INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

CUP 23-11 & LDP 23-27
RANCHO 30 CULTIVATION FACILITY PROJECT
SWC OF RANCHO RD. & RACCOON AVE.
APNS 3128-011-02, -03, & -04
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
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NOVEMBER 13, 2024

ADLT 096

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Rancho 30 Cultivation Facility (CUP 23-11 and LDP 23-27)

PROJECT APPLICANT: Mr. Jim Tracy, Rancho 30, LLC. 2241 Gilberto, Suite A, Rancho Santa Margarita, CA 92668.

PROJECT LOCATION: The proposed project site is located to the south of Rancho Road and to the west of Raccoon Avenue, in the south-central portion of the City of Adelanto. There is no current address that has been assigned to this project site. The corresponding Assessor Parcel Numbers (APNs) are 3128-011-02, -03, & -04.

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

PROJECT: The proposed project would involve 4 total phases.

- *Phase 1* consists of the construction of three new buildings totaling 86,649 square feet within the 9.48-acre property located on the southwest corner of Rancho Road and Raccoon Avenue. The APNs for this property is 3128-011-04. The three new buildings are referred to as *Buildings A, B, and C.* Building A would be a single level cultivation building and would consist of 34,425 square feet; Building B would be a single level cultivation building and would consist of 34,425 square feet; and Building C would be a two level building and would consist of 17,799 square feet. The total floor area of the three new buildings would be 86,649 square feet. Access to the proposed development would be provided by three new driveway connections. One connection would be with the south side of Rancho Avenue and two driveway connections would be with the west side of Raccoon Road. The southernmost connection on Raccoon Avenue would be for emergency access only. A total of 112 parking spaces would be provided. A proposed bioswale would be located on the site's northeast corner. Landscaping would total 48,381 square feet and would be installed throughout the site and along the site's frontages with Rancho Road and Raccoon Avenue.

- *Phase 2* of the project would consist of 5 new buildings totaling 138,110 square feet within the 10.28-acre property located west of Phase 1's buildings. The APN for this property is 3128-011-03. The 5 buildings are referred to as *Buildings F, I, L, O, and P.* Buildings F, I, and L would be a single level building and would consist of 34,425 square feet of floor area and would be used for cultivation. Building O would be used for processing would consist of 10,160 square feet; Building P would be a single level processing building and would consist of 24,675 square feet of floor area. A 33,207 square foot retention basin would be constructed in the northeast corner of the Phase 2 area. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Construction of Phase 2 would commence in the 2nd quarter of 2027.

- *Phase 3* of the project would consist of 4 new buildings totaling 123,675 square feet within the 11.09-acre property located west of Phase 2 development. The APN for this property is 3128-011-02. These 4 buildings are referred to as *Building E, H, K, and N.* Buildings E, H, and K would be a single level building and each building would consist of 34,425 square feet of floor area and would be used for cultivation. Building N would consist of a single level, be used for processing, and would total 20,400 square feet of floor area. Access would be provided by internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Construction of Phase 3 would commence in the 1st quarter of 2029.

- *Phase 4* of the project would consist of 4 new buildings totaling 131,325 square feet of floor area within the parcel that is shared with Phase 3. The APN for Phase 4 is 3128-011-02. These 4 buildings are referred to as *Building D, G, J, and M.* Buildings D, G, and J would be a single level building and each building would consist of 34,425 square feet of floor area and would be used for cultivation. Building M would be a single level processing building and would consist of 28,050 square feet of floor area. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Construction of Phase 4 would commence in the 1st quarter of 2031.

EVALUATION FORMAT: The attached initial study is prepared in accordance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of the attached Initial Study was guided by Section 15063 of the State CEQA Guidelines. The project was evaluated based on its effect on 21 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist includes a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

No Impact: No impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact: No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact with Mitigation: Possible significant adverse impacts have been identified or anticipated and mitigation measures are required as a condition of the project's approval to reduce these impacts to a level below significance.

Potentially Significant Impact: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in the attached Initial Study.

