

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

**CUP 22-10, LDP 22-07, TPM 20498
KUSA DEVELOPMENT
NWC OF VIOLET RD. & ASTER RD.
APN 0459-441-38
ADELANTO, CALIFORNIA**



LEAD AGENCY:

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

REPORT PREPARED BY:

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

AUGUST 31, 2022

ADLT 078

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Violet & Aster Road, CUP 21-17&LDP 21-15.

PROJECT APPLICANT: Alan Brown. Kusa Licensing and Consulting 135 Enterprise Court, Corona, California 92882.

PROJECT LOCATION: The proposed project site is located on the southeast corner of Violet Road and Aster Road in Adelanto, California 92301. There is not a current address designated to this parcel site. The corresponding Assessor Parcel Number (APN) is 0459-441-38.

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

PROJECT: The City of Adelanto is reviewing an application to construct nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324,220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition, a total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).

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

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

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

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

KUSA DEVELOPMENT • NW CORNER OF ASTER RD. & VIOLET RD. • APN 0459-441-38 • CUP 22-10, LDP 22-07, & TPM 20498

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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

The City of Adelanto is reviewing an application to construct nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).¹

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

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

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

¹Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10.* September 2, 2022.

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

³ Ibid. (CEQA Guidelines) §15050.

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

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

1.2 INITIAL STUDY'S ORGANIZATION

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

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



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

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

SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

This Initial Study analyzes the environmental impacts associated with an application to construct nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁶

2.2 PROJECT LOCATION

The City of Adelanto is located approximately 85 miles northeast of Downtown Los Angeles and 40 miles north of the City of San Bernardino. Adelanto is bounded on the north by unincorporated San Bernardino County; on the east by Victorville and unincorporated San Bernardino County; on the south by Hesperia and unincorporated San Bernardino County; and on the west by unincorporated San Bernardino County.⁷ Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15), extending in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395, traversing the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), which traverses the southern portion of the City in an east to west orientation.⁸The project site's latitude and longitude is 34.562122, -117.437216. The location of Adelanto, in a regional context, is shown in Exhibit 2-1.

A citywide map is provided in Exhibit 2-2. The proposed project site is located on the northwest corner of Violet Road and Aster Road in Adelanto. There is not a current address assigned to the project site. The corresponding Assessor Parcel Number (APN) is 0459-411-38. The project site is located in Township 6 North, Range 5 West, Section 32, USGS Adelanto, California Quadrangle, 1956. Aster Road extends along the project site's east side while Violet Road extends along the project site's south side. A local vicinity map is provided in Exhibit 2-3. An aerial photograph of the site and the surrounding area is provided in Exhibit 2-4.

⁶Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10.* September 2, 2022.

⁷Blodgett Baylosis Environmental Planning. 2021.

⁸Google Earth. Website accessed December 9, 2021.

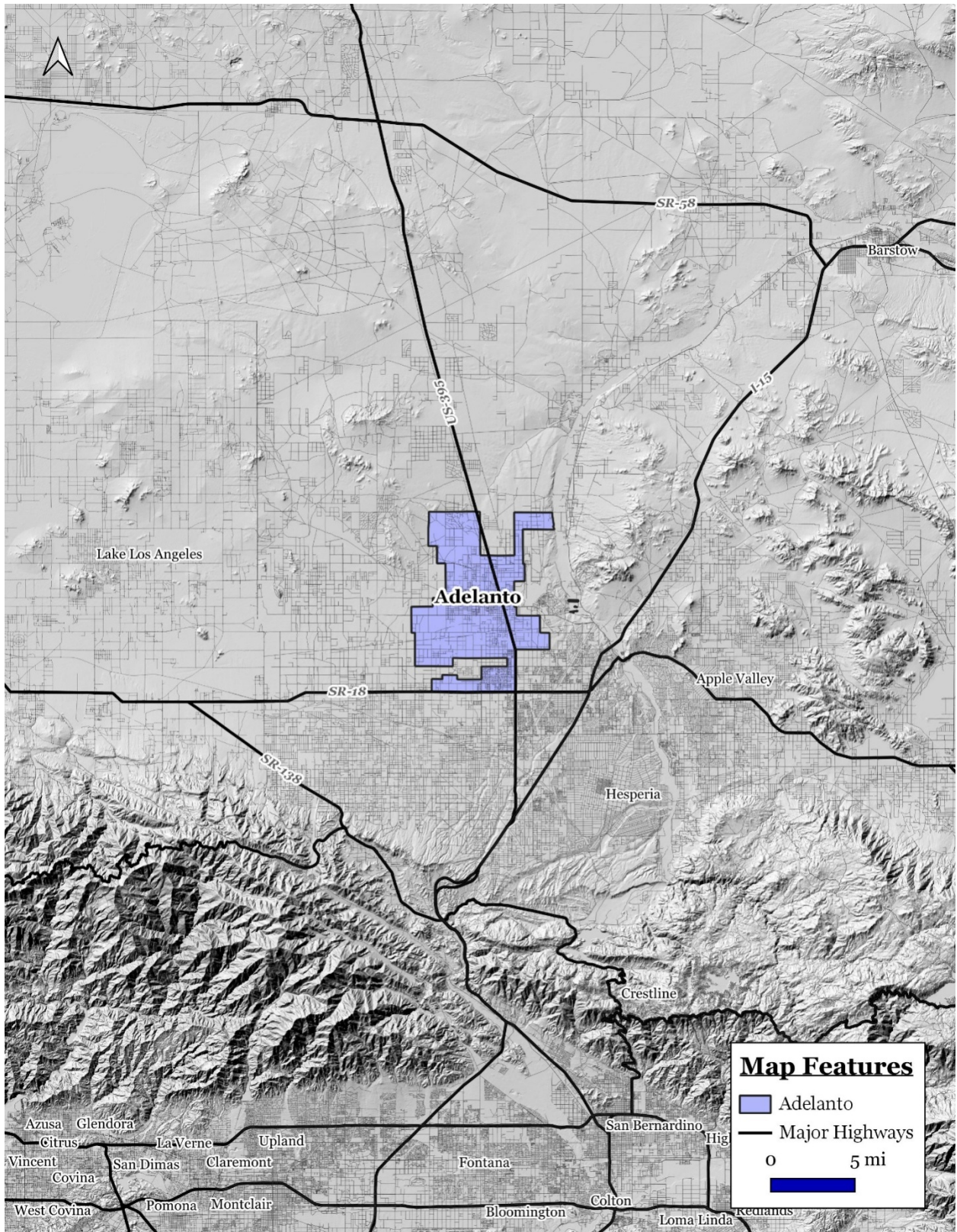


EXHIBIT 2-1 REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

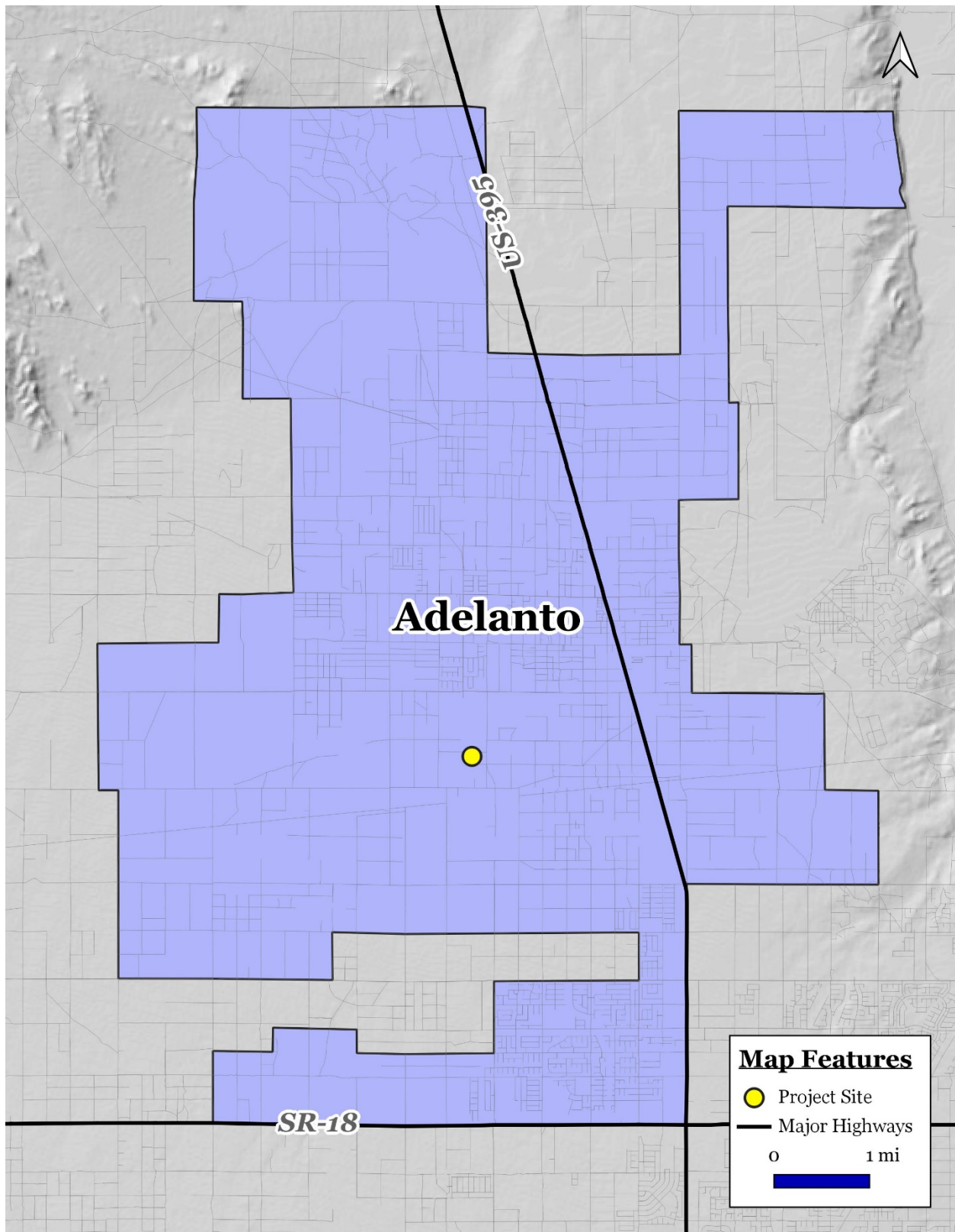


EXHIBIT 2-2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

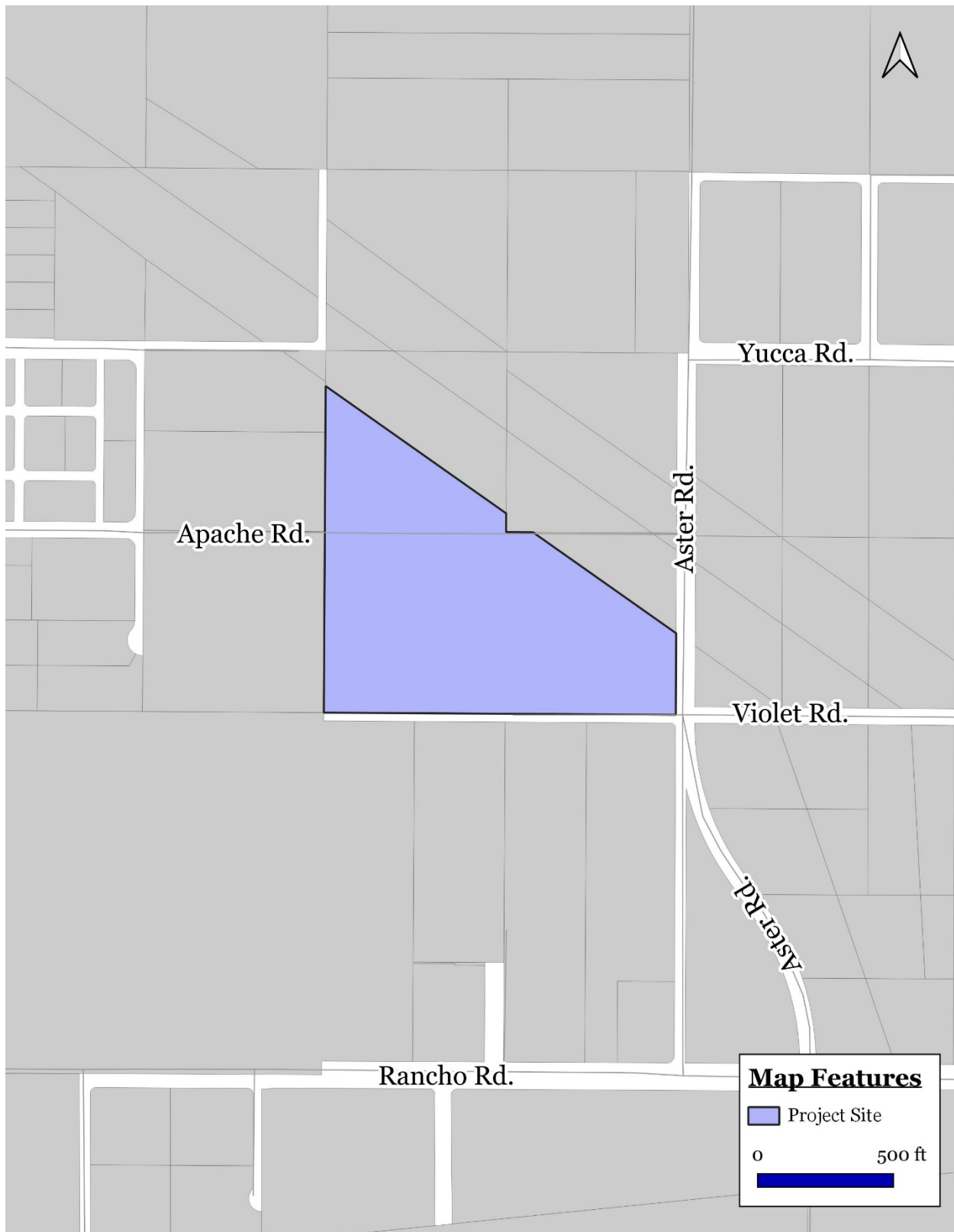


EXHIBIT 2-3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

2.3 ENVIRONMENTAL SETTING

The proposed project site is located on a site that is currently vacant though it has been disturbed by off-road activity and illegal dumping. As indicated previously, the proposed project site is located on a 21.86-acre parcel that is currently undeveloped. The site contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site and the surrounding area are provided in Exhibit 2-4. Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* Vacant undeveloped land and a utility easement extends along the proposed project's north side. These parcels are zoned as Manufacturing Industrial (MI).⁹
- *East of the project site:* Aster Road extends along the project site's easterly side. Further east is undeveloped land. This area is zoned as Manufacturing Industrial (MI).¹⁰
- *South of the project site:* Violet Road extends along the project site's south side. Further south is the Adelanto ICE Processing Center. This area is also zoned as Manufacturing Industrial (MI).¹¹
- *West of the project site:* Vacant though disturbed land along with developed industrial uses are located west of the project site. This area is zoned as Manufacturing Industrial (MI).¹²

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

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

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

- *Proposed Site Plan.* The proposed nineteen buildings would total of 324, 220 square feet and would range in size from 10,000 square feet to 34,620 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. Each building would contain grow rooms, a distribution room, a water room, a work area, a break room, a bathroom, a janitor's room, an electric room, and an office area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis.¹³
- *Open Space and Landscaping.* A stormwater detention basin would be located in the north-eastern portion of the site. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site.¹⁴

⁹ Google Maps. Site Accessed September 1, 2022 and Adelanto Zoning Map, Site Accessed, September 1, 2022.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10.* September 2, 2022.

