

## NOTICE OF EXEMPTION

DATE:	April 26, 2023		
TO:	Larch McNeill	FROM:	Adam B. Rush, AICP Principal Consultant
	Senior Planner		
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RE:	SPR 21-05: Greenfields Group, Inc., (APN: 206-041-05 &-06)		

### **INTRODUCTION:**

#### **Phase I:**

**Phase One** consists of one (1), 8,505 square-foot (SF) building (shown on the site plan as Building “A”) for the commercial cultivation, manufacturing, and distribution of cannabis and cannabis-related products.

#### **Phase II:**

**Phase Two** consists of two (2), 6,500 square-foot (SF) buildings (shown on the site plan as Buildings “B”, “C”) for the commercial cultivation, manufacturing, and distribution of cannabis and cannabis-related products.

#### **Phase III:**

**Phase Three** consists of two (2), 6,500 square-foot (SF) buildings (shown on the site plan as Buildings “D”, and “E”) for the commercial cultivation, manufacturing, and distribution of cannabis and cannabis-related products.

Rush Environmental, LLC has reviewed the Project proposal to develop, construct, and operate a new commercial cannabis operation that includes the cultivation, manufacturing, and distribution of cannabis and cannabis-related products on approximately 1.8 gross acres. The Assessor’s Parcel Numbers (APN) are listed as 206-041-05 and 206-041-06. The property is located adjacent and southerly of Willow Avenue, northerly of Forest Blvd., westerly of Neuralia Rd., and easterly of Isabella Blvd. The Project is zoned Heavy Industrial, located within the M-2 Zoning District, as set forth in Article 22 of the California City Municipal Code (CCMC). The General Plan Land Use Designation (LUD) is identified as Heavy Industrial, which is consistent with the underlying zoning classification as well as the proposed use<sup>1</sup>.

The Project is situated in the Central core of the City’s General Plan as identified on Map 3, of the General Plan Land Use Exhibit. At the request of the Lead Agency, the following is an outline of the infill CEQA Exemption, as defined by Section 15332, which is the most appropriate CEQA determination. This Project will be developed across three development phases, which is outlined as follows:

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<sup>1</sup> Kern County General Plan, Figure 2-2, Existing General Plan Land Use Designations (page 50). <https://www.californiacity-ca.gov/CC/index.php/planning>

## Phase I:

**Phase One** consists of one (1), 8,505 square-foot (SF) building (shown on the site plan as Building “A”) for the commercial cultivation, manufacturing, and distribution of cannabis and cannabis-related products.

## Phase II:

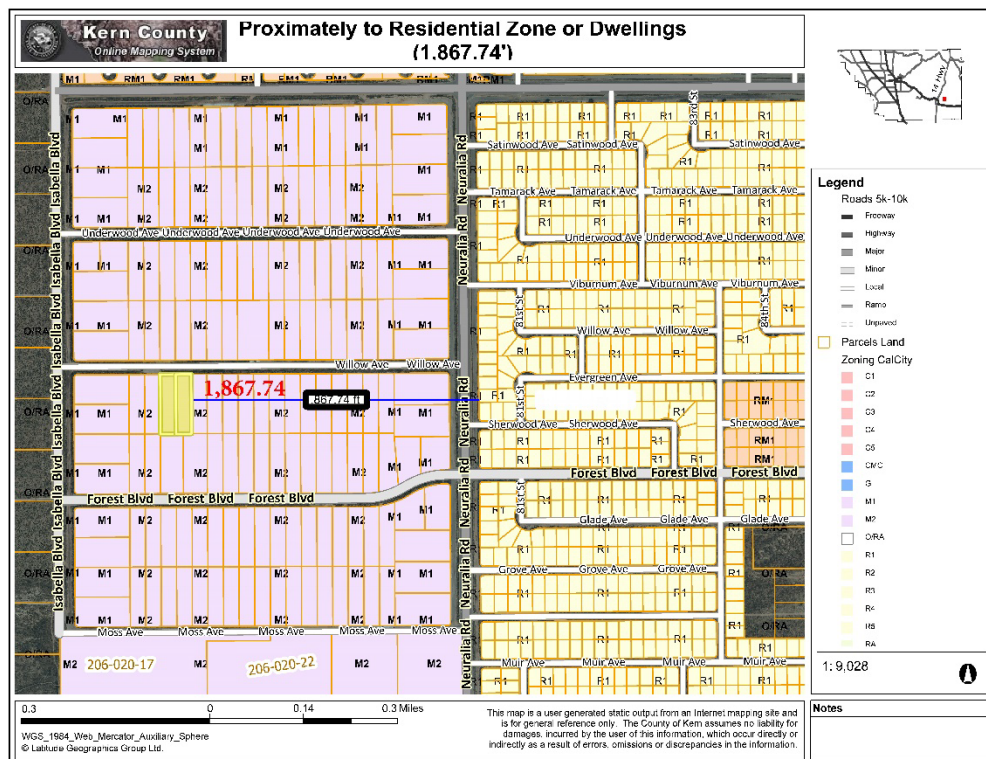
**Phase Two** consists of two (2), 6,500 square-foot (SF) buildings (shown on the site plan as Buildings “B”, “C”) for the commercial cultivation, manufacturing, and distribution of cannabis and cannabis-related products.

