEQA). The records search results revealed that seven previous cultural resource studies have taken place, and two cultural resources have been identified within the 0.5-mile research radius. None of the previous studies have assessed the project site and no cultural resources have been identified within its boundaries. No cultural resources of any kind (including historic-period or prehistoric archaeological resources, or historic-period architectural resources) were identified during the field survey. Therefore, no significant impact related to historical resources is anticipated and no further investigations are recommended for the proposed project unless:

- The proposed project is changed to include areas that have not been subject to this cultural resource assessment;
- Cultural materials are encountered during project activities.

The current study attempted to determine whether significant archaeological deposits were present on the proposed project site. Although none were yielded during the records search and field survey, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register of Historic Places (National Register), plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

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

A Sacred Lands File search with the NAHC was initiated in November, but results have not been received. The City will initiate Assembly Bill (AB) 52 Native American Consultation for the project, as required. Since the city will initiate and carry out the required Native American Consultation, the results of the consultation are not provided in this report. However, this

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report may be used during the consultation process, and BCR Consulting staff is available to answer questions and address concerns as necessary.

According to CEQA Guidelines, projects subject to CEQA must determine whether the project would “directly or indirectly destroy a unique paleontological resource”. The Paleontological Overview provided in Appendix B has recommended that:

The geologic units underlying this project are mapped entirely as alluvial silt, sand, and gravel deposits dating from the Holocene period (Dibblee 1960, Dibblee and Minch 2008). Holocene alluvial units are considered to be of high preservation value, but material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching Pleistocene alluvial sediments would increase. The Western Science Center does not have localities within the project area or within a 1 mile radius.

While the presence of any fossil material is unlikely, if excavation activity disturbs deeper sediment dating to the earliest parts of the Holocene or Late Pleistocene periods, the material would be scientifically significant. Excavation activity associated with the development of the project area is unlikely to be paleontologically sensitive, but caution during development should be observed.

If human remains are encountered during any project activities, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

MARCH 31, 2022

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CULTURAL RESOURCES ASSESSMENT
SARK PROJECT

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A:	NATIVE AMERICAN HERITAGE COMMISSION CORRESPONDENCE
B:	PALEONTOLOGICAL RESOURCES OVERVIEW
C:	PROJECT PHOTOGRAPHS
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MARCH 31, 2022

BCR CONSULTING LLC
CULTURAL RESOURCES ASSESSMENT
SARK PROJECT

INTRODUCTION

BCR Consulting LLC (BCR Consulting) is under contract to Pontious Architecture to complete a Cultural Resources Assessment of the Sark Project (Tentative Parcel Map 20461; the project) located in the City of Adelanto (City), San Bernardino County, California. A cultural resources records search, reconnaissance-level pedestrian field survey, Native American Heritage Commission (NAHC) Sacred Lands File Search, and vertebrate paleontological resources overview were conducted for the project in partial fulfillment of the California Environmental Quality Act (CEQA). The project site, as identified in this report, will occupy a portion of Section 32, Township 6 North, Range 5 West, San Bernardino Baseline and Meridian. It is depicted on the United States Geological Survey (USGS) *Adelanto, California* (1993) 7.5-minute topographic quadrangle (Figure 1).