☐ Aesthetics	☐ Agriculture & Forestry Resources	✖ Air Quality
✖ Biological Resources	✖ Cultural Resources	✖ Energy
☐ Geology & Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology & Water Quality	☐ Land Use & Planning	☐ Mineral Resources
☐ Noise	☐ Population & Housing	☐ Public Services
☐ Recreation	☐ Transportation & Traffic	☐ Tribal Cultural Resources
☐ Utilities & Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation, the following finding is made:

☐	The proposed project *COULD NOT* have a significant effect on the environment, and a *NEGATIVE DECLARATION* shall be prepared.
✖	Although the proposed project could have a significant effect on the environment, there shall not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A *MITIGATED NEGATIVE DECLARATION* shall be prepared.
☐	The proposed project *MAY* have a significant effect on the environment, and an *ENVIRONMENTAL IMPACT REPORT* is required.
☐	The proposed project *MAY* have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An *ENVIRONMENTAL IMPACT REPORT* is required, but it must analyze only the effects that remain to be addressed.
☐	Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an *earlier EIR or NEGATIVE DECLARATION* pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that *earlier EIR or NEGATIVE DECLARATION,* including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature _____ Date _____

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

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APPENDICES (UNDER A SEPARATE COVER)

SECTION 1. INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

The proposed project would involve the following 4 phases.

- *Phase 1* consists of the construction of three new buildings totaling 86,649 square feet within the 9.48-acre property located on the southwest corner of Rancho Road and Raccoon Avenue. The three new buildings are referred to as *Building A*, *Building B*, and *Building C*. Building A would be a single level cultivation building and would consist of 34,425 square feet; Building B would be a single level cultivation building and would consist of 34,425 square feet; and Building C would be a two level building and would consist of 17,799 square feet. The total floor area of the three new buildings would be 86,649 square feet. Access to the proposed development would be provided by three new driveway connections. One connection would be with the south side of Rancho Avenue and two driveway connections would be with the west side of Raccoon Road. The southernmost connection on Raccoon Avenue would be for emergency access only. A total of 112 parking spaces would be provided. A proposed bioswale would be located on the site's northeast corner. Landscaping would total 48,381 square feet and would be installed throughout the site and along the site's frontages with Rancho Road and Raccoon Avenue.[1]
- *Phase 2* of the project would consist of 5 new buildings totaling 138,110 square feet within the 10.28-acre property located west of Phase 1's buildings. The APN for this property is 3128-011-03. The 5 buildings are referred to as *Buildings F, I, L, O, and P*. Buildings F, I, and L would be a single level building and would consist of 34,425 square feet of floor area and would be used for cultivation. Building O would be used for processing would consist of 10,160 square feet; Building P would be a single level processing building and would consist of 24,675 square feet of floor area. A 33,207 square foot retention basin would be constructed in the northeast corner of the Phase 2 area. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Construction of Phase 2 would commence in the 2nd quarter of 2027.
- Phase 3 of the project would consist of 4 new buildings totaling 123,675 square feet within the 11.09-acre property located west of Phase 2 development. The APN for this property is 3128-011-02. These 4 buildings are referred to as *Building E, H, K, and N*. Buildings E, H, and K would be a single level building and each building would consist of 34,425 square feet of floor area and would be used for cultivation. Building N would consist of a single level, would be used for processing, and would total 20,400 square feet of floor area. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Construction of Phase 3 would commence in the 1st quarter of 2029.
- Phase 4 of the project would consist of 4 new buildings totaling 131,325 square feet of floor area within the parcel that is shared with Phase 3. The APN for Phase 4 is 3128-011-02. These 4 buildings are referred to as *Building D, G, J, and M*. Buildings D, G, and J would be a single level building and each building would consist of 34,425 square feet of floor area and would be used for cultivation. Building M would be a single level processing building and would consist of 28,050 square feet of floor area. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Construction of Phase 4 would commence in the 1st quarter of 2031.

[1] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0*. September 8, 2023.

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

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

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Adelanto, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.[4] This Initial Study and the *Notice of Intent (NOI) to Adopt 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:

James C. Hirsch
City of Adelanto, Planning Division
11600 Air Expressway
Adelanto, California 92301

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

[3] Ibid. (CEQA Guidelines) §15050.

[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.

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.

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SECTION 2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed project site is located in the south-central portion of the City of Adelanto. 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.[6] Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15), extends in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395, traverses the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), traverses the southern portion of the City in an east to west orientation.[7] The location of Adelanto, in a regional context, is shown in Exhibit 1. A citywide map is provided In Exhibit 2.

