

COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number:

Project Case Type (s) and Number(s): CUP1900059

Lead Agency Name: Riverside County Planning Department

Address: 4080 Lemon Street, 12th Floor, PO Box 1409, Riverside CA, 92502

Contact Person: Kathleen Mitchell

Telephone Number: (951) 955-3200

Applicant's Name: IsenGarden, LLC

Applicant's Address: 32875 Red Mountain Road, Hemet, California 92544

I. PROJECT INFORMATION

Project Description:

IsenGarden, LLC. is requesting the approval of a Development Agreement (DA190050), a Conditional Use Permit (CUP190059), and a Zone Change to Light Agriculture allowing for the development and operation of a cannabis cultivation facility. The Project Site is located at 32875 Red Mountain Road in unincorporated Riverside County (See Figure 1-Regional Location and Figure 2-Project Vicinity). The Project Site is identified as Assessor's Parcel Number (APN) 569-150-010 and is approximately five acres in size. The Project Site has an existing two-story, 2,340 square-foot residence, two sheds totaling 286 square-feet and one solar array on the northeast corner of the site.

The Proposed Project includes an 18,070 square-foot two-story cannabis cultivation facility, 16 solar arrays and a six-foot fence around the facility and two of the solar arrays (See Figure 3-Site Plan). Security lighting for the Proposed Project is anticipated to be minimal however, the State Department of Cannabis Control (DCC) has lighting standards that require compliance for licensing. All outdoor lighting used for security purposes shall be shielded and downward facing. Lighting used for cultivation at the Project Site will all be indoors. Figures 4a – 4d show architectural designs of the main structure to be added on the Project Site.

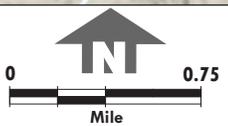
Impervious surface areas on the Project Site will include 11,816 square feet of hardscape and 8,702 square feet for the building roof (20,518 square-feet total). There will be no grading activities that would result in import or export of materials. Security fencing at least six feet in height will fully enclose the cultivation area and most of the solar arrays. An infiltration trench will be installed to collect and treat stormwater runoff. Trash disposal areas will be fully enclosed. Access to the site is via a driveway along Owl Creek Road at the northwest corner of the site that extends to Red Mountain Road. All construction activities are anticipated to be completed within 14 months.

The proposed solar arrays are anticipated to generate 553,918 kWh annually. To meet California Energy Code requirements, the cannabis cultivation facility building design will provide for roof-top solar panels which would be operational in addition to the solar array field at build-out. The total on-site solar to be generated would be approximately 93% of the facility's demand so the project would only be minimally reliant on the grid.

The Project Site consists of hills, rock outcrops and drainages. Development of the Proposed Project would require materials to be imported to level the property. On the site, approximately 4.0 acres of Undifferentiated Chaparral category is dominated by chamise. The Residential/Urban/Exotic category is present in the northwest corner of the site on approximately 1.00 acre. On the site, the disturbed/developed areas have been invaded by invasive non-native grasses and weeds. Escaped



PROJECT SITE



Source: Lilburn Corp., June, 2021.

LILBURN
CORPORATION

REGIONAL LOCATION
IsenGarden Cannabis Cultivation Facility
County of Riverside, California

FIGURE 1

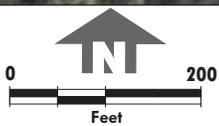


PROJECT SITE

Owl Creek Rd

Owl Creek Rd

Willow Creek Rd



Source: Lilburn Corp., June, 2021.

LILBURN
CORPORATION

PROJECT VICINITY
IsenGarden Cannabis Cultivation Facility
County of Riverside, California

FIGURE 2

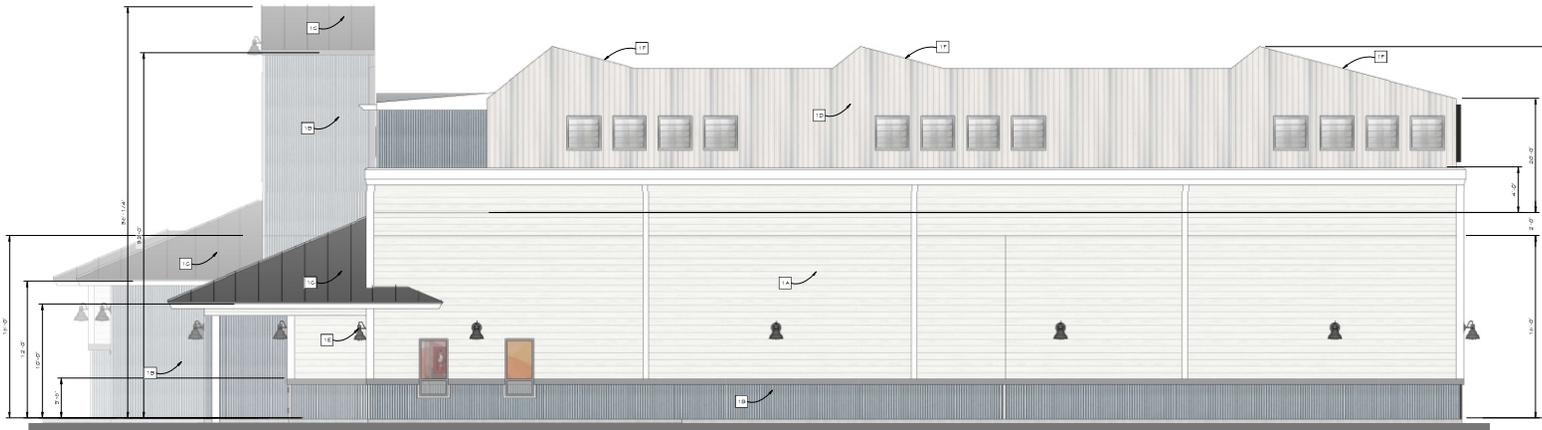
1. KEY NOTES

- 1A EXTERIOR SIDING, CORAL TRU EXTERIOR
- 1B CORRUGATED METAL SIDING
- 1C GLASS & KATED, STANDING SEAM METAL ROOFING
- 1D INSULATED METAL WALL PANEL
- 1E EXTERIOR WALL, BOUNCIE LIGHT URBAN BATH, OUTDOOR, GAZEBOED, LED
- 1F GREEN HOUSE, FLEXI-GLASS PANEL ROOFING



WEST ELEVATION "A"

SCALE: 1/8" = 1'-0"



SOUTH ELEVATION "B"

SCALE: 1/8" = 1'-0"

ISENGARDEN CULTIVATION FACILITY
 32875 RED MOUNTAIN RD., HEMET, CA.
 CANNABIS CULTIVATION



AXIS ARCHITECTS INC.
 REGIONAL
 COMMERCIAL
 MULTI-FAMILY
 DESIGN SERVICES
 WWW.AXISARCHITECTS.COM
 951.646.6299
 4300 BLACK OAK LOOP
 SUITE 200
 TEMECULA, CA 92590

ARCHITECT:
 AXS ARCHITECTS, P.C.
 STEPHEN C. BURR
 1000 W. BROADWAY
 SUITE 100
 ANAHEIM, CA 92801
 (714) 939-9393
 JONAS R. BURR, ARCH. #11
 1000 W. BROADWAY, SUITE 100
 ANAHEIM, CA 92801

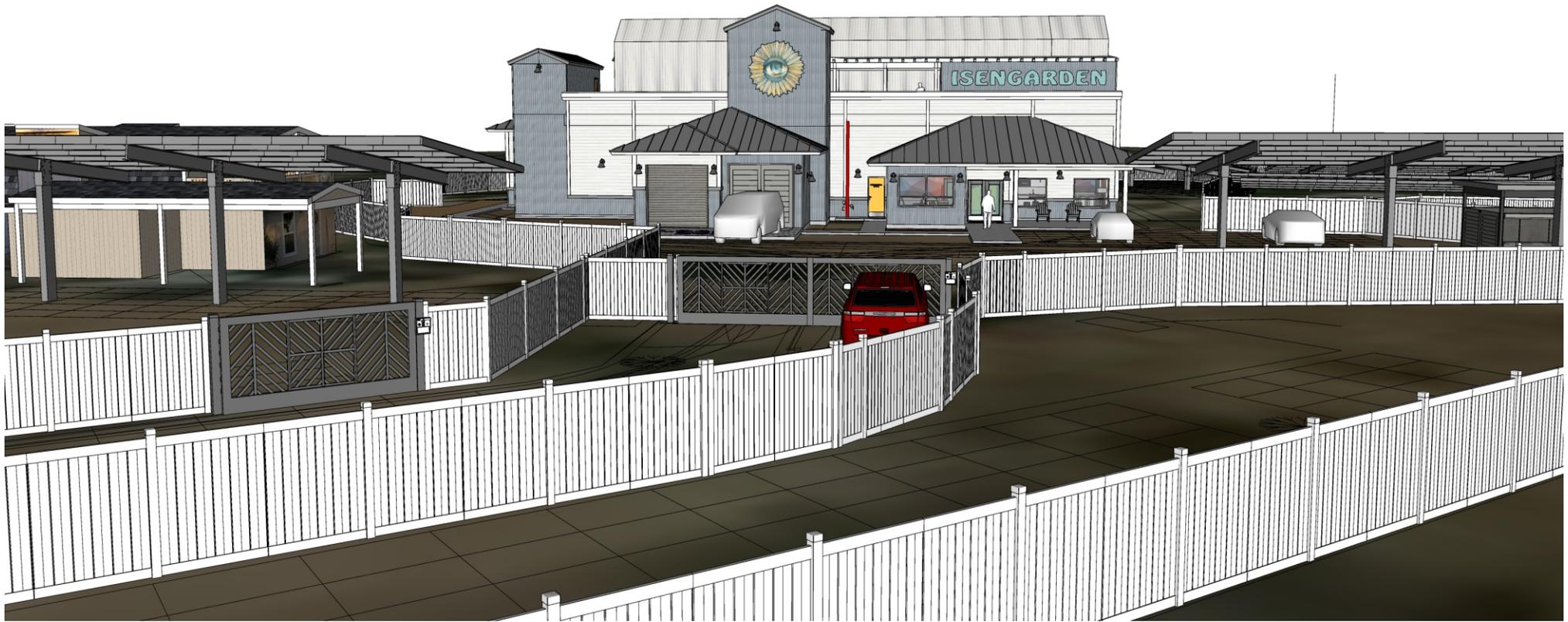
CONSTRUCTION ADMINISTRATION:
 JONAS R. BURR, ARCH. #11
 1000 W. BROADWAY, SUITE 100
 ANAHEIM, CA 92801

PLOT DATE 03/15/19



EXTERIOR
 ELEVATIONS

A-2.0



ARCHITECTURAL DESIGN
IsenGarden Cannabis Cultivation Facility
County of Riverside, California

Isen Garden, LLC
32875 Red Mountain Road
Hemet, CA

PROPOSED BUILDING PAD PALETTE

SYMBOL	BOTANICAL NAME/COMMON NAME	SIZE/SPACING	QTY.	WUCOLS BY PLANT FACTOR
	CERCIDIUM N. / DESERT MUSEUM / DESERT MUSEUM PALO VERDE	24" BOX 29	6	L
	CITRUS NAVAL ORANGE / ORANGE CITRUS TREE	24" BOX 10'	1	M
	FILICJA SELLOWIANA / FINE APPLE OLIVA	24" BOX 10'	1	M
	OLEA E. MANZANILLO / MANZANILLO OLIVE TREE	24" BOX 30	3	L
	PISTACIA CHIENENSIS / CHINESE PISTACHE	24" BOX 20	1	M

NOTE: PROVIDE A PRE-APPROVED ROOT BARRIER FOR ALL TREES PLANTED WITHIN 6'-0" OF HARDSCAPE OR WALLS AND PROVIDE A MINIMUM OF 3'-0" CLEARANCE BETWEEN TREE TRUNK AND ADJACENT STRUCTURE OR WALLS

PROPOSED SHRUBS:

	ARBUTUS U. COMPACTA / COMPACT STRAWBERRY TREE	5 GAL. 8" O.C.	+142	L
	GAURA LINDHEIMERI / GAURA	5 GAL. 4" O.C.	+146	L
	HESPERALOE PARVIFLORA / RED YUCCA	5 GAL. 4" O.C.	+137	L
	ROSMARINUS O. TUSCAN BLUE / TUSCAN BLUE ROSEMARY	5 GAL. 4" O.C.	+128	L
	SALVIA CLEVELANDII / CLEVELAND SAGE	5 GAL. 4" O.C.	+141	L
	TECOMA STANS / YELLOW BELLS	5 GAL. 4" O.C.	+123	L

PROPOSED GROUND COVER:

	ANOPOLUM PARVIFOLIUM / MYOPORUM	1 GAL. 6" O.C.	+142	L
	TRACHELOSPERMUM JASMINOIDES / STAR JASMINE	1 GAL. 3" O.C.	+103	M
	VERBENA P. PURPLE / PURPLE VERBENA	1 GAL. 3" O.C.	+126	L

NOTE: 1. TOTAL PROPOSED LANDSCAPE AREA FOR BLDG. PAD: 4,091 S.F. = 81.2 %

PROPOSED SLOPE PALETTE

SYMBOL	BOTANICAL NAME/COMMON NAME	SIZE/SPACING	QTY.	WUCOLS BY PLANT FACTOR
	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX 20'	3	L
	QUERCUS AGRIFOLIA / COAST LIVE OAK	24" BOX 50'	3	L

NOTE: PROVIDE A PRE-APPROVED ROOT BARRIER FOR ALL TREES PLANTED WITHIN 6'-0" OF HARDSCAPE OR WALLS AND PROVIDE A MINIMUM OF 3'-0" CLEARANCE BETWEEN TREE TRUNK AND ADJACENT STRUCTURE OR WALLS

PROPOSED SHRUBS:

	ARCTOSTAPHYLOS GLANDULOSA SPP. / EAST WOOD MANZANITA	5 GAL. 9" O.C.	+4235	L
	BACCHARIS PELLULARIS SPP. / CONSIGNAGUEA / CHAMPANEL BLOOM	5 GAL. 10" O.C.	+121	L
	HETEROMELES ARBUTIFOLIA / TOYON	5 GAL. 10" O.C.	+126	L
	QUERCUS BERBERIDIFOLIA / CALIFORNIA SCRUB OAK	5 GAL. 8" O.C.	+143	L
	SALVIA CLEVELANDII / CLEVELAND SAGE	5 GAL. 4" O.C.	+130	L
	TRICHOSTEMA LANATUM / WOOLLY BLUE CURLS	5 GAL. 9" O.C.	+146	L

PROPOSED GROUND COVER:

	ARCTOSTAPHYLOS EDMONSTONEI / LITTLE SUR MANZANITA	1 GAL. 6" O.C.	+4276	L
	BACCHARIS PELLULARIS SPP. / PELLULARIS / TWIN PEAKS II	1 GAL. 6" O.C.	+1403	L