## Phase III:

**Phase Three** consists of two (2), 6,500 square-foot (SF) buildings (shown on the site plan as Buildings “D”, and “E”) for the commercial cultivation, manufacturing, and distribution of cannabis and cannabis-related products.

The City’s development code prohibits any commercial cannabis operations to be located within 200-feet of any residential zoning district or existing residential dwelling unit. The Project is approximately 1,867.74-feet from the nearest residentially zoned property, which is located northerly of Redwood Blvd. As such, the Project will not place commercial cannabis operations within 200-feet of any residentially zoned property or residential structure. The Project is surrounded by Heavy Industrial (M-2) zoning to the north, south, east, and west. As such, no impact upon residential zoning is anticipated.

**FIGURE 1**



The Project is subject to a Site Plan Review (SPR) process, which will authorize the submission of building and grading plans to the City for review, and ultimately for permits to be issued. Given that the Project is located within a municipal corporate boundary, is less than five (5)-acres in size and is considered an infill property (based upon the planned development opportunities set forth in the City's General Plan) the In-Fill Exemption (Section 15332) applies to the Project. As such, the Project does not require the preparation of an Initial Study to review, analyze and evaluate the possible effects resulting upon the surrounding environment.

Commercial cannabis uses are authorized in the M-2 zone as well as ancillary uses associated with the cultivation and manufacturing processes, including but not limited to the harvesting, watering, and packaging of raw materials for manufacturing and distribution by others. The M-2 zone also authorizes the distribution of commercial cannabis products to their respective end-user retail dispensaries. These facilities are subject to all State Law and regulations including the California Code of Regulations, Title 21, Division 42, Bureau of Cannabis Control. All cannabis related activities are only permitted in the interior of enclosed structures, facilities, and buildings.

The Lead Agency finds that the proposed development qualifies under a General Rule Exemption, as defined by Section 15332, of the 2022 CEQA Statutes and Guidelines. For reference, the Categorical Exemption (CE), is detailed below for ease of review and analysis:

According to the 2022, CEQA Statutes & Guidelines the following provisions are in effect per Sections 15332. IN-FILL EXEMPTION:

(a) A project is exempt from CEQA if:

***The Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.***

**Reason why the Project is exempt:**

- (a) The Project is within the Heavy Industrial General Plan Land Use Designation (GP-LUD) of the City (General Plan 2009 – 2028 (GP)). Within the General Plan, Section 2.8, Figure 1-4 details that development around the City's core contains an available level infrastructure, public facilities, and public services and that adjacent development should be encouraged to the maximum extent (GP). This Project is zoned M-2 (Heavy Industrial) as noted on the Kern County Interactive Zoning Map.<sup>2</sup> Cannabis cultivation businesses are authorized pursuant Title 5, Chapter 6, Article 3.<sup>3</sup> The M-2 zoning district provides for high intensity/heavy manufacturing processes for which

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<sup>2</sup> Kern County Interactive Zoning Map, <https://maps.kerncounty.com/H5/index.html?viewer=> (Accessed July 7, 2021)

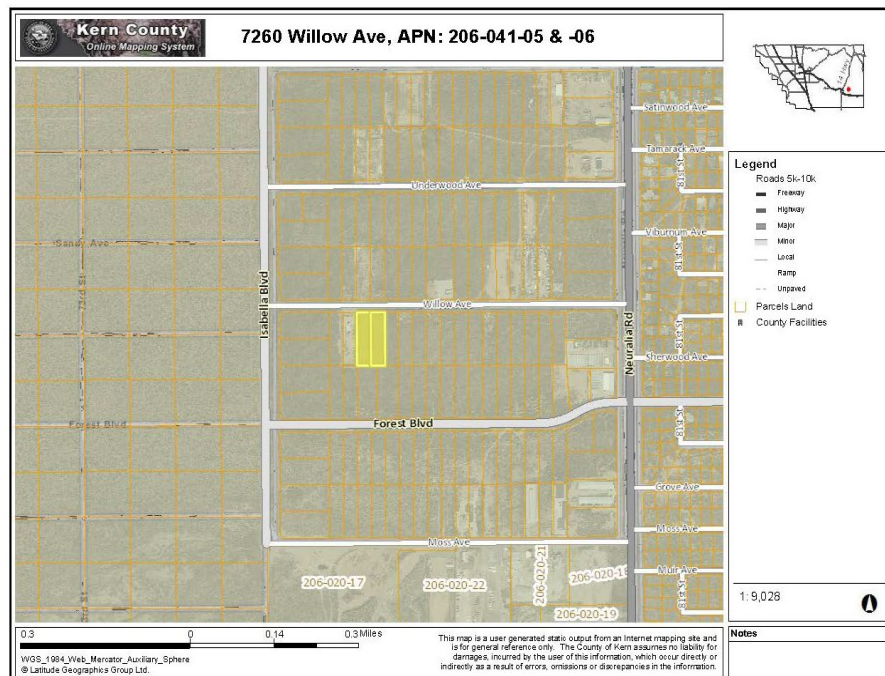
<sup>3</sup>[https://library.municode.com/ca/california\\_city/codes/code\\_of\\_ordinances?nodeId=CD\\_ORD\\_TIT5PUWE\\_CH6RECAREBUAC\\_ART3CABUPEREOWOPCAWOPEREEM](https://library.municode.com/ca/california_city/codes/code_of_ordinances?nodeId=CD_ORD_TIT5PUWE_CH6RECAREBUAC_ART3CABUPEREOWOPCAWOPEREEM)