The proposed project site is located to the south of Rancho Road and to the west of Raccoon Avenue, in the south-central portion of the City of Adelanto. There is no current address that has been assigned to this project site. The corresponding Assessor Parcel Numbers (APN) is 3128-011-04. The project site occupies a portion of Section 6, Township 5 North, Range 5 West, San Bernardino Baseline and Meridian. It is depicted on the United States Geological Survey (USGS) Adelanto, California (1993) 7.5-minute topographic quadrangle. The proposed project's latitude and longitude is 34°33'23.44"N, -117°26'49.24W". A local vicinity map is provided in Exhibit 3.

2.3 ENVIRONMENTAL SETTING

The project site consists of a vacant lot with moderate disturbance in the form of a dirt road, utility infrastructure, unofficial walking paths, off-road vehicle use, trash and refuse dumping, and signs of feral dog presence. There are no known previous developments at the site with the exception of the utility transmission lines and towers. The project site is largely flat with elevations ranging from approximately 2,945 to 2,960 feet above mean sea level (AMSL) with a slight overall slope towards Rancho Road to the north. Land surrounding the project site consist of similar topography (flat and slightly sloping to the north). Common native plants onsite and in the area include creosote, cacti, rabbit bush, interior golden bush, cheese bush, species of sage, buckwheat at higher elevations and near drainages, Joshua trees, and various grasses. Common native animals include coyotes, cottontails and jackrabbits, rats, mice, desert tortoises, roadrunners, raptors, turkey vultures, and other bird species. There are 34 Joshua trees present in scattered density throughout the project site.

The site and the surrounding area are illustrated in Exhibit 4. The project site's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*. Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* Rancho Road extends along the project site's north side. Various industrial uses are located further north of the aforementioned roadway. These parcel's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[8]

[6] Blodgett Baylosis Environmental Planning. 2023.

[7] Google Earth. Website accessed December 4, 2023.

[8] Google Maps. Site and Adelanto Zoning Map, Site Accessed, December 4, 2023.