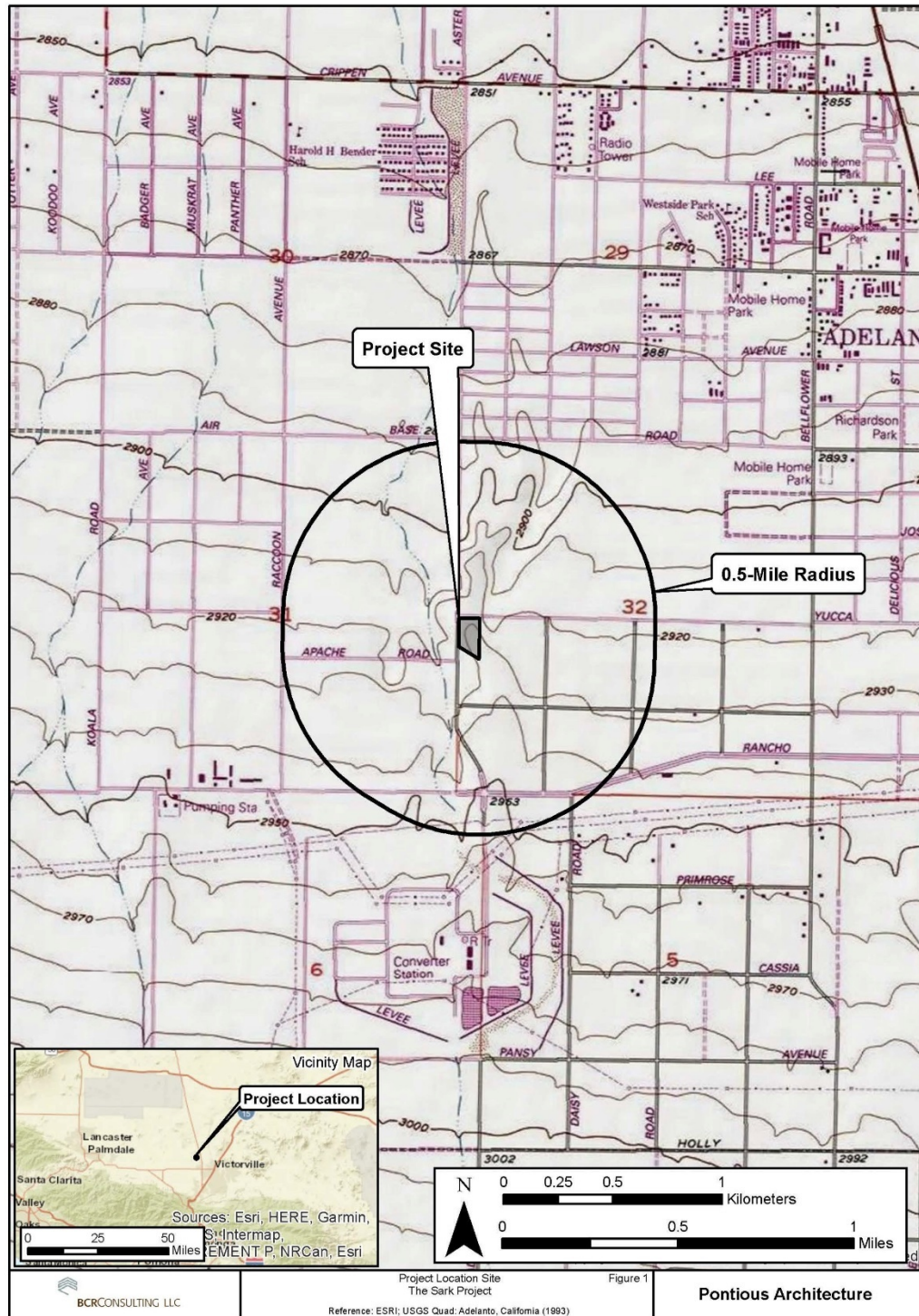
Regulatory Setting

The California Environmental Quality Act. CEQA applies to all discretionary projects undertaken or subject to approval by the state's public agencies (California Code of Regulations 14(3), § 15002(i)). Under CEQA, "A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (Cal. Code Regs. tit. 14(3), § 15064.5(b)). State CEQA Guidelines section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- Listed in, or eligible for listing in, the California Register of Historical Resources (California Register)
- Listed in a local register of historical resources (as defined at Cal. Public Res. Code § 5020.1(k))
- Identified as significant in a historical resource survey meeting the requirements of § 5024.1(g) of the Cal. Public Res. Code
- Determined to be a historical resource by a project's lead agency (Cal. Code Regs. tit. 14(3), § 15064.5(a))

A historical resource consists of "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California... Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (Cal. Code Regs. tit. 14(3), § 15064.5(a)(3)).

The significance of a historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the California Register. If an impact on a historical or archaeological resource is significant, CEQA requires feasible measures to minimize the impact (State CEQA Guidelines § 15126.4 (a)(1)). Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the resource. Section 5024.1 of the Cal. Public Res. Code established the California Register. Generally, a resource is considered by the lead agency to be "historically significant" if the resource meets



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the criteria for listing in the California Register (Cal. Code Regs. tit. 14(3), § 15064.5(a)(3)). The eligibility criteria for the California Register are similar to those of the National Register of Historic Places (National Register), and a resource that meets one or more of the eligibility criteria of the National Register will be eligible for the California Register.

The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. Criteria for Designation:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of this report, all resources older than 45 years (i.e. resources from the "historic-period") will be evaluated for California Register listing eligibility, or CEQA significance. The California Register also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

Finally, CEQA requires that significant effects on unique archaeological resources be considered and addressed. CEQA defines a unique archaeological resource as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

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CEQA Guidelines Section 15064.5 Appendix G includes significance criteria relative to archaeological and historical resources. These have been utilized as thresholds of significance here, and a project would have a significant environmental impact if it would:

- a) cause a substantial adverse change in the significance of a historical resource as defined in section 10564.5;
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 10564.5;
- c) Disturb any human remains, including those interred outside of formal cemeteries.