commercial cannabis cultivation, manufacturing, and distribution is an authorized use in this zone. The proposed operations contain industrial agricultural uses completely contained within an enclosed building. The M-2 zoning district also includes uses such as research/office park developments in conjunction with light industrial use where such locations are compatible with adjacent residential lands. The Lead Agency has determined the Project to be consistent with both Article 5 and Article 9, and the provisions contained therein, and that the construction and operation of a commercial cannabis cultivation, manufacturing, and distribution facility is authorized in the M-2 zoning classification. The Project does not require either a Zone Change or General Plan Amendment in order to facilitate the intended use. As such, the Project is consistent with the underlying regulations, ordinances, and rules applicable to the Project and set forth through the City's Municipal Code.

***The proposed development occurs within City limits on a project site of no more than five (5) acres substantially surrounded by urban uses.***

- (b) The Project is less than two (2) acres and is located entirely within the municipal boundary of California City. The Project is located on previously subdivided industrial lots, which are included as part of planned industrial and manufacturing uses. Adjacent zoning and land use includes Heavy Manufacturing Zoning (M-2) to the north, south, east, west.
- (c) As identified in CEQA Guidelines Section 21094.5, the Project can be tiered under the General Plan Environmental Impact Report (EIR) that was certified for the City's General Plan and covers infill development activities.

**FIGURE 2**





- i. **Infrastructure:** This Project is located easterly of Isabella Blvd. and westerly of Neuralia Road. Both roadway facilities are City-maintained and provide north-south circulation to and from the Project. The General Plan was analyzed and approved based on construction occurring within these areas. Roads, both paved and unpaved, are constructed throughout the area. The Project will utilize a subsurface sewage system until connection to municipal sewer facilities is available. All regulations and ordinances will be followed for installation and use. This Project is not located within any zone, set forth in the California Municipal Airport Land Use Compatibility Plan.
- ii. **Traffic/Circulation:** Development of Project represents an extension of an urban-type and industrial land uses located within the Central-Core<sup>4</sup> portion of California City. The Project is approximately 661-feet from a major arterial roadway (Isabella Blvd.)<sup>5</sup>, which is identified as a General Plan Element roadway within the City's Circulation Element and the Kern County Circulation Plan. As such, growth inducing elements have already been introduced into the Project area and were previously evaluated. The City of California City utilizes the Kern County Council of Government (KernCOG) traffic impact study guidelines and thresholds to determine whether a traffic study is required and for determining potential traffic impacts. According to the KernCOG guidelines, a Project that generates less than 100-peak hour trips (with an average daily trip rate of 33.70, as shown in Table 4.2 below)<sup>6</sup>. As such, the Project is considered to have no significant impacts.

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Industrial Park	33.70	25.40	12.40	77,269	77,269
Parking Lot	0.00	0.00	0.00		
Total	33.70	25.40	12.40	77,269	77,269

- iii. **Biology:** The Project site does not contain any ephemeral streams, rills, or other similar bodies of water. Per the General Plan review and analysis, the Project area nor the vicinity contain any plant or animal species "identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations." The Project site has no value as habitat for endangered, rare, or threatened species. The parcel in question is heavily disturbed and does not represent habitat for sensitive species or species that are listed either by the federal or

<sup>4</sup> City of California City Planning Division website; Map 3. Central-Core (<https://www.californiacity-ca.gov/CC/index.php/planning/maps/land-use>); Accessed March 25, 2022

<sup>5</sup> Kern County GIS, <https://maps.kerncounty.com/H5/index.html?viewer=KCPublic> (Accessed 4-19-23).