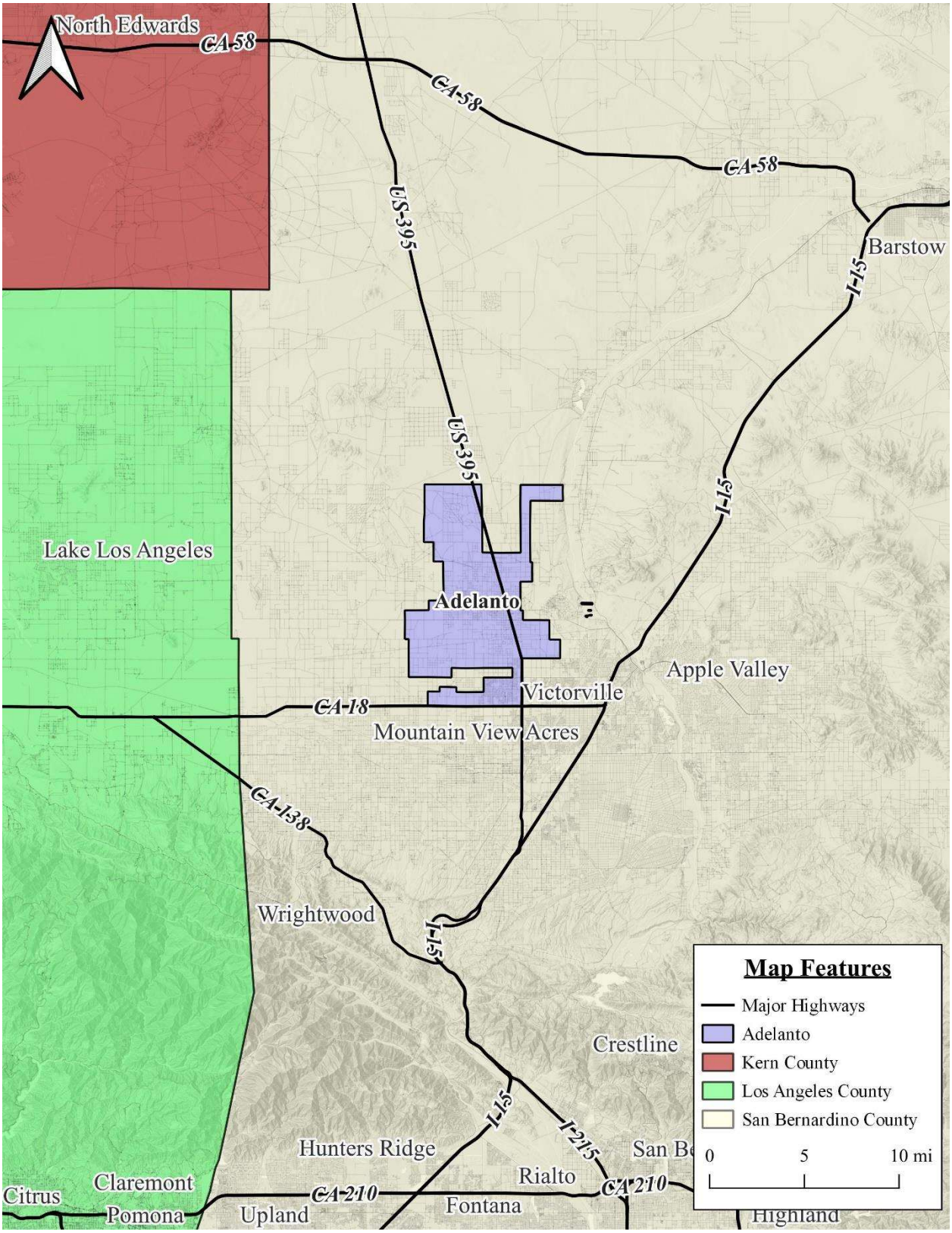


EXHIBIT 1 REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

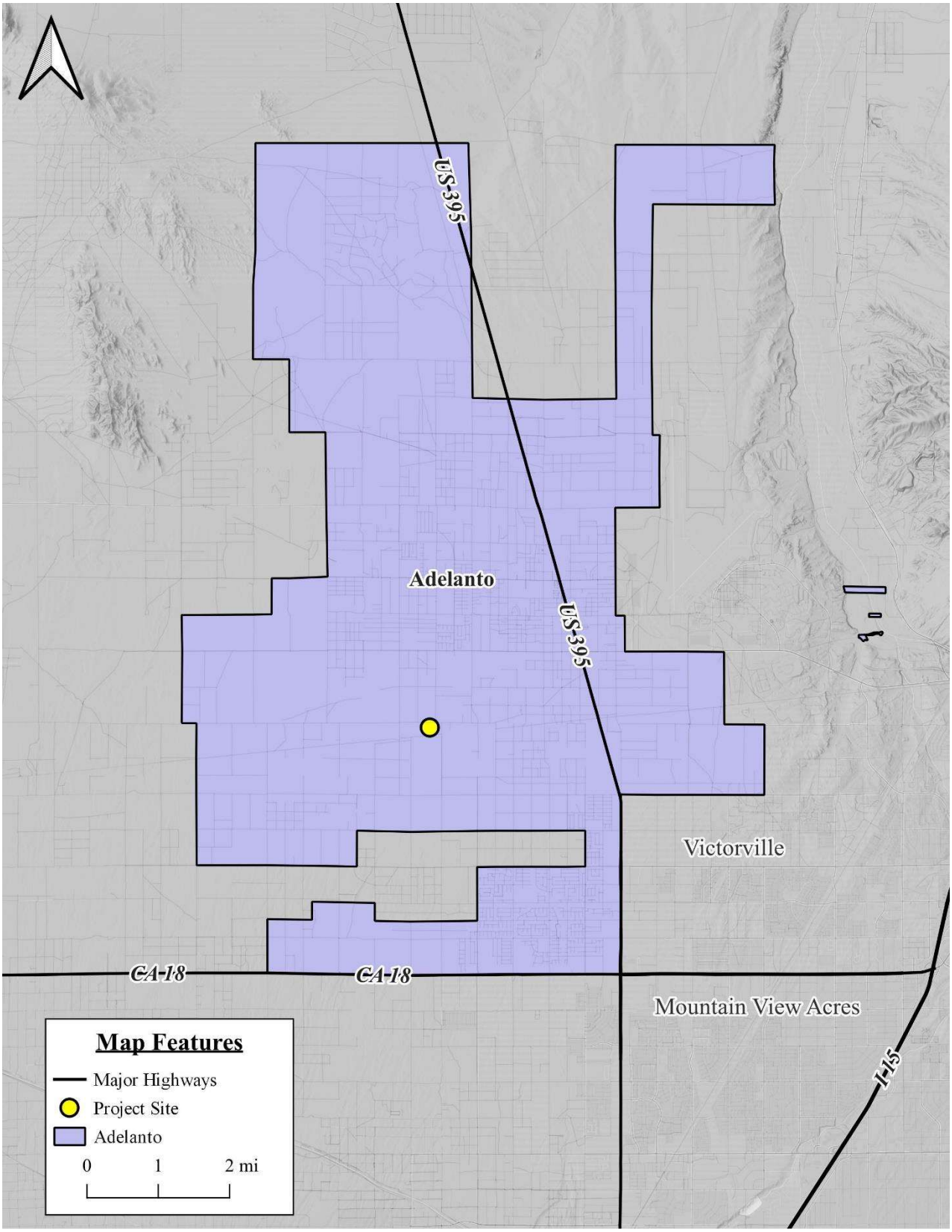


EXHIBIT 2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

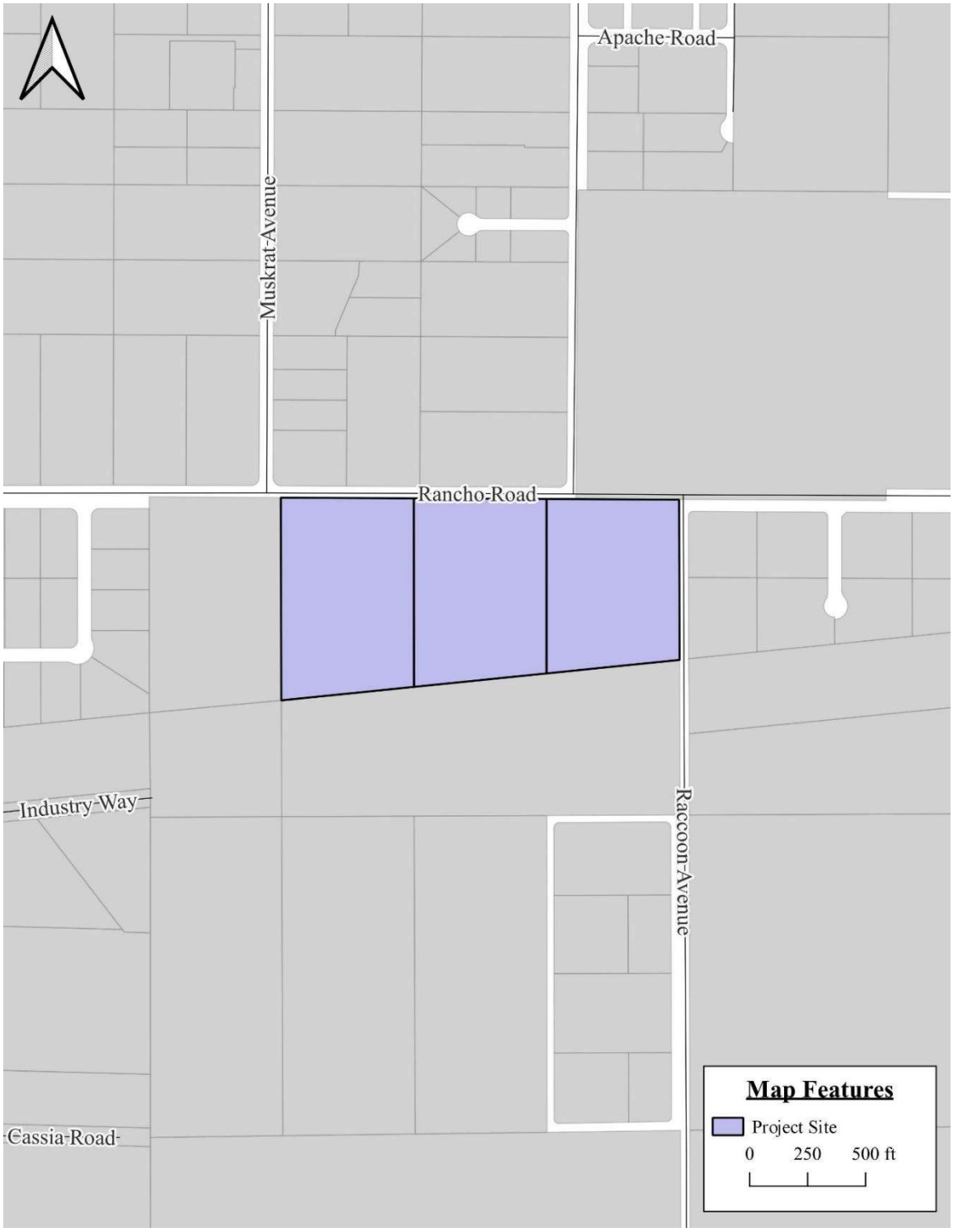


EXHIBIT 3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

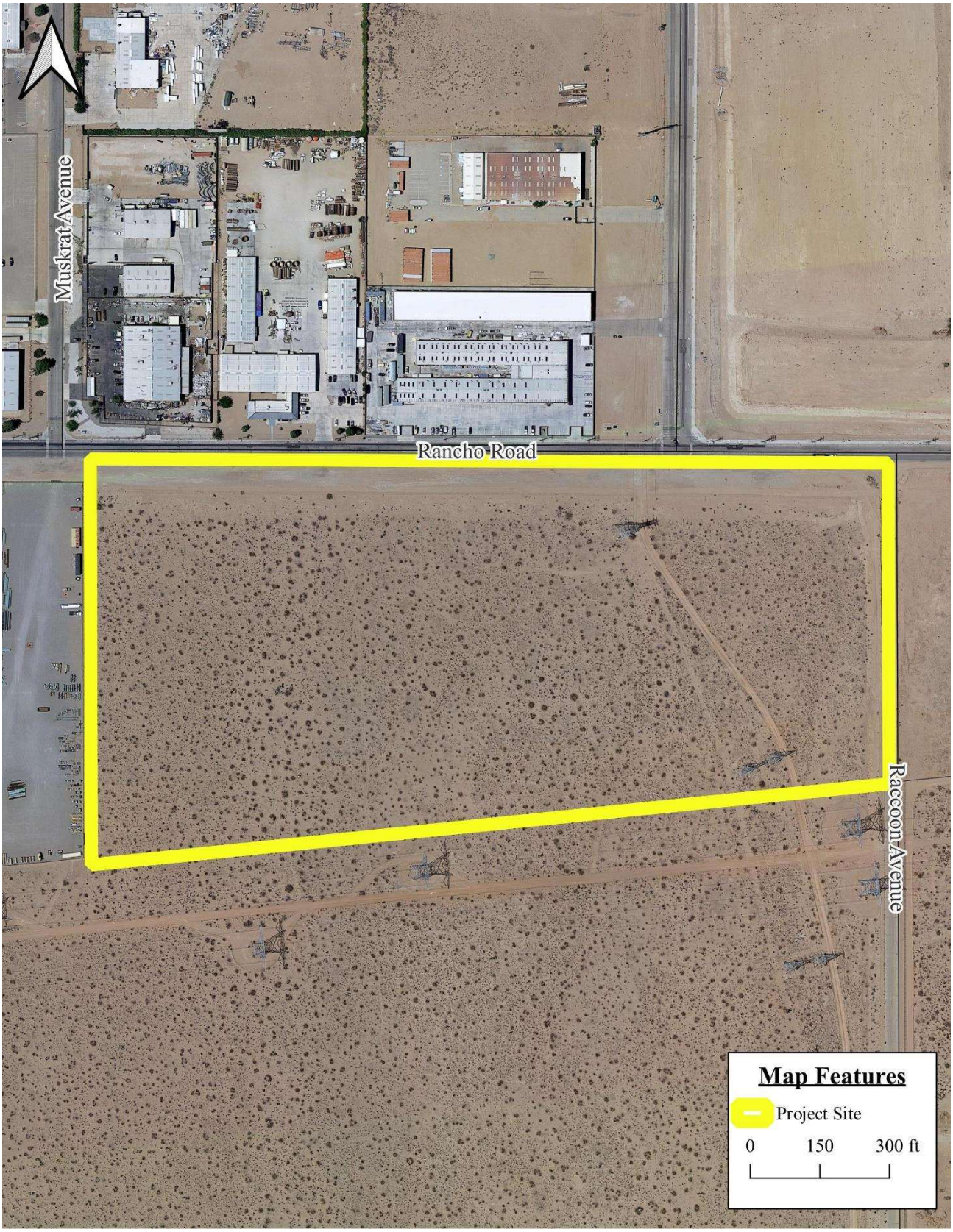


EXHIBIT 4 AERIAL IMAGE OF PROJECT SITE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *East of the project site:* Raccoon Avenue extends along the project site's east side. Vacant, undeveloped land is located further east, along the east side of the aforementioned roadway. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[9]
- *South of the project site:* Vacant, undeveloped land is located to the south of the project site. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.
- *West of the project site:* An industrial use is located to the west of the project site. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[10]

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PHASE 1 PROJECT

Key elements of the proposed Phase 1 project are summarized below and on the following page.