NOTE: 1. TOTAL NEW PROPOSED LANDSCAPE AREA FOR SLOPES: 10,648 S.F. = 225.5 %

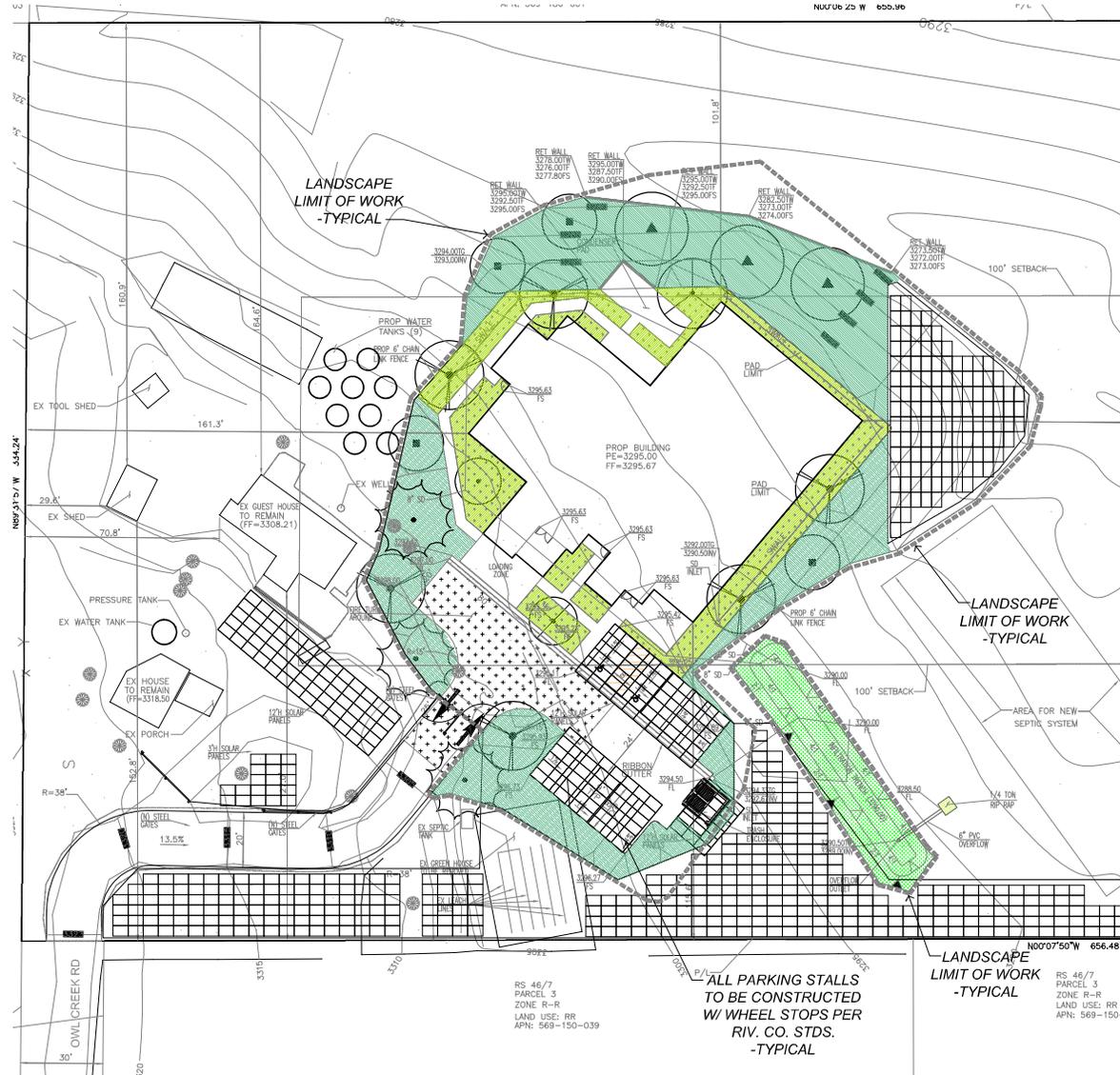
PROPOSED WATER QUALITY PLANT PALETTE

SYMBOL	BOTANICAL NAME/COMMON NAME	SIZE/SPACING	QTY.	WUCOLS BY PLANT FACTOR
	MUHLENBERGIA CAPILLARIS / PINKISHLY GRASS	1 GAL. 6" O.C.	1,978	L

NOTE: 1. TOTAL NEW PROPOSED LANDSCAPE AREA FOR BASIN: 1,978 S.F. = 4.2 %

NOTE:

1. ALL PROPOSED TREES, SHRUBS, VINE AND GROUND COVER ARE CONSIDERED DROUGHT TOLERANT AND ARE TO BE IRRIGATED WITH AN AUTOMATIC ET BASED CONTROLLER AND DRIP IRRIGATION SYSTEM.
2. THERE ARE NO EXISTING TREES, SHRUBS, TURF AREAS, OR IRRIGATION WITHIN THE PROJECT AREA TO REMAIN.
3. THERE ARE TO BE NO INVASIVE PLANTS USED ON THIS PROJECT.
4. TOTAL BASIN LANDSCAPE AREA: 1,978 S.F. = 4.2 %
TOTAL IMPERVIOUS AREA: 30,535 S.F.
TOTAL NON-BASIN LANDSCAPE AREA: 14,739 S.F. = 31.2 %
TOTAL LANDSCAPE AREA: 16,717 S.F. = 35.4 %
TOTAL PROJECT AREA: 47,268 S.F.



Riverside County Ordinance 89 Landmark Water Use Calculations

Project Type: Commercial
Shower Calculated: 0.00
APN: 569-150

1. Maximum Annual Water Allowance: 100,000 GPD

2. Estimated Annual Water Use: 100,000 GPD

3. Estimated Annual Water Use: 100,000 GPD

PLANT NOTES

- 1) ALL LANDSCAPING AND IRRIGATION TO BE INSTALLED BY OWNER OR OWNER'S AGENT IN ACCORDANCE WITH LOCAL CODES AND REGULATIONS.
- 2) ALL LANDSCAPING SHALL BE MAINTAINED BY OWNER OR OWNER'S AGENT.
- 3) ALL PLANTING SHALL BE COMPLETED WITHIN 90 DAYS OF THE DATE OF THE COMMENCEMENT OF CONSTRUCTION.
- 4) TREES SHALL BE PLANTED WITHIN 10' OF THE EDGE OF THE DRIVE OR WALKWAY.
- 5) ALL TREES WITHIN 15' OF WALLS, HARDSCAPE, OR BALCONIES SHALL BE INSTALLED WITH COUNTY APPROVED LINEAR ED BARRIER ROOT COLLARS, BARRIERS OR TYPICAL ROOT BARRIER SHALL NOT EXCEED THE TREE TRUNK BUT SHALL BE LOCATED AT EDGE OF HARDSCAPE AND EXTEND BEYOND CENTER OF TREE A MINIMUM OF 18" BROADNESS.
- 6) ALL PLANTING LOCATIONS ARE APPROXIMATE. CONSTRUCTION SHALL VERIFY ALL PLANT LOCATIONS WITH THE OWNER ON THE OWNER'S PROPERTY TO THE DEGREE OF ACCURACY.
- 7) ALL TREES SHALL BE PLANTED WITHIN 10' OF THE DRIVE OR WALKWAY. ALL TREES SHALL BE PLANTED WITHIN 10' OF THE DRIVE OR WALKWAY. ALL TREES SHALL BE PLANTED WITHIN 10' OF THE DRIVE OR WALKWAY.
- 8) TREE PLACEMENT MINIMUMS SHALL BE 30' FROM LIGHT STANDSTOPS, POWER POLES AND OTHER APPROVED AND PRIVATE UTILITIES. THE PERIOD AND PROPERTY SHALL NOT BE ALLOWED IN SHADE.
- 9) ALL SHRUBS SHALL BE PLANTED AND IRRIGATED PER THE COUNTY OF RIVERSIDE CODES AND REGULATIONS.
- 10) ALL SHRUBS SHALL BE PLANTED AND IRRIGATED PER THE COUNTY OF RIVERSIDE CODES AND REGULATIONS.
- 11) ALL LANDSCAPE AREAS SHALL BE PROVIDED WITH AN AUTOMATIC IRRIGATION SYSTEM AND IRRIGATION SHALL BE PROVIDED WITHIN 90 DAYS OF THE COMMENCEMENT OF CONSTRUCTION. REFER TO LANDSCAPE CONSTRUCTION DRAWING SET FOR FURTHER DETAILS.
- 12) ALL IRRIGATION SYSTEMS IN LANDSCAPE AREAS ADJACENT TO PESTICIDE TREATMENT AREAS SHALL BE INSTALLED WITH NON-PHOSPHORUS BASED INJECTORS TO PREVENT PHOSPHORUS FROM ENTERING THE TREATMENT AREAS.
- 13) ALL LANDSCAPE AREAS SHALL BE KEPT FREE FROM WEEDS AND DEBRIS AND MAINTAINED AT ALL TIMES. ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES. ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES.
- 14) ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES. ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES.
- 15) ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES. ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES.
- 16) ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES. ALL WEEDS AND DEBRIS SHALL BE REMOVED AND MAINTAINED AT ALL TIMES.
- 17) ALL PARKING SPACES SHALL BE INSTALLED WITH WHEEL STOPS PER CAL. STDS.



ROBERT TAFT + ASSOCIATES
LANDSCAPE ARCHITECTURE

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Web: www.RobertTaftAssociates.com

GENERAL NOTE

PRIOR TO PROJECT CONSTRUCTION, I AGREE TO SUBMIT A COMPLETE LANDSCAPE CONSTRUCTION DOCUMENT PACKAGE THAT COMPLES WITH THE REQUIREMENTS OF APPLICABLE ORDINANCES, INCLUDING BUT NOT NECESSARILY LIMITED TO ORDINANCE NO. 348; ORDINANCE 348; ORDINANCE 461- PROJECT CONDITIONS OF APPROVAL; AND IN SUBSTANTIAL CONFORMANCE WITH THE APPROVED LANDSCAPE CONCEPT PLAN, SHOULD THE ORDINANCES BE REVISED, PLANS MAY BE SUBJECT TO CHANGE.

SHADING SUMMARY

TOTAL PARKING AREA: 1,944 S.F.
(EXCLUDES DRIVE AISLES AND COVERED PARKING SPACES)

50% SHADING REQUIRED FOR UNCOVERED AREAS: 972 S.F.

PARKING AREA SHADED BY 6 TREES: 1,086 S.F.

TREE SIZE SHOWN AT 15 YEARS MATURITY, PER RIVERSIDE COUNTY ORDINANCE 348, SECTION 18.12

Conceptual Landscape Plan



CONCEPTUAL LANDSCAPE PLAN
IsenGarden Cannabis Cultivation Facility
County of Riverside, California

ISEN GARDEN, LLC - CONCEPTUAL LANDSCAPE PLAN - SHEET 1 OF 1 - 02/02/21

exotics are not present on the site. Plants found on-site are included in the Biological Resources section of this EA.

The Project Site is designated Rural Residential in the Riverside County General Plan and occurs within the Rural Residential (R-R) Zoning district. Approval of a Zone Change would convert the current R-R zoning to Light Agriculture (A-1) district. "Medium Mixed Light Cannabis Cultivation" is allowed on lots five gross acres or more in the A-1 zoning district with a CUP. The adjacent parcel to the north is designated as Open Space-Conservation Habitat (OS-CH), the parcel to the east is designated as Rural Residential (RR), the parcel to the south is defined as Rural Residential (RR), and both parcels to the west are designated as Rural Residential (RR). The nearest existing residence is located approximately 200 feet from the westerly property line and approximately 300 west of the proposed cannabis cultivation building.

A. Type of Project: Site Specific ; Countywide ; Community ; Policy .

B. Total Project Area:

Residential Acres: N/A	Lots: N/A	Units: N/A	Projected No. of Residents: 2
Commercial Acres: 5.03	Lots: 1	Sq. Ft. of Bldg. Area: 20,080	Est. No. of Employees: 10
Industrial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Other:			

C. Assessor's Parcel No(s): 569-150-010

Street References:

D. Section, Township & Range Description or reference/attach a Legal Description:
Township 6 South, Range 1 East, Section 28 NE, Hemet, CA, 7.5' quadrangle

E. Brief description of the existing environmental setting of the project site and its surroundings:

The Project Site currently has a land use designation of Rural Residential (RR) and is located at the end of Owl Creek Road, south of Red Mountain Road. Adjacent properties are designated Rural Residential to the south, east and west, and Open Space-Conservation Habitat to the north.

The Project Site is dominated by a mix of chaparral vegetation, sparse rock outcroppings (boulder size), two small residential structures, an ancillary structure, and solar arrays. The majority of the Project Site slopes from the north (3292 feet amsl) to the southeast (3266 feet amsl).

F. Other Public Agency Involvement:

California Department of Cannabis Control:

The Department of Cannabis Control (DCC) regulates, issues licenses to, and enforces compliance of all commercial cannabis business activity in California (Bus. & Prof. Code, Section 26103(a)). The project applicant will be required to submit an application for a CalCannabis Cultivation License through the DCC. The DCC will have an opportunity to review and comment on the Initial Study/Mitigated Negative Declaration.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. **Land Use:** (Rural Residential) The current Project Site land use designation is Rural Residential. A Zone Change is requested to change the current zoning from Rural Residential to Light Agriculture (A-1). A-1 allows a single-family residence with a minimum lot size of 5 acres to allow limited animal keeping and agriculture uses including cannabis cultivation, recreational uses, compatible resources development, associate and government uses.
2. **Circulation:** The Project Site is located south of Red Mountain Road. The nearest paved road is west of the Project Site is Sage Road. The Proposed Project would have adequate circulation to and within the Project Site and is therefore consistent with the Circulation Element of the General Plan. The Proposed Project meets the Regional Urban and Rural Trails and all other applicable circulation policies of the General Plan.
3. **Multipurpose Open Space:** The Project Site does not have a land use designation that is intended to conserve or preserve resources. The Proposed Project would not interfere with the goals set forth in the County's General Plan Multipurpose Open Space Element.
4. **Safety:** The Proposed Project is not located in a floodplain or a fault zone. The Project Site is not located in an area susceptible to liquefaction and seismically-induced landslides. The proposed project meets all other applicable Safety element policies.
5. **Noise:** The Proposed Project would permanently increase the ambient noise levels in the project vicinity above levels existing without the project. However, noise levels are expected to remain below the County's exterior daytime noise threshold of 65 dBA and the County's nighttime exterior noise threshold of 45 dBA.
6. **Housing:** There is a residential structure currently on the subject site and no additional housing is proposed, nor is any housing anticipated to be removed.
7. **Air Quality:** The Proposed Project is located within the South Coast Air Basin. According to the California Emissions Estimator Model (CalEEMod) v. 2020.4.0, the Proposed Project is anticipated to meet all South Coast Air Quality Management District (SCAQMD) standards and thresholds with incorporation of sustainable design and compliance with regulation.
8. **Healthy Communities:** The Proposed Project meets all applicable Healthy Community element policies.
9. **Environmental Justice (After Element is Adopted):** N/A

B. **General Plan Area Plan(s):** Riverside Extended Mountain Area Plan (REMAP)

C. **Foundation Component(s):** Rural

D. **Land Use Designation(s):** Rural Residential (RR)

E. **Overlay(s), if any:** None

F. **Policy Area(s), if any:** None

G. Adjacent and Surrounding:

- 1. **General Plan Area Plan(s):** Riverside Extended Mountain Area Plan (REMAP)
- 2. **Foundation Component(s):** Rural
- 3. **Land Use Designation(s):** Rural Residential
- 4. **Overlay(s), if any:** None
- 5. **Policy Area(s), if any:** None

H. Adopted Specific Plan Information

- 1. **Name and Number of Specific Plan, if any:**
- 2. **Specific Plan Planning Area, and Policies, if any:**

I. Existing Zoning: Rural Residential (RR)

J. Proposed Zoning, if any: Light Agriculture (A-1).

K. Adjacent and Surrounding Zoning: The adjacent parcel to the north is designated as Open Space-Conservation Habitat (OS-CH), the parcel to the east is designated as Rural Residential (RR), the parcel to the south is defined as Rural Residential (RR), and both parcels to the west are designated as Rural Residential (RR).

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

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

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. **A MITIGATED NEGATIVE DECLARATION** will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.

I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.

I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following:(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or,(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Signature _____

Kathleen Mitchell, Project Planner

Date _____
6/16/2022
For: John Hildebrand
Planning Director

Printed Name _____

V. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction and implementation of the project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
1) Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan, Caltrans Scenic Highway Interactive Map, Submitted Project Materials

Findings of Fact:

- a) **No Impact.** The Project Site is within Riverside County General Plan’s Riverside Extended Mountain Area Plan (REMAP). The Project Site is not located near any scenic highways or scenic viewpoints.¹ The nearest scenic highway is the CA – 74 Idyllwild National Forest Highway, located approximately 8 miles northeast of the Project Site. No impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** The Project Site is currently developed with an existing residence. Natural features on the hilly terrain include rock outcroppings and rocky knolls. Most of the boulders are quite exfoliated, and those located within drainages are covered in moss.

¹ Riverside County General Plan: Riverside Extended Mountain Area Plan (REMAP), Figure 8 “Riverside Extended Mountain Area Plan Scenic Highways
 (https://planning.rclima.org/Portals/14/genplan/general_Plan_2017/areaplans/REMAP_120815m.pdf?ver=2017-10-11-101551-660)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The rock outcroppings on the property would be avoided during the construction and operation of the Proposed Project. Research conducted for the Historical/Archaeological Resources Report, April 17, 2020, prepared by CRM Tech concluded that no “historical resources,” as defined by CEQA were encountered throughout the course of the study. Development of the Proposed Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features. The Proposed Project would not obstruct any prominent scenic vista or views that are open to the public. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The Project Site is in a non-urbanized area and is surrounded by vacant land and scattered rural residential properties. There are no publicly accessed scenic trails near the Project Site that view the property. The residential dwellings to the west and south are the only properties that may have limited views of the Project Site. There are no regional trails that are in view of the Project Site.² The proposed development would not significantly degrade the existing visual character of the Project Site and its surroundings. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

2) Mt. Palomar Observatory

- a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

Source: Riverside County Ordinance. No. 655 (Regulating Light Pollution), Riverside County General Plan: REMAP Figure 5

Findings of Fact:

- a) **Less than Significant Impact.** According to the County General Plan, the Proposed Project is subject to lighting standards that are intended to limit light leakage and spillage that may interfere with the operations of the Mount Palomar Observatory. Mount Palomar Observatory, located in San Diego County, is approximately 19 miles south of the Project Site. Riverside County Ordinance No.655 restricts the permitted use of certain light fixtures that emit undesirable light rays into the night sky and interfere with astronomical observation and research. This ordinance defines two impacted zones: Zone A is within a 15-mile in radius of the Palomar Observatory and Zone B is within a 45-mile radius. The Project Site is located within Zone B.³

Adherence to the applicable lighting standards established by Riverside County Ordinance 655 and adherence to the County development standards would ensure no significant impact to astronomical observations at Mount Palomar occur as a result of development of the Proposed Project. The Proposed Project would be required to adhere to County standards related to the placement and shielding of lighting fixtures. The Applicant would be required to submit an on-

² Riverside County General Plan, Riverside Extended Mountain Area Plan, Figure 7 “Riverside Extended Mountain Area Plan Trails and Bikeway System”

³ Riverside County General Plan: REMAP. Figure 5 “MT Palomar Night Time Lighting Policy Area.”