<sup>6</sup> CalEEMod Modeling Report, Rush Environmental, LLC, dated March 25, 2022.

state agencies. The property is surrounded by planned heavy industrial and manufacturing to the north and east. In addition, biological studies have been conducted, for other Projects, within the vicinity of this proposal.<sup>7</sup> As such, no endangered species have been determined to exist, or their habitat either on or within a 500-ft buffer from the Project site. Furthermore, the Project site does not contain any federally protected wetlands or riparian habitat. Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

- iv. **Water, Air Quality, Noise:** All regulations and applicable policies from the various agencies (East Kern Air Quality Control District, Lahontan Water Quality Control Board, the City of California City General Plan, etc.) will be followed preventing any significant impacts to traffic, noise, air quality, or water quality. The Municipal Code, City of California City, California, Title 5–Public Welfare, Chapter 6, Medical Cannabis Related Businesses and Activity provides clear requirements to operating cannabis facilities in the City of California City (California City 2018). Following these requirements further ensures no significant environmental impacts are likely to occur as a result of this Project. Public services such as police and fire were coordinated with, and their approvals obtained through the Site Plan Review (SPR) process. Estimated water use is 2,312,500 gallons per year<sup>8</sup>, provided by the City’s Municipal Water Department. California City retains sufficient water supply, as detailed in the Urban Water Management Plan (California City 2017). Development of the Project site was anticipated and assumed in the calculations for the aforementioned Plan. Furthermore, pesticide use will be controlled by compliance with existing regulations through the Department of Toxic Substance Control (DTSC). Up to 12.4 tons (24,800 lbs.) of industrial waste a year will be hauled away by a licensed company and disposed of in compliance with all existing standard regulations. One delivery vehicle a week will be transporting materials to and from the facility. Up to 15 employees will be present at the facility, at any one time and during normal business hours or shifts. Per the Department of Cannabis Control (DCC), Cannabis licensees must restrict all public access to and within their facility. Per CCMC Section 9-2, lighting will be dark-sky compliant with security lights pointing downward (California City 2009). The Project will comply with all City noise ordinances. Filtration systems will be designed to control odors using carbon filters. The City

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<sup>7</sup> Biological Resource Assessment of APN 216-010-18, California City, California; Re: Update to “Biological Resource Assessment of APN 302-273-30, California City, California”

<sup>8</sup> CalEEMod Modeling Report, Rush Environmental, LLC, dated March 25, 2022.

of California City, East Kern Air Quality Control District, and Lahontan Water Quality Control Board have regulations and ordinances in place which ensure operational issues from this Project cannot cause a significant impact. The Project site will comply with District Rule 402 (Fugitive Dust) for construction sites less than 10-acres.

**(d) The project site has no value as habitat for endangered, rare, or threatened species.**

- i. The parcel in question is heavily disturbed and does not represent habitat for sensitive species or species that are listed either by the federal or state agencies. Results were determined by on-site meeting by the Project consultants and documenting such events.
- ii. The property is surrounded by planned industrial uses in all directions and is accessed by Isabella Blvd. and Neuralia Rd. which are both two-lane roadways along the Project frontage.
- iii. Based upon review of the USFWS database, the Project site does not contain any ephemeral streams, rills, or other similar bodies of water. The City's General Plan EIR and several biological surveys conducted did not identify any biological resources of concern, within the survey area. Furthermore, the Project does not contain any plant or animal species "identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations." The site does not contain any federally protected wetlands or riparian habitat.

**(e) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

- i. The property constitutes a highly disturbed and infill parcel, surrounded by urban-type land uses in all directions. The Project includes the siting and development of one (1) 8,505 square-foot (SF) Cultivation and Drying building, and four (4) 6,500 SF for cultivating indoor medical and adult use cannabis. The Project will exist within a planned urbanized setting of approved (but unbuilt) commercial cannabis cultivation businesses.
  - i. The City is a member of the Kern County Council of Government (KernCOG), and they provide regional traffic assessments, guidance, and in some cases data on a regional scale. According to the KernCOG guidelines, a Project that generates less than 100 peak hour trips is considered to have no significant impacts. The Project will construct a 34,505 square-foot commercial cannabis facility that includes cultivation, manufacturing, and distribution. The daily trips are

substantially less than the 100-trip threshold and therefore do not require further environmental review.

- ii. **Air Quality:** Based upon the CalEEMOD model analysis, the Project does not exceed the daily emissions thresholds of significance established by the Eastern Kern County Air Pollutant Control District (EKAPCD):

TABLE 2.1: PROJECT CONSTRUCTION EMISSIONS ( <i>Unmitigated</i> )			
Pollutant	Daily Maximum Emissions (lbs./day) <sup>9</sup>	EKAPCD Maximum Daily Threshold (lbs./day) <sup>10</sup>	Exceeds EKAPCD Threshold?
Reactive Organic Gas (ROG)	46.84	137	NO
Oxides of Nitrogen (NO <sub>x</sub> )	12.02	137	NO
Carbon Monoxide (CO)	7.59	548	NO
PM <sub>10</sub>	5.90	82	NO
PM <sub>2.5</sub>	3.06	82	NO
SO <sub>2</sub>	0.02	148	NO