¹⁴ Ibid.

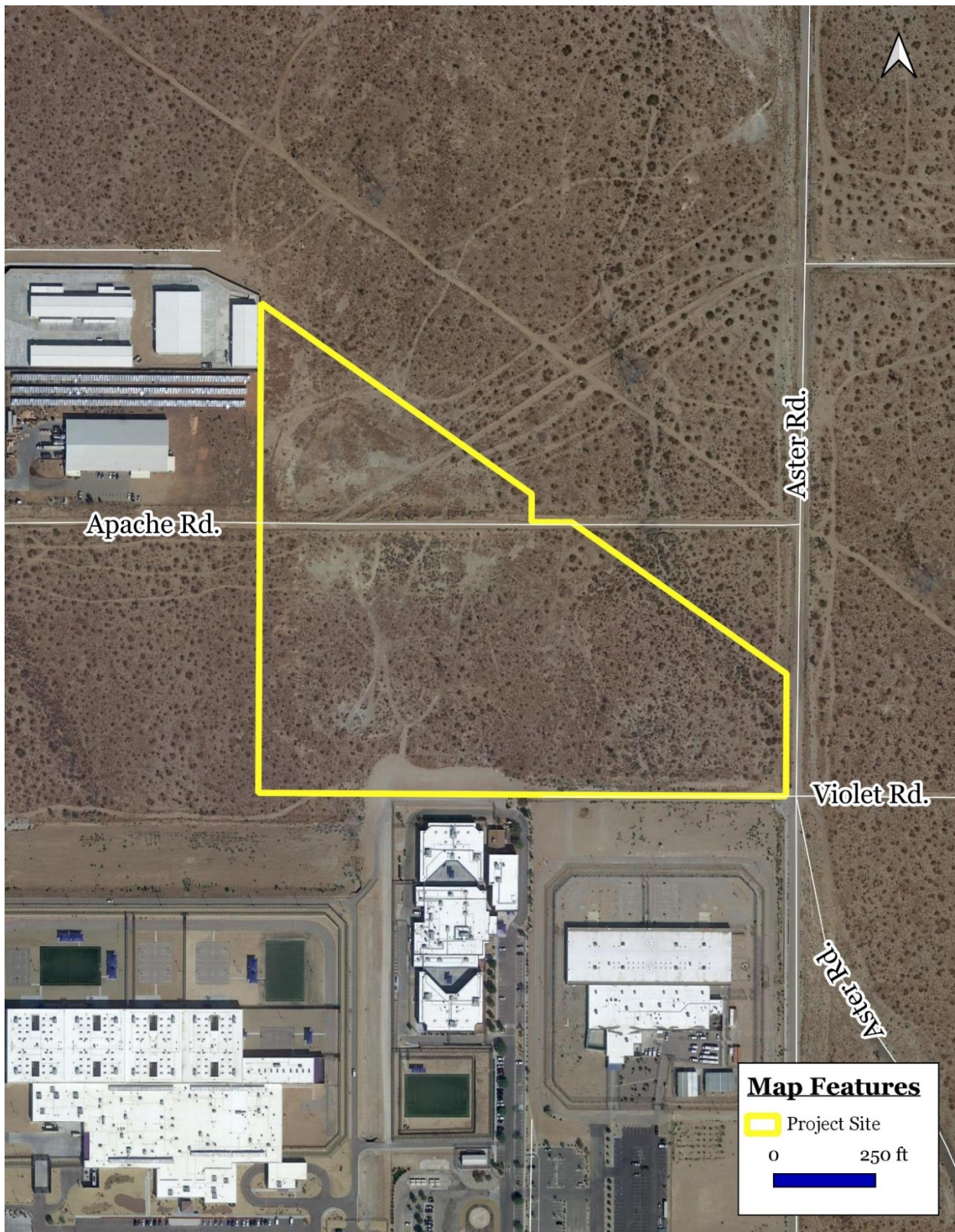


EXHIBIT 2-4
AERIAL IMAGE OF PROJECT SITE
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *Access and Parking.* Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided.¹⁵
- *On-Site Improvements.* Power (electrical) would be met with connections to the existing Southern California Edison utility lines. A Southern California Edison transmission line easement extends along the project site's north side. Water lines are available in Violet Road approximately 1,300 feet to the south and sewer lines are located in Aster Road.
- *Security.* On-site security will be provided twenty-four hours a day, seven days a week by security guards. In addition, security fencing, cameras, and shielded security lighting that would conform with all municipal lighting regulations will be installed on the premises.

The proposed site plan is illustrated in Exhibit 2-5 and are summarized in Table 2-1.

Table 2-1
Project Summary (Building & Lot Characteristics)

Building/Lot No.	Bldg. Area (sq. ft.)	Lot Area (Acres)	Parking	ADA	Loading
Bldg./Lot No. 1	20,000	1.80	23	2	2
Bldg. Lot No. 2	10,000	0.61	10	1	1
Bldg./Lot No. 3	10,000	0.63	11	1	1
Bldg./Lot No. 4	10,000	0.66	10	1	1
Bldg./Lot No. 5	10,000	0.67	11	1	1
Bldg./Lot No. 6	10,000	0.64	10	1	1
Bldg./Lot No. 7	10,000	0.61	10	1	1
Bldg./Lot No. 8	10,000	0.77	11	1	1
Bldg./Lot No. 9	10,000	0.77	11	1	1
Bldg./Lot No. 10	10,000	0.77	11	1	1
Bldg./Lot No. 11	20,000	1.14	21	1	2
Bldg./Lot No. 12	19,600	1.34	23	1	2
Bldg./Lot No. 13	20,000	1.18	23	1	2
Bldg./Lot No. 14	20,000	1.13	23	1	2
Bldg./Lot No. 15	20,000	1.16	23	1	2
Bldg./Lot No. 16	20,000	1.12	23	1	2
Bldg./Lot No. 17	30,000	1.73	23	1	2
Bldg./Lot No. 18	30,000	75.835	23	1	2
Bldg./Lot No. 19	34,620	101,326	44	2	3
Total	324, 220		364	22	33

Source: Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10.* September 2, 2022.

2.4.2 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

As indicated previously, the site is zoned as Manufacturing/Industrial (M/I). The two buildings would total 20,000 square feet of floor area. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. The estimated employment is based on the following:

¹⁵ Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10.* September 2, 2022.

- *Cultivation Method.* The cultivation method will be soil based or organic. Organic cultivation involves the use of soil and plant or manure-based composts. Organic soils are rich with living microbes that slowly break down components in the soil and release nutrients to the plant.
- *Equipment.* The cultivation and manufacturing would occur inside the individual buildings. As a result, the equipment would be limited to that suitable for use in an indoor environment. Planting, cultivation, and trimming would be undertaken by trained staff. Organic cultivation involves the use of soil and plant or manure-based composts. Organic soils are rich with living microbes that slowly break down components in the soil and release nutrients to the plant.
- *Cultivation Area.* Each building g would include an area devoted to cultivation. The cannabis will be grown and trimmed in this area. The key positions include a grow/cultivation manager, a grower/horticulturalist, and a trimmer/post harvester. For purposes of analysis, it is assumed that one cultivation position will be required for every 2,000 square feet of floor area devoted to cultivation per shift. This translates into a total of approximately cultivation 162 jobs for the entire project.
- *Manufacturing Area.* A single room in each building would be devoted to manufacturing. In this area, marijuana and CBD products are packaged and prepared for sale. A variety of items are created and prepared for retail sales. No direct sales will occur at this facility. For purposes of analysis, it is assumed that one manufacturing position will be required for each building This translates into a total 20 manufacturing jobs during the main shift.
- *Distribution Area.* Each building would have a single distribution room. The manufactured cannabis products will be delivered to the retail establishments. The distribution component will consist of 1 driver and 1 person for receiving and shipping for each building. A total of 30 employees will be assigned to distribution.
- *Support.* Other personnel will be required for management, security, maintenance, and administration. For purposes of analysis, a total of 2 employees were classified as support for each building for a total of 40 employees.

The entire project would employ an estimated 152 full-time equivalent employees over three shifts, seven days a week. The hours of on-site operations for the proposed new development will be Monday through Sunday, 8:00 AM to 5:00 PM and 24-hours a day security.¹⁶ The analysis assumes that the facility, in its entirety, will operate as a cannabis facility and will be operated by a single operator. The scope of the IS/MND addresses the construction of the proposed project in its entirety. Note that DCC requires an annual-license applicant to provide operation-specific evidence of exemption from, or compliance with, CEQA (4 Cal. Code of Regs. § 15010). If a local jurisdiction prepares a site-specific CEQA compliance document, or record of decision for the conclusion that no further CEQA documentation is required, it improves the efficiency with which DCC can issue annual licenses for projects located within that jurisdiction.

¹⁶ Blue Engine

Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

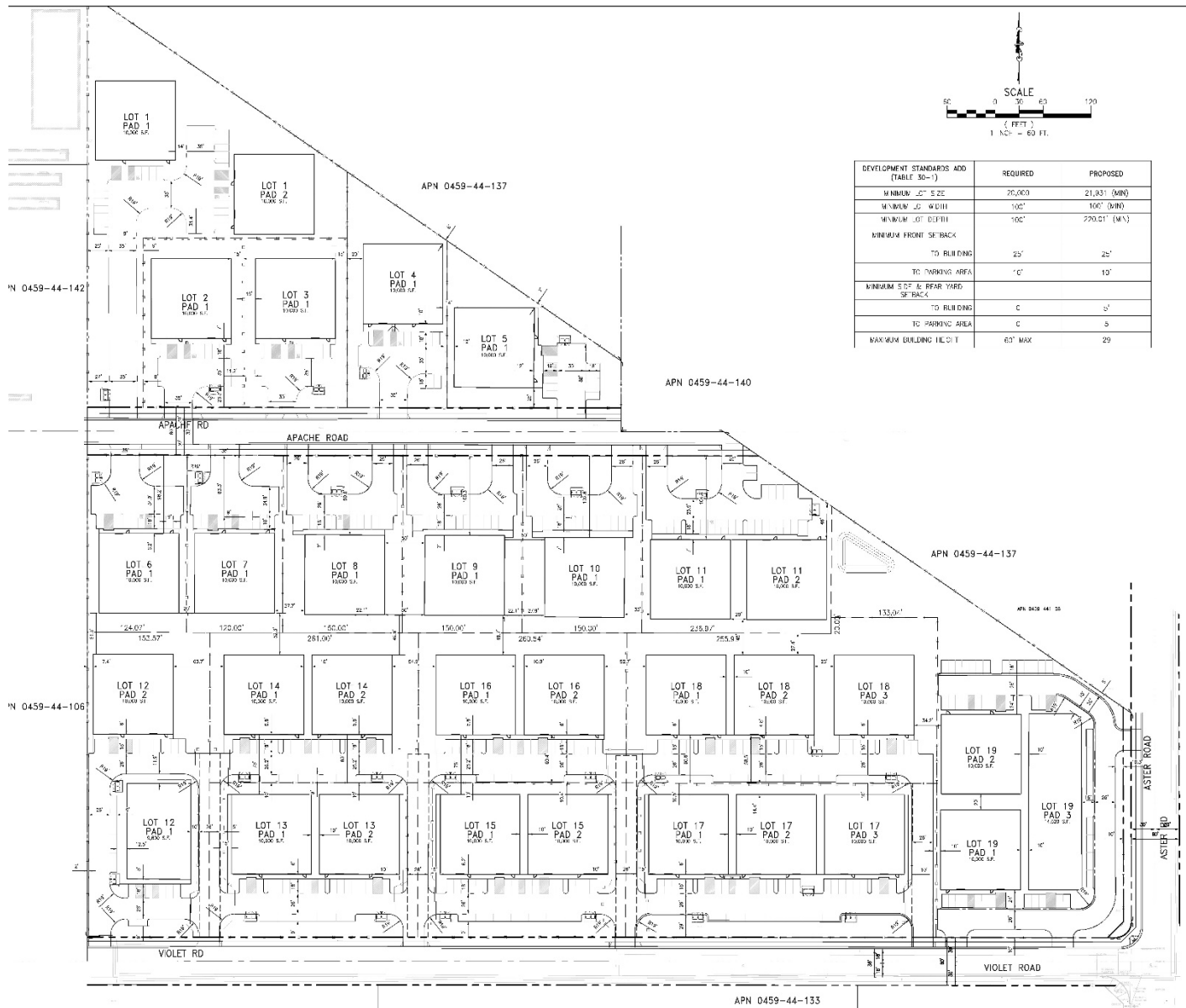


EXHIBIT 2-5
SITE PLAN
 SOURCE: BLUE ENGINEERING

2.4.3 CONSTRUCTION CHARACTERISTICS

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

- *Task 1 Grading.* The project site would be graded and readied for the construction. The site would be graded to a depth of approximately 6 inches. The typical heavy equipment used during this construction phase would include graders, bulldozers, offroad trucks, back-hoes, and trenching equipment. This task would require one month to complete.
- *Task 2 Site Preparation.* During this phase, the building footings, utility lines, and other underground infrastructure would be installed. The typical heavy equipment used during this construction phase would include bulldozers, offroad trucks, back-hoes, and trenching equipment. This task would require two months to complete.
- *Task 3 Building Construction.* The new buildings would be constructed during this phase. The typical heavy equipment used during this construction phase would include offroad trucks, cranes, and fork-lifts. This task will take approximately ten months to complete.
- *Task 4 Paving and Finishing.* This concluding task would involve the paving and finishing. The typical heavy equipment used during this construction phase would include trucks, backhoes, rollers, pavers, and trenching equipment. The completion of this phase will take approximately two months to complete.