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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site lighting plan for review and approval. This on-site lighting plan requires the identification of the type, intensity, and location of each proposed on-site lighting source. The submittal of this plan is required as evidence that the proposed on-site lighting sources would meet County lighting standards. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

3) Other Lighting Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose residential property to unacceptable light levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County Ordinance. No. 655 (Regulating Light Pollution)

Findings of Fact:

a, b) **Less than Significant Impact.** The Project Site is surrounded by vacant land and rural residential development. There is no development immediately adjacent to the Project Site. The property to the west is approximately 400 feet from where the proposed facility would be constructed. Additionally, the Proposed Project is subject to the lighting standards set forth by Riverside County Ordinance No. 655. The Project Applicant would be required to submit a lighting plan subject to approval by the County. Compliance with County lighting standards would minimize light and glare exposure so that there would be no unacceptable light levels and it would not affect day or nighttime views in the area.

Similar to County lighting standards, the Department of Cannabis Control (DCC) has lighting standards that require compliance for licensing. All outdoor lighting used for security purposes shall be shielded and downward facing (CCR Title 4 Section 16304(c). Mixed-light license types of all tiers and sizes shall ensure that lights used for cultivation are shielded from sunset to sunrise to avoid nighttime glare (CCR Title 4 Section 16304(g)).

Compliance with County and DCC cannabis cultivation regulations would reduce other lighting issues to less than significant levels. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE & FOREST RESOURCES Would the project:				
4) Agriculture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Riverside Extended Mountain Area Plan: Figure 3 "Land Use Plan," Department of Conservation Riverside County Important Farmland 2016 (<https://maps.conservation.ca.gov/DLRP/CIFF/>), Riverside County Parcel Report; Riverside County Information Technology (RCIT) GIS

Findings of Fact:

- a) **No Impact.** The California Important Farmland Finder Interactive Map identifies the Project Site as "Other Land".⁴ "Other Land" is defined as low density rural developments, brush, timber, wetland and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. No prime farmland, unique farmland, or farmland of statewide importance is identified at the Project Site or within the immediate vicinity. The Proposed Project would not convert farmland to a non-agricultural use. The Proposed Project includes a Zone Change to Light Agriculture to allow for cannabis cultivation. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.
- b-d) **No impact.** The Project Site is mapped as "Other Land and is not located within a Williamson Act contract."⁵ There are no lands zoned for agricultural production or that are under active production on or within the vicinity of the Project Site. Therefore, the Proposed Project would not conflict within any agricultural zoning or agricultural uses. No impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

⁴ <https://maps.conservation.ca.gov/DLRP/CIFF/> Accessed 6/17/21.

⁵ Riverside County Parcel Report for the Project Site.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5) Forest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) 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 Govt. Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure OS-3b “Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas”

Findings of Fact:

a-c) **No impact.** There are no timber or forest lands on the Project Site or in the surrounding vicinity. Timberland production zones are defined as an area which has been zoned pursuant to Section 51112 or 51113 of the California Code and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). The Project Site and surrounding parcels are zoned Rural Residential (R-R). Therefore, the Proposed Project would not conflict with any existing zoning, cause any rezoning, or result in the loss or conversion of any forest land or timberland production zones. Furthermore, as there are no forest lands in the project vicinity, the Proposed Project would not involve any changes to the environment that could result in a conversion of forest land to a non-forest use. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AIR QUALITY Would the project:				
6) Air Quality Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan; Riverside County Climate Action Plan (“CAP”); Air Quality Management Plan (AQMP); California Emissions Estimator Model (CalEEMod) version 2020.4.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) **Less than Significant Impact.** The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal air quality standards. The most recent AQMP (2016 AQMP) was adopted by the SCAQMD on March 3, 2017. The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories.

The Project Site is designated Rural Residential in the Riverside County General Plan and occurs within the Rural Residential (R-R) Zoning district. Approval of a Zone Change would convert the current R-R zoning to Light Agriculture (A-1) district. "Medium Mixed Light Cannabis Cultivation" is allowed on lots five gross acres or more in the A-1 zoning district with a CUP. The Proposed Project does not include a General Plan Amendment (GPA) and therefore, approval of the Proposed Project would not conflict with the AQMP. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- b) **Less than Significant With Mitigation.** The Proposed Project's construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2020.4 prepared by the SCAQMD. CalEEMod was used to estimate the on-site and off-site construction emissions. The emissions incorporate Rule 402 and 403 by default as required during construction. The criteria pollutants screened for include reactive organic gases (ROG), nitrous oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO2), and particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, ROG and NOx, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Source Emissions

Construction activities associated with the Proposed Project would have the potential to generate air emissions and odor impacts. Construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: site grading (mass and fine grading), building construction, paving, and architectural coating. The grading phase of the Proposed Project is anticipated to include no import or export of materials. Impacts from construction activities are anticipated to be short-term. Refer to Table 1, Summer Emissions and Table 2, Winter Emissions for construction emissions generated. However, in order for project impacts to be less than Local Significance Thresholds, the applicant will be limited to two rubber-tired dozers operating up to 7 hours a day and 2 tractor/loaders/backhoes operating up to 7 hours a day during the site preparation phase as to limit PM_{2.5} exposure to sensitive receptors with implementation of Mitigation Measure AQ-1.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Table 1
Summer Construction Emissions
(Pounds per Day)**

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition	2.7	25.7	21.0	0.0	1.3	1.1
Site Preparation	1.8	18.3	10.4	0.0	6.4	3.5
Grading	2.0	20.9	15.8	0.0	4.2	2.4
Construction	2.1	17.3	20.4	0.0	2.0	1.0
Paving	1.0	8.8	12.9	0.0	0.6	0.4
Architectural Coating	13.8	1.3	2.4	0.0	0.2	0.1
Highest Value (lbs/day)	13.8	25.7	21.0	0.0	6.4	3.5
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2020.4 Summer Emissions.
Phases do not overlap and represent the highest concentration.

**Table 2
Winter Construction Emissions
(Pounds per Day)**

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition	2.7	25.7	21.0	0.0	1.3	1.1
Site Preparation	1.8	18.3	10.4	0.0	6.4	3.5
Grading	2.0	20.9	15.8	0.0	4.2	2.4
Construction	2.1	17.3	20.4	0.0	2.0	1.0
Paving	1.0	8.8	12.9	0.0	0.6	0.4
Architectural Coating	13.8	1.3	2.4	0.0	0.2	0.1
Highest Value (lbs/day)	13.8	25.7	21.0	0.0	6.4	3.5
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2020.4 Winter Emissions.
Phases do not overlap and represent the highest concentration.

As shown in Table 1 and Table 2, none of the project's construction emissions will exceed regional thresholds. Impacts would be less than significant, and no mitigation measures would be required.

Compliance with SCAQMD Rules and Regulations

During construction and operation, the project must comply with applicable rules and regulations. The following are rules the project may be required to comply with, either directly, or indirectly:

SCAQMD Rule 402

Prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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SCAQMD Rule 403

Governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM₁₀ component). Compliance with these rules would reduce impacts on nearby sensitive receptors. Rule 403 measures may include but are not limited to the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.)
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspension of all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Bumper strips or similar best management practices shall be provided where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replanting disturbed areas as soon as practical.
- During all construction activities, construction contractors shall sweep on-site and off-site streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

SCAQMD Rule 481

Applies to all spray painting and spray coating operations and equipment. The rule states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

1. The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.

2. Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
3. An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

SCAQMD Rule 1108

Governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule would regulate the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the project must comply with SCAQMD Rule 1108.

SCAQMD Rule 1113

Governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of the project must comply with SCAQMD Rule 1113.

SCAQMD Rule 1143

Governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

SCAQMD Rule 1186

Limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.

SCAQMD Rule 1303

Governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM₁₀ among other pollutants.

SCAQMD Rule 1401

New Source Review of Toxic Air Contaminants specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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SCAQMD Rule 1403

Asbestos Emissions from Demolition/Renovation Activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

SCAQMD Rule 2202

On-Road Motor Vehicle Mitigation Options, is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. It applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average.

Compliance with Department of Cannabis Control Rules and Regulations

During construction and operation, the project must comply with applicable rules and regulations for cannabis cultivation activities. The following are rules that the project may be required to comply with, either directly, or indirectly:

CCR Title 4 Section 16102(s):

The Project cultivation license application shall include the following, if deemed applicable:

- For indoor and mixed-light license types, identification of all power sources for cultivation activities, including but not limited to, illumination, heating, cooling and ventilation.

CCR Title 4 Section 16304(e):

The Project cultivation license shall comply with the following environmental protection measures:

- Requirements for generators pursuant to Section 16306 of this chapter.

CCR Title 4 Section 16305):

Specifies requirements for certain mixed-light cannabis cultivator licensees to ensure that by 2023, their electrical power meets the average electricity greenhouse gas emissions intensity required by their local provider. That section includes options for the purchase of carbon offset credits if such standards are not met.

CCR Title 4 Section 16106:

Specifies requirements for stationary and portable generators greater than fifty (50) horsepower. It requires these to comply with the appropriate Airborne Toxic Control Measures for stationary or portable generators and includes certificates or permits that are acceptable to prove compliance. Additional compliance options are provided for generators below fifty (50) horsepower by 2023, including limiting hours of operation, meeting certain emergency use requirements, or filter and engine requirements.

Compliance with these DCC cannabis cultivation regulations would minimize air quality operational impacts.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Operational Emissions

The operation of the Proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the project-generated vehicle trips and through operational emissions from the on-going use of the Proposed Project. Operational emissions are categorized as energy (generation and distribution of energy to the end use), area (operational use of the project), and mobile (vehicle trips). Operational emissions were estimated using the CalEEMod version 2020.4 defaults values for Light Industrial use generating up to 102 daily trips (worst case assumption as the proposed project is anticipated to generate up to 20 trips per day) are listed in Table 3 and Table 4, which represent summer and winter operational emissions, respectively.

**Table 3
Summer Operational Emissions Summary
(Pounds Per Day)**

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	0.5	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.2	0.1	0.0	0.0	0.0
Mobile	0.4	0.5	4.1	0.0	1.0	0.3
Totals	0.9	0.7	4.2	0.0	1.0	0.3
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2020.4 Summer Emissions

**Table 4
Winter Operational Emissions Summary
(Pounds Per Day)**

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	0.5	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.2	0.1	0.0	0.0	0.0
Mobile	0.4	0.5	3.6	0.0	1.0	0.3
Totals	0.9	0.7	3.7	0.0	1.0	0.3
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2020.4 Winter Emissions

As shown, both summer and winter season operational emissions are below SCAQMD thresholds.

Construction impacts would exceed Local Significance Thresholds for sensitive receptor exposure to PM_{2.5} without mitigating construction activities. Therefore, impacts would be less than significant with implementation of Mitigation Measure AQ-1.

Mitigation: Mitigation Measure AQ-1: The Project Applicant will be limited to two rubber-tired dozers operating up to 7 hours per day and 2 tractor/loaders/backhoes operating up to 7 hours a day during the site preparation phase.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Monitoring: Prior to issuance of grading permit a construction schedule shall be approved by building and safety.

- c) **Less than Significant With Mitigation.** SCAQMD has developed a methodology to assess the localized impacts of emissions from a proposed project as outlined within the Final Localized Significance Threshold (LST) Methodology report; completed in June 2003 and revised in July 2008. The use of LSTs is voluntary to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. LSTs apply to projects that must undergo CEQA or the National Environmental Policy Act (NEPA) and are five acres or less. LST methodology is incorporated to present worst-case scenario off-site construction emissions. The LSTs were developed to analyze the significance of potential air quality impacts of proposed projects to sensitive receptors and provide screening tables for small projects (one, two, or five acres). Projects are evaluated based on geographic location and distance from the sensitive receptor (25, 50, 100, 200, or 500 meters from the site).

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, convalescent facility or anywhere that is possible for an individual to remain for 24 hours. Additionally, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours, but are usually present for shorter periods of time, such as eight hours.

The Project Site is approximately five acres and therefore, the “five-acre” LST thresholds was utilized. The nearest sensitive receptor to the Project Site is a single-family residence located approximately 200 feet west of the Project Site. LSTs are based on a conservative 25-meter distance and therefore a conservative distance of 150ft (47 meters) was used. The limitation of construction activities to two rubber-tired dozers operating up to 7 hours per day and 2 tractor/loaders/backhoes operating up to 7 hours a day during the site preparation phase was incorporated into the CalEEMod model.

**Table 5
Localized Significance Thresholds
(Pounds per Day)**

Source	NO _x	CO	PM ₁₀		PM _{2.5}	
Construction Emissions (Max. from Table 1 and Table 2)	25.7	21.0	6.4		3.5	
Operational Emissions (Max. Total from Table 3 and Table 4)	0.7	4.2	1.0		0.3	
Highest Value (lbs/day)	25.7	21.0	6.4	1.0	3.5	0.3
LST Thresholds	371	1,965	13*	8†	4*	2†
Greater Than Threshold	No	No	No	No	No	No

Note: PM₁₀ and PM_{2.5} emissions are separated into construction and operational thresholds in accordance with the SCAQMD Mass Rate LST Look-up Tables.

* Construction emissions LST

† Operational emissions LST

Source: CalEEMod.2020.4 Summer & Winter Emissions; SCAQMD Final Localized Significance Threshold Methodology; SCAQMD Mass Rate Look-up Tables for five-acre site in Source Receptor Area No. 26, distance of 25 meters.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As shown in Table 5, the Proposed Project's emissions are not anticipated to exceed the thresholds for LSTs with implementation of Mitigation Measure AQ-1. Therefore, the Proposed Project is not anticipated to expose sensitive receptors to substantial pollutant concentrations. No significant adverse impacts are identified or anticipated, and no additional mitigation measures are required.

- d) **Less than Significant Impact.** The cannabis cultivation activities shall be sited and operated in a manner that prevents nuisance odors from being detected off-site. Exhaust fans installed at the cultivation building are only for emergency use and would not be operational most of the time. Odor is controlled by the building being sealed and recirculating air through a combination of Carbon filters and Bipolar ionization units which will meet restrictions of odors being detected off-site. Therefore, the activities shall provide a sufficient odor absorbing ventilation and exhaust system so that odor generated inside the building that is distinctive to its operation is not detected outside of the operation's facility. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

BIOLOGICAL RESOURCES Would the project:

7) Wildlife & Vegetation

a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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. Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Habitat Assessment and MSHCP Consistency Analysis, November 16, 2020, Principe and Associates

Findings of Fact:

a-c) **Less than Significant with Mitigation Incorporated.** A Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis, dated November 16, 2020, was completed by Principe and Associates (available at the County offices for review), and is summarized herein.

As part of the MSCHP Consistency Analysis, it was determined that based on the final Western Riverside County MSHCP (adopted June 17, 2003), the site is not located within a MSHCP Criteria Area (proposed MSHCP Conservation Planning Criteria Area). The site is not located within a Cell, Cell Group or Sub Unit of the Riverside Extended Mountain Area Plan (REMAP).

Three criteria areas are located within one mile of the site. Cell #5111 of Cell Group F of Sub Unit 1 (Cactus Valley) of REMAP is located approximately 0.38 miles northeast of the site. Cell #5127 of Cell Group I of Sub Unit 1 (Cactus Valley) of REMAP is located approximately 0.44 miles east of the site. Cell #5028 of Cell Group H of Sub Unit 1 (Cactus Valley) of REMAP is located approximately 0.50 miles north of the site.