Tribal Cultural Resources. The Legislature added requirements regarding tribal cultural resources for CEQA in Assembly Bill 52 (AB 52) that took effect July 1, 2015. AB 52 requires consultation with California Native American tribes and consideration of tribal cultural resources in the CEQA process. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. Since the City will initiate and carry out the required AB52 Native American Consultation, the results of the consultation are not provided in this report. However, this report may be used during the consultation process, and BCR Consulting staff are available to answer questions and address comments as necessary.

Paleontological Resources. CEQA provides guidance relative to significant impacts on paleontological resources, indicating that a project would have a significant impact on paleontological resources if it disturbs or destroys a unique paleontological resource or site or unique geologic feature. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources. CEQA documentation prepared for projects would be required to analyze paleontological resources as a condition of the CEQA process to disclose potential impacts. Please note that as of January 2018 paleontological resources are considered in the geological rather than cultural category. Therefore, paleontological resources are not summarized in the body of this report. A paleontological overview completed by the Western Science Center is provided as Appendix B.

NATURAL SETTING

Geology

The project is located in the southwestern portion of the Mojave Desert. Sediments within the project boundaries include a geologic unit composed of unconsolidated, undissected alluvial silt, sand, and gravel of valley areas derived from adjacent higher ground deposited in the late Holocene Epoch of the Quaternary Period (Dibblee 2008). Field observations during the

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current study are basically consistent with these descriptions, and are described further in Results, below.

Hydrology

The project elevation is approximately 3,060 to 3,020 feet above mean sea level (AMSL). Sheetwashing and some rilling occur generally from the southwest to the northeast. The project site drains into an unnamed and partially channelized wash which runs through the south half of the project area from its western border. Ultimately, the wash drains into the Mojave River at a point approximately 4.25 miles to the northeast. To the south, the peaks of the San Gabriel Mountains rise above 10,000 feet and are often capped with snow until late spring or early summer. The area currently exhibits a relatively arid climate, with dry, hot summers and cool winters. Rainfall ranges from five to 15 inches annually (Jaeger and Smith 1971:36-37). Precipitation usually occurs in the form of winter and spring rain or snow at high elevations, with occasional warm monsoonal showers in late summer.

Biology

The mild climate of the late Pleistocene allowed piñon-juniper woodland to thrive throughout most of the Mojave (Van Devender et al. 1987). The vegetation and climate during this epoch attracted significant numbers of Rancholabrean fauna, including dire wolf, saber toothed cat, short-faced bear, horse, camel, antelope, mammoth, as well as birds which included pelican, goose, duck, cormorant, and eagle (Reynolds 1988). The drier climate of the middle Holocene resulted in the local development of complementary flora and fauna, which remain largely intact to this day. Common native plants include creosote, cacti, rabbit bush, interior golden bush, cheese bush, species of sage, buckwheat at higher elevations and near drainages, Joshua tree, and various grasses. Common native animals include coyotes, cottontail and jackrabbits, rats, mice, desert tortoises, roadrunners, raptors, turkey vultures, and other bird species (see Williams et al. 2008).

CULTURAL SETTING

Prehistory

The prehistoric cultural setting of the Mojave Desert has been organized into many chronological frameworks (see Warren and Crabtree 1986; Bettinger and Taylor 1974; Lanning 1963; Hunt 1960; Wallace 1958, 1962, 1977; Wallace and Taylor 1978; Campbell and Campbell 1935), although there is no definitive sequence for the region. The difficulties in establishing cultural chronologies for the Mojave are a function of its enormous size and the small amount of archaeological excavations conducted there. Moreover, throughout prehistory many groups have occupied the Mojave and their territories often overlap spatially and chronologically resulting in mixed artifact deposits. Due to dry climate and capricious geological processes, these artifacts rarely become integrated in-situ. Lacking a milieu hospitable to the preservation of cultural midden, Mojave chronologies have relied upon temporally diagnostic artifacts, such as projectile points, or upon the presence/absence of other temporal indicators, such as groundstone. Such methods are instructive, but can be limited by prehistoric occupants' concurrent use of different artifact styles, or by artifact re-use or re-sharpening, as well as researchers' mistaken diagnosis, and other factors (see Flenniken 1985; Flenniken and Raymond 1986; Flenniken and Wilke 1989). Recognizing the shortcomings of comparative temporal indicators, this study synthesizes Warren and Crabtree

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(1986), who have drawn upon this method to produce a commonly cited and relatively comprehensive chronology.