2.5 DISCRETIONARY ACTIONS

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

- Approval of a Conditional Use Permit (CUP 22-10);
- Approval of a Land Development Plan (LDP 22-07);
- Approval of a Tentative Parcel Map (TPM 20498)); and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program(MMRP).

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

SECTION 3 ENVIRONMENTAL ANALYSIS

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

Aesthetics (Section 3.1); Agricultural & Forestry Resources (Section 3.2); Air Quality (Section 3.3); Biological Resources (Section 3.4); Cultural Resources (Section 3.5); Energy (Section 3.6) Geology & Soils (Section 3.7); Greenhouse Gas Emissions; (Section 3.8); Hazards & Hazardous Materials (Section 3.9); Hydrology & Water Quality (Section 3.10); Land Use & Planning (Section 3.11);	Mineral Resources (Section 3.12) ; Noise (Section 3.13) ; Population & Housing (Section 3.14). Public Services (Section 3.15); Recreation (Section 3.16); Transportation (Section 3.17); Tribal Cultural Resources (Section 3.18); Utilities (Section 3.19); Wildfire (Section 3.20); and, Mandatory Findings of Significance (Section 3.21).
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The environmental analysis included in this section reflects the Initial Study Checklist format used by the City of Adelanto in its environmental review process (refer to Section 1.3 herein). Under each issue area, an analysis of impacts is provided in the form of questions followed by corresponding detailed responses. For the evaluation of potential impacts, questions are stated, and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

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

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

3.1 AESTHETICS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

This Initial Study analyzes the environmental impacts associated with an application to construct nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324,220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition, A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).¹⁷

The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. In addition, local views are already dominated by regional Southern California Edison (SCE) transmissions towers and transmission lines located to the

¹⁷Blue Engineering & Consulting Inc. TPM 20498, Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

south of the project site. Views from the mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. *As a result, no impacts will occur.*

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

According to the California Department of Transportation, none of the unimproved roads located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.¹⁸ There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The City of Adelanto 2035 Sustainable Plan identifies prominent view sheds within the City. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.¹⁹ Lastly, the project site does not contain any buildings listed in the State or National registrar. *As a result, no impacts will occur.*

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

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

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

The nearest sensitive receptor is located 3,900 feet north of the project site. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.90.040 – Lighting of the City of Adelanto Municipal Code. The City's Code requirements includes the following requirements related to outdoor lighting:

- (a) All on-site lighting shall be energy efficient, stationary, and directed away from adjoining properties and public rights-of-way.

¹⁸ California Department of Transportation. *Official Designated Scenic Highways*.

¹⁹ MIG Hogle-Ireland. *Adelanto North 2035 Comprehensive Sustainable Plan*. August 27, 2014.

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

KUSA DEVELOPMENT • NW CORNER OF ASTER RD. & VIOLET RD. • APN 0459-441-38 • CUP 22-10, LDP 22-07, & TPM 20498

- (b) Light fixtures shall be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture.
- I Light fixtures shall be shielded so no light above 0.5 footcandle spills over onto adjacent properties and rights-of-way. There shall be no spillover (0.0 footcandle) onto adjacent residential used or zoned properties.

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

MITIGATION MEASURES

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

3.2 AGRICULTURE & FORESTRY RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

This Initial Study analyzes the environmental impacts associated with an application to construct nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).²⁰

²⁰Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. As a result, no impacts will occur.¹¹

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

The project site is currently zoned as Manufacturing/Industrial (MI). The property is vacant and undeveloped and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.²¹ *As a result, no impacts on existing Williamson Act Contracts will result from the proposed project's implementation.*

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

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

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

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

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

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

MITIGATION MEASURES

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

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

²¹ California Department of Conservation, *State of California Williamson Act Contract Land*.

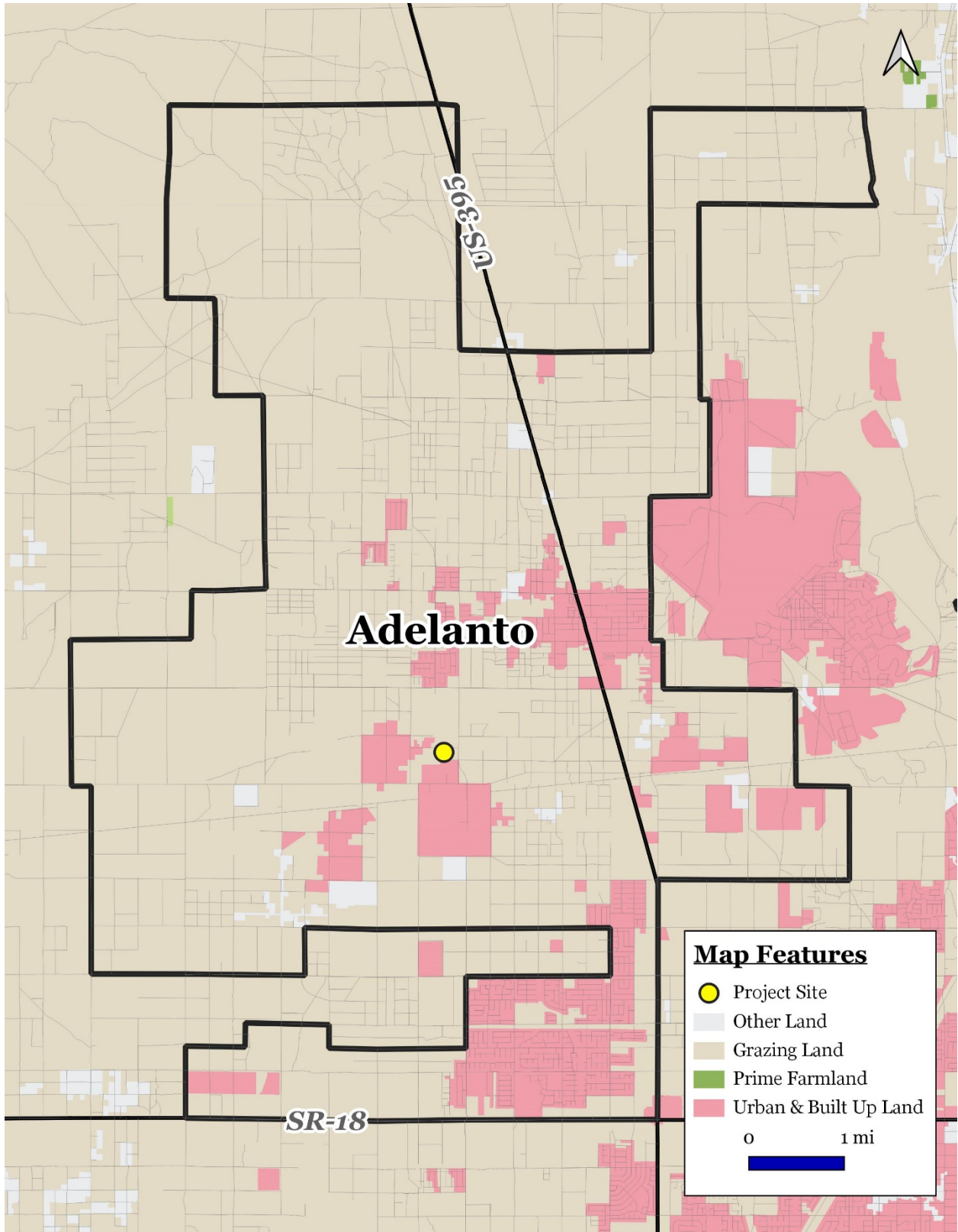


EXHIBIT 3-1
AGRICULTURE MAP
SOURCE: US DEPARTMENT OF CONSERVATION

3.3 AIR QUALITY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

This Initial Study analyzes the environmental impacts associated with an application to construct nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).²²

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The City is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain

²²Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and in the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.²³ The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).
- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).
- *Sulfur Dioxide (SO_2)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).
- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM_{10} and 65 pounds per day of $PM_{2.5}$.
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of “smog.” The daily threshold is 137 pounds per day of ROG.

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Adelanto is projected to add a total of 38,900 new residents and 3,900 new employees through the year 2040.²⁴ The proposed project will not introduce new residents and is anticipated to employ approximately 23 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project’s construction emissions would be below the thresholds of significance established by the MDAQMD (the project’s daily construction emissions are summarized in Table 3-1). In addition, the proposed project’s long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). *As a result, no conformity impacts will occur.*

²³ Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

²⁴ Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast*. April 2016.

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

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

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

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

Table 3-1
Estimated Daily Construction Emissions

Construction Phase	ROG	Nox	CO	SO ₂	PM ₁₀	PM _{2.5}
Site Preparation (on-site)	0.53	6.19	3.92	--	0.31	--
Site Preparation (off-site)	0.02	0.01	0.15	--	0.04	0.01
Total Site Preparation	0.55	6.20	4.07	--	0.35	0.01
Grading (on-site)	0.93	10.18	5.55	0.01	5.05	2.88
Grading (off-site)	0.03	0.02	0.23	--	0.07	0.02
Total Grading	0.96	10.20	5.78	0.01	5.12	2.90
Building Construction (on-site)	0.63	6.42	7.10	0.01	0.32	0.29
Building Construction (off-site)	0.03	0.12	0.29	--	0.09	0.02
Total Building Construction	0.66	6.54	7.39	0.01	0.41	0.31
Paving (on-site)	0.61	5.50	7.02	0.01	0.26	0.25
Paving (off-site)	0.06	0.04	0.53	--	0.15	0.04
Total Paving	0.67	5.54	7.55	0.01	0.41	0.29
Architectural Coating (on-site)	15.64	1.30	1.81	--	0.07	0.07
Architectural Coating (off-site)	--	--	0.06	--	0.02	--
Total Architectural Coating	15.64	1.30	1.87	--	0.09	0.07
Maximum Daily Emissions	16.99	22.94	17.24	0.04	5.85	3.44
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2020.4.0.

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. The analysis of long-term operational impacts summarized in Table 3-2 also used the CalEEModV.2020.4.0 computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the MDAQMD daily emissions thresholds.

Table 3-2
Estimated Operational Emissions in lbs/day

Emission Source	ROG	Nox	CO	SO₂	PM₁₀	PM_{2.5}
Area-wide (lbs/day)	1.04	0.75	4.07	--	0.81	0.23
Energy (lbs/day)	0.02	0.17	0.15	--	0.01	0.01
Mobile (lbs/day)	0.46	0.57	3.92	--	0.80	0.22
Total (lbs/day)	1.04	0.75	4.07	--	0.81	0.22
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2020.4.0.

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

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

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (400 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. No sensitive receptors are located near the project site. *As a result, the impacts will be less than significant.*

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

Cannabis cultivation directly impacts air quality in two predominant operations, plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by

the generation of strong odors. The majority of the odors of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants and vary widely between plants.²⁵ Cannabis produces over 140 different terpenes, and these chemicals are found in varying concentrations in different cannabis varieties. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis' psychoactivity, has no odor whatsoever. The type and potency of cannabis odors range widely from variety to variety, as do receptors' opinions regarding whether the odor is pleasant or objectionable.¹⁶ The natural growth of the cannabis plants, and other processes at cultivation facilities, emit terpenes. Terpenes, known for their strong odor, are volatile organic compounds (VOCs). At facilities such as that being considered, the evaporation of solvents, and other processes in the production cycle, also result in VOC emissions. The project Applicant will employ certain technologies that will be beneficial in controlling odors including the following:

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

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

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

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

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

MITIGATION MEASURES

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

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

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

3.4 BIOLOGICAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

This Initial Study analyzes the environmental impacts associated with an application to construct nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the

approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).²⁶

The site supports a variety of wildlife, with many of them being birds. One mammal was observed on site, the desert cottontail (*Sylvilagus audubonii*). Other mammals that are expected to occur include antelope ground squirrel (*Ammospermophilus leucurus*), California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), and coyote (*Canis latrans*). Birds observed included ravens (*Corvus corax*) and house finch (*Haemorhous mexicanus*). Other species that may occur on site include rock pigeon (*Columba livia*), house sparrow (*Passer domesticus*), and horned larks (*Eremophila*). Section 5.0 provides a more detailed discussion of the various species observed during the surveys. One reptile was observed during the survey, the common side-blotched lizard (*Uta stansburiana*). Other reptiles that may occur on the site include desert spiny lizard (*Sceloporus magister*) and western whiptail lizard (*Cnemidophorus tigris*).²⁷

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

Meandering transects were walked on the site and in surrounding areas (i.e., the zone of influence) where accessible at a pace that allowed for careful documentation of the plant and animal species present on the site. All plants observed were identified in the field and wildlife was identified through visual observations and/or by vocalizations. Habitat assessments were conducted for the desert tortoise, burrowing owl, and Mohave ground squirrel. The site supports a slightly disturbed desert scrub plant community which sparsely covers the property. Species present on the site included kelch grass (*Schismus barbatus*), creosote bush (*Larrea tridentata*), Asian mustard (*Brassica tournefortii*), Western Joshua Tree (*Yucca brevifolia*), Nevada jointfir (*Ephedra nevadensis*), and fiddleneck (*Amsinckia tessellata*).²⁸

Birds observed included ravens (*Corvus corax*) and house finch (*Haemorhous mexicanus*). Other species that may occur on site or in the surrounding area include rock pigeon (*Columba livia*), Anna's hummingbird (*Calypte anna*), house sparrow (*Passer domesticus*), and European starling (*Sturnus vulgaris*). One reptile was observed on the property, Common side-blotched lizard (*Uta stansburiana*). Only one mammal was observed on site, the desert cottontail (*Sylvilagus audubonii*), although California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), antelope ground squirrel (*Ammospermophilus leucurus*), and Merriam's kangaroo rats (*Dipodomys merriami*) may also occur on the site given their wide-spread distribution in the region. Tables 1 and 2 (Appendix A) provides a compendium of the various plant and animal species identified during the field investigations and those common to the area. No distinct wildlife corridors were identified on the site or in the immediate area.²⁹

²⁶Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10*. September 2, 2022.