The site is located along the southern boundary of Western Riverside County Regional Conservation Agency (RCA) Conserved Lands that extend north for over five miles to Bautista Creek. The site is also located approximately one mile west of the western boundary of MSHCP Public/Quasi-Public Lands Conserved Lands that extend east past the summit of Red Mountain for over 15 miles to Palm Springs. The MSCHP Consistency Analysis determined that wildlife within the adjacent MSHCP Conservation Area will not be subject to noise that would exceed exterior daytime or nighttime noise standards pursuant to applicable rules, regulations and guidelines related to land use noise standards. Noise-generating land uses will not be associated with the project.

All commercial cannabis activities are required to be sited and operated in a manner that prevents cannabis nuisance odors from being detected off the site. All commercial cannabis activities shall provide a sufficient odor absorbing ventilation and exhaust system so that odor generated inside the activity that is distinctive to its operation is not detected outside of the operation's facility.

Suitable nesting habitats for migratory birds are present on the site. The structurally tall red shank, mature coast live oak trees and shade trees planted on the site provide potential nesting habitats for perching bird and predatory bird species. The bird species observed at or have a probability of occurring on the site are bird species governed by the MBTA, and are listed in 50 CFR Part 10. The MBTA requires that project-related disturbances at active nesting territories be reduced or eliminated during critical phases of the nesting cycle. The removal of vegetation and/or destruction of nests during the breeding season are considered potentially significant impacts. Compliance with the MBTA would reduce impacts to a less than significant level. Therefore, Mitigation Measure BIO-1 shall be implemented to reduce potential impacts to a less than significant level.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mountain yellow-legged frog (*Rana mucosa*)

The Mountain yellow-legged frog (*Rana mucosa*) (MYLF) is a Federal-listed Endangered Species and a State-listed Species of Special Concern. The MSHCP has designated the MYLF as a Group 3 species because it presently occurs at only a few locations in very low numbers, requires specific breeding habitat conditions and is narrowly distributed within the Plan Area. This species will require site-specific considerations, protection of primary breeding habitat and adjacent upland areas, and species-specific conservation measures. MYLF is on the Additional Survey Needs and Procedures list (*Section 6.3.2 of the MSHCP*), and surveys for the species are to be conducted as part of the project review process.

There are no MYFL records in California Natural Diversity Database (CNDDDB) from within three miles of the site. A walk-over survey was conducted along the entire length of the ephemeral drainage on the site in September 2020. There was no evidence discovered on the site of permanent aquatic features that retain freshwater long enough to support adult MYLF or MYLF tadpoles. A drive-by survey of the land located upstream of the onsite ephemeral drainage was also conducted in September. Perennial stream flows supporting ponderosa pine, montane hardwood-conifer or montane riparian habitats were not discovered in the area located north of the site to Red Mountain Road. Required habitats for MYLF are not present on the site.

Urban/Wildlands Interface

The Guidelines Pertaining to the Urban/Wildlands Interface are intended to address indirect effects associated with locating the proposed project in proximity to an existing MSHCP Conservation Area. Prior to the approval of any project, Riverside County will issue a list of conditions that must be satisfied. Existing local regulations are generally in place that address the same issues presented in the Guidelines Pertaining to the Urban/Wildlands Interface section of the MSHCP such as lighting, urban runoff, toxics, and grading/land development. Specifically, Riverside County has an approved General Plan, Building Codes and Zoning Ordinances and polices that include mechanisms to regulate the development of land.

The project could result in edge effects that will adversely affect the maintenance of habitat for the species using the MSHCP Conservation Area. Therefore, the project will be subject to the following Guidelines Pertaining to the Urban/Wildlands Interface that address indirect effects of locating a project adjacent to an existing MSHCP Conservation Area.

The site's north property line is located along the boundaries of an existing MSHCP Conservation Area. However, the project will be sited downstream of the MSHCP Conservation Area. It will not discharge runoff water into the MSHCP Conservation Area, but it will be discharged into the onsite ephemeral drainage. The runoff water discharged from the project will not be altered in an adverse way when compared with existing conditions.

Drainage/Urban Runoff: Measures required by the Riverside County Building & Safety Department and the San Diego Regional Water Quality Control Board shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the onsite ephemeral drainage. Stormwater facilities shall be designed to prevent the release of fertilizers, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes into the onsite ephemeral drainage. This will be accomplished by the installation of an infiltration trench (mechanical trapping device). The primary purpose of the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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infiltration trench will be to treat stormwater quality. Rain falls on impervious surfaces, and flows downhill across the surface collecting pollutants present on the surface. The infiltration trench will be dug in an area where it can intercept this surface flow. Regular maintenance shall occur to ensure effective operations of the stormwater control system.

Toxics: The site is located adjacent to an existing MSHCP Conservation Area. However, the Proposed Project will not use chemicals or generate bio-products that are potentially toxic or that may adversely affect wildlife species, habitat or water quality. The proposed infiltration trench will ensure that application of such chemicals does not result in discharge into the onsite ephemeral drainage. These materials include, but are not limited to, petroleum products, cleaning materials, solvents, manure, landscaping fertilization overspray, or other elements that might degrade or harm biological resources or ecosystem processes within the onsite ephemeral drainage.

Lighting: Development of the facility shall provide assurance that all lighting shall be shielded and directed down into the Project Site as to not spill light into surrounding properties or onto the roadway. Wildlife in existing or proposed MSHCP Conservation Areas will not be subject to direct lighting sources. Night lighting shall be directed away from MSHCP Conservation Areas. Shielding shall be incorporated into structure and access/circulation designs to ensure ambient lighting in MSHCP Conservation Areas is not increased.

Noise and Odor: Wildlife within the existing MSHCP Conservation Area will not be subject to noise that would exceed exterior daytime or nighttime noise standards pursuant to applicable rules, regulations and guidelines related to land use noise standards. Noise-generating land uses will not be associated with the project.

All commercial cannabis activities shall be sited and operated in a manner that prevents cannabis nuisance odors from being detected off the site. All commercial cannabis activities shall provide a sufficient odor absorbing ventilation and exhaust system so that odor generated inside the building that is distinctive to its operation is not detected outside of the operation's facility.

Invasives: None of the invasive, non-native plant species listed in Table 6-2 of Section 6.1.4 of the MSHCP, "Plants That Should Be Avoided Adjacent to the MSHCP Conservation Area", will be used to landscape developed/disturbed areas.

Barriers: All cannabis cultivation shall occur within a secure fence at least six feet in height that fully encloses the cultivation premises of area and prevents easy access to the cultivation area. The fence shall be solid, durable and include a lockable gate(s) that is locked at all times, except during times of active ingress and egress. Fences shall be separated by a minimum of six feet from all cultivation structures, providing a clear six-foot path. The fence shall comply with all other fencing restrictions. Cannabis cultivation areas shall not be secured by fences with barbed wire or screened with plastic sheeting on chain link. Surveillance cameras, motion sensors and secure inventory rooms, etc. will be provided. "No Loitering" signs will be acquired from the Sheriff's Department and displayed at the site.

The siting and design of the fencing will not impede wildlife movement through the site. The proposed land use will not result in unauthorized public access, domestic animal predation, illegal trespass, or dumping in the adjacent MSHCP Conservation Area.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Domestic Predators: The Proposed Project is a cannabis cultivation operation. This kind of land use will not introduce domestic predators into existing or proposed MSHCP Conservation Areas.

Grading/Land Development: No grading or land development associated with the construction of the building and building pad, manufactured slopes or continuous accessible paved path of travel shall extend into the existing MSHCP Conservation Area. Weed abatement and fuel modification zones will not encroach into the MSHCP Conservation Area.

Similar to some of the requirements above, the DCC has the following requirements to minimize biological impacts:

CCR Title 4 Section 16102:

Each application for a cultivation license shall include the following, if deemed applicable:

(w) A copy of any final lake or streambed alteration agreement issued by the California Department of Fish and Wildlife, pursuant to sections 1602 or 1617 of the Fish and Game Code, or written verification from the California Department of Fish and Wildlife that a lake and streambed alteration agreement is not required;

(dd) If applicable, the applicant shall provide evidence that the proposed premises is not located in whole or in part in a watershed or other geographic area that the State Water Resources Control Board or the Department of Fish and Wildlife has determined to be significantly adversely impacted by cannabis cultivation pursuant to section 16216.

CCR Title 4 Section 16216:

If the State Water Resources Control Board or the Department of Fish and Wildlife notifies the department in writing that cannabis cultivation is causing significant adverse impacts on the environment in a watershed or other geographic area pursuant to section 26069, subdivision (c)(1), of the Business and Professions Code, the department shall not issue new licenses or increase the total number of plant identifiers within that watershed or area while the moratorium is in effect.

CCR Title 4 Section 16304:

All licensees shall comply with all of the following environmental protection measures:

(a) Compliance with section 13149 of the Water Code as implemented by the State Water Resources Control Board, Regional Water Quality Control Boards, or California Department of Fish and Wildlife;

(b) Compliance with any conditions requested by the California Department of Fish and Wildlife or the State Water Resources Control Board under section 26060.1(b)(1) of the Business and Professions Code;

(c) All outdoor lighting used for security purposes shall be shielded and downward facing;

(g) Mixed-light license types of all tiers and sizes shall ensure that lights used for cultivation are shielded from sunset to sunrise to avoid nighttime glare.

Compliance with the DCC cannabis cultivation regulations above would help minimize potential project impacts on biological resources.

- d) **Less than Significant Impact.** The assessment included an analysis of wildlife habitat linkages associated with the Study Area based on information compiled from literature, including

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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MSHCP-mapped habitat linkages; analysis of aerial photographs; and direct observations made in the field during the November 2020 field investigations.

The valley that trends through the Project Site is providing a wildlife movement corridor for migrations, foraging movements and for finding a mate through the local Cactus Valley area. The Project Site does not connect two or more larger core habitat areas that would otherwise be fragmented or isolated from one another. However, it does connect a large area of relatively undisturbed chaparral habitat located south and east of the site with a large core-sized area of similar habitat located north and west of the site. For wildlife movement purposes, the site is providing a corridor for most resident and/or migratory species. The southern and southeastern portion of the site is to remain undisturbed by Project operations, thus would not interfere with active wildlife movement occurring on the Project Site. The valley that trends through the small 5-acre site is providing a wildlife movement corridor for migrations, foraging movements and for finding a mate through the local Cactus Valley area. The proposed project does not include any improvements that would interfere with or block any resident or migratory wildlife species moving through the site, nor would it impede the use of native wildlife nursery areas. None of the mature trees on-site would be removed and no grading of significance would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- e-f) **No Impact.** Under the MSHCP, riparian/riverine habitat is defined as lands which contain habitat dominated by trees, shrubs, persistent emergent, or emergent mosses and lichens that occur close to or which depend upon soil moisture from a nearby freshwater source, or areas with freshwater flow during all or a portion of the year.

The MSHCP defines Vernal Pools as “seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season.”

A small historical ephemeral drainage with one patch of riparian vegetation is present on the Project Site. However, suitable habitats for the species listed under ‘Purpose’ in Volume 1, Section 6.1.2 of the MSHCP such as least Bell’s vireo, southwestern willow flycatcher and yellow-billed cuckoo are not present on the site. The riparian habitat consists entirely of a large patch of mature coast live oak trees protruding out of the Undifferentiated Chaparral. No depressions or areas where water would pool were observed within the Project Site which would be classified as vernal pools. There was no evidence discovered on the site of the retention of storm water in naturally-occurring pools or manmade depressions long enough to support fairy shrimp. Due to the continuous downward slope of the natural terrain, storm water does not pool on the surface after a precipitation event. In addition, plant species typically associated with jurisdictional and/or riparian areas were not observed.

The Proposed Project would not cause a significant impact to the riparian habitat or vernal pools. The entire area occupied by the ephemeral drainage is located outside of the project footprint and would be protected in place. Other kinds of perennial or seasonal aquatic features that could be classified as federally protected wetlands as defined by Section 404 of the Clean Water Act are not present on the Project Site. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- g) **Less than Significant Impact.** There are no local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance other than the MSHCP as described above that would apply to the Proposed Project. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation:

Mitigation Measure BIO-1: When the trees are removed from the site, the Project Proponent shall demonstrate to the satisfaction of the County of Riverside that either of the following has been or will be accomplished:

- Tree removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds.
- Any construction activities that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) in the trees and will require that all potential habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of clearing. If any active nests are detected, then a buffer of at least 300 feet (500 feet for raptors) will be delineated, flagged, and avoided until the nesting cycle is complete as determined by the biological monitor to minimize impacts.

Monitoring: May be required depending on the results of the surveys.

CULTURAL RESOURCES Would the project:

8) Historic Resources				
a) Alter or destroy a historic site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Historical/Archaeological Resources Report, CRM Tech, April 17, 2020.

Findings of Fact:

- a,b) **Less than Significant Impact.** A Historical/Archaeological Resources Report (available at the County offices for review), dated April 17th, 2020, was prepared for the Proposed Project by CRM Tech in compliance with CEQA and County of Riverside Planning Department requirements.

Between February and April 2020, CRM TECH performed a cultural resources study on the Project Site. The purpose of the study was to provide the County with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or around the project area. In order to identify such resources, CRM TECH conducted a historical/archaeological resources records search, historical background research, consultation with Native American representatives, and a systematic field survey. The information below is a summary of methods, results, and final conclusion of the study

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Historical sources consulted for this study suggest that the Project Site is relatively low in sensitivity for cultural resources from the historic period. No man-made features of any kind were known to be present within or adjacent to the Project Site throughout the 1850s-1950s era. By 1967, what is now Owl Creek Road, a dirt road, was seen extending into the Project Site, and a small structure may have been present on the property. However, the first notable development on the parcel took place in 1975, when the cabin and two storage buildings were constructed.

The two-story guesthouse on the property today was converted from a barn that was evidently constructed in 1982. Later aerial photographs demonstrate that a total of four buildings, undoubtedly representing the cabin, the barn/guesthouse, and the two storage buildings, were present in the Project Site until 2013-2014, when the two original storage buildings were removed. The storage shed currently extant on the property was built in 2016, followed by the greenhouse in 2018 and the solar panels after that. All of the existing built-environment features within the Project Site, therefore, are modern in origin. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

9) Archaeological Resources				
a) Alter or destroy an archaeological site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Cultural Resources Report, CRM Tech, April 17, 2020

Findings of Fact:

a, b) **Less Than Significant Impact With Mitigation Incorporated.** The records search results indicate that four archeological sites and one isolate of prehistoric origin were previously recorded within one mile of the project location, including a campsite, bedrock mortars, and a possible pictograph. With these results, the possibility of prehistoric cultural remains concealed by the dense vegetation cannot be ruled out despite the negative finding on the rest of the property.

During the archaeological evaluation for the Phase I Cultural Resources assessment, no archaeological artifacts or remains were identified; the Proposed Project would not alter or destroy an archaeological site. However, archaeological monitoring should be required during vegetation removal operations in the eastern portion of the Project Site where the field surveys could not be conducted due to vegetation cover. Therefore, possible significant adverse impacts

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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have been identified and Mitigation Measures CR-1 through CR-3 are required as a Condition of Approval to reduce these impacts to a level below significant.

Mitigation:

Mitigation Measure CR-1: Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant and address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

Mitigation Measure CR-2: If during ground disturbance activities, cultural resources are discovered, the following procedures shall be followed:

- i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the archaeologist, the tribal representative(s) and the Planning Director to discuss the significance of the find.
- ii. At the meeting, the significance of the discoveries shall be discussed with the tribal representative(s) and the archaeologist. A decision shall be made, with the concurrence of the Planning Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.
- iii. Grading or further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. Work shall be allowed to continue outside of the buffer area and monitoring will continue if needed.
- iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance.
- v. The applicant and the Project Archaeologist, with input from the Tribe(s) shall develop a Preservation Plan for the long term care and maintenance of the cultural resource(s). The plan shall indicate at minimum, the specific areas to be included in and excluded from long-term maintenance, prohibited activities, methods of preservation to be employed, the party responsible for the long term maintenance, appropriate protocols, monitoring and necessary emergency protocols.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation Measure CR-3: Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance with procedures stipulated in the Cultural Resources Management Plan.

Monitoring:

Monitoring for Mitigation Measure CR-1-CR-3:

During all weed abatement or grubbing operations within the project area, for adequate inspection of the ground surface prior to the commencement of construction. The monitoring program shall be coordinated with the nearby Soboba and Pechanga Bands of Luiseño Indians, as well as any other interested Tribe(s).

- c) **Less Than Significant Impact.** CRM Tech's site visit determined that the Project Site does not include a formal cemetery or any archaeological resources that might contain interred human remains. Nonetheless, the Proposed Project will be required to adhere to State Health and Safety Code Section 7050.5. In the event that human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin of the remains. Also, the project would be required to adhere to DCC cannabis cultivation regulation CCR Title 4 Section 16304(d), which requires all licensees to immediately halt cultivation activities and implement section 7050.5 of the Health and Safety Code if human remains are discovered. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. This is State Law, is also considered a standard Condition of Approval and as pursuant to CEQA, is not considered mitigation. Therefore, impacts are considered less than significant.