TABLE 2.2: PROJECT OPERATIONAL EMISSIONS ( <i>Unmitigated</i> )			
Pollutant	Daily Maximum Emissions (lbs./day) <sup>11</sup>	EKAPCD Maximum Daily Threshold (lbs./day) <sup>12</sup>	Exceeds EKAPCD Threshold?
Reactive Organic Gas (ROG)	0.40	137	NO
Oxides of Nitrogen (NO <sub>x</sub> )	0.22	137	NO
Carbon Monoxide (CO)	0.95	548	NO
PM <sub>10</sub>	0.19	82	NO
PM <sub>2.5</sub>	0.06	82	NO
SO <sub>2</sub>	0.002	148	NO

- i. **Noise:** The CCMC authorizes construction to occur between the hours of 7:00am to 6:00pm, Monday through Friday, and from 8:00am to 5:00pm, on Saturday. Work shall be prohibited on

<sup>9</sup> Emission totals represent the highest levels modeled between Winter and Summer months (See CalEEMod Emissions Model Report, dated January 3, 2022, Version No. 3).

<sup>10</sup> Source: <http://www.kernair.org/Documents/CEQA/AirQualityAssessmentPreparationGuidelines.pdf>

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.



Sundays and Holidays and hours of construction, within the public right-of-way, shall be regulated by the City Public Works Department.

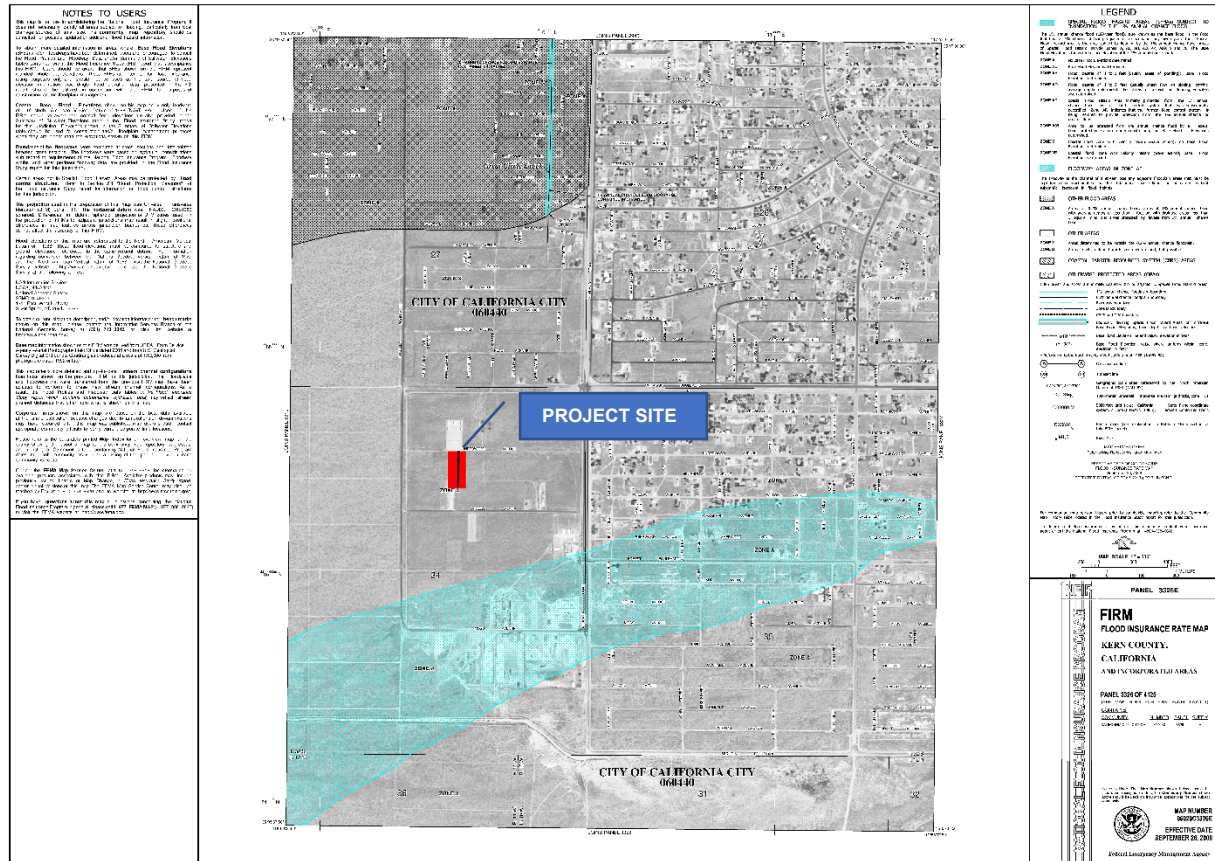
- ii. The project will only require minor construction related activities due to the prefabricated nature of the proposed structure. Furthermore, the project site will require only minimum grading activities to establish the correct grades and drainage swales as specified by the Municipal Code. As such, all grading and construction activities are anticipated to comply with Chapter One, Section 117, of the California Building Code (CBC) [codified Title 8, Chapter 1 of the CCMC]. In addition, the project is required to comply with the following special code provisions, established specifically for Day Care Centers.
- iii. Water Quality: The project site is less than one-acre in size and as such, is not required to comply with the National Pollution Discharge System (NPDES) requirements.
  - 1. During construction, the project would be required comply with the City's municipal stormwater permit requirements under the Lahontan Regional Water Quality Control Board (Region 6)<sup>13</sup>, the California Stormwater Quality Association's Best Management Practices for Construction Activities, and Compliance with these standards and regulations would minimize any water quality impacts resulting from construction of the project. Additionally, the project would reduce the number of impervious surfaces by converting a portion of the paved parking lot to landscaping, thus reducing the amount of stormwater runoff from the site. No streams, rivers, or wetlands are on or near the project site and thus none of these features would be impacted by the project. Water would be provided to the site by the California City Water Department and thus the project would not affect ground water recharge, well water supplies, or aquifers. According to the Federal Emergency Management Agency (FEMA), FIRM Map 06029C3326E (effective 9/26/2008), the Project site is not within a flood hazard area (e.g., Zone "A" or "AO") as mapped by the FEMA Flood Map Service Center.<sup>14</sup>