Paleoindian (12,000 to 10,000 BP) and Lake Mojave (10,000 to 7,000 BP) Periods. Climatic warming characterizes the transition from the Paleoindian Period to the Lake Mojave Period. This transition also marks the end of Pleistocene Epoch and ushers in the Holocene. The Paleoindian Period has been loosely defined by isolated fluted (such as Clovis) projectile points, dated by their association with similar artifacts discovered in-situ in the Great Plains (Sutton 1996:227-228). Some fluted bifaces have been associated with fossil remains of Rancholabrean mammals approximately dated to ca. 13,300-10,800 BP near China Lake in the northern Mojave Desert. The Lake Mojave Period has been associated with cultural adaptations to moist conditions, and resource allocation pointing to more lacustrine environments than previously (Bedwell 1973; Hester 1973). Artifacts that characterize this period include stemmed points, flake and core scrapers, choppers, hammerstones, and crescentics (Warren and Crabtree 1986:184). Projectile points associated with the period include the Silver Lake and Lake Mojave styles. Lake Mojave sites commonly occur on shorelines of Pleistocene lakes and streams, where geological surfaces of that epoch have been identified (Basgall and Hall 1994:69).

Pinto Period (7,000 to 4,000 BP). The Pinto Period has been largely characterized by desiccation of the Mojave. As formerly rich lacustrine environments began to disappear, the artifact record reveals more sporadic occupation of the Mojave, indicating occupants' recession to the more hospitable fringes (Warren 1984). Pinto Period sites are rare, and are characterized by surface manifestations that usually lack significant in-situ remains. Artifacts from this era include Pinto projectile points and a flake industry similar to the Lake Mojave tool complex (Warren 1984), though use of Pinto projectile points as an index artifact for the era has been disputed (see Schroth 1994). Milling stones have also occasionally been associated with sites of this period (Warren 1984).

Gypsum Period. (4,000 to 1,500 BP). A temporary return to moister conditions during the Gypsum Period is postulated to have encouraged technological diversification afforded by the relative abundance of resources (Warren 1984:419-420; Warren and Crabtree 1986:189). Lacustrine environments reappear and begin to be exploited during this era (Shutler 1961, 1968). Concurrently a more diverse artifact assemblage reflects intensified reliance on plant resources. The new artifacts include milling stones, mortars, pestles, and a proliferation of Humboldt Concave Base, Gypsum Cave, Elko Eared, and Elko Corner-notched dart points (Warren 1984; Warren and Crabtree 1986). Other artifacts include leaf-shaped projectile points, rectangular-based knives, drills, large scraper planes, choppers, hammer stones, shaft straighteners, incised stone pendants, and drilled slate tubes. The bow and arrow appears around 2,000 BP, evidenced by the presence of a smaller type of projectile point, the Rose Spring point (Rogers 1939; Shutler 1961).

Saratoga Springs Period (1,500 to 800 BP). During the Saratoga Springs Period regional cultural diversifications of Gypsum Period developments are evident within the Mojave. Basketmaker III (Anasazi) pottery appears during this period, and has been associated with turquoise mining in the eastern Mojave Desert (Warren and Crabtree 1986:191). Influences from Patayan/Yuman assemblages are apparent in the southern Mojave, and include buff and brown wares often associated with Cottonwood and Desert Side-notched projectile points (Warren 1984:423). Obsidian becomes more commonly used throughout the Mojave and characteristic artifacts of the period include milling stones, mortars, pestles, ceramics, and

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ornamental and ritual objects. More structured settlement patterns are evidenced by the presence of large villages, and three types of identifiable archaeological sites (major habitation, temporary camps, and processing stations) emerge (McGuire and Hall 1988). Diversity of resource exploitation continues to expand, indicating a much more generalized, somewhat less mobile subsistence strategy.

Shoshonean Period (800 BP to Contact). The Shoshonean period is the first to benefit from contact-era ethnography –as well as be subject to its inherent biases. Interviews of living informants allowed anthropologists to match artifact assemblages and particular traditions with linguistic groups, and plot them geographically (see Kroeber 1925; Gifford 1918; Strong 1929). During the Shoshonean Period continued diversification of site assemblages, and reduced Anasazi influence both coincide with the expansion of Numic (Uto-Aztecan language family) speakers across the Great Basin, Takic (Uto-Aztecan language family) speakers into southern California, and the Hopi across the Southwest (Sutton 1996). Hunting and gathering continued to diversify, and the diagnostic arrow points include desert side-notch and cottonwood triangular. Ceramics continue to proliferate, though are more common in the southern Mojave during this period (Warren and Crabtree 1986). Trade routes have become well established across the Mojave, particularly the Mojave Trail, which transported goods and news across the desert via the Mojave River, to the west of the current project. Trade in the western Mojave was more closely related to coastal groups than others.