Mitigation: None

Monitoring: None

ENERGY Would the project:				
10) Energy Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County Climate Action Plan (CAP); California Electric Utility Service Areas Map; California Energy Commission *Utility Service Areas Map*; California Gas and Electric Utilities 2018 *California Gas Report*; Riverside County Eligible Renewable Energy Development; 348 Kw Sunpower 435, Renova Energy, July 30, 2020

Findings of Fact:

a) **Less than Significant Impact.**

Electricity

Section 17.302.120 (G) states “All cannabis cultivation operations shall include adequate measures to address the projected energy demand for cannabis cultivation at the lot. On-site renewable energy generation shall be required for all indoor cannabis cultivation operations. Renewable energy systems shall be designed to have a generation potential equal to or greater than 20 percent of the anticipated energy demand.”⁶ A 348 Kw Sunpower 435 ((Solar Photovoltaic (PV) System Detail)), dated July 30, 2020, was completed by Renova Energy. The Proposed Project is estimated to consume three megawatt-hours (MWh) (3,000,000 kilowatt-hours (kWh)) maximum annually. The Proposed Project includes the installation of 16 solar arrays. As discussed in the PV System Detail, the proposed solar arrays are expected to produce a total of 594,730 kWh annually, which would equate to approximately 93 percent of the Proposed Project’s demand, per the required generation potential equal to or greater than 20 percent of the anticipated energy demand. Remaining energy demands would be provided by Southern California Edison (SCE).

Currently, the existing Project Site uses electricity for the residential uses. Development of the Proposed Project would cause a permanent increase in demand for electricity when compared to existing conditions. The increased demand is expected to be sufficiently served by the on-site solar system and existing SCE electrical facilities. According to the California Energy Commission: Electricity Consumption by SCE Planning Area, the Agricultural and Water Pump factor consumed 9,470.32 GWh in the year 2019. The proposed cannabis facility would consume approximately 594,730 kWh annually. The solar system is anticipated to meet 93% of the project’s demand. Therefore, the Proposed Project would receive approximately 40,812 kWh from SCE. The increase in electricity demand from the project would represent 0.00043 percent of the overall SCE Agricultural and Water Pump consumption. Therefore, projected electrical demand would not significantly impact SCE’s level of service.

The Proposed Project has been designed to comply with the 2019 Building Energy Efficiency Standards. The County would review and verify that the Proposed Project plans would be in compliance with the most current version of the Building and Energy Efficiency Standards. The Proposed Project would also be required to adhere to CALGreen, which establishes planning and design standards for sustainable developments, and energy efficiency. Adherence to these requirements would result in the Proposed Project being efficient in terms of energy consumption. The development of the Proposed Project is not anticipated to affect achievement of the 60 percent Renewable Portfolio Standard established in in the current SB 100. SCE and other electricity retailer’s SB 100 goals include that end-user electricity use such as residential and commercial developments use would decrease from current emission estimates. The

⁶ Riverside County Municipal Code. Section 17.302.120 (G).

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and no mitigation measures are recommended.

Also refer to Compliance with Department of Cannabis Control Rules and Regulations in the Air Quality Analysis section of this Initial Study/Mitigated Negative Declaration.

Natural Gas

The Proposed Project would utilize propane gas. It would not rely on a natural gas provider. Title 24 is a collection of energy standards that address the energy efficiency of new (and altered) homes; the 2022 Building Energy Efficiency Standards will improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The Proposed Project would be built in accordance with the 2022 energy standards of Title 24; therefore, no significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation are anticipated and no mitigation measures are recommended. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

Fuel

During operations of the Proposed Project, the use of fuel would be generated by maintenance staff and product delivery/pick-up trips. The Proposed Project is not expected to result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. The fuel use related with vehicle trips produced by the Proposed Project would not be considered inefficient, wasteful, or unnecessary. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

- b) **Less than Significant Impact.** Construction of the Proposed Project would be temporary and limitations on idling of vehicles and equipment, and requirements that equipment be properly maintained would save fuel. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, paving, and building construction. The County’s permissible hours for construction is 7:00 a.m. to 6:00 p.m. on non-holiday weekdays, including Saturdays. As on-site construction activities would be restricted between these hours, it is anticipated that the use of construction lighting would be minimal.

The State’s Title 24 energy efficiency standards are widely regarded as the most advanced energy efficiency standards. These standards help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Policy OS 16.1 of the County of Riverside’s General Plan reinforces the implementation and enforcement of the California Code of Regulations (the “California Building Standards Code”) particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. The Policy also encourages establishing mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of within CCR Title 24. The Proposed Project would be required by State law to comply with the Title 24 energy efficiency standards and shall abide by the CAP.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GEOLOGY AND SOILS Would the project directly or indirectly:

11) Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be subject to 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?				

Source(s): California Department of Conservation’s Fault Activity Map of California (2010) (Accessed July 9, 2021).

Findings of Fact:

Earthquakes have the greatest potential for loss of life or property and economic damage. Southern California is susceptible to damaging earthquakes and their secondary geologic effects, like liquefaction, landslides, subsidence, seiches and ground shaking. Secondary effects also include human-made hazards, such as urban fires, dam failures, and toxic chemical releases. A preliminary Geotechnical Interpretive Report, dated March 13, 2020, was prepared for the Proposed Project by Earth Strata Geotechnical Services (report available at County office).

a) **Less than Significant Impact.** Earthquake risk is higher in the western portion of the County due to the presence the San Andrea and San Jacinto faults, two of California’s most active faults. In the Riverside Extended Mountain Planning Area, the San Jacinto fault is the most significant seismic hazard. The State Alquist-Priolo Fault Zoning Act (A-P) Act was passed in 1972 to mitigate the hazard of surface faulting as surface rupture is the most easily avoided seismic hazard. The A-P Act’s purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.

According to the California Department of Conservation’s Fault Activity Map of California (2010), the Project Site is not located in an Alquist-Priolo or Riverside County Earthquake Fault Zone. The nearest fault zone to the Project Site is the San Jacinto Fault Zone, located approximately 4.5 miles northeast of the Project Site. The likelihood for on-site rupture is considered low, due to the absence of known faults within the vicinity. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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12) Liquefaction Potential Zone

a) Be subject to seismic-related ground failure, including liquefaction?

Source(s): Riverside County Information Technology (RCIT) Map My County GIS – Geographic Layers (Accessed July 15, 2021)

Findings of Fact:

a) **Less than Significant Impact.** Liquefaction is a destructive secondary effect of strong seismic shaking and occurs when loose, unconsolidated, water-laden soils lose cohesion. Portions of Riverside County are susceptible to liquefaction. The Project Site is not located in an area susceptible to liquefaction, as shown on the RCIT Map My County GIS map. Therefore, no significant adverse impacts have been identified or are anticipated and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

13) Ground-shaking Zone

a) Be subject to strong seismic ground shaking?

Source(s): Riverside County General Plan Chapter 6 Safety, Figure S-16 “Inventory of Communication Facilities”

Findings of Fact:

a) **Less than Significant Impact.** Ground shaking can occur on the Project Site as a result of earthquakes associated with nearby and more distant faults. As stated previously, the nearest fault zone to the Project Site is the San Jacinto Fault Zone, located approximately 4.5 miles northeast of the Project Site. The Proposed Project would be required to comply with all applicable California Building Code (CBC) requirements to ensure that the Proposed Project does not pose a threat to the safety and welfare of the public. No significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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14) Landslide Risk

a) 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, collapse, or rockfall hazards?

Source(s): Riverside County General Plan: Riverside Extended Map Area Plan (REMAP), Figure 14 “Riverside Extended Mountain Area Plan Slope Instability”

Findings of Fact:

a) **Less than Significant Impact.** According to the County General Plan REMAP Figure 14, the Project Site is not located in an area susceptible to seismically induced landslides and rockfalls. As stated previously, the Project Site is not located on a geologic unit susceptible to liquefaction. Seismically induced lateral spreading involves lateral movement of soils due to ground shaking. The Project Site would be leveled under proposed conditions and therefore, the potential for seismically induced lateral ground spreading is considered low. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

15) Ground Subsidence

a) 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 ground subsidence?

Source(s): Riverside County General Plan Chapter:6 Safety Element Figure S-7 “Documented Subsidence Areas Map”

Findings of Fact:

a) **Less than Significant Impact.** Subsidence refers to the sinking or downward settling and compaction of soil and other surface material with little or no horizontal motion. As shown on Figure S-7 of the County’s General Plan Safety Element, the Project Site is not located in an area identified as susceptible to subsidence hazards based on geologic and hydrogeologic characteristics that are similar to regions of the County where subsidence is documented. The Proposed Project is required to comply with the California Building Code which would address any potential impacts to unstable soils. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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16) Other Geologic Hazards

a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): Riverside County General Plan Chapter: 6 "Safety Element", USGS Volcano Observatory web page "<https://www.usgs.gov/observatories/california-volcano-observatory>"

Findings of Fact:

a) **Less than Significant Impact.** Seiches are standing waves that reverberate on the surface of water in response to ground shaking and can damage buildings, roads and infrastructure surrounding the body of water. The Project Site is located approximately 7.0 miles southeast of the nearest body of water, Diamond Valley Lake. No volcanoes occur on or near the Project Site. The Project Site is on a downward slope from the north (3292 feet) descending to the southeast (3266 feet.) Given that the Project Site occurs on a slope of 15% - 25%, impacts from mudflow are not anticipated. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

17) Slopes

a) Change topography or ground surface relief features?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in grading that affects or negates subsurface sewage disposal systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Project Application Materials

Findings of Fact:

a, b) **Less Than Significant Impact.** According to the County General Plan: Riverside Extended Map Area Plan Figure 13, the topography of the Project Site is on a slope range (15-25%). The Project Site would be leveled to construct the proposed agriculture building. The construction of the agriculture building will not significantly alter the topography on-site or result in cut/fill slopes greater than 2:1 and will comply the UBC construction regulations. The Proposed Project would comply with the California Building Code The project grades of the proposed driveways will connect to the existing grade of Red Mountain Road. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

c) **No Impact.** The Proposed Project would not connect to existing sewer lines and an on-site septic system is proposed for the agriculture building. The grading of the Project Site would not affect or negate subsurface sewage disposal systems. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

18) Soils

a) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): US Department of Agriculture: Web Soil Surveys, Riverside County General Plan Figure S-8 “Wind Erosion Susceptibility Map; Project Application Materials

Findings of Fact:

- a) **Less than Significant Impact.** Implementation of the Proposed Project can result in the generation of project-related dust due to the operation of grading equipment or high winds. As shown in Figure S-8 of the County’s General Plan Safety Element, the Project Site is rated “moderate” for wind erodibility. Site preparation and grading under the Proposed Project have the potential to loosen surface soils, consequently making soils susceptible to wind and/or water erosion. Moreover, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb more than one acre of soil; therefore, the Proposed Project would be subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit include: clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** Expansive soils, as defined in Section 1803.5.3 of the California Building Code (2019), have a plasticity index of 15 or greater, more than 10 percent of the soil particles pass a No. 200 sieve (75 um/micrometers), more than 10 percent of the soil particles less than 5 micrometers in size, and expansion index greater than 20. These soils generally have a significant amount of clay particles, which can shrink or swell depending on the amount of held water. The change in volume exerts stress on buildings and other loads placed on these soils. The extent of shrink/swell is influenced by the amount and type of clay in the soil. According to the United States Department of Agricultural (USDA) Web Soil Surveys, there are three soil types on the Project Site: Vista coarse sandy loam (VsD2), Cieneba rocky sandy loam (CkF2), and Vista rocky coarse sandy (VtF2). VsD2 covers majority of the subject property, however the construction will be in the area of CkF2 soil type. The CkF2 topmost soil layer depth

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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of 0-14 inches are sandy loam, while the layer of 15-22 inches are weathered bedrock. Expansion testing and mitigation are required by current grading and building codes. The Riverside County Building Code requires the Proposed Project to undergo proper site investigation, soils testing, foundation design and quality assurance prior to grading operations. In addition, all building plans are required to comply with current adopted 2019 CBC. These measures will reduce impacts to less than significant level. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The Proposed Project would not connect to any existing sewer lines. The proposed 1000-gallon septic system would be sufficient to handle the additional wastewater generated by ten employees working five days per week, eight hours per day project. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

19) Wind Erosion and Blows and from project either on or off site.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?				

Source(s): Riverside County General Plan (Chapter: 6 Safety Figure S-8) "Wind Erosion Susceptibility Map"

Findings of Fact:

- a) **Less than Significant Impact.** As shown in Figure S-8 of the County's General Plan Safety Element, soils that occur at the Project Site are rated "moderate" for wind erodibility. As with any movement of soil, development of the Project Site would have the potential to loosen surface soils, thereby making soils susceptible to wind and/or water erosion. As previously discussed, the Proposed Project would be required to prepare a SWPPP and WQMP to ensure potential impacts from erosion are reduced to the extent feasible. The SWPPP and WQMP would address any issues related to potential erosion. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GREENHOUSE GAS EMISSIONS Would the project:

20) Greenhouse Gas Emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan; Riverside County Climate Action Plan (“CAP”)

Findings of Fact:

- a) **Less than Significant Impact.** The County of Riverside’s Climate Action Plan Update (CAP) was completed in November 2019. The CAP Update describes Riverside County’s GHG emissions for the year 2017, projects how these emissions will increase into 2020, 2030, and 2050, and includes strategies to reduce emissions to a level consistent with the State of California’s emissions reduction targets. The CAP Update sets a target to reduce community-wide GHG emission emissions by 15 percent from 2008 levels by 2020, 49 percent by 2030, and 83 percent by 2050.

Appendix D of the Riverside County CAP Update also states that projects that do not exceed the CAP’s screening threshold of 3,000 MTCO_{2e} per year are considered to have less than significant GHG emissions and are in compliance with the County’s CAP Update. Therefore, to determine whether the project’s GHG emissions are significant, the analysis in the Air Quality, Global Climate Change and Energy Impact Analysis report, dated October 16, 2020 and revised January 13, 2021, uses the SCAQMD draft local agency tier 3 threshold and County of Riverside CAP screening threshold of 3,000 MTCO_{2e} per year for all land use types. Projects that do not exceed emissions of 3,000 MTCO_{2e} per year are also required to include the following efficiency measures:

1. Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and
2. Water conservation measures that matches the California Green Building Code in effect as of January 2017.

Projects that exceed emissions of 3,000 MTCO_{2e} per year are also required to use Screening Tables. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the County’s CAP Update. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions. Those projects that do not garner 100 points using the Screening Tables will need to provide additional analysis to determine the significance of GHG emissions.

Emissions associated with the construction and operation of the Proposed Project were estimated using CalEEMod version 2020.4.0. The operational emissions analyzed a worst-case assumption of a 20,518 sq. ft. of a light industrial use generating up to 102 daily trips and that the entire facility would be powered by the electrical grid (203,539 kWh per year). The project is anticipated to generate up to 20 daily trips and the applicant proposes to develop a solar field that will generate up to 93% (553,918 kWh per year) of the project’s electrical needs. Therefore, 7% (40,812 kWh per year) would need to come from the grid.

Table 6 shows that the total for the proposed project’s emissions would be approximately 275.2 MTCO_{2e} per year. According to the thresholds of significance, a cumulative global climate change impact would not occur. GHG emissions created from the proposed operations of the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Proposed Project would not exceed the SCAQMD threshold of 3,000 MTCO₂e. Therefore, operation of the Proposed Project would not create a significant cumulative impact to global climate change.

**Table 6
Greenhouse Gas Operational Emissions
(Metric Tons per Year)**

Source/Phase	CO ₂	CH ₄	N ₂ O
Area	0.0	0.0	0.0
Energy	85.5	0.0	0.0
Mobile	139.7	0.0	0.0
Waste	5.2	0.3	0.0
Water	16.4	0.2	0.0
Total MTCO₂e	261.6		
Construction Amortized (30 Years)	13.6		
County of Riverside screening threshold	3,000		
Significant	No		

Source: CalEEMod.2020.4 Annual Emissions.

- b) **Less than Significant Impact.** As referenced above, the County of Riverside CAP Update (updated in December 2019) contains guidance on Riverside County’s GHG Inventory reduction goals, thresholds, policies, guidelines, and implementation programs. In particular, the CAP elaborates on the General Plan goals and policies relative to the GHG emissions and provides a specific implementation tool to guide future decisions of the County of Riverside.