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<sup>13</sup> Source: <https://www.waterboards.ca.gov/lahontan>

<sup>14</sup> Source: <https://msc.fema.gov/portal/search?AddressQuery=#searchresultsanchor>

**FIGURE 3**



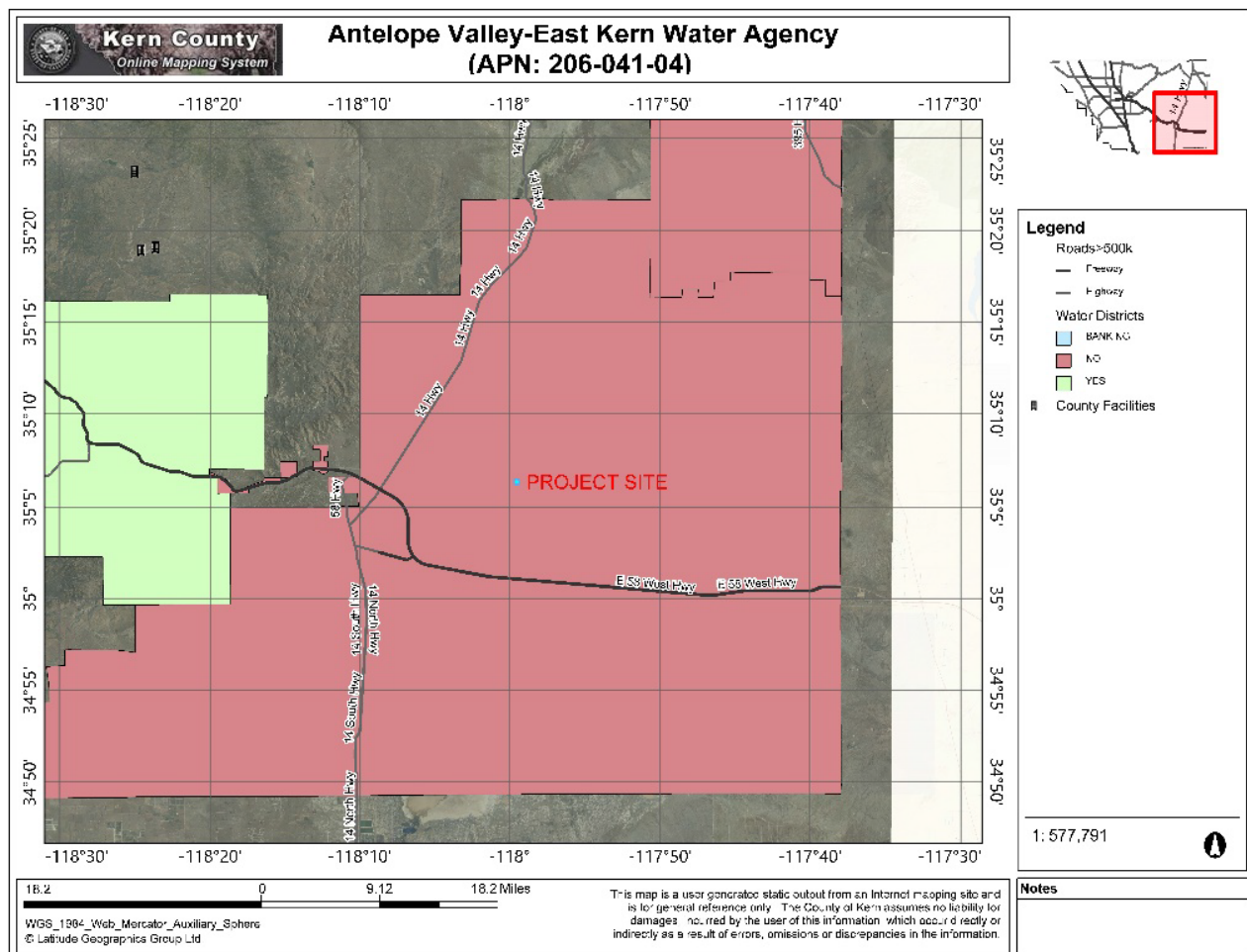
2. Notwithstanding the above, the project will only require minimum grading activities in order to site the prefabricated building within the developed pad area.
3. During grading and construction activities, the project applicant will incorporate the City's established Best Management Practices (BMPs) and Standards to the greatest extent feasible.