Ethnography

The Uto-Aztecan “Serrano” people occupied the western Mojave Desert periphery. Kroeber (1925) applied the generic term “Serrano” to four groups, each with distinct territories: the Kitanemuk, Tataviam, Vanyume, and Serrano. Only one group, in the San Bernardino Mountains and West-Central Mojave Desert, ethnically claims the term Serrano. Bean and Smith (1978) indicate that the Vanyume, an obscure Takic population, was found along the Mojave River at the time of Spanish contact. The Kitanemuk lived to the north and west, while the Tataviam lived to the west. The Serrano lived mainly to the south (Bean and Smith 1978). All may have used the western Mojave area seasonally. Historical records are unclear concerning precise territory and village locations. It is doubtful that any group, except the Vanyume, actually lived in the region for several seasons yearly.

History

Historic-era California is generally divided into three periods: the Spanish or Mission Period (1769 to 1821), the Mexican or Rancho Period (1821 to 1848), and the American Period (1848 to present).

Spanish Period. The first European to pass through the project area is thought to be a Spaniard called Father Francisco Garcés. Having become familiar with the area, Garcés acted as a guide to Juan Bautista de Anza, who had been commissioned to lead a group across the desert from a Spanish outpost in Arizona to set up quarters at the Mission San Gabriel in 1771 near what today is Pasadena (Beck and Haase 1974). This is the first recorded group crossing of the Mojave Desert and, according to Father Garcés’ journal, they camped at the headwaters of the Mojave River, one night less than a day’s march from the mountains. Today, this is estimated to have been approximately 11 miles southeast of Victorville (Marenczuk 1962). Garcés was followed by Alta California Governor Pedro Fages, who briefly explored the western Mojave region in 1772. Searching for San Diego Presidio deserts, Fages had traveled north through Riverside to San Bernardino, crossed over the mountains into the

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Mojave Desert, and then journeyed westward to the San Joaquin Valley (Beck and Haase 1974).

Mexican Period. In 1821, Mexico overthrew Spanish rule and the missions began to decline. By 1833, the Mexican government passed the Secularization Act, and the missions, reorganized as parish churches, lost their vast land holdings, and released their neophytes (Beattie and Beattie 1974).

American Period. The American Period, 1848–Present, began with the Treaty of Guadalupe Hidalgo. The Gold Rush had attracted huge numbers of American settlers and in 1850, California was accepted into the Union. The cattle industry reached its greatest prosperity during the first years of the American Period. Mexican Period land grants had created large pastoral estates in California, and demand for beef during the Gold Rush led to a cattle boom that lasted from 1849–1855. However, beginning about 1855, the demand for beef began to decline due to imports of sheep and cattle from the eastern U.S. When the beef market collapsed, many California ranchers lost their ranchos. A series of disastrous floods in 1861–1862, followed by a significant drought diminished the economic impact of local ranching. This decline combined with ubiquitous agricultural and real estate developments of the late 19th century, set the stage for diversified economic pursuits that have continued to proliferate to this day (Beattie and Beattie 1974; Cleland 1941).

Local Sequence. The Victor Valley was first settled in 1858 by Ex-army captain Aaron G. Lane during a mass exodus of Mormons from San Bernardino back to Utah. Lane set up a ranch on the west bank of the Mojave River which became a popular stop for travelers coming through the area (Marenczuk 1962; Gutglueck 2015a). The railway connecting San Bernardino and Barstow, which traveled through present day Victorville, was completed in 1884. The completion of the railway brought many travelers through the town and allowed mining in the area, which was already known for its rich silver and gold mines, to flourish and expand into granite, limestone, and marble (Gutglueck 2015a). The town of Victor, later to be renamed Victorville, was founded in 1885 and named for Jacob N Victor, a general manager of operations for the California Southern Railroad, a subsidiary of the Atchison, Topeka and Santa Fe Railway who were responsible for the newly constructed railway (Gudde 1962; Wallenfeldt 2020).

The town's name was changed to Victorville in 1904 because many were confusing the town for another of the same name in Colorado (Wallenfeldt 2020; Gutglueck 2015b). Population, commerce, and development continued growing throughout the early 20th century and the town established the Victorville Chamber of Commerce in 1911 in response. The first high school in Victorville was opened in 1914 and cement plants were being opened throughout the larger area during the initial few decades of the 20th century. The Mojave River provided relatively plentiful water, which allowed local agriculture to flourish alongside mining operations until its decline in 1972 (Nurdyke 1974). Canals distributed runoff water for farms near the river (Turner and Presswood 1963:86), and a shallow water table encouraged well drilling for various remote agricultural endeavors. Local crops included alfalfa, onions, watermelon, cantaloupe, non-citrus fruits, and other produce (Marenczuk 1962; Turner and Presswood 1963:86). Farming, mining, cement manufacturing, and business brought in by travelers, continued to be one of the main drivers of Victorville's budding economy throughout much of the 20th century. George Air Force Base, initially named Victorville Air Base, was

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completed in 1943 in response to World War II (Colton Courier 1943). It was later renamed George Air Force Base and was decommissioned in 1992. The former air base is now the Southern California Logistics Airport and is used mainly for business, military, and freight use (Wallenfeldt 2020).