Per the County’s CAP Update, the County adopted its first Climate Action Plan (CAP) in 2015 which set a target to reduce emissions back to 1990 levels by the year 2020 as recommended in the AB 32 Scoping Plan. Furthermore, the goals and supporting measures within the County’s CAP Update are proposed to reflect and ensure compliance with changes in the local and State policies and regulations such as SB 32 and California’s 2017 Climate Change Scoping Plan. Therefore, compliance with the County’s CAP in turn reflects consistency with the goals of the CARB Scoping Plan, Assembly Bill (AB) 32 and Senate Bill (SB) 32.

According to the County’s CAP Update, projects that do not exceed emissions of 3,000 MTCO₂e per year are also required to include the following efficiency measures:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and
- Water conservation measures that matches the California Green Building Code in effect as of January 2017.

Also, refer to Compliance with Department of Cannabis Control Rules and Regulations in the Air Quality Analysis section of this Initial Study/Mitigated Negative Declaration.

As shown above, the proposed project is anticipated to generate 275.2 MTCO₂e per year and would not exceed the County’s screening threshold. Therefore, the project is in compliance with County’s screening thresholds. No significant impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HAZARDS AND HAZARDOUS MATERIALS Would the project:				
21) Hazards and Hazardous Materials	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Project Application Materials, Riverside County General Plan: Safety Element, Department of Toxic Substances Control *EnviroStor*

Along with compliance with the relevant regulations presented throughout this analysis section, the project would be required to adhere to the following DCC cannabis cultivation regulations:

CCR Title 4 Section 16102(q):

Each cultivation license application shall include the following, if applicable:

- Evidence that the applicant has conducted a hazardous materials record search of the EnviroStor database for the proposed premises. If hazardous sites were encountered, the applicant shall provide documentation of protocols implemented to protect employee health and safety.

CCR Title 4 Section 16106(a)(3):

(a) The cultivation plan for each Specialty Cottage, Specialty, Small, and Medium licenses shall include all of the following:

(3) A pest management plan which shall include, but not be limited to, the following:

(A) Product name and active ingredient(s) of all pesticides to be applied to cannabis during any stage of plant growth:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(B) Integrated pest management protocols, including chemical, biological, and cultural methods the applicant anticipates using to control or prevent the introduction of pests on the cultivation site; and

(C) A signed attestation that states the applicant shall contact the appropriate County Agricultural Commissioner regarding requirements for legal use of pesticides on cannabis prior to using any of the active ingredients or products included in the pest management plan and shall comply with all pesticide laws.

CCR Title 4 Section 16304(f):

All licensees shall comply with all of the following environmental protection measures:

- Compliance with pesticide laws and regulations pursuant to section 16307 of this chapter.

CCR Title 4 Section 16307:

Includes requirements regarding compliance with pesticide laws and regulations. It also contains measures to protect pollinators, water bodies, and wildlife.

Compliance with the DCC cannabis cultivation regulations above would help minimize project implementation impacts regarding hazards and hazardous materials.

Findings of Fact:

a, b) **Less than Significant Impact.** Components of the Proposed Project that may involve the potential impacts from hazardous materials include the on-site use of materials required for construction of the 18,070 square-foot two-story cannabis cultivation facility, 16 solar arrays and a six-foot fence around the facility and two of the solar arrays, and the transportation of materials required for construction. Construction of the Proposed Project would require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. Hazardous materials commonly found in cannabis-related activity include fertilizers, soil amendments (such as nitrogen, phosphorus and potassium), herbicides, fungicides, pesticides and insecticides. Prior to issuance of a Building and Safety permit, handling of any hazardous materials/wastes will be reviewed by Hazardous Materials Management Branch (HMMB) to ensure compliance with applicable California Health and Safety codes, County of Riverside Ordinances and other applicable federal, State, and local regulations.

Development of the Proposed Project would disturb approximately 5.03 acres, and therefore would be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. Requirements of the permit would include development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include Best Management Practices (BMPs) to control and abate pollutants. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

c) **Less than Significant Impact.** According to the County's General Plan Figure S-14, Inventory of Emergency Response Facilities, the Project Site does not contain any emergency facilities. During construction, the contractor would be required to maintain adequate emergency access

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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for emergency vehicles as required by the County. Project operations would not interfere with an adopted emergency response or evacuation plan. Access provided via Red Mountain Road and Sage Road would be maintained for ingress/egress at all times. In addition, the facility will require a business emergency plan for the storage of hazardous materials at greater than 55 gallons, or if any acutely hazardous materials or extremely hazardous substances are handled or stored on the premises. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- d) **No Impact.** Community Christian School is the nearest school to the Project Site and is located approximately 7.5 miles west of the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- e) **Less than Significant Impact.** According to the Hazardous Waste and Substances site list as compiled pursuant to Government Code Section 65962.5, reported by the Department of Toxic Substances Control through the EnviroStor database,⁷ there is no existing toxic or hazardous material recognized as an environmental concern at the Project Site. Furthermore, a Phase I Environmental Site Assessment, dated October 28, 2020, was prepared for the Project Site by Phase One Group. The assessment revealed no evidence of recognized environmental conditions, historical recognized environmental conditions, controlled recognized environmental conditions or environmental issues in connection with the Project Site. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

22) Airports	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in an inconsistency with an Airport Master Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require review by the Airport Land Use Commission?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan, Riverside Extended Mountain Area Plan; Riverside County General Plan, San Jacinto Valley Area Plan, Figures 4 & 5 (Hemet-Ryan Airport Land Use Compatibility Plan)

⁷ Envirostor Database Accessed: 5/12/2021
<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=32875+Red+Mountain+Road+Riverside+>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

a-d) **Less than Significant Impact.** The purpose of airport master plans is to assess the demand for airport facilities and to guide the development necessary to meet those demands. Since the Project Site is not on-airport property, there is no inconsistency. The Project Site is not within any Airport Land Use Commission boundaries. Therefore, the Airport Land Use Commission (ALUC) will not be required to review the Proposed Project. The Project Site is located approximately 7 miles southeast of the boundaries of the Hemet-Ryan Airport influence area, resulting in no safety hazards for anyone residing or working in that area⁸. The Proposed Project includes the construction and operation of an agriculture building, solar arrays, trash enclosures, parking area, and security fencing; all structures would be less than 50 feet in height. These uses would not result in any hazards to aircraft flights. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HYDROLOGY AND WATER QUALITY Would the project:				
23) Water Quality Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial erosion or siltation on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁸ Riverside County General Plan, San Jacinto Valley Area Plan, Figures 4 & 5 (Hemet-Ryan Airport Land Use Compatibility Plan)
https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/SJVAP_120616.pdf?ver=2017-10-06-094252-663

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Advisory Notification Document; Thomas Love: Preliminary Water Quality Management Plan; Eastern Municipal Water District UWMP; Riverside County General Plan Safety Element

Along with compliance with the relevant regulations presented throughout this analysis section, the project would be required to adhere to the following DCC cannabis cultivation regulations:

CCR Title 4 Section 16102 (a portion of):

The cultivation license application shall include the following, if deemed applicable:

(p) For all cultivator license types except Processor, evidence of enrollment in an order or waiver of waste discharge requirements with the State Water Resources Control Board or the appropriate Regional Water Quality Control Board. Acceptable documentation for evidence of enrollment can be a Notice of Applicability letter. Acceptable documentation for a Processor that enrollment is not necessary can be a Notice of Non-Applicability;

(v) Identification of all of the following applicable water sources used for cultivation activities and the applicable supplemental information for each source pursuant to section 16107 of this chapter:

(1) A retail water supplier;

(2) A groundwater well;

(3) A rainwater catchment system;

(4) A diversion from a surface waterbody or an underground stream flowing in a known and definite channel.

(w) A copy of any final lake or streambed alteration agreement issued by the California Department of Fish and Wildlife, pursuant to sections 1602 or 1617 of the Fish and Game Code, or written verification from the California Department of Fish and Wildlife that a lake and streambed alteration agreement is not required;

(dd) If applicable, the applicant shall provide evidence that the proposed premises is not located in whole or in part in a watershed or other geographic area that the State Water Resources Control Board or the Department of Fish and Wildlife has determined to be significantly adversely impacted by cannabis cultivation pursuant to section 16216.

CCR Title 4 Section 16216:

If the State Water Resources Control Board or the Department of Fish and Wildlife notifies the department in writing that cannabis cultivation is causing significant adverse impacts on the environment in a watershed or other geographic area pursuant to section 26069, subdivision (c)(1), of the Business and Professions Code, the department shall not issue new licenses or

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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increase the total number of plant identifiers within that watershed or area while the moratorium is in effect.

CCR Title 4 Section 16304 (a and b):

All licensees shall comply with all of the following environmental protection measures:

(a) Compliance with section 13149 of the Water Code as implemented by the State Water Resources Control Board, Regional Water Quality Control Boards, or California Department of Fish and Wildlife:

(b) Compliance with any conditions requested by the California Department of Fish and Wildlife or the State Water Resources Control Board under section 26060.1(b)(1) of the Business and Professions Code;

CCR Title 4 Section 16307:

Includes requirements regarding compliance with pesticide laws and regulations. It also contains measures to protect pollinators, water bodies, and wildlife.

Compliance with the DCC cannabis cultivation regulations above would help minimize project implementation impacts regarding hydrology and water quality.

Findings of Fact:

a) **Less than Significant Impact.** The Proposed Project would develop 5.03 acres of vacant land and therefore would be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State’s General Construction permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Stormwater Pollution Prevention Plan (SWPPP). The purpose of an SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction.

The NPDES also requires a Water Quality Management Plan (WQMP). A Preliminary WQMP (available at the County offices for review), dated October 16, 2019, was prepared for the Proposed Project by Thomas Love. The WQMP includes mandatory compliance of Best Management Practices (BMPs) as well as compliance with NPDES Permit requirements. Review and approval of the WQMP by the County would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site.

b) **Less than Significant Impact.** Potable water will be provided by an existing well on-site. All domestic water use demand in the vicinity of the Project Site is provided by wells owned and maintained by property owners. The Proposed Project includes water storage (nine tanks with capacity of 5,000 gallons each = 45,000 gallons of total storage). Water use on-site in addition

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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to the existing domestic uses (estimated at 500 gallons per day) will be for cannabis plant irrigation. Based on the number of plants at full capacity, the total demand would be an additional 5,000 gallons per day. A recycled water system would be included to provide for 97% recovery/recycling of irrigation water use. The demand for well water would therefore be 200 gpd; water would be pumped and stored in the on-site tanks. The existing on-site water well was inspected and tested on July 20, 2021⁹. The average yield during the pump test was 7.6 gallons per minute which would yield approximately 11,000 gallons per day; thereby meeting/exceeding the Proposed Project's estimated total demand. This demand would not decrease groundwater supplies in the vicinity as there is no underlying groundwater basin – only fractured bed rock. There are no groundwater recharge facilities in the vicinity and therefore the Proposed Project would not interfere with any groundwater recharge. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

c) **Less than Significant Impact.** The Proposed Project includes 23,931 SF of impervious surface on an approximately 5.03-acre site. The Project would not alter the course of a stream or river because no such features occur on site. The proposed grading would preserve existing drainage patterns. Integrating existing drainage patterns into the site plan helps to maintain the time of concentration and infiltration rates of runoff and decrease peak flows. Additionally, the Proposed Project would have a design capture volume of 1,173 cubic feet (CF) of storm flows, all of which would be handled on-site by the proposed infiltration trench. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

d) **Less than Significant Impact.** During development of the Project Site, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb approximately 5.03 acres and therefore is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must list BMPs to avoid and minimize soil erosion. BMP provided in the Proposed Project's WQMP include:

- Use gravel bag berms or sandbag barriers as a linear sediment control measure below cleared areas, downslope of exposed soil areas, and around any temporary stockpiles and spoil areas.
- Wind erosion control to be provided by regular watering during construction when winds exceed 25 mph.
- Limit construction vehicle traffic to 15 mph.

Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial erosion or siltation on- or off-site. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

e, f) **Less than Significant Impact.** An infiltration trench with a proposed volume of 1,942 CF will be installed to collect and treat stormwater runoff. The Proposed Project would have a design capture volume of 1,173 cubic feet (CF), all of which would be handled on-site by the proposed infiltration trench. As stated in the Proposed Project's WQMP, the Proposed Project would

⁹ Heritage Well Service Well Inspection Report #3058, July 20, 2021.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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maintain existing drainage patterns to maintain an acceptable time of concentration and infiltration rates of runoff and decrease peak flows. With adherence to the Preliminary WQMP, the Proposed Project would not provide substantial additional sources of polluted runoff. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- g) **Less than Significant Impact.** Project grading would preserve the existing drainage pattern. The proposed infiltration trench has been sized to collect and treat stormwater runoff. The proposed structures would not impede or redirect flood flows because they would be situated out of the drainage areas. Therefore, the Proposed Project would not impede or redirect flood flows. No significant impacts are identified or anticipated, and no mitigation measures are required.
- h) **Less than Significant Impact.** Seiches are standing waves generated in enclosed bodies of water in response to ground shaking. The Project Site is located approximately 7.0 miles southeast of Diamond Valley Lake. According to the County General Plan Safety Element, the Project Site is not located within a 100-year FEMA flood zone area. Tsunamis are large waves generated in open bodies of water by fault displacement of major ground movement. Due to the inland location of the Project Site, tsunamis are not considered to be a risk. Dams or other water-retaining structures may fail as a result of large earthquakes, resulting in flooding and mudflow production. The Project Site is not located in an area at risk for dam failure inundation.¹⁰ Therefore, the Proposed Project is not anticipated to risk release of pollutants due to project inundation. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- i) **Less than Significant Impact.** The Proposed Project would disturb approximately 5 acres of land and is therefore subject to the NPDES permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State’s CGP include removal of vegetation, grading excavating, or any other activity that causes the disturbance of at least one acre. The CGP requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. Implementation of a SWPPP is for the purpose of protecting surface water quality during construction activities.

The preliminary WQMP prepared for the Proposed Project is intended to comply with the requirements of the County of Riverside for Ordinance No. 457, which includes the requirement for the preparation and implementation of a Project-Specific WQMP. The WQMP includes Best Management Practices for the long-term protection of groundwater and surface waters. The Project Applicant shall be responsible for the implementation and funding of the WQMP which will be approved by the County of Riverside.

California’s Sustainable Groundwater Management Act (SGMA) requires local Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or to develop Alternatives to GSPs. GSPs provide a roadmap for how groundwater basins will reach long-term sustainability. Priority Basins and GSPs are available on the Department of Water Resources’ (DWR) . The Project Site is westerly of the San Jacinto Groundwater Basin and does not overlie any groundwater basins (GSA Map

¹⁰ County of Riverside. General Plan: REMAP -Figure 10 : Dam Failure Inundation Zones

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Viewer (ca.gov) accessed 8.31.21) defined by either the State or regional water agencies. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

LAND USE/PLANNING Would the project:

24) Land Use	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County Information Technology GIS *Map My County*

Findings of Fact:

a,b) **No Impact.** The Project Site is located in the Riverside Extended Mountain Area Plan, a rural mountainous area that has a variety of land uses. The vicinity is sparsely populated and residential properties are 5 acres or more. There is no main thoroughfare, no town center, and no defineable community. The Project Site has a current land use designation and zoning of Rural Residential (RR). This allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses and governmental uses. The Proposed Project includes a Zone Change from Rural Residential to Light Agriculture (A-1) in order for cultivation operations to occur on the Project Site. A-1 allows a single-family residence with a minimum lot size of 5 acres to allow limited animal keeping and agriculture uses including cannabis cultivation, recreational uses, compatible resources development, associate and government uses. The Proposed Project would be consistent with the proposed zoning. Land use designations for the adjacent properties are Open Space-Conservation Habitat and Rural Residential, with all adjacent properties being zoned Rural Residential (R-R). The development of the Proposed Project would not disrupt or divide an established community as none exist in the vicinity. No impacts are identified or are anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES Would the project:				
25) Mineral Resources				
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan (Chapter 5: Open Space Figure OS-6) “Mineral Resources Zone,” Riverside County General Plan Extended Mountain Area Plan, Table 1 “Land Use Designations Summary,”

Findings of Fact:

- a, b) **Less than Significant Impact.** In addition to agricultural production, mineral extraction is an important component of Riverside County’s economy. The State Mining and Geology Board (SMGB) has also established Mineral Resources Zones (MRZ) to designate lands that contain mineral deposits. As shown in the County’s General Plan, the Project Site occurs in an area identified as Unstudied (no MRZ designation issued). The Project Site occurs in an area designated for Rural Residential. It does not occur within an Open Space Mineral Resources (OS-MR) land use designation, which includes mineral extraction and processing facilities and areas held in reserve for future mineral extraction and processing. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** According to the Riverside County General Plan, and the Google Earth imagery database, there are no existing or abandoned mines or quarries on the Project Site or in the vicinity.¹¹ Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in:				
26) Airport Noise				
a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹¹ Riverside County General Plan (Chapter 5: Open Space Figure OS-6) “Mineral Resources Zone” https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch05_MOSE_120815.pdf ver=2017-10-11-102103-833

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan: Circulation, Figure C-1 "Circulation Plan"

Findings of Fact:

a, b) **Less than Significant Impact.** The Project Site is located approximately 7 miles southeast of the nearest airport, Hemet-Ryan Airport. It is not within an Airport Influence Area. Therefore, the Proposed Project will not be required to go through Airport Land Use Commission review.