**I. The site can be adequately served by all required utilities and public service**

- a. The site is located in an established urban area of California City and is located in direct adjacent, and surrounded by, commercial, residential, and civic land uses which provide a wide range of service commercial opportunities for residents, patrons, and businesses in the City.
- i. The surrounding businesses and civic uses all receive adequate and reliable public utility services provided primarily by Southern California Edison (SCE) for electricity and Southern California Gas for natural gas utilities.

- ii. The California City Water Department will provide water services to the Project site. According to Figure III – Existing Water System Exhibit (California City Water Master Plan) a 4-inch water main is located within the Right-of-Way (R/W) of Willow Avenue . The project applicant is required to apply for, and complete, a **Will Serve** application prior to the issuance of a City building permit and at this time there are no moratoriums or restrictions on the issuance of **Will Serve** letters.
- iii. According to the Kern County GIS Mapping Service, the Project is located within the Antelope Valley-East Kern Water Agency (See Below):

**FIGURE 4**



- b. The project area is not restricted on telephone, cellular or internet services as multiple carriers provide competitive service for the project area.
- c. The City provides street maintenance and Capital Improvement Programs (CIP). The adjacent roadways (Willow Avenue), and the closest major cross

street (Isabella Blvd.) are in a state of good repair and maintenance will continue under the City's management.

d. Police and Fire Protection Services:

- i. **Police:** The project area is served by the California City Police Department. The department provides a full range of services to the community through three divisions: Field Operations, Administrative and Support, and Special Operations. The City contracts with the Kern County Sheriff's Office to provide and support police services in the most cost-effective manner. Police dispatching and Animal Control are contracted through Kern County, while the City is part of mutual aid agreements in case of a major incident. The Police Department also contracts with the State of California for the California Identification System, which utilizes computer technology to evaluate fingerprint evidence for the identification of criminals.
- ii. **Fire:** Fire protection services are provided by the California City Fire Department, which provides a full range of fire prevention, suppression, and advanced emergency services. Emergency Operations of the Fire Department include controlling and extinguishing fires, intervention in medical emergencies which threaten life and health, and protection of life, the environment, and property from the effects of storm, flood, earthquake, disaster, hazardous chemical releases, and other emergency events.

**Review of Article 19., Section 15300.2. Exceptions to the Categorical Exemptions:**

(a) **Location.**

- i. This exception to the Categorical Exemptions only applies to Classes 3, 4, 5, 6, and 11 and is not applicable to a Class 32 – Infill Exemption.

(b) **Cumulative Impact.** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

- i. The proposed Project is located within an urbanized area that is part of a greater industrial area planned by the City, including the Heavy and Light Industrial zoning classifications.
- ii. Using the current environmental baseline of March of 2022, the City has approved approximately three (3) commercial cannabis cultivation operations within reasonable distance from the current Project. Each of these proposed operations are similar in size and scope.
- iii. Therefore, the Project will not contribute (either directly or indirectly) to a cumulative impact related to successive projects of a similar type, location, and timeframe.

iv. As such, No Impact upon resulting cumulative impacts will occur.

(c) **Significant Effect.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

i. Based upon the proposed square-footage, property acreage, building height, coverage, and footprint; and furthermore, based upon the properties immediately surrounding and adjacent to the Project, there is no reasonable or foreseeable possibility that the Project can or will have a significant effect on the environment. Additionally, the Project is a permitted use in the M-2 Zoning District and no conditional approval and/or unusual or special circumstances have occurred or are anticipated to occur that would cause a significant impact.

(d) **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. (This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR).*

i. Based upon the Scenic Highway provisions in the City's General Plan, Interstates 14 and I-54 are not designated as Scenic Highways. According to California Scenic Highway mapping system, neither I-14 or I-54 are classified as scenic or potentially scenic anywhere along the frontage of California City. However, no portion of either Interstate is visible from any vantage point located within or immediately adjacent to the Project site. As a result, the Project would not substantially damage scenic resources within a State Scenic Highway and no impact will occur.

ii. The Project will construct a single-story building, on a parcel surrounded by buildings of similar height and will not produce any architectural enhancements, signage, colors, or materials that are inconsistent with surrounding developments. As such, the Project will not produce or result in any impact upon the scenic resources listed above.

iii. According to Table 5-3, of the City's Cultural Resources Element, specifically the Archeological Studies and Previously Recorded Prehistoric Sites, a list of previously recorded historic sites is listed. However, all sites set forth in Table 5-3 are located within Township 11 – North, Range 11 – West whereas the proposed Project is located in Section 16 of Township 32-south, Range 38-east and nowhere within the vicinity of the aforementioned sites.