²⁷ Ibid.

²⁸ Ibid.

²⁹RCA Associates, Inc. *General Biological Resources Assessment, Adelanto, California*. APN 0459-101-21. December 1, 2021.

No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations. The following are the listed and special status species that have the ability to occur on the project site. It is not a comprehensive list of all the species in the quad. This information has been taken from the California Natural Diversity Database and is using the most current version.³⁰

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

Future development of the site will have minimal impact on the general biological resources present on the site, and most, if not all, of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. However, more mobile species (i.e., birds, large mammals) will be displaced into adjacent areas and will likely experience minimal impacts. Therefore, loss of about 2.44-acres of desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitat throughout the surrounding desert region. No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive

³⁰ Ibid.

species, etc.) were observed on the site during the field investigations.³¹

No federal or State-listed wildlife species were observed on the site during the field investigations including the Mohave ground squirrel and desert tortoise. In addition, there are no documented observations of these species either on the site or in the immediate area. The site is not expected to support populations of the desert tortoise based on the absence of suitable habitat. As per CDFW protocol, the burrowing owl survey results are valid for only 30 days; therefore, CDFW may require a 30-day pre-construction survey be performed prior to any clearing/grading activities to determine if owls have moved on to the site since the survey.³²

Future development activities are expected to grade the property and remove the vegetation from the 2.44-acre parcel; however, cumulative impacts to the general biological resources (plants and animals) in the surrounding area are expected to be negligible. This assumption is based on the habitat containing scarce vegetation of non-native species. In addition, future development activities are not expected to have any impact on any State or Federal listed or State special status plant or animal species. As discussed above, the site does not support any desert tortoises. In addition, burrowing owls do not inhabit the site and are not expected to be impacted given the absence of any suitable burrows. The following mitigation measures are recommended:

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

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

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

³¹RCA Associates, Inc. *General Biological Resources Assessment, Adelanto, California. APN 0459-101-21*, December 1, 2021.

³² Ibid.

- Prior to grading or any other ground-disturbing activity, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 30 days prior to the beginning of project activities. A secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Biological Resources Mitigation Measure 3 shall also apply.
- If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist shall be no less than 300 feet. If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project Site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.
- Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010) or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50-foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.
- A CDFW-approved biologist shall conduct a protocol level presence or absence survey within the project area and 50-foot buffer no more than 48 hours prior to Project activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities

and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.

- Prior to Project implementation, and during the appropriate season, the City shall conduct botanical field survey following protocols set forth in the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any rare plants or sensitive vegetation communities are identified, the City shall either avoid the occurrence, with an appropriate buffer, or mitigate the loss of the occurrence through the purchase of mitigation credits from a CDFW-approved bank or land acquisition and conservation at a minimum 3:1 (replacement-to-impact) ratio. Note that a higher ratio may be warranted if the proposed mitigation lands are located far away from the Project site (i.e., within a separate watershed) or is not occupied by or available to special status species. If the Project has the potential to impact a State-listed species, the City should apply for a California Endangered Species Act Incidental Take Permit with the California Department of Fish and Wildlife.
- Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.
- Prior to construction and issuance of any grading permit, the City of Adelanto shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.

Cannabis cultivation operations often use artificial lighting or "mixed-light" techniques in greenhouse structures and indoor operations to increase yields. If not disposed of properly, these lighting materials pose significant environmental risks because they contain mercury and other toxins (O'Hare et al. 2013). In addition to containing toxic substances, artificial lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Night lighting can disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication (e.g., birdsong; Miller 2006), determining when to begin foraging (Stone et al. 2009), behavioral thermoregulation (Beiswenger 1977), and migration (Longcore and Rich 2004). Phototaxis, a phenomenon that results in attraction and movement toward

light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore and Rich 2004). The ISMND indicates that Project activities will involve glass or translucent plastic on building roofs and gables for greenhouses to allow natural daylight use. Because of the potential for artificial light to impact nocturnal wildlife species and migratory birds that fly at night, CDFW recommends the following mitigation measure:

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

Construction and operation of cannabis facilities may result in a substantial amount of noise through road use, equipment, and other project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 decibels (Barber et al. 2009). (For reference, normal conversation is approximately 60 decibels, and natural ambient noise levels [e.g., forest habitat] are generally measured at less than 50 decibels.). Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats. Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011). Considering the above, CDFW recommends MM No. 11 below to restrict the use of equipment to hours least likely to disrupt wildlife and to suppress device noise.

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

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

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

According to the United States Fish and Wildlife Service and the results of the site visits, there are no wetland or migratory bird nesting areas located within the project site.³³The site in its entirety is undeveloped. In addition, there is no riparian habitat located on-site or in the surrounding areas.¹⁸No offsite wetland or migratory bird nesting areas will be affected by the proposed development since all development will be confined to the project site. *As a result, no impacts are anticipated.*

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

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

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

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

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

E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact with Mitigation.

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

As of September 22, 2020, the California Department of Fish and Wildlife temporarily listed the western Joshua Tree (*Yucca brevifolia*) as an endangered species for one year until a final decision is made in 2022. Therefore, any attempt to remove a Joshua tree or part of a Joshua tree, dead or alive from its current position will require an Incidental Take Permit (ITP). As a result, the proposed project will be required to implement the following mitigation measure.

- The project Applicant will be required to obtain a California Endangered Species Act (CESA) Incidental Take Permit (ITP) from the State of California Department of Fish and Wildlife (CDFW) related to the removal, replanting or any development activity that may affect the Joshua Trees located on-site. Around each western Joshua tree parent, seedling, and sprout. No project activities may occur within the buffer. Should avoidance be infeasible (during candidacy or if the species is listed under CESA), CDFW recommends that the Project Proponent apply for an Incidental Take Permit from CDFW prior to initiating Project activities.

¹⁹ Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

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

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

MITIGATION MEASURES

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

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

Biological Resources Mitigation Measure No. 2. Prior to grading or any other ground-disturbing activity, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 30 days prior to the beginning of project activities. A secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Biological Resources Mitigation Measure 3 shall also apply.

Biological Resources Mitigation Measure No. 3. If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist shall be no less than 300 feet. If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall

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

As of September 22, 2020, the California Department of Fish and Wildlife temporarily listed the western Joshua Tree (*Yucca brevifolia*) as an endangered species for one year until a final decision is made in 2022. Therefore, any attempt to remove a Joshua tree or part of a Joshua tree, dead or alive from its current position will require an Incidental Take Permit (ITP). As a result, the proposed project will be required to implement the following mitigation measure.

Biological Resources Mitigation Measure No. 4. The project Applicant will be required to obtain a California Endangered Species Act (CESA) Incidental Take Permit (ITP) from the State of California Department of Fish and Wildlife (CDFW) related to the removal, replanting or any development activity that may affect the Joshua Trees located on-site. Around each western Joshua tree parent, seedling, and sprout. No project activities may occur within the buffer. Should avoidance be infeasible (during candidacy or if the species is listed under CESA), CDFW recommends that the Project Proponent apply for an Incidental Take Permit from CDFW prior to initiating Project activities.

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

Biological Resources Mitigation Measure No. 5. Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010) or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50-foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.

Desert Tortoise is a state-threatened, proposed endangered species, as such CDFW is concerned that the ISMND lacks a mitigation measure for pre-construction desert tortoise surveys, because the Project site is within the desert tortoise range and contains suitable habitat for desert tortoise: creosote bush scrub. To address potential direct/indirect impacts to desert tortoise, CDFW recommends the inclusion of the following mitigation measure prior to the City adopting the ISMND:

Biological Resources Mitigation Measure No. 6. A CDFW-approved biologist shall conduct a protocol level presence or absence survey within the Project area and 50-foot buffer no more than 48 hours prior to Project

activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.

Biological Resources Mitigation Measure No. 7. Prior to Project implementation, and during the appropriate season, the City shall conduct botanical field survey following protocols set forth in the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any rare plants or sensitive vegetation communities are identified, the City shall either avoid the occurrence, with an appropriate buffer, or mitigate the loss of the occurrence through the purchase of mitigation credits from a CDFW-approved bank or land acquisition and conservation at a minimum 3:1 (replacement-to-impact) ratio. Note that a higher ratio may be warranted if the proposed mitigation lands are located far away from the Project site (i.e., within a separate watershed) or is not occupied by or available to special status species. If the Project has the potential to impact a State-listed species, the City should apply for a California Endangered Species Act Incidental Take Permit with the California Department of Fish and Wildlife.

Biological Resources Mitigation Measure No. 8. Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

Biological Resources Mitigation Measure No. 9. Prior to construction and issuance of any grading permit, the City of Adelanto shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.

Biological Resources Mitigation Measure No. 10. Light shall not be visible outside of any structure used for cannabis cultivation. This shall be accomplished by: employing blackout curtains where artificial light is used to prevent light escapement, eliminating all nonessential lighting from cannabis sites and avoiding or limiting the use of artificial light during the hours of dawn and dusk when many wildlife species are most active, ensuring that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at <http://darksky.org/>), and using LED lighting with a correlated color temperature of 3,000 Kelvins or less. All hazardous waste associated with lighting shall be disposed of properly and lighting that contains toxic compounds shall be recycled with a qualified recycler.

Biological Resources Mitigation Measure No. 11. Project construction shall not occur during the hours of dawn and dusk when many wildlife species are most active. To suppress Project noise, the Project shall implement the use of mufflers and all generators shall be enclosed.

3.5 CULTURAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).³⁴

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

³⁴Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

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

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

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.³⁵

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no historic

³⁵ U. S. Department of the Interior, National Park Service. National Register of Historic Places. <http://nrhp.focus.nps.gov>. 2010.

resources were listed within the City of Adelanto.³⁶The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).³⁷The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).²²The project site is vacant and does not have any historical or cultural significance. *Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.*

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

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

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

³⁶ U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed December 6, 2020.

³⁷ California Department of Parks and Recreation. *California Historical Resources*. Website accessed on December 20, 2020.

Therefore, the following mitigation measure is required:

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

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

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

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

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

There are no dedicated cemeteries located within or in the vicinity of the project site.³⁸ The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity.

Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

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

Additionally, Section 5097.98 of the Public Resources Code states:

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

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

MITIGATION MEASURES

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

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

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

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

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

3.6 ENERGY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).³⁹

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

For indoor grow operations (as opposed to greenhouse operations), LED lighting fixtures are being successfully applied to vegetative rooms, saving up to 50% of the lighting energy compared to the standard practice. For flower rooms, double ended, high-pressure sodium (HPS) fixtures save 20-25% compared to the standard HPS

³⁹Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

fixtures. While less common, some growers are successfully applying LED fixtures or LED/HPS hybrid designs for up to 30-40% energy savings in flower rooms. For cooling and dehumidification, smaller grow operations are saving energy by using split ductless air conditioning units in place of standard rooftop units. Medium and large-sized grow operations are using chilled water systems to accomplish both cooling and dehumidification, with energy savings of up to 40% compared to the standard practice. By implementing all these best practices, a medium-size or larger indoor grow operation can achieve up to 30-35% energy savings compared to a standard indoor grow.²³ The total energy costs for indoor cannabis grow operations typically varies between 20-50% of total operating costs. By comparison, for a typical medium-size or larger brewery, energy use accounts for about 6-12% of total operating costs. The proposed project's electric power service would be provided by the Southern California Edison Company (SCE). SCE also maintains a transmission line adjacent to the project site.

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

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

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

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

The impacts will be less than significant with mitigation.

B. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- *Less Than Significant Impact.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned commercial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The

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

proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. *As a result, the potential impacts will be less than significant.*

MITIGATION MEASURES

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

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

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

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

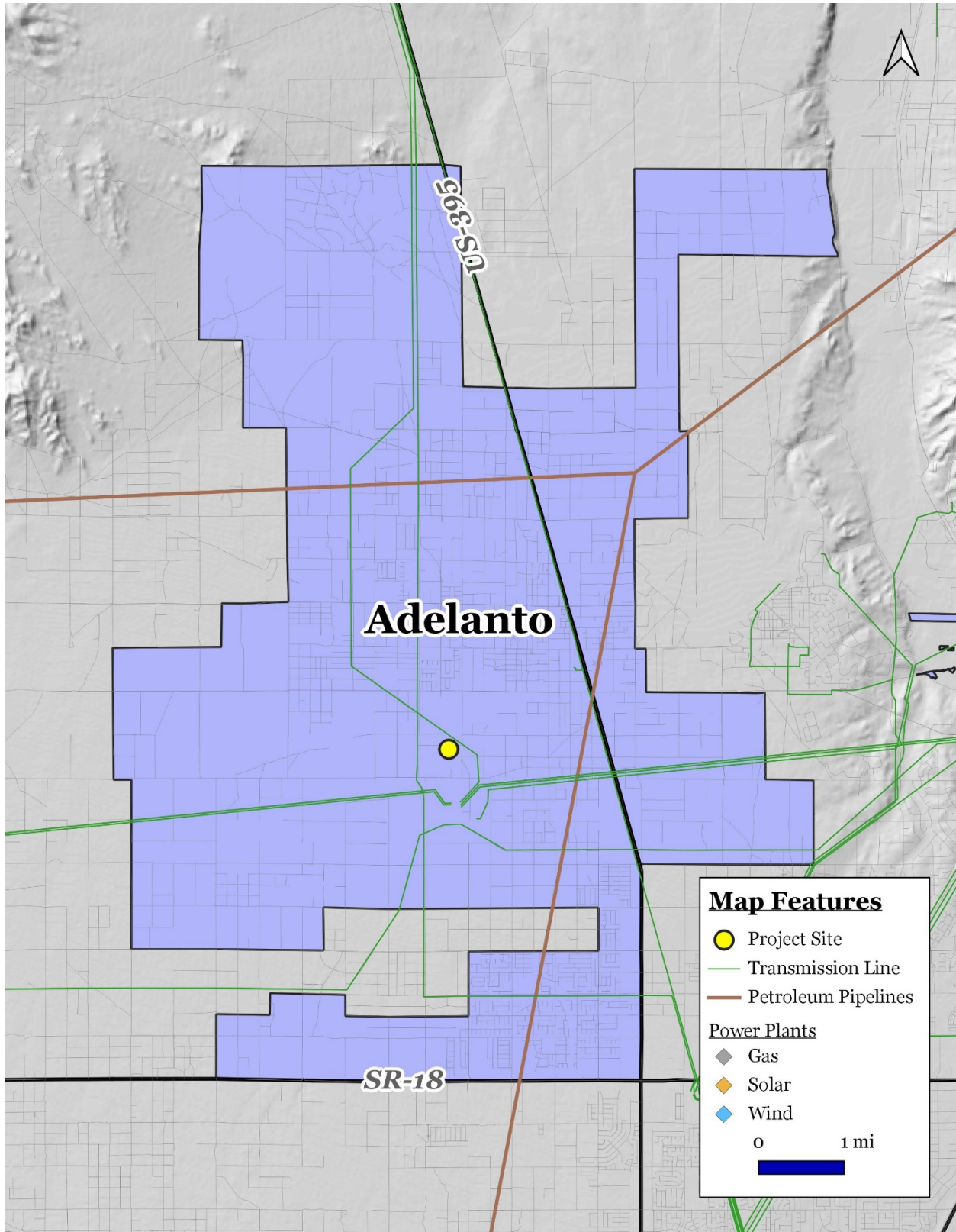


EXHIBIT 3-2 ENERGY MAP

SOURCE: CALIFORNIA ENERGY COMMISSION

3.7 GEOLOGY & SOILS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is

located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁴⁰

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The closest fault to the project site is the Mirage Valley Fault, from the Late Quaternary period, which is located approximately 1.6 miles west of the City.⁴¹

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is in a moderate liquefaction zone.⁴² According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. *As a result, the potential impacts regarding liquefaction and landslides are less than significant.*

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

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by Bryman, Helendale, and Cajon soils associations consisting of loamy fine sand with 2 to 5 percent slopes.⁴³ The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and requires soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program.

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

⁴⁰Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10.* September 2, 2022.

⁴¹California Department of Conservation. [Fault Activity Map](#).

⁴² San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

⁴³ UC Davis. *SoilWeb*. Website accessed December 11, 2021.

construction phase. As a result, the impacts will be less than significant.

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

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

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

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by Bryman, Helendale, and Cajon soils associations consisting of loamy fine sand with 2 to 5 percent slopes.⁴⁴ According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.³⁰ The applicant is required to adhere to all requirements detailed by the USDA. As a result, the potential impacts which will be less than significant.

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

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

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

The proposed project site is located on a 21.86-acre parcel that is currently vacant though it has been disturbed. The proposed development will be constructed in the northwestern portion of the City of Adelanto. The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The

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

⁴⁴ UC Davis. *SoilWeb*. Website accessed September 1, 2021.

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

closest fossil vertebrate locality is LACM7786, between Adelanto and the former George Air Force Base. This locality produced a fossil specimen of meadow vole, *Microtus*. The following mitigation will be applicable during earth-disturbing activities as a means to protect potential paleontological resources:

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

MITIGATION MEASURES

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

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

Paleontological Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely

manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

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

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

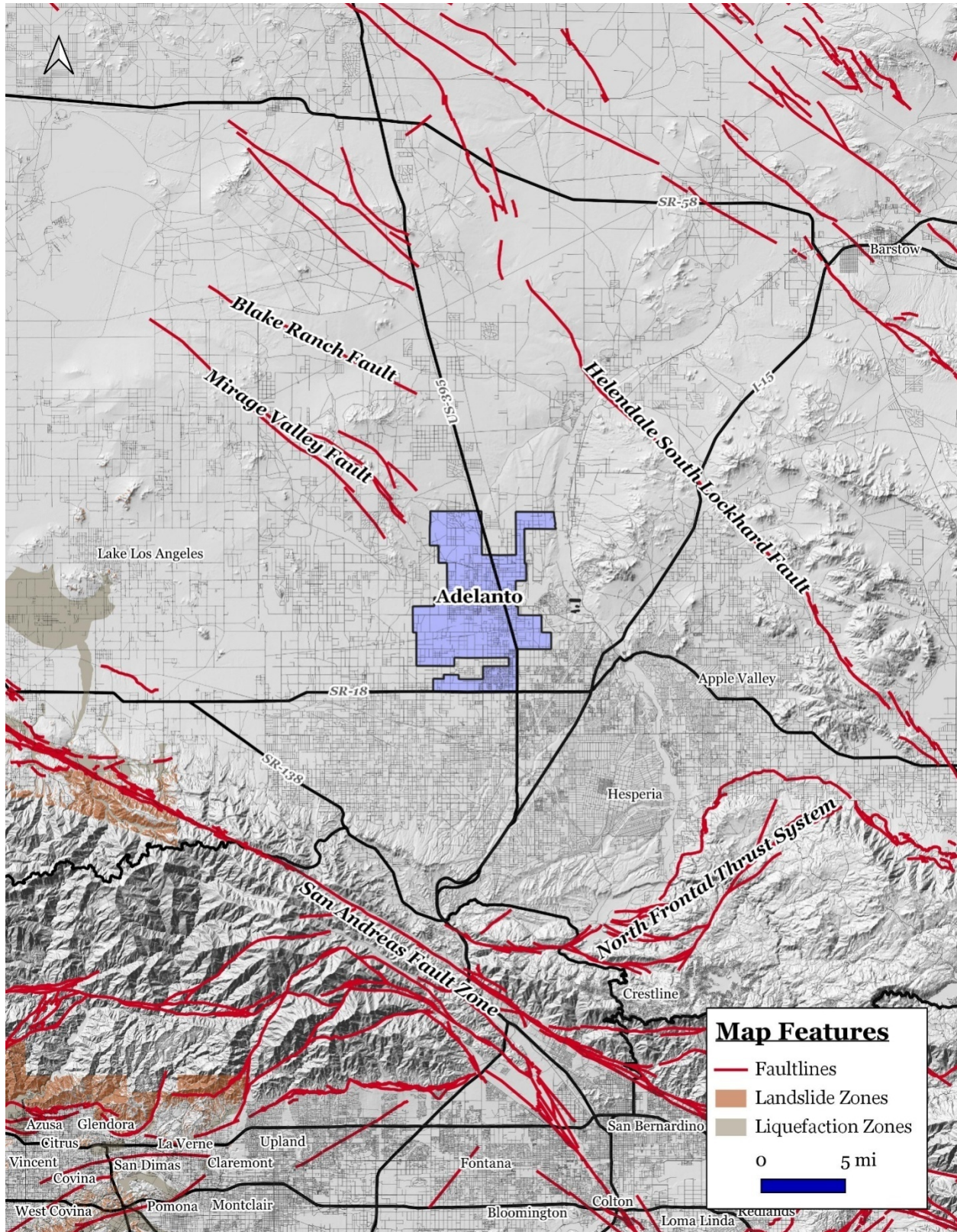


EXHIBIT 3-3 GEOLOGY MAP

SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

3.8 GREENHOUSE GAS EMISSIONS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁴⁵

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouse gases in a common and collective unit. The MDAQMD established the 10,000 MTCO₂ threshold for industrial land uses. As indicated in Table 3-4, the operational CO₂E is 1,170.11 pounds per day which is well below the threshold.

⁴⁵Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

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

Source	GHG Emissions			
	CO ₂	CH ₄	N ₂ O	CO ₂ E
Long-Term – Area Emissions	--	--	--	--
Long-Term – Energy Emissions	208.41	--	--	209.65
Long-Term – Mobile Emissions	830.61	0.04	0.04	844.07
Long-Term – Total Emissions	1,039.02	0.05	0.04	1,053.73
Total Construction Emissions	3,633.34	1.11	0.02	3,664.89
Significance Threshold				10,000 MTCO₂E

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

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

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

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was adopted in March 2021. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. It is important to note that the California Department of Transportation as well as the Counties of Los Angeles and San Bernardino are engaged in an effort to construct a multi-modal transportation corridor consisting of public transit, a new freeway, and bicycle lanes known as the High Desert Corridor (HDC). The aforementioned regional program will reduce potential GHG emissions related to excessive VMTs to levels that are less than significant.

Those Partnership jurisdictions, including Adelanto, choosing to complete and adopt local CAPs that are consistent with the County's GHG Reduction Plan and with the prior Regional Plan Program EIR and the addendum or supplemental CEQA document prepared by SBCOG will be able to tier their future project-level

CEQA analyses of GHG emissions from their CAP. This can help to streamline project-level CEQA review. The City of Adelanto selected a goal to reduce its community GHG emissions to a level that is 40% below its 2020 GHG emissions level by 2030. The City will meet and exceed this goal subject to reduction measures that are technologically feasible and cost effective through a combination of state (~60%) and local (~40%) efforts. The Pavley vehicle standards, the state's LCFS, the RPS, and other state measures will reduce GHG emissions in Adelanto's on-road, off-road, and building energy sectors in 2030. An additional reduction of 59,812 MTCO_{2e} will be achieved primarily through the following local measures, in order of reductions achieved: GHG Performance Standard for New Development (PS-1); solar installation for existing commercial/industrial facilities (Energy-8); and waste diversion and reduction (Waste-2).⁴⁶

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

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

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

- *Policy NR 1.4:* All new developments will be required to implement energy conservation techniques into the development design.

⁴⁶ San Bernardino County. *San Bernardino County Regional Greenhouse Gas Reduction Plan (SBCRGGRP)*. March, 2021.

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

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

MITIGATION MEASURES

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

3.9 HAZARDS & HAZARDOUS MATERIALS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-

38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁴⁷

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

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

⁴⁷Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.

- *Nutrients and Corrosive Chemicals.* Cannabis Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

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

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

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

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

- *Less than Significant Impact.*

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

The project’s construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project’s construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the

event of any spill, cleanup activities would be required to adhere to all pertinent protocols. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As indicated in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Environstor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project's construction phase is remote. *As a result, the impacts will be less than significant.*

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

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

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

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

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

The project site is not located within an airport land use plan and the site is not located within two miles of a public airport or public use airport.⁴⁸ The nearest airport to the city is the Southern California Logistics Airport is located approximately 3.1 miles to the northeast of the project site.⁴⁹ The project will not introduce a structure that will interfere with the approach and take off airplanes utilizing any regional airports. *As a result, no impacts related to this issue will occur.*

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

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

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

⁴⁸ Toll-Free Airline. *Los Angeles County Public and Private Airports, California*.

⁴⁹ Google Earth. Website accessed September 1, 2021.

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

The project site is not located within a “moderate fire hazard severity zone.”³³As a result, no impacts will result.

MITIGATION MEASURES

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

³³CalFire. Very High Fire Hazard Severity Zone Map.
SECTION 3.9 • HAZARDS & HAZARDOUS MATERIALS

3.10 HYDROLOGY & WATER QUALITY

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁵⁰

⁵⁰Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

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

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

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

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

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

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

The proposed project’s location would be restricted to the proposed project site and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site is presently undeveloped though there are no stream channels or natural drainages that occupy the property but are located within the vicinity of

the project site. The site would be designed so the proposed hardscape surfaces (the building and paved areas) will percolate into the landscape parkway areas. *As a result, the potential impacts will be less than significant.*

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

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Adelanto, the proposed project site is located in a flood hazard zone, labeled as “Zone X.” Thus, properties located in “Zone X” are areas of minimal flood hazard.⁵¹ The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 70 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.⁵² As a result, no impacts are anticipated.

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

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

MITIGATION MEASURES

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

⁵¹FEMA. Glossary. Flood Zones. Website accessed December 12, 2021.

⁵² Google Earth. Website accessed December 12, 2021.