Therefore, people residing or working in the Project Site would not be exposed to excessive noise levels. No significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

27) Noise Effects by the Project	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Project Application Materials

Along with compliance with the relevant regulations presented throughout this analysis section, the project would be required to adhere to the following DCC cannabis cultivation regulations:

CCR Title 4 Section 16304(e):

All licensees shall comply with all of the following environmental protection measures:

(e) Requirements for generators pursuant to section 16306 of this chapter

CCR Title 4 Section 16306:

Includes requirements for stationary and portable generators greater than 50 horsepower. It requires these to comply with the appropriate Airborne Toxic Control Measure for stationary or portable generators and includes certificates or permits that are acceptable to prove compliance. Additional compliance options are provided for generators below 50 horsepower by 2023, including limiting hours of operation, meeting certain emergency use requirements, or filter and engine requirements.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Compliance with the DCC cannabis cultivation regulations above would help minimize project implementation impacts regarding noise effects caused by the project.

Findings of Fact:

a) **Less than Significant Impact.** Construction noise would be temporary, intermittent and short duration, and would not present any long-term impacts. The Proposed Project is the development and operation of a cannabis cultivation facility. It would permanently increase the ambient noise levels in the project vicinity from the few vehicle trips to be added to the vicinity and exhaust fans to be run only during emergencies. Construction activities would be limited to the hours and days allowed in Chapter 9.52: "Noise regulations" of the Riverside County Municipal Code.

Noise-generating activities on-site during operations would include delivery trucks entering and exiting the site. Exhaust fans would be installed for use only during emergency situations. The nearest residence is approximately 300 feet west of the cannabis grow building. Noise levels are expected to remain below the County's exterior daytime noise threshold of 65 dBA and the County's nighttime exterior noise threshold of 45 dBA at the nearest residence. Vehicles entering and exiting the site are anticipated to be less than 50 trips per week. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

b) **Less than Significant Impact.** Construction activities can produce vibration that may be felt by adjacent uses. Although the primary sources of vibration during construction would be from bulldozers and vibratory rollers, other vibratory equipment could be used during installation of pavement. Construction of the Proposed Project would be temporary and would not present any long-term impacts. The Proposed Project includes a CUP to allow for the operation of a cannabis cultivation facility. Operation of the Proposed Project would not generate groundborne vibration. No significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

PALEONTOLOGICAL RESOURCES:

28) Paleontological Resources	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?				

Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity;"

Findings of Fact:

a) **No Impact.** The Project Site is located in an area mapped as having low sensitivity for paleontological resources.¹² According to the United States Department of Agricultural (USDA) Web Soil Surveys, there are three soil types on the Project Site: Vista coarse sandy loam (VsD2), Cieneba rocky sandy loam (CkF2), and Vista rocky coarse sandy (VtF2). VsD2 covers

¹² County of Riverside. General Plan - Open Space Element. Figure OS-8.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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majority of the subject property, however the construction will be in the area of CkF2 soil type. The CkF2 topmost soil layer depth of 0-14 inches are sandy loam, while the layer of 15-22 inches are weathered bedrock. The geologic formation exposed on the site is granitic bedrock (Cretaceous-age Tonalite) (Morton, D. M., Matti, J.C., Preliminary geologic map of the Hemet 7.5' quadrangle, Riverside County, California, USGS Open-File Report OF-2004-1455, 2005). This formation indicates no potential for paleontological resources to be unearthed on the Project Site.

The Project Site is currently developed and zoned as Rural Residential, with a dense chaparral habitat dominating the southern portion of the Project Site. There are also boulder sized rock outcroppings (fewer than a dozen) that may be considered unique geologic features and have also been reported to the local Cahuilla, Cabazon, Cupeño, Morongo, Pechanga, and Luiseño Bands. These boulders would not be impacted by the proposed development. Soils on-site are not considered Older Alluvium and therefore would not have the potential for paleontological resources. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

POPULATION AND HOUSING Would the project:

29) Housing	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Project Application Materials, Riverside County General Plan Extended Mountain Area Plan

Findings of Fact:

- a) **No Impact.** The Project Site is currently developed with an existing single family residential structure and supporting outbuildings. The development of the Proposed Project would not displace existing people or housing. The existing residents (one family) would remain at the site and the additional workers would travel to the site five days per week. The construction of replacement housing elsewhere would not be necessary. Therefore, no impacts are identified and anticipated, and no mitigation measures are required.
- b, c) **Less than Significant Impact.** As stated in the County General Plan, the almost doubling of Riverside County's population in only 20 years has been met by focusing growth in areas that

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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are well served by public facilities and services. The Proposed Project site will not result in a demand for additional housing or infrastructure. No new utility lines or roads would be constructed, nor would existing infrastructure need to be extended thereby inducing additional population growth. The ten employees will commute from the local area. There will not be a need for additional housing and businesses, or an extension of road and other infrastructure. No significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

30) Fire Services

Source(s): Riverside County General Plan Safety Element (Figure S-11), Riverside County General Plan Housing Element, Riverside County Fire Department *Strategic Plan*

Findings of Fact:

Less than Significant Impact. Due to the natural occurring climate, the County of Riverside has a high-risk factor for wildfires. The Project Site occurs within a “very high” existing fire service area. The Riverside County Fire Department provides fire and emergency services to the unincorporated communities of Riverside County. Pursuant to the Riverside County Fire Department Strategic Plan 2009-2029, the department consists of 93 fire stations within the County. The nearest fire station to the Project Site is station No. 28 (Sage Fire Station). It is located approximately 5.1 miles south of the Project Site at 35655 Sage Rd, Hemet, CA 92544. The Project Applicant is required to pay development impact fees to account for potential impacts of the Proposed Project under Ordinance No. 659. The Proposed Project is expected to include fire safety and suppression measures, such as appropriate building materials, fire sprinklers, and paved fire access. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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31) Sheriff Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): Riverside County General Plan

Findings of Fact:

Less than Significant Impact. The Riverside County Sheriff’s Department Southwest Station will provide law enforcement and first responders services to the Project Site. The closest Riverside County Sheriff station is located approximately 17.2 miles south of the Project Site at 43950 Acacia Ave # B, Hemet, CA 92544. The Proposed Project includes the construction and operation of an agriculture building, solar arrays, trash enclosures, parking area, AC condensers, storm drain basin, drainage culvert, and fencing to enclose the area. The Project Site will also require “No Loitering” signs from the sheriff’s department to deter unwanted guests. With approval of the Change of Zone, the proposed uses would be consistent with the Project Site’s zoning of Light Agriculture. The Project Applicant has prepared a Security Plan and Safety Plan (on file with Riverside County) to address facility security. The security plan was developed with the view that facility and product protection begins with the layout of the site and the facility’s floor plan. IsenGarden will equip the entire facility with a modern surveillance system, internal area access control, and “Track-and-trace” software. They will implement a comprehensive employee-training program so that each employee is educated on their role in keeping the facility, themselves, and products safe and secure. IsenGarden will also implement systems that facilitate access by local law enforcement to the site and facility. Product location data, surveillance video, and inventory reports will also be made available.

There shall be no signage on the building, except the address and “no loitering” sign, as it will not be used for commercial retail purposes and has no need for visitors. Further, the absence of signage is in keeping with the requirements of State law while at the same time minimizing the presence of an attractiveness nuisance. Lack of signage will help limit attention and thus, the threat of crime.

Implementation of the Proposed Project’s Security Plan and Safety Plan would alleviate an increase in demand of police services. The development impact fees paid by the Project Applicant would be allocated to finance an increased demand for police protection services. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): Riverside County General Plan Riverside Extended Map Area Plan (Figure S-15)

Findings of Fact:

Less than Significant Impact. The Project Site is located within the Hemet Unified School District. Community Christian School is the nearest school to the Project Site and is located

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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approximately 7.5 miles west of the Project Site. The Project Applicant will be required to pay applicable development fees in support of public school facilities. This fee will be sufficient in mitigating impacts of the Proposed Project on the school district. Moreover, the increase in employment demand from the Proposed Project will be fulfilled by the local population. The Proposed Project is not anticipated to result in an increase in population growth within the area, thereby not increasing the number of students in that area. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

33) Libraries

Source(s): Riverside County General Plan Southwest Area Plan

Findings of Fact:

Less than Significant Impact. The Riverside County Library System serves residents of the County. The nearest library to the Project Site is Hemet Public Library, located approximately 13.3 miles northwest of the Project Site. The Proposed Project is not anticipated to have a significant impact on libraries services as no residential development is proposed and no significant increase in population would result. The demand for ten full-time employees for the Proposed Project is expected to be met by residents of the local community. The collection of developer impact fees at the time of building permit issuance would ensure potential impacts to library services are reduced to a less than significant level. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34) Health Services

Source(s): Riverside County General Plan Chapter 6: Safety (Figure S-12), Project Application Materials

Findings of Fact:

Less than Significant Impact. Health Services will be provided by several facilities within the region. The nearest hospital to the Project Site is Hemet Global Medical Center, located approximately 13.7 miles northwest of the Project Site. The Hemet Global Medical Center provides: cardiology care services / cardiac cath lab, primary stroke center, orthopedic services, maternal child health services, vascular services, total joint replacement Ct/MRI scans, subacute long term care unit, skilled nursing facility, and 24 hour emergency services. The Proposed Project does not include new residential uses or result in any significant population increase that would generate additional demand for health services. The demand for ten full-time employees

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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for the Proposed Project is expected to be met by residents of the local community. No new/upgraded healthcare facilities would be necessary. Moreover, any potential impacts of the Proposed Project would be mitigated by payment of development impacts fees. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

RECREATION Would the project:				
35) Parks and Recreation				
a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications), County Ord. No. 659 (Establishing Development Impact Fees), Valley-Wide Recreation and Park District *Master Plan 2010*

Findings of Fact:

- a) **No impact.** The Proposed Project includes the construction and operation of an agriculture building, solar arrays, trash enclosures, parking area, AC condensers, storm drain basin, drainage culvert, and fencing to enclose the area. The demand for ten full-time employees for the Proposed Project is expected to be met by residents of the local community. Therefore, it is not anticipated to result in significant population growth and would not require the construction or expansion of recreational facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b,c) **Less than Significant Impact.** The closest park to the Project Site is McSweeney Park, located approximately 9.3 miles north of the Project Site. The implementation of the Proposed Project is not anticipated to lead to substantial population growth and significant deterioration of McSweeney Park and other recreational facilities. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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36) Recreational Trails

a) Include the construction or expansion of a trail system?

Source(s): Riverside County General Riverside Extended Mountain Area Plan Figure: 7 (Trails and Bikeway System)

Findings of Fact:

a) **No Impact.** According to the County General Plan, the Project Site is adjacent to an Urban/Suburban Regional Trail along Stanley Road. The Proposed Project includes the construction and operation of an agriculture building, solar arrays, trash enclosures, parking area, AC condensers, storm drain basin, drainage culvert, and fencing to enclose the area. No construction or the expansion of a trail system is proposed. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:

37) Transportation

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

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

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

d) Cause an effect upon, or a need for new or altered maintenance of roads?

e) Cause an effect upon circulation during the project's construction?

f) Result in inadequate emergency access or access to nearby uses?

Source(s): Riverside County General Plan: REMAP; RCIT Map My County

Findings of Fact:

a) **Less than Significant Impact.** The purpose of the circulation system within REMAP is to provide for the movement of people and commodities efficiently, economically, and safely while not inducing growth beyond the intent of the General Plan or disrupting the unique environments within this planning area. The Proposed Project would be consistent with the following applicable policies:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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REMAP 9.4: Preserve natural resources, including scenic values, and avoid the unnecessary destruction of trees and flora in all future plans for development or improvement of circulation and transportation facilities.

Consistent: The Proposed Project does not require any alterations to existing roads nor does it require a construction of a new one.

REMAP 9.7: Consider emergency access and circulation, paying special attention to seasonal traffic, in fire hazard areas.

Consistent: The Project Site is located within a very high fire hazard severity zone. Fire apparatus access roads shall have an unobstructed width of no less than 24 feet, as approved by the Office of the Fire Marshal. Access to the site is via a 24-foot-wide driveway along Owl Creek Road. The Proposed Project is anticipated to generate less than 50 trips per week, including delivery trips and trips by employees.

REMAP 10.2: Implement Figure 7, Trails and Bikeway System, as discussed in the Non-motorized Transportation section of the General Plan Circulation Element.

Consistent: The Project Site is not adjacent to any bike paths. The closest bike path, which is a Combination trail (Regional Trail/ Class 1 Bike Path), is approximately 16.8 miles north of the Project Site.¹³ Therefore, the Proposed Project is not anticipated to interfere with the plan for trails and bikeway system.

REMAP 11.3: Enforce at least a 150 foot setback from the centerline of the scenic highway for new development, where such a setback requirement would not prohibit the use of a parcel.

Consistent: The Project Site is not located near any scenic highways or scenic viewpoints.

Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** California Senate Bill 743 (SB 743) directs the State Office of Planning and Research (OPR) to amend the California Environmental Quality Act (CEQA) Guidelines for evaluating transportation impacts to provide alternatives to Level of Service that “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. Agencies may currently opt-in to applying the updated CEQA guidelines for VMT analysis and implementation is required State-wide by July 1, 2020. The County of Riverside adopted VMT Guidelines and thresholds of significance in December 2020.

¹³ Riverside County. General Plan: Riverside Extended Map Area Plan (Figure: 7) “Trails and Bikeway System”,

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Riverside County Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020) provides the following screening criteria for certain land development projects that may be presumed to result in a less than significant VMT impact:

- Single Family Housing projects less than or equal to 110 Dwelling Units; or
- Multi Family (low rise) Housing projects less than or equal to 147 Dwelling Units; or
- Multi Family (mid-rise) Housing projects less than or equal to 194 Dwelling Units; or
- General Office Building with area less than or equal to 165,000 SF; or
- Retail buildings with area less than or equal to 60,000 SF; or
- Warehouse (unrefrigerated) buildings with area less than or equal to 208,000 SF; or
- General Light Industrial buildings with area less than or equal to 179,000 SF
- Project GHG emissions less than 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO_{2e}) as determined by a methodology acceptable to the Transportation Department; or
- Unless specified above, project trip generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by Riverside County.

The Proposed Project would generate less than 50 trips per week. Because the Proposed Project would generate less than 110 trips per day, it is presumed to result in a less than significant VMT impact as specified in the County's VMT Guidelines. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** Access to the site is via a driveway along Owl Creek Road at the northwest corner of the site that extends to Red Mountain Road. The Project Site is not adjacent to a curved road or a dangerous intersection. The Proposed Project is the development of a cannabis cultivation facility. The Proposed Project would not create substantial hazards due to a site design feature or incompatible use. Discretionary actions by the County of Riverside includes approval of the project design. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant Impact.** Red Mountain Road is county-maintained and classified as a Mountain Arterial (110 ft ROW) Highway.¹⁴ The Proposed Project would utilize Owl Creek Road and Red Mountain Road, both of which are unpaved roads. With less than 50 weekly trips occurring on unpaved roads, the Proposed Project would not result in a need for new or altered maintenance of roads. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- e,f) **Less than Significant Impact.** Fire apparatus access roads shall have an unobstructed width of no less than 24 feet, as approved by the Office of the Fire Marshal. Access to the site is via a 24-foot-wide driveway along Owl Creek Road at the northwest corner of the site. During construction and long-term operation, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County of Riverside. Therefore, the Proposed Project would not result in inadequate emergency access or cause an effect upon circulation during the project's construction. No significant impacts are identified or anticipated, and no mitigation measures are required.

¹⁴ RCIT. Map My County GIS Map. Accessed July 20, 2021.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

38) Bike Trails

a) Include the construction or expansion of a bike system or bike lanes?