(a) **Hazardous Waste Sites.** A categorical exemption shall not be used for a Project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

- i. Based upon a review of the Department of Toxic Substances Envirostor Mapping Tool and the State Water Resources Control Board GeoTracker Mapping Tool<sup>15</sup>, the Project is not located on or adjacent to any site included on any list compiled pursuant to Section 65962.5.

(b) **Historical Resources.** A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significant of a historical resource.

- i. “Historic” resources typically include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits (often found in old wells and privies). The Office of Historic Preservation has also determined that buildings and structures 45-years and older may be of historic value. According to the *State Office of Historic Preservation Historic Properties Directory*, there are no historic sites located in the City.
- ii. There are no properties in the city listed on the National Register of Historic Places.

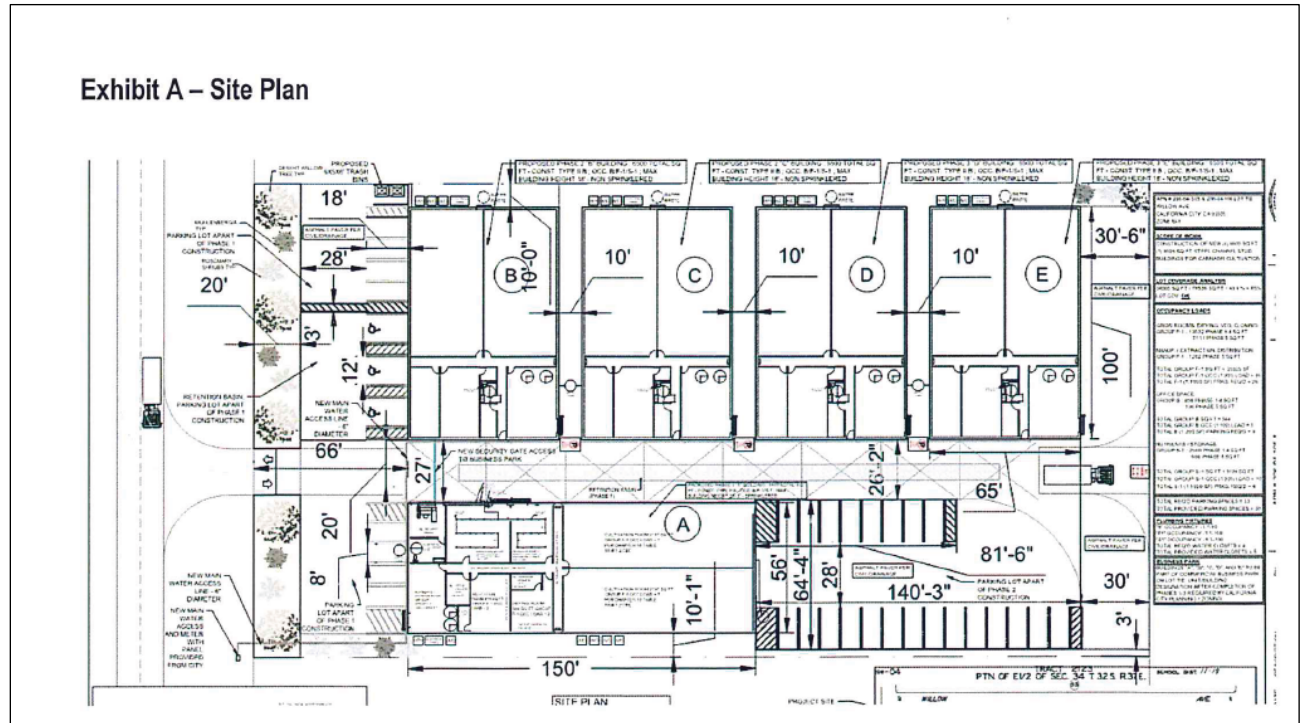
In conclusion, the proposed Project will not create (directly or indirectly) any impacts upon the environment; moreover, the Project will not impair the level of service currently provided or available to the property through the inclusion of any growth inducing measures for which are reasonably foreseen by the Project description. Accordingly, no impacts (significant or otherwise) to the environment are anticipated or reasonably foreseen to occur. The Project qualifies under a Class 32 – Infill Exemptions – pursuant to CEQA Guidelines Section 15532.

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<sup>15</sup> Department of Toxic Substances, 2015. *Envirostor Mapping Tool*. Accessed May 21, 2021. State Water Resources Control Board, 2015. *GeoTracker Mapping Tool*. Accessed March 25, 2022.



### FIGURE 5



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