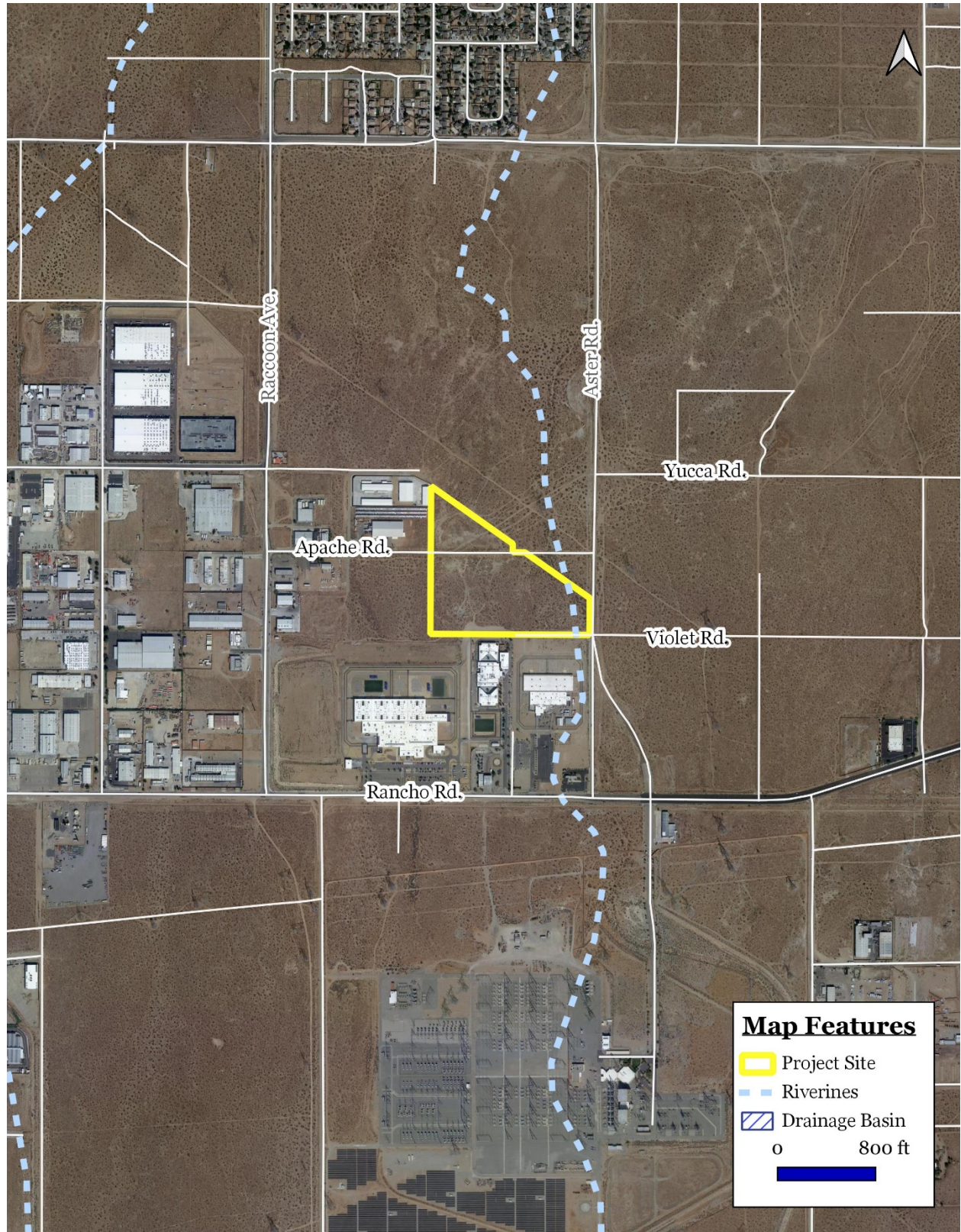


EXHIBIT 3-4
WATER RESOURCES MAP
 SOURCE: CALIFORNIA DEPARTMENT OF WATER RESOURCES

3.11 LAND USE & PLANNING

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁵³

The proposed project site is located on a site that is currently vacant though it has been disturbed by off-road activity and illegal dumping. As indicated previously, the proposed project site is located on a 21.86-acre parcel that is currently undeveloped. The site contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site and the surrounding area are provided in Exhibit 2-4. Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* Vacant undeveloped land and a utility easement extends along the proposed project's north side. These parcels are zoned as Manufacturing Industrial (MI)).⁵⁴

⁵³Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

⁵⁴ Google Maps. Site Accessed September 1, 2022 and Adelanto Zoning Map, Site Accessed, September 1, 2022.

- *East of the project site:* Aster Road extends along the project site's easterly side. Further east is undeveloped land. This area is zoned as Manufacturing Industrial (MI).⁵⁵
- *South of the project site:* Violet Road extends along the project site's south side. Further south is the Adelanto ICE Processing Center. This area is also zoned as Manufacturing Industrial (MI).⁵⁶
- *West of the project site:* Vacant though disturbed land along with developed industrial uses are located west of the project site. This area is zoned as Manufacturing Industrial (MI).⁵⁷

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

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

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

MITIGATION MEASURES

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

⁵⁵ Google Maps. Site Accessed September 1, 2022 and Adelanto Zoning Map, Site Accessed, September 1, 2022.

⁵⁶ Ibid.

⁵⁷ Ibid.

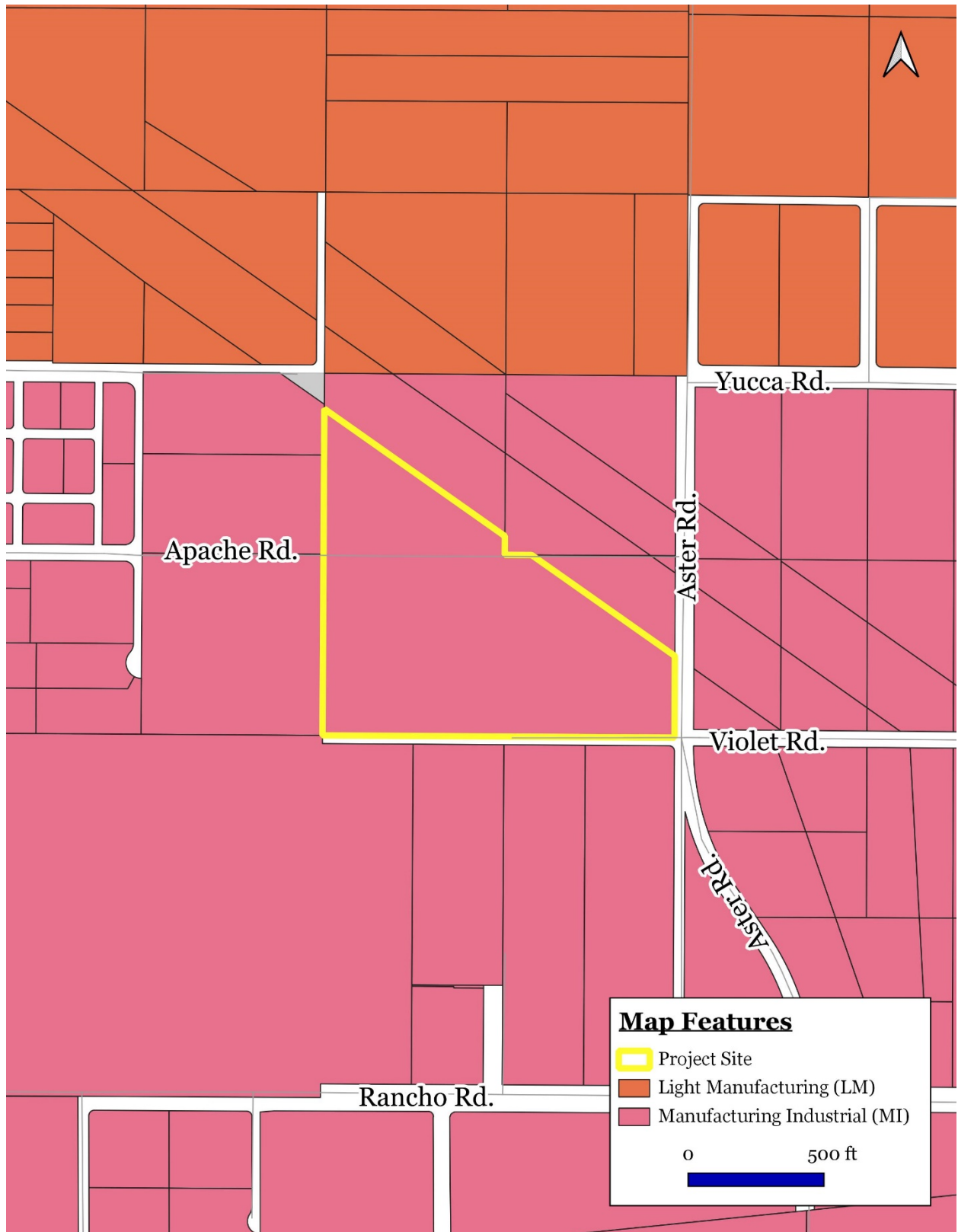


EXHIBIT 3-5
LAND USE MAP
SOURCE: CITY OF ADELANTO

3.12 MINERAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324,220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁵⁸

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

- *Mineral Resource Zone 1 (MRZ-1)*: This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

⁵⁸Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

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

- *Mineral Resource Zone 2 (MRZ-2)*: This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3)*: This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4)*: This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.⁵⁹ The project site is located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.⁶⁰ As indicated previously, there are no active mineral extraction activities occurring on-site or in the adjacent properties. *As a result, no impacts to mineral resources would occur.*

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

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

MITIGATION MEASURES

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

⁵⁹California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*.

⁶⁰ California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed December 12, 2021.

3.13 NOISE

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁶¹

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.³⁸ Future sources of noise generated on-site will

⁶¹Blue Engineering & Consulting Inc. *TPM 20498, Entitlement Plan Set, Sheets 1 through 10*. September 2, 2022.

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

include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. All of the cultivation and manufacturing of cannabis products will occur indoors. In addition, the operation of the facility will not expose any surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. Finally, there are no noise sensitive land uses located in the vicinity of the site. As a result, the proposed project will not expose sensitive receptors to excessive noise levels. *As a result, the impacts would be less than significant.*

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

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

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

The project site is located within an airport land use plan and is located within two miles of a public airport or public use airport.⁶² The nearest airport to the city is the Southern California Logistics Airport is located approximately 3.5 miles northeast of the project site.⁶³ The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. *As a result, no impacts would occur.*

MITIGATION MEASURES

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

⁶² Toll-Free Airline. *San Bernardino County Public and Private Airports, California.*

⁶³ Google Earth. Website accessed December 12, 2021.

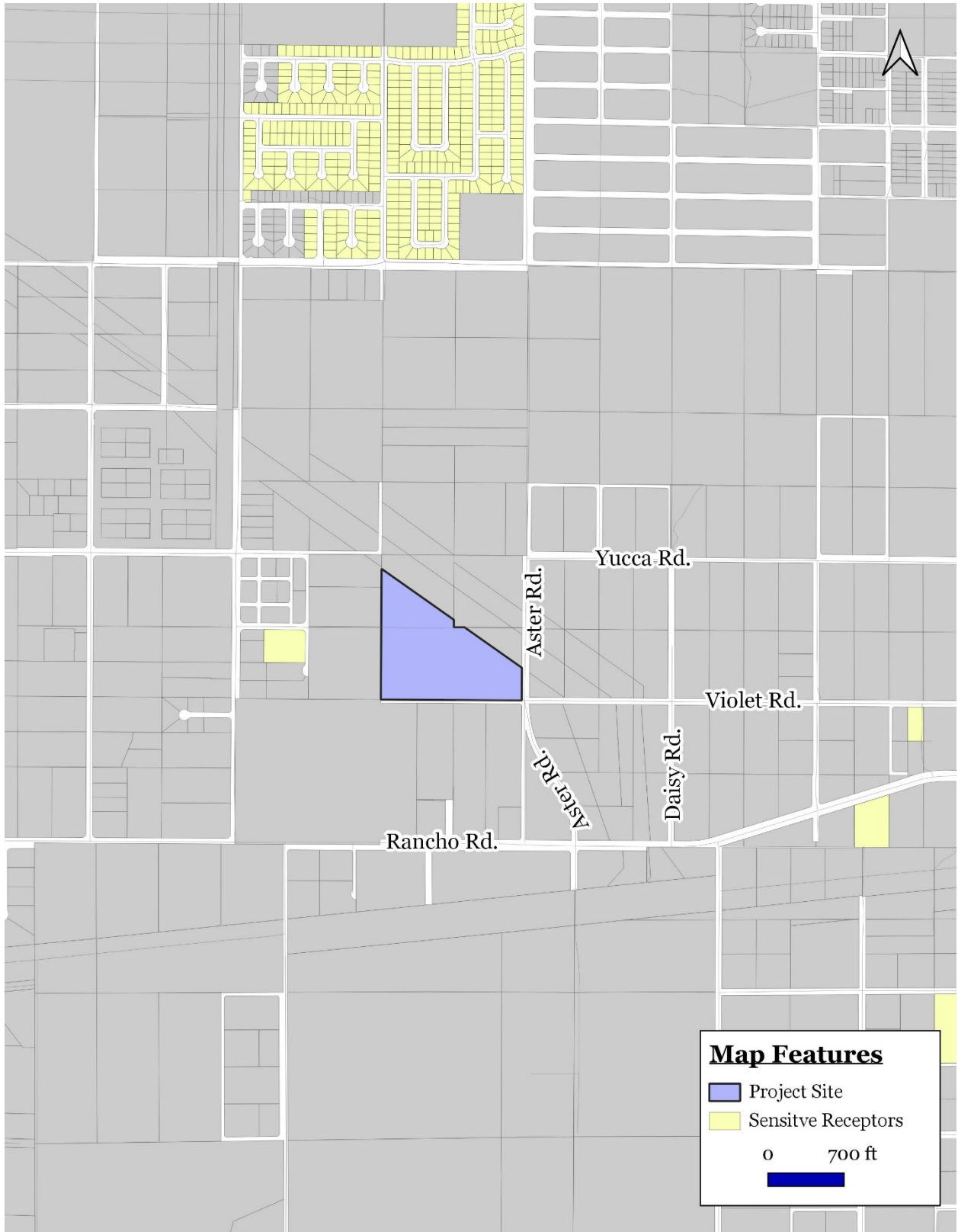


EXHIBIT 3-6
SENSITIVE RECEPTORS MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

3.14 POPULATION & HOUSING

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁶⁴

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

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

⁶⁴Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only.
- *Extension of infrastructure and other improvements.* The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.
- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in a limited increase in employment which can be accommodated by the local labor market. The cultivation facility is projected to employ 23 persons at full capacity. The hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

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

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

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

MITIGATION MEASURES

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

3.15 PUBLIC SERVICES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324,220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁶⁵

Fire Department

The City of Adelanto contracts fire protection services with the San Bernardino County Fire Department from two fire stations located within the City limits. The Fire Department currently reviews all new development plans. The proposed project will be required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires). The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all pertinent Fire Code Standards including

⁶⁵Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by City and County Fire officials to ensure adequate fire service and safety as a result of project implementation. *As a result, the potential impacts to fire protection services would be less than significant.*

Law Enforcement

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

Schools

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

Recreational Services

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

Governmental Services

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

MITIGATION MEASURES

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

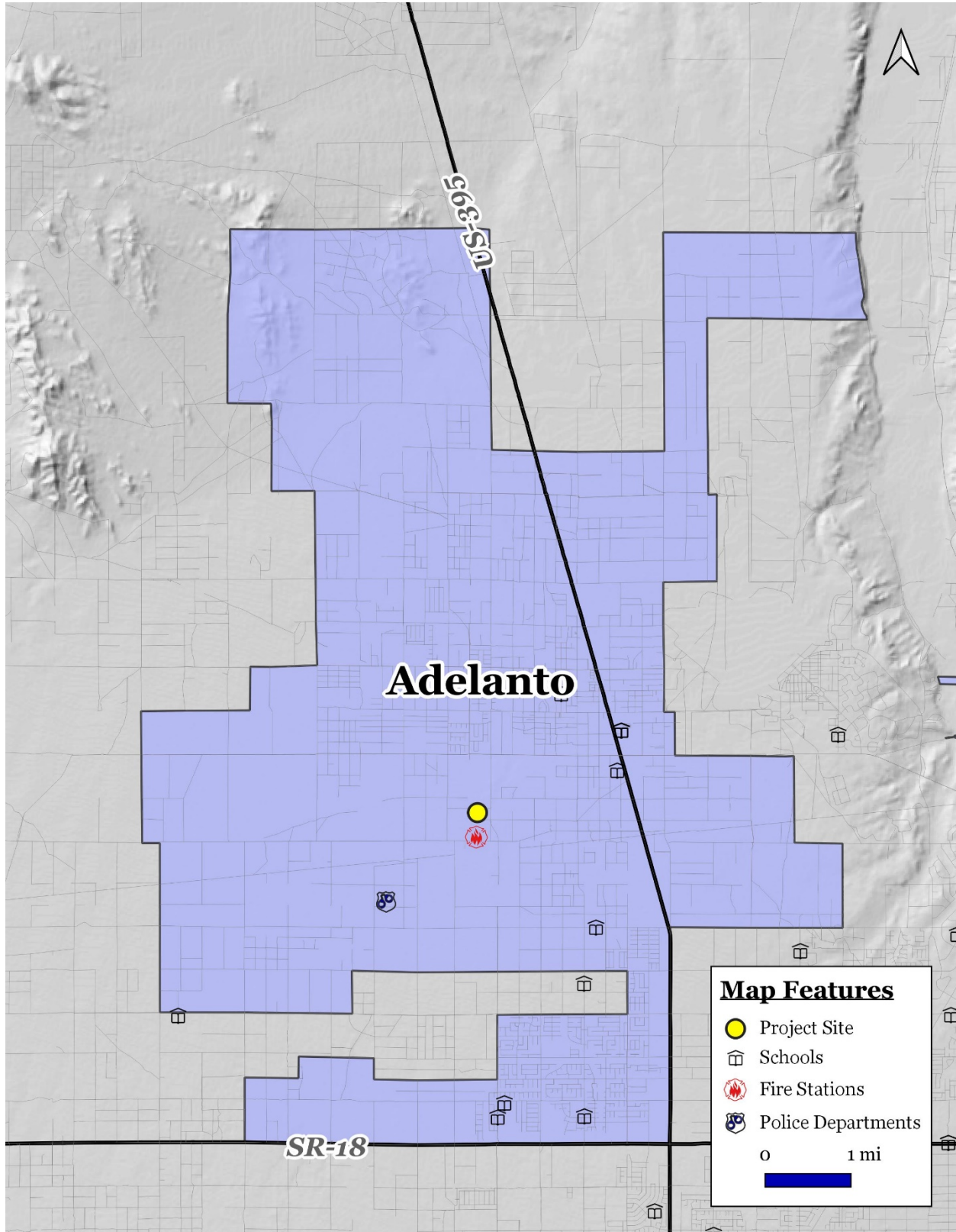


EXHIBIT 3-7 PUBLIC SERVICES MAP

SOURCE: CITY OF ADELANTO

3.16 RECREATION

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁶⁶

⁶⁷Due to the use of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. *As a result, no impacts are anticipated.*

⁶⁶Blue Engineering & Consulting Inc. *TPM 20498. Entitlement Plan Set, Sheets 1 through 10.* September 2, 2022.

⁶⁷Ibid.

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

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

MITIGATION MEASURES

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

3.17 TRANSPORTATION

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁶⁸

The key operational assumptions used in determining potential daily traffic generation are summarized below:

- The proposed project would operate the cannabis cultivation, manufacturing and distribution facility from 8:00 AM to 5:00 PM, Monday through Friday. A total of 152 full-time staff will be on-site.
- The facility will be closed to the public at all times. Non-employees such as vendors, delivery persons, and maintenance personnel, will only be allowed to enter the facility with a permitted escort.

⁶⁸Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

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

The total trip generation assumed 302 trip ends (152 round trips) per day for the 152 employees, 40 trip ends for the deliveries (20 round trips) and 40 trip ends (20 round trips) per day for the vendors. A maximum of 384 new trip ends per day are anticipated for the proposed project. *As a result, the impacts will be less than significant.*

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

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. As previously mentioned in Subsection A, the proposed project will not create a significant amount of traffic in the surrounding area. As a result, the proposed project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impacts will occur. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should also be presumed to have a less than significant transportation impact. The project site is located within 1.76 miles of Highway 395.

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

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

Access to the project site will be provided by one 35-footwide roadway connection along Violet Road. The internal roadways will consist of two travel lanes with a total aisle width of 35-feet. The new development would have a total of 22 parking spaces.⁶⁹The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. *As a result, the potential impacts would be less than significant.*

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

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

⁶⁹Blue Engineering & Consulting Inc. Aster and Violet Development, Project Information, Sheet 2. April 18, 2022.

impacts are associated with the proposed project's implementation.

MITIGATION MEASURES

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

3.18 TRIBAL CULTURAL RESOURCES

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping

would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number (APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁷⁰ A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

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

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

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

The project site is located on recognized Yuhaaviatam/Maarenga'yam (Serrano) ancestral territory.⁷¹ A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no Native historic resources was listed within the City of Adelanto. Since the project's implementation will not impact any Federal, State, or locally designated historic resources. *As a result, no impacts will occur.*

⁷⁰Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

⁷¹Native Land.ca. Website Accessed December 12, 2021

MITIGATION MEASURES

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

3.19 UTILITIES AND SERVICE SYSTEMS

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324,220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number

(APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁷²

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

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

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario.⁷³ The medicinal cannabis will be cultivated, harvested, dried, packaged, stored, and distributed from this facility. In addition, the project will be equipped with water efficient fixtures and hydroponics. *As a result, the impacts will be less than significant.*

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

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

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

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

⁷²Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

⁷³City of Adelanto. 2015 Urban Water Management Plan. Report dated June 22, 2016.

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

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

MITIGATION MEASURES

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

3.20 WILDFIRE

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the construction and subsequent occupancy of nineteen new buildings within a 21.86-acre property that is currently undeveloped. The site is zoned as Manufacturing/Industrial (M/I). The nineteen buildings would have a total floor area of 324, 220 square feet. Each building would consist of either a single or two-level structure with a maximum building height of approximately 30-feet. A stormwater detention basin would be located in the north-eastern portion of the site. The individual buildings would range in size from 10,000 square feet to 34,620 square feet. Each. The proposed project would be used for the cultivation, manufacturing, and distribution of adult and medicinal cannabis. Vehicular access would be provided by four, 26-foot-wide driveway connections with the north side of Violet Road. Access to the individual buildings would be provided by a series of internal, 26-foot wide, drive aisles. A total of 364 parking spaces would be provided, including 22 ADA parking spaces. In addition. A total of 33 loading spaces would be provided. Landscaping would total 314,360 square feet (9.10-acres) and would be provided throughout the site. The project site is located on the northeast corner of Aster Road and Violet Road. The corresponding Assessor's Parcel Number

(APN) is 0459-441-38. The proposed project would require the approval of a conditional use permit (CUP 22-10), a land development permit (LDP 22-07), and a tentative parcel map (TPM 20498).⁷⁴

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

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

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

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

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

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

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

MITIGATION MEASURES

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

⁷⁴Blue Engineering & Consulting Inc. TPM 20498. Entitlement Plan Set, Sheets 1 through 10. September 2, 2022.

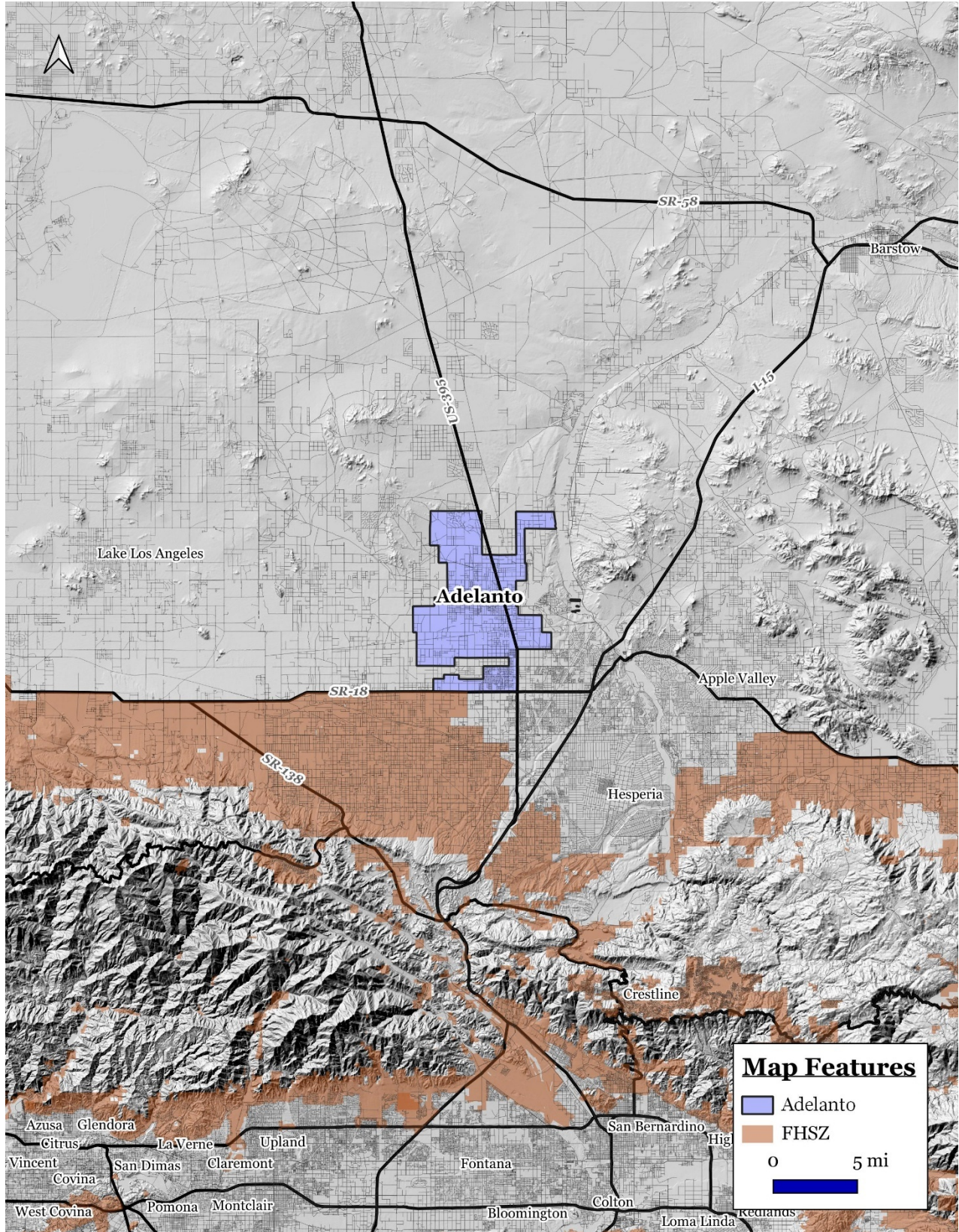


EXHIBIT 3-8

FHSZ MAP

SOURCE: CALFIRE

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

SECTION 4 CONCLUSIONS

4.1 FINDINGS

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

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

4.2 MITIGATION MONITORING

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

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SECTION 5 REFERENCES

5.1 PREPARERS

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

Marc Blodgett, Project Principal
Karla Nayakarathne, Project Manager, GIS Technician
Genesis Loyda, Administrator
Alice Ye, Administrative Assistant

5.2 REFERENCES

The references that were consulted have been identified using footnotes.