Source(s): Riverside County General Plan: Riverside Extended Map Area Plan (Figure: 7) "Trails and Bikeway System", Riverside County General Plan Chapter 4 Circulation (Figure C-7)

Findings of Fact:

Less than Significant Impact. The County's Bikeway System is part of the circulation system. According to the County General Plan Riverside Extended Mountain Area Plan, the Project Site is not adjacent to any bike paths. The closest bike path, which is a Combination trail (Regional Trail/ Class 1 Bike Path), is approximately 16.8 miles north of the Project Site near Simpson Park. Combination trails function as regional connectors linking together the urban and rural communities and major water bodies and regional parks in Riverside County. These trails provide opportunities for long-distance users to take advantage of this system for long one-way or loop-type trips. The Proposed Project does not include the construction or expansion of a bike system or bike lanes. It is not anticipated to result in a change in the County's bikeway system. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRIBAL CULTURAL RESOURCES 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, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

39) Tribal Cultural Resources

a) 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)?

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Historical/Archaeological Resources Report, CRM Tech, April 17, 2020.

Findings of Fact:

a, b) **Less than Significant with Mitigation Incorporated.** A Historical/Archaeological Resources Report, dated April 17, 2020, was prepared for the Proposed Project by CRM Tech in compliance with CEQA and County of Riverside Planning Department requirements. The field survey yielded negative results for potential cultural resources, and no buildings, structures, objects, sites, features, or artifacts more than 50 years of age were encountered on the Project Site¹⁵. The Sacred Lands File identified no Native American cultural resources in the project vicinity but recommended that local Native American groups be contacted for further information¹⁶. Written requests and comments were sent to the 11 Native American groups whose ancestral territories are located in or near the Sage area.

A search of the Native American Heritage Commission Sacred Lands File was completed for the area of potential effect (APE), with negative results. At the time the cultural report was written, responses to the 11 project scoping letters sent to tribal representatives interested in Sage Area development has only been received from the Cahuilla, Cabazon, Cupeño, Morongo, Pechanga, Soboba and Luiseño Bands.

On behalf of the Morongo Band, Travis Armstrong stated that the tribe had no comments at this time but might provide other information to the County of Riverside during future government-to-government consultation process. Joseph Ontiveros of the Soboba Band also requested further consultation with the County of Riverside and the project proponents, along with Native American monitoring of all ground-disturbing activities in the project area by a representative of the tribe. Monitors from the Soboba Band and the Pechanga Band participated in the archaeological field survey for this study.¹⁷ Therefore, they have no objection to the continuation of project activities currently planned and defer to the wishes of Tribes in closer proximity to the project.

As of the time of the report, no information has been obtained through Native American consultation that the subject property is culturally or spiritually significant and no Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the Project Site. Based on completion of consultation under Assembly Bill 52 (AB 52) with interested tribes, final recommendations shall be incorporated into the Project's Conditions of Approval. Implementation of Mitigation Measures **CR-1** to **CR-3** can reduce potential impacts to less than significant level.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

¹⁵ Historical/Archaeological Resources Report by Bai "Tom" Tang (Page:14)
¹⁶ Historical/Archaeological Resources Report by Bai "Tom" Tang (Page:11)
¹⁷ Historical/Archaeological Resources Report by Bai "Tom" Tang (Page:13)

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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UTILITIES AND SERVICE SYSTEMS Would the project:

40) Water	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s):

Findings of Fact:

- a) **Less Than Significant Impact.** Potable water will be provided by an existing well on-site. No public water system exists in the area and all domestic water needs in the vicinity are met by individual wells owned and maintained by property owners. An infiltration trench will be installed to collect and treat stormwater runoff. The proposed onsite septic system is sufficient to meet the Proposed Project's increase in demand for wastewater treatment. The construction of these utilities is not anticipated to cause significant environmental effects, as demonstrated in other sections of this Initial Study. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** The Proposed Project includes water storage (nine tanks with capacity of 5,000 gallons each). Water use on-site in addition to domestic uses will be for plant irrigation. Based on the number of plants at full capacity, the total Project demand would be 5,000 gallons per day. A recycled water system would be included to provide for 97% recovery/recycling of irrigation water use. The Project's demand for well water would therefore be 200 gpd; water would be pumped and stored in the on-site tanks. The existing on-site water well was inspected and tested on July 20, 2021¹⁸. The average yield during the pump test was 7.6 gallons per minute which would yield approximately 11,000 gallons per day; thereby meeting the Proposed Project's estimated total demand. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

41) Sewer	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹⁸ Heritage Well Service Well Inspection Report #3058, July 20, 2021.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s):

Findings of Fact:

a,b) **Less than Significant Impact.** Sewage disposal will be provided by the existing and proposed new 1000-gallon septic system on-site. The total aggregate domestic waste flows generated by the project are anticipated to be sufficiently served by the existing and additional sewage disposal system. The existing system has been approved by RWQCB and County Department of Environmental Health and the new system will require approval. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

42) Solid Waste	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County Department of Waste Resources, CalRecycle Estimated Solid Waste Generation Rate, Advisory Notification Document

Along with compliance with the relevant regulations presented throughout this analysis section, the project would be required to adhere to the following DCC cannabis cultivation regulations:

CCR Title 4 Section 16108:

Presents options for acceptable management of cannabis waste, including onsite composting, collection by a local or contracted waste agency, or self-hauling to certain approved destinations.

CCR Title 4 Section 16308:

Presents additional requirements for cannabis waste management, including reporting requirements.

Compliance with the DCC cannabis cultivation regulations above would help minimize project implementation impacts regarding solid waste.

Findings of Fact:

a,b) **Less than Significant Impact.** The County of Riverside Department of Waste Resources operates five landfills and administers several transfer station leases. The department has a contract agreement for waste disposal with Waste Management of the Inland Empire, a local waste disposal company, Waste Management Inc. Most refuse in the region is disposed of at the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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El Sobrante Landfill, which is a privately owned landfill that is open to the public. It is located 10910 Dawson Canyon Road, Corona, CA 92883, approximately 34 miles northwest of the Project Site.

El Sobrante Landfill has a maximum daily throughput of 16,054 tons/day.¹⁹ The Proposed Project would generate 0.12 tons/day (based on 2.4 tons/1000SF per year).²⁰ The estimated project-generated waste represents approximately 0.00074 percent of the total permitted waste received daily at the El Sobrante Landfill. Due to the amount of waste generated under 1 percent per day, these findings are less than significant. A space allocation will be provided for trash and recyclable materials, and include signage indicating the location of each bin in the proposed trash enclosure.

The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with AB 939. AB 939 established an integrated waste management hierarchy to guide the Board and local agencies on source reduction, recycling and composting, and environmentally safe transformation and land disposal. The Proposed Project would comply with all applicable solid waste statues and regulations. AB 1826 requires businesses to arrange for organic waste recycling. The Project Applicant shall take at least one of the actions recommended by the County to divert organic waste. Moreover, AB 341 requires businesses that generate four or more cubic yards of waste per week to divert commercial solid waste from disposal.

Prior to issuance of a building permit, the Project Applicant shall submit a Waste Recycling Plan (WRP) to the Riverside County Department of Waste Resources for approval. The WRP must identify methods that will be taken to recycle, reuse and/or reduce the amount of materials and the targeted recycling or reduction rate. Moreover, the Project Applicant must identify programs or plans that address commercial and organics recycling in compliance with State legislation/regulation by completing a Mandatory Commercial Recycling and Organics Recycling Compliance form.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

43) Utilities

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

a) Electricity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Natural gas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Communications systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Maintenance of public facilities, including roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹⁹ CalRecycle. SWIS Facility/Site Activity Details: El Sobrante Landfill. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402>

²⁰ County of Riverside. Draft EIR for the General Plan. Table 4.17-N

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Project Application Materials, California Energy Commission: Electricity Utilities Service Area Map, Southern California Edison, Southern California Gas Company, Department of Cannabis Control

The project would be required to adhere to the following DCC cannabis cultivation regulations relevant to utilities:

CCR Title 4 Section 16102(s):

The application for a cultivation license shall include the following, if deemed applicable:

-For indoor and mixed-light license types, identification of all power sources for cultivation activities, including but not limited to, illumination, heating, cooling, and ventilation;

Compliance with the DCC cannabis cultivation regulations above would help minimize project implementation impacts regarding utilities.

Findings of Fact:

- a) **No Impact.** The proposed solar arrays are expected to produce a total of 594,730 kWh annually, which would equate to approximately 93 percent of the Proposed Project's demand, per the required generation potential equal to or greater than 20 percent of the anticipated energy demand. Remaining energy demands would continue to be provided by an existing service connection with Southern California Edison (SCE). According to the California Energy Commission: Electricity Consumption by SCE Planning Area, the Agricultural and Water Pump factor consumed 9,470.32 GWh in the year 2019. The proposed cannabis facility would consume approximately 594,730 kWh annually. The solar system is anticipated to meet 93% of the project's demand. Therefore, the Proposed Project would receive approximately 40,812 kWh from SCE. The increase in electricity demand from the project would represent 0.00043 percent of the overall SCE Agricultural and Water Pump consumption. The Proposed Project's demand is expected to be sufficiently served by the existing SCE electrical facilities, particularly as the project will generate the vast majority of the needed electricity onsite with its solar panels. The increase in electricity demand from the Proposed Project would represent an insignificant percent of the overall demand in SCE's service area. The Proposed Project would not require the expansion or construction of new electrical facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b) **No Impact.** The Proposed Project would utilize propane gas from existing storage tanks located on site. The storage tanks would be refilled by a propane service provider as needed. It would not rely on a natural gas provider and therefore, it would not require or result in the construction of new natural gas facilities or expansion of existing facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** The Proposed Project would be serviced by Verizon and Time Warner. The Proposed Project will continue to use existing telecommunication infrastructure and will not require the expansion or construction of new communications systems facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- d) **No Impact.** Lights are proposed along access roads and within project boundaries in a rural area. The Proposed Project will not require the construction of additional streetlights. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** Any potential impacts to public facilities will be mitigated by the Project Applicant’s payment of development impacts fees. The County of Riverside Transportation Department is responsible for the repair and maintenance of approximately 2,200 miles of roads located within the unincorporated areas of Riverside County. The Proposed Project would utilize Owl Creek Road and Red Mountain Road, both of which are unpaved roads. With less than 50 weekly trips occurring on unpaved roads, the Proposed Project would not result in a need for new or altered maintenance of roads. No impacts are identified or anticipated, and no mitigation measures are required.
- f) **No Impact.** The Proposed Project is not anticipated to require additional services aside from those already mentioned. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

WILDFIRE If located in or near a State Responsibility Area (“SRA”), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:

44) Wildfire Impacts

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

Source(s): RCIT Map my County, Riverside County General Plan Safety Element Figure S-14 “Inventory of Emergency Response Facilities,” Figure S-11 “Wildfire Susceptibility”

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) **No Impact.** The Project Site is located in a State Responsibility Area (SRA) in lands classified as very high hazard severity zone. As shown in the County General Plan Figure S-14, the Project Site does not contain any emergency facilities. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County. Project operations would not interfere with an adopted emergency response or evacuation plan. The Project Site will be constructing a driveway entrance/exit with a 20-foot-wide clearance. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b, c) **Less than Significant Impact.** According to Riverside County Information Technology GIS Wildfire Susceptibility map, the Project Site is located within a Very High fire hazard severity zone. The Project Site is on a slope (15-25%) and elevation ranges from the north (3292 feet) descending to the southeast (3266 feet). The Proposed Project will be required to meet minimum fire safety standards such as, but not limited to, clearing brush in fuel modification zones that would reduce wildfire risks. The fuel modification zones would be established pursuant to the Riverside County and California Fire Codes. The Office of the Fire Marshal will review building plans and ensure that fire and life safety conditions are met. The Proposed Project does not include the installation of new roads, power lines or other utilities that would exacerbate wildfire risk for the area. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d, e) **Less than Significant Impact.** The Project Site is on a slope within (15-25%) grade. According to the County General Plan Safety Element, the Project Site is not located within a 100-year FEMA flood zone area. As shown on the Riverside Extended Mountain Area Plan, Figure S-4, Slope Instability, the Project Site is not susceptible to landslides (or there is no data gathered to reflect a result). A storm water catch basin will be constructed beyond the southeast corner of the agricultural structure. A drainage culvert will also be constructed in the southeast portion of the Project Site. As documented in the Proposed Project's WQMP, the Proposed Project would maintain existing drainage patterns to maintain an acceptable time of concentration and infiltration rates of runoff and decrease peak flows. Therefore, post-fire slope instability and/or drainage changes are not anticipated. No significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:				
45) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): MSHCP Consistency Analysis, Phase I Cultural Resources Assessment

Findings of Fact:

Less Than Significant with Mitigation Incorporated. In November 2020, a Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis was prepared for the Proposed Project by Principe and Associates. The Project Site is located south of a Conservation Area. Additionally, the Project Site is located within the Riverside County HCP fee area for Stephen’s kangaroo rat. Any potential impacts to this species will be mitigated through participation in the HCP and a per-acre fee will be required. The Biological Assessment concluded that no listed or special status plant or wildlife species or sensitive habitats were observed within the Project Site during the field investigation. Additionally, the Project Site does not contain any vernal pools or Urban/Wildlands interface areas.

The Project Site contains structurally tall red shank, mature coast live oak trees and shade trees provide potential nesting habitats for perching bird and predatory bird species. The Proposed Project is not expected to result in any significant indirect impacts to special-status biological resources. However, Sections 3503, 3503.5, and 3800 of the California Department of Fish and Game (CDFG) Code prohibit the take, possession, or destruction of birds, their nests or eggs to reduce potential impacts. The site is not located in an area where additional surveys are needed for Criteria Area, Burrowing Owl or Mammal Species in conjunction with MSHCP implementation in order to achieve coverage for these species. Implementation of Mitigation Measure BIO-1 would ensure potential impacts are reduced to a less than significant level.

In April 2020, a Historical/Archaeological Resources Report was prepared for the Proposed Project by Bai “Tom” Tang, Principal Investigator. No information has been obtained through Native American consultation that the subject property is culturally or spiritually significant and no Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the project area. During the current cultural resources evaluation, no artifacts or remains were identified or recovered that could be reasonably associated with such practices. Despite the fact that no cultural resources of prehistoric or historical origin were observed within the boundaries of the Project Site, the property is situated in an area considered to be archaeologically and historically sensitive. In addition, the Sage area lies on the vaguely defined border between the traditional territories of the Luiseño and the Mountain Cahuilla, two Takic-speaking Native American groups. Considering these facts, there is at least a possibility of a subsurface cultural deposit existing within the property boundaries. In addition, due to the lack of ground visibility by dense chaparral habitat, there were several areas within the property that were not accessible for adequate survey. Therefore, Mitigation Measures CR-1 to CR-3 should be implemented to avoid any significant impacts.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
46) Have impacts which 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, other current projects and probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Traffic Impact Analysis, Project Application Materials

Findings of Fact:

Less Than Significant Impact. Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Air Quality

Development of the Proposed Project will be conditioned to comply with current SCAQMD rules and regulations to minimize impacts to air quality. With implementation of Mitigation Measure AQ-1 to reduce the level of construction-related PM_{2.5} emissions, the Proposed Project would not exceed SCAQMD air quality thresholds. Operational impacts resulting from either the existing General Plan zoning designations or the Proposed Project would not exceed SCAQMD thresholds. Consequently, the Proposed Project would not result in a conflict or obstruction to the implementation of the AQMP. Therefore, cumulative impacts are anticipated to be less than significant.

Greenhouse Gas

Greenhouse gas (GHG) emissions are cumulative in nature, in that, no one single project can measurably contribute to climate change and its affects (global average change in temperature, rising sea levels etc.). The direct or indirect GHG impacts are therefore not evaluated on a local level, but whether or not the GHG emissions resulting from the project are cumulative; that is, they add considerably to an increase in GHGs as compared to the existing environmental setting based on: 1) an established significance threshold(s); or 2) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project's total net operational GHG emissions do not exceed the County's Climate Action Plan (CAP) threshold of 3,000 MTCO₂e per year. Therefore, the Proposed Project is consistent with CAP and its incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable. No significant impacts are identified or anticipated, and no mitigation measures are required.

47) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): Staff Review, Project Application Materials

Findings of Fact:

Less Than Significant Impact. The incorporation of the REMAP design measures and Riverside County policies, standards, guidelines, and proposed mitigation measures as provided in this Initial Study would ensure that the Proposed Project would have no substantial adverse effects on human beings, either directly or indirectly on an individual or cumulative basis. As stated above, the Project Site is not susceptible to geologic hazards. Therefore, implementation of Proposed Project is not anticipated to pose any foreseeable danger to human beings. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any:

- Riverside County, *County of Riverside General Plan*. Adopted December 8, 2015.
- Riverside County, *County of Riverside General Plan Draft Environmental Impact Report*. Adopted December 8, 2015.

Location Where Earlier Analyses, if used, are available for review:

Location: County of Riverside Planning Department
4800 Lemon Street, 12th Floor
Riverside, CA 92505

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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