The town of Oro Grande, Spanish for “Big Gold”, represents the most significant historic settlement in the region. As the town’s name suggests local prospecting resulted in the establishment of several mines that produced silver and gold refined by the Oro Grande gold mill during the 1880s. The historic Mojave Trail and later the California Southern Railway provided convenient transport for the minerals via stagecoach and train across the desert between Salt Lake City and San Bernardino. Subsequent enormous discoveries of silica and lime deposits punctuated the development of a new mining industry, and by 1907 cement plants began operating along the railroad. With the exception of brief hiatus periods during the great depression and World War II, the cement industry has remained vital to this day (Thompson 2000; Gudde 1975; Marenczuk 1962:9).

PERSONNEL

David Brunzell, M.A., RPA acted as the Project Manager/Principal Investigator for the current study, and authored the technical report. Mr. Brunzell performed the records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. BCR Consulting Archaeological Crew Chief Nicholas Shepetuk and Staff Historian and Staff Archaeologist George Brentner, B.A. carried out the pedestrian field survey.

METHODS

Research

Mr. Brunzell completed an archaeological records search using SCCIC records of California State University, Fullerton for the current project. This archival research reviewed the status of all recorded historic and prehistoric cultural resources, and survey and excavation reports completed within the project site boundaries and within a 0.5-mile radius of it. Additional resources reviewed included the National Register of Historic Places (National Register), the California Register, the Built Environmental Resource Directory (BERD), and documents and inventories published by the California Office of Historic Preservation. These include the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

Field Survey

An intensive-level cultural resources field survey of the project site was conducted on March 2, 2022. The survey was conducted by walking parallel transects spaced approximately 15 meters apart across the project site. Digital photographs were taken at various points within the project site.

RESULTS

Research

Data from the South Central Coastal Information Center (SCCIC) revealed that seven previous cultural resource studies have taken place, and two cultural resources have been

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identified within the 0.5-mile research radius. None of the previous studies have assessed the project site and no cultural resources have been identified within its boundaries. The records search is summarized in Table A, and a bibliography is provided as Appendix D.

Table A. Cultural Resources and Reports Within One Half-Mile of the Project Site

USGS Quad	Cultural Resources	Studies
Adelanto, California (1993)	P-36-7562H: Historic-Period Water Conveyance (1/4 Mile SE) P-36-61239: Prehistoric Isolated Flake (1/2 Mile SW)	SB-697, 1158, 1175, 1479, 2399, 2795, 3070

Field Survey

During the field survey, BCR Consulting archaeologists identified no cultural resources (including historic-period or prehistoric archaeological sites, or historic-period architectural resources) of any kind within the project site boundaries. The project has been subject to moderate artificial disturbances associated with modern refuse dumping, offroad vehicle use, and utility installation. Vegetation consisted of creosote scrub and Joshua tree woodland, and afforded surface visibility of approximately 95 percent. Surficial sediments observed were chiefly composed of dry, yellowish-brown sandy silt, with relatively low levels of subangular gravel.

RECOMMENDATIONS

BCR Consulting conducted a cultural resources assessment of the Sark Project in the City of Adelanto, San Bernardino County, California. No cultural resources of any kind (including historic-period or prehistoric archaeological resources, or historic-period architectural resources) were identified. Therefore, no significant impact related to historical resources is anticipated and no further investigations are recommended unless:

- The proposed project is changed to include areas that have not been subject to this cultural resource assessment;
- Cultural materials are encountered during project activities.

The current study attempted to determine whether significant archaeological deposits were present on the proposed project site. Although none were yielded during the records search and field survey, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register of Historic Places (National Register), plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

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

A Sacred Lands File search with the NAHC was initiated in November, but results have not been received. The city will initiate Assembly Bill (AB) 52 Native American Consultation for the project, as required. Since the city will initiate and carry out the required Native American Consultation, the results of the consultation are not provided in this report. However, this report may be used during the consultation process, and BCR Consulting staff is available to answer questions and address concerns as necessary.

According to CEQA Guidelines, projects subject to CEQA must determine whether the project would “directly or indirectly destroy a unique paleontological resource”. The Paleontological Overview provided in Appendix B has recommended that:

The geologic units underlying this project are mapped entirely as alluvial silt, sand, and gravel deposits dating from the Holocene period (Dibblee 1960, Dibblee and Minch 2008). Holocene alluvial units are considered to be of high preservation value, but material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching Pleistocene alluvial sediments would increase. The Western Science Center does not have localities within the project area or within a 1 mile radius.