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APPENDIX A – AIR QUALITY WORKSHEETS

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

KUSA DEVELOPMENT • NW CORNER OF ASTER RD. & VIOLET RD. • APN 0459-441-38 • CUP 22-10, LDP 22-07, & TPM 20498

CalEEMod Version: CalEEMod.2020.4.0

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Aster Rd 3 - Mojave Desert Air Basin, Summer

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

Aster Rd 3

Mojave Desert Air Basin, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Manufacturing	20.00	1000sqft	0.46	20,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	31
Climate Zone	10			Operational Year	2024
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - Construction Characteristics

Off-road Equipment - no demolition

Grading - 2.5 acres

Mobile Land Use Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	5.00	30.00
tblConstructionPhase	NumDays	100.00	240.00
tblConstructionPhase	NumDays	10.00	0.00
tblConstructionPhase	NumDays	2.00	30.00

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

KUSA DEVELOPMENT • NW CORNER OF ASTER RD. & VIOLET RD. • APN 0459-441-38 • CUP 22-10, LDP 22-07, & TPM 20498

CalEEMod Version: CalEEMod.2020.4.0

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Aster Rd 3 - Mojave Desert Air Basin, Summer

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

tblConstructionPhase	NumDays	5.00	30.00
tblConstructionPhase	NumDays	1.00	30.00
tblConstructionPhase	PhaseEndDate	6/21/2023	7/26/2023
tblConstructionPhase	PhaseEndDate	6/7/2023	12/20/2023
tblConstructionPhase	PhaseEndDate	1/13/2023	12/30/2022
tblConstructionPhase	PhaseEndDate	1/18/2023	2/27/2023
tblConstructionPhase	PhaseEndDate	6/14/2023	7/19/2023
tblConstructionPhase	PhaseEndDate	1/16/2023	2/24/2023
tblGrading	AcresOfGrading	22.50	2.50
tblGrading	AcresOfGrading	15.00	2.50
tblOffRoadEquipment	HorsePower	81.00	0.00
tblOffRoadEquipment	HorsePower	247.00	0.00
tblOffRoadEquipment	HorsePower	97.00	0.00
tblOffRoadEquipment	LoadFactor	0.73	0.00
tblOffRoadEquipment	LoadFactor	0.40	0.00
tblOffRoadEquipment	LoadFactor	0.37	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	1.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00

2.0 Emissions Summary

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

KUSA DEVELOPMENT • NW CORNER OF ASTER RD. & VIOLET RD. • APN 0459-441-38 • CUP 22-10, LDP 22-07, & TPM 20498

CalEEMod Version: CalEEMod.2020.4.0

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Aster Rd 3 - Mojave Desert Air Basin, Summer

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

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	16.9917	22.9363	17.2421	0.0374	4.8862	0.9687	5.8549	2.5534	0.8913	3.4446	0.0000	3,633.3365	3,633.3365	1.1083	0.0143	3,664.8923
Maximum	16.9917	22.9363	17.2421	0.0374	4.8862	0.9687	5.8549	2.5534	0.8913	3.4446	0.0000	3,633.3365	3,633.3365	1.1083	0.0143	3,664.8923

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	16.9917	22.9363	17.2421	0.0374	4.8862	0.9687	5.8549	2.5534	0.8913	3.4446	0.0000	3,633.3365	3,633.3365	1.1083	0.0143	3,664.8923
Maximum	16.9917	22.9363	17.2421	0.0374	4.8862	0.9687	5.8549	2.5534	0.8913	3.4446	0.0000	3,633.3365	3,633.3365	1.1083	0.0143	3,664.8923

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

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2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.5552	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003
Energy	0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511
Mobile	0.4631	0.5728	3.9200	8.1600e-003	0.7920	6.9500e-003	0.7989	0.2112	6.5300e-003	0.2178		830.6074	830.6074	0.0443	0.0415	844.0734
Total	1.0374	0.7465	4.0679	9.2000e-003	0.7920	0.0202	0.8121	0.2112	0.0197	0.2310		1,039.0243	1,039.0243	0.0483	0.0453	1,053.7291

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.5552	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003
Energy	0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511
Mobile	0.4631	0.5728	3.9200	8.1600e-003	0.7920	6.9500e-003	0.7989	0.2112	6.5300e-003	0.2178		830.6074	830.6074	0.0443	0.0415	844.0734
Total	1.0374	0.7465	4.0679	9.2000e-003	0.7920	0.0202	0.8121	0.2112	0.0197	0.2310		1,039.0243	1,039.0243	0.0483	0.0453	1,053.7291

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2023	12/30/2022	5	0	
2	Site Preparation	Site Preparation	1/14/2023	2/24/2023	5	30	
3	Grading	Grading	1/17/2023	2/27/2023	5	30	
4	Building Construction	Building Construction	1/19/2023	12/20/2023	5	240	
5	Paving	Paving	6/8/2023	7/19/2023	5	30	
6	Architectural Coating	Architectural Coating	6/15/2023	7/26/2023	5	30	

Acres of Grading (Site Preparation Phase): 2.5

Acres of Grading (Grading Phase): 2.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 30,000; Non-Residential Outdoor: 10,000; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Demolition	Concrete/Industrial Saws	0	0.00	0	0.00
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20

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Grading	Graders	1	6.00	187	0.41
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	0	0.00	0	0.00
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	0	0.00	0	0.00
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	9	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	8.00	3.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	2.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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3.3 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0884	0.0000	0.0884	9.5400e-003	0.0000	9.5400e-003			0.0000			0.0000
Off-Road	0.5348	6.1887	3.9239	9.7300e-003		0.2266	0.2266		0.2084	0.2084		942.4317	942.4317	0.3048		950.0517
Total	0.5348	6.1887	3.9239	9.7300e-003	0.0884	0.2266	0.3150	9.5400e-003	0.2084	0.2180		942.4317	942.4317	0.3048		950.0517

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0183	0.0100	0.1472	3.7000e-004	0.0411	2.0000e-004	0.0413	0.0109	1.9000e-004	0.0111		37.8982	37.8982	1.0800e-003	1.0100e-003	38.2248
Total	0.0183	0.0100	0.1472	3.7000e-004	0.0411	2.0000e-004	0.0413	0.0109	1.9000e-004	0.0111		37.8982	37.8982	1.0800e-003	1.0100e-003	38.2248

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3.3 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0884	0.0000	0.0884	9.5400e-003	0.0000	9.5400e-003			0.0000			0.0000
Off-Road	0.5348	6.1887	3.9239	9.7300e-003		0.2266	0.2266		0.2084	0.2084	0.0000	942.4317	942.4317	0.3048		950.0517
Total	0.5348	6.1887	3.9239	9.7300e-003	0.0884	0.2266	0.3150	9.5400e-003	0.2084	0.2180	0.0000	942.4317	942.4317	0.3048		950.0517

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0183	0.0100	0.1472	3.7000e-004	0.0411	2.0000e-004	0.0413	0.0109	1.9000e-004	0.0111		37.8982	37.8982	1.0800e-003	1.0100e-003	38.2248
Total	0.0183	0.0100	0.1472	3.7000e-004	0.0411	2.0000e-004	0.0413	0.0109	1.9000e-004	0.0111		37.8982	37.8982	1.0800e-003	1.0100e-003	38.2248

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

3.4 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.6049	0.0000	4.6049	2.4922	0.0000	2.4922			0.0000			0.0000
Off-Road	0.9335	10.1789	5.5516	0.0141		0.4201	0.4201		0.3865	0.3865		1,364.7713	1,364.7713	0.4414		1,375.8062
Total	0.9335	10.1789	5.5516	0.0141	4.6049	0.4201	5.0250	2.4922	0.3865	2.8787		1,364.7713	1,364.7713	0.4414		1,375.8062

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0292	0.0160	0.2355	6.0000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		60.6372	60.6372	1.7300e-003	1.6100e-003	61.1597
Total	0.0292	0.0160	0.2355	6.0000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		60.6372	60.6372	1.7300e-003	1.6100e-003	61.1597

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3.4 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.6049	0.0000	4.6049	2.4922	0.0000	2.4922			0.0000			0.0000
Off-Road	0.9335	10.1789	5.5516	0.0141		0.4201	0.4201		0.3865	0.3865	0.0000	1,364.7713	1,364.7713	0.4414		1,375.8062
Total	0.9335	10.1789	5.5516	0.0141	4.6049	0.4201	5.0250	2.4922	0.3865	2.8787	0.0000	1,364.7713	1,364.7713	0.4414		1,375.8062

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0292	0.0160	0.2355	6.0000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		60.6372	60.6372	1.7300e-003	1.6100e-003	61.1597
Total	0.0292	0.0160	0.2355	6.0000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		60.6372	60.6372	1.7300e-003	1.6100e-003	61.1597

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3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6322	6.4186	7.0970	0.0114		0.3203	0.3203		0.2946	0.2946		1,104.6089	1,104.6089	0.3573		1,113.5402
Total	0.6322	6.4186	7.0970	0.0114		0.3203	0.3203		0.2946	0.2946		1,104.6089	1,104.6089	0.3573		1,113.5402

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.3700e-003	0.1081	0.0513	5.9000e-004	0.0204	9.7000e-004	0.0213	5.8600e-003	9.3000e-004	6.7900e-003		62.3521	62.3521	2.7000e-004	8.7000e-003	64.9499
Worker	0.0292	0.0160	0.2355	6.0000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		60.6372	60.6372	1.7300e-003	1.6100e-003	61.1597
Total	0.0336	0.1241	0.2868	1.1900e-003	0.0861	1.3000e-003	0.0874	0.0233	1.2300e-003	0.0245		122.9892	122.9892	2.0000e-003	0.0103	126.1097

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3.5 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6322	6.4186	7.0970	0.0114		0.3203	0.3203		0.2946	0.2946	0.0000	1,104.6089	1,104.6089	0.3573		1,113.5402
Total	0.6322	6.4186	7.0970	0.0114		0.3203	0.3203		0.2946	0.2946	0.0000	1,104.6089	1,104.6089	0.3573		1,113.5402

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.3700e-003	0.1081	0.0513	5.9000e-004	0.0204	9.7000e-004	0.0213	5.8600e-003	9.3000e-004	6.7900e-003		62.3521	62.3521	2.7000e-004	8.7000e-003	64.9499
Worker	0.0292	0.0160	0.2355	6.0000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		60.6372	60.6372	1.7300e-003	1.6100e-003	61.1597
Total	0.0336	0.1241	0.2868	1.1900e-003	0.0861	1.3000e-003	0.0874	0.0233	1.2300e-003	0.0245		122.9892	122.9892	2.0000e-003	0.0103	126.1097

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

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6112	5.5046	7.0209	0.0113		0.2643	0.2643		0.2466	0.2466		1,036.0878	1,036.0878	0.3018		1,043.6331
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.6112	5.5046	7.0209	0.0113		0.2643	0.2643		0.2466	0.2466		1,036.0878	1,036.0878	0.3018		1,043.6331

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0658	0.0360	0.5299	1.3500e-003	0.1479	7.3000e-004	0.1486	0.0392	6.8000e-004	0.0399		136.4336	136.4336	3.8800e-003	3.6200e-003	137.6094
Total	0.0658	0.0360	0.5299	1.3500e-003	0.1479	7.3000e-004	0.1486	0.0392	6.8000e-004	0.0399		136.4336	136.4336	3.8800e-003	3.6200e-003	137.6094

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3.6 Paving - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6112	5.5046	7.0209	0.0113		0.2643	0.2643		0.2466	0.2466	0.0000	1,036.0878	1,036.0878	0.3018		1,043.6331
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.6112	5.5046	7.0209	0.0113		0.2643	0.2643		0.2466	0.2466	0.0000	1,036.0878	1,036.0878	0.3018		1,043.6331

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0658	0.0360	0.5299	1.3500e-003	0.1479	7.3000e-004	0.1486	0.0392	6.8000e-004	0.0399		136.4336	136.4336	3.8800e-003	3.6200e-003	137.6094
Total	0.0658	0.0360	0.5299	1.3500e-003	0.1479	7.3000e-004	0.1486	0.0392	6.8000e-004	0.0399		136.4336	136.4336	3.8800e-003	3.6200e-003	137.6094

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

3.7 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	15.4500					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
Total	15.6417	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.3100e-003	4.0000e-003	0.0589	1.5000e-004	0.0164	8.0000e-005	0.0165	4.3600e-003	8.0000e-005	4.4300e-003		15.1593	15.1593	4.3000e-004	4.0000e-004	15.2899
Total	7.3100e-003	4.0000e-003	0.0589	1.5000e-004	0.0164	8.0000e-005	0.0165	4.3600e-003	8.0000e-005	4.4300e-003		15.1593	15.1593	4.3000e-004	4.0000e-004	15.2899

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3.7 Architectural Coating - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	15.4500					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
Total	15.6417	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.3100e-003	4.0000e-003	0.0589	1.5000e-004	0.0164	8.0000e-005	0.0165	4.3600e-003	8.0000e-005	4.4300e-003		15.1593	15.1593	4.3000e-004	4.0000e-004	15.2899
Total	7.3100e-003	4.0000e-003	0.0589	1.5000e-004	0.0164	8.0000e-005	0.0165	4.3600e-003	8.0000e-005	4.4300e-003		15.1593	15.1593	4.3000e-004	4.0000e-004	15.2899

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

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.4631	0.5728	3.9200	8.1600e-003	0.7920	6.9500e-003	0.7989	0.2112	6.5300e-003	0.2178		830.6074	830.6074	0.0443	0.0415	844.0734
Unmitigated	0.4631	0.5728	3.9200	8.1600e-003	0.7920	6.9500e-003	0.7989	0.2112	6.5300e-003	0.2178		830.6074	830.6074	0.0443	0.0415	844.0734

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated		Mitigated	
	Weekday	Saturday	Sunday	Annual VMT		Annual VMT	
Manufacturing	78.60	128.40	101.80	259,920		259,920	
Total	78.60	128.40	101.80	259,920		259,920	

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Manufacturing	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Manufacturing	0.531780	0.056022	0.172399	0.135630	0.029743	0.007796	0.007114	0.023242	0.000520	0.000194	0.028649	0.001160	0.005752

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

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

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511
NaturalGas Unmitigated	0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Manufacturing	1771.51	0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511
Total		0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511

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5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Manufacturing	1.77151	0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511
Total		0.0191	0.1737	0.1459	1.0400e-003		0.0132	0.0132		0.0132	0.0132		208.4126	208.4126	3.9900e-003	3.8200e-003	209.6511

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.5552	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003
Unmitigated	0.5552	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003

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6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1270					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.4280					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.9000e-004	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003
Total	0.5552	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003

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

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1270					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.4280					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.9000e-004	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003
Total	0.5552	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6600e-003

7.0 Water Detail

7.1 Mitigation Measures Water

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8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

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

11.0 Vegetation

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APPENDIX B – BIOLOGICAL STUDY

APPENDIX C— CULTURAL STUDY

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