While the presence of any fossil material is unlikely, if excavation activity disturbs deeper sediment dating to the earliest parts of the Holocene or Late Pleistocene periods, the material would be scientifically significant. Excavation activity associated with the development of the project area is unlikely to be paleontologically sensitive, but caution during development should be observed.

If human remains are encountered during any project activities, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC

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APPENDIX A
NATIVE AMERICAN HERITAGE COMMISSION CORRESPONDENCE

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION
SARK PROPERTIES, LLC • CUP 21-24, LDP 21-24, & TPM 20461 • SEC OF YUCCA RD. & ASTER RD.

3/5/22, 1:01 PM

Gmail - BCR Sacred Lands File Search for the Sark Project (PON2201)



David Brunzell <bcrllc2008@gmail.com>

BCR Sacred Lands File Search for the Sark Project (PON2201)

1 message

David Brunzell <bcrllc2008@gmail.com>
To: "NAHC@NAHC" <NAHC@nahc.ca.gov>

Fri, Mar 4, 2022 at 6:56 PM

To whom it may concern,

I would like to request a sacred lands file search for the Sark Project located in Adelanto, San Bernardino County, California. Please find attached a project location map and request form.

Thank you,
Nicholas Shepetuk



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MARCH 31, 2022

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SARK PROJECT

APPENDIX B
PALEONTOLOGICAL RESOURCES OVERVIEW



March 19, 2022

BCR Consulting, LLC
Nicholas Shepetuk
505 W. 8th St.
Claremont, CA 91711

Dear Mr. Shepetuk,

This letter presents the results of a record search conducted for the Sark Project located in the City of Adelanto, San Bernardino County, California. The project site is located north of Violet Road, south of Yucca Road, east of Aster Road, and west of Verbena Road in the Township 6 North, Range 5 West, Section 32 on the *Adelanto, CA* USGS 7.5 minute quadrangle.

The geologic units underlying this project are mapped entirely as alluvial silt, sand, and gravel deposits dating from the Holocene period (Dibblee 1960, Dibblee and Minch 2008). Holocene alluvial units are considered to be of high preservation value, but material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching Pleistocene alluvial sediments would increase. The Western Science Center does not have localities within the project area or within a 1 mile radius.

While the presence of any fossil material is unlikely, if excavation activity disturbs deeper sediment dating to the earliest parts of the Holocene or Late Pleistocene periods, the material would be scientifically significant. Excavation activity associated with the development of the project area is unlikely to be paleontologically sensitive, but caution during development should be observed.

If you have any questions, or would like further information, please feel free to contact me at bstoneburg@westerncentermuseum.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brittney Stoneburg', written in a cursive style.

Brittney Elizabeth Stoneburg
Collections Technician

MARCH 31, 2022

BCR CONSULTING LLC
CULTURAL RESOURCES ASSESSMENT
SARK PROJECT

APPENDIX C
PROJECT PHOTOGRAPHS

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION
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APPENDIX D
RECORDS SEARCH BIBLIOGRAPHY

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Report List

PON2201

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-00697	NADB-R - 1060697; Voided - 78-11.1A	1973	SCHUILING, WALTER C.	ENVIRONMENTAL IMPACT ARCHAEOLOGICAL SURVEY: SEYMOUR FLAT DEVELOPMENT	SAN BERNARDINO COUNTY MUSEUM ASSOCIATION	
SB-01158	NADB-R - 1061158; Voided - 81-7.3	1981	GREENWOOD, ROBERTA S. and MICHAEL J. MCINTYRE	CLASS III CULTURAL RESOURCE INVENTORY: ADELANTO-RINALDI 500 KV T/L CORRIDORS 1, 2, AND 3, LOS ANGELES DEPARTMENT OF WATER AND POWER	GREENWOOD AND ASSOCIATES	36-004674, 36-004675, 36-004676
SB-01175	NADB-R - 1061175; Voided - 81-8.4	1981	LERCH, MICHAEL K.	CULTURAL RESOURCES ASSESSMENT OF PROPOSED IMPROVEMENT PROJECTS OF ADELANTO ROAD AND RANCHO ROAD, CITY OF ADELANTO, SAN BERNARDINO COUNTY, CALIFORNIA	SAN BERNARDINO COUNTY MUSEUM ASSOCIATION	
SB-01479	NADB-R - 1061479; Voided - 85-1.1	1985	DAMES & MOORE	MEAD/MCCULLOUGH- VICTORVILLE/ADELANTO TRANSMISSION PROJECT TECHNICAL REPORT: VOLUME IV, CULTURAL RESOURCES	DAMES & MOORE	36-005331, 36-005332, 36-005430, 36-023426
SB-02399	NADB-R - 1062399; Voided - 91-3.10	1991	MCGUIRE, KELLY R. and LESLIE GLOVER	A CULTURAL RESOURCES INVENTORY OF A PROPOSED NATURAL GAS PIPELINE CORRIDOR FROM ADELANTO TO WARD VALLEY, SAN BERNARDINO COUNTY, CALIFORNIA	FAR WESTERN ANTHROPOLOGICAL RESEARCH GROUP	36-000562, 36-001907, 36-001908, 36-002107, 36-002340, 36-002792, 36-003252, 36-004037, 36-004055, 36-005054, 36-005598, 36-005794, 36-006404, 36-006502, 36-006507, 36-006511, 36-006512, 36-006513, 36-006517, 36-006518, 36-006519, 36-006520, 36-006525, 36-006526, 36-006527, 36-006528, 36-006693, 36-006889, 36-006890, 36-006891, 36-006892, 36-006893, 36-006894, 36-006895, 36-006896, 36-006897, 36-006898, 36-006899, 36-006900, 36-006941, 36-006942, 36-006943, 36-006944, 36-006945, 36-006946, 36-006947, 36-006948, 36-006949, 36-006950, 36-006951, 36-006952, 36-006953, 36-006954

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Report List

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-02795	NADB-R - 1062795	1991	HAMPSON, R. PAUL, JAMES J. SCHMIDT, AND JUNE A. SCHMIDT	CULTURAL RESOURCE INVESTIGATION: CAJON PIPELINE PROJECT	GREENWOOD & ASSOCIATES	36-002910, 36-004252, 36-004253, 36-004255, 36-004268, 36-004271, 36-004272, 36-004411, 36-004418, 36-005361, 36-005362, 36-005586, 36-006793, 36-007076, 36-007077, 36-007078, 36-007079, 36-007080, 36-007081, 36-007082, 36-007084, 36-007085, 36-007086, 36-007087, 36-007088, 36-007089, 36-007090, 36-007091, 36-007092, 36-007093, 36-007094, 36-007095, 36-007096
SB-03070	NADB-R - 1063070	1995	YORK, ANDREW, W.G. SPAULDING, G. DAVIS, D. POWERS, and T. WAHOFF	CLASS III CULTURAL RESOURCES INVENTORY FOR LOS ANGELES DEPARTMENT OF WATER AND POWER MEAD TO ADELANTO TRANSMISSION LINE PROJECT: MT GENERAL, KRAMER AND ADELANTO DIVISIONS.	DAMES & MOORE	36-000276, 36-000403, 36-001221, 36-001607, 36-002071, 36-002072, 36-002257, 36-004022, 36-004024, 36-005331, 36-005332, 36-005454, 36-006147, 36-006148, 36-006343, 36-006346, 36-006347, 36-006348, 36-006570, 36-006571, 36-006572, 36-006693, 36-006733, 36-006734, 36-006735, 36-006873, 36-006874, 36-006878, 36-007015, 36-007084, 36-007085, 36-007086, 36-007087, 36-007088, 36-007089, 36-007090, 36-007421, 36-007422, 36-007423, 36-007424, 36-007425, 36-007427, 36-007428, 36-007429, 36-007430, 36-007432, 36-007541, 36-007542, 36-007543, 36-007544, 36-007545, 36-007546, 36-007547, 36-007548, 36-007549, 36-007550, 36-007551, 36-007552, 36-007553, 36-007554, 36-007555, 36-007556, 36-007557, 36-007558, 36-007559, 36-007560, 36-007561, 36-007562, 36-007665, 36-007666, 36-007667, 36-007668, 36-007669, 36-007670, 36-007671, 36-007672, 36-007673, 36-007674, 36-007681, 36-007682, 36-007683, 36-007684, 36-007685, 36-007687, 36-007690
SB-07982		2013	Dietler, Sara, Elizabeth Denniston, and Steven Treffers	Cultural Resources Impact Mitigation Analysis for the Adelanto North 2035 Sustainable Community Plan, City of San Bernardino County, California	SWCA Environmental Consultants Pasadena Office	

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Resource List

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-36-007562	CA-SBR-007562H	Resource Name - AY-40-6	Site	Historic	AH07; AH16	1993 (T. Wahoff, L. Peterson, A. York, P. Eisentraut, Dames & Moore); 1993 (T. Wahoff, L. Peterson, A. York, P. Eisentraut, Dames & Moore)	SB-03070
P-36-061239		Resource Name - Rancho Road Flake; flake; Other - IA1583-S; Other - SBCM-4961	Other	Prehistoric	AP16	1981 (LERCH)	

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