- *Proposed Phase 1 Site Plan*. The proposed Phase 1 development will house medical and recreational marijuana cultivation uses. The total gross site building footprint would be 79,747 square feet. The internal roadways and paved areas would total 60,604 square feet. Concrete curbs and gutters would total 7,699 square feet. Finally, on-site landscaped areas would total 48,381 square feet. The proposed project would involve the construction of three new buildings with a total floor area of 86,649 square feet within the 9.48-acre project site. The three new buildings are referred to as *Building A*, *Building B*, and *Building C*.[11]
- *Cultivation Building A*. Building A would be a single level cultivation building and would consist of 34,425 square feet of floor area. The maximum building height would be 27-feet. The overall building's dimensions would be 255 feet by 135 feet. This building would include 30,028 square feet of cultivation area, 1,125 square feet of office and business area, and 3,272 square feet for the proposed storage area. This building would include 12 cultivation rooms, 1 fertigation (fertilization) room, a lab area, 3 drying rooms, a small office, a break room, and rest rooms. Parking stalls would be located along the north and east sides of the proposed building. The main public and employee entrances would be located on the building's north elevation. Two roll-up doors would be located on the building's front (north) elevation. According to the project architect, the building's construction type would be Type II-B. According to the project architect, the maximum occupant load for this building is 119 persons.[12]
- *Cultivation Building B*. Building B would be a single level cultivation building and would consist of 34,425 square feet of floor area. The maximum building height would be 27-feet. The overall building's dimensions would be 255 feet by 135 feet. This building would include 30,028 square feet of cultivation area, 1,125 square feet of office and business area, and 3,272 square feet for the proposed storage area. This building would include 12 cultivation rooms, 1 fertigation (fertilization) room, a lab area, 3 drying rooms, a small office, a break room, and rest rooms. Parking stalls would be located along the south and east sides of the proposed building. Two roll-up doors would be located on the building's front (north) elevation. The main public and employee entrances would be located on the building's south

[9] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0*. September 8, 2023.

[10] Ibid.

[11] Ibid.

[12] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0*. September 8, 2023

elevation. According to the project architect, the building's construction type would be Type II-B. According to the project architect, the maximum occupant load for this building is 119 persons.[13]

- *Processing Building C.* Building C would be a two level building and would consist of 17,799 square feet. The maximum building height would be 29-feet. The overall building's dimensions would be 65 feet by 191 feet. This building would include 9,700 square feet for the processing area, 4,051 square feet of offices and business area, and 3,996 square feet of storage area. This building would include warehouse and storage rooms, rest rooms, quality control room, and a trimming room. Parking stalls would be located along the west and south sides of the proposed building. The main public and employee entrances would be located on the building's north elevation. According to the project architect, the building's construction type would be Type II-B. According to the project architect, the maximum occupant load for this building is 72 persons.[14]
- *Access.* Access to the proposed development would be provided by three new driveway connections. One connection would be with the south side of Rancho Avenue and two driveway connections would be with the west side of Raccoon Road. The southernmost driveway connection with Raccoon Avenue would be used for emergency access only. Internal site access to the individual buildings would be provided by an internal, 26-foot wide, drive aisle.[15]
- *Parking*. A total of 112 parking spaces would be provided. Of this total, 102 spaces would be standard size stalls, 8 stalls would be ADA stalls, and 2 stalls would be reserved for bicycles.[16] Truck loading areas would be located to the south of Building A and the north side of Building B. Two roll-up doors would be located on the front (north) elevations of Building A and Building B.
- *Landscaping*. A proposed bioswale would be located on the site's northeast corner. Landscaping would total 48,381 square feet and would be installed throughout the site and along the site's frontages with Rancho Road and Raccoon Avenue. The proposed chain-link fence (8-foot high) would be screened by shrubs.[17]
- *Utilities.* Power (electrical) would be met with connections to the existing Southern California Edison utility lines. A Southern California Edison transmission line easement extends to the site' south side. Water and sewer line connections would be extended to Raccoon Avenue.[18]
- *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 Phase 1 project is summarized in Table 1.

[13] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023

[14] Ibid.

[14] Ibid.

[15] Ibid.

[16] Ibid.

[17]Ibid.

[18] Ibid.

Table 1 Phase 1 Project Summary Characteristics

Building/Lot No.	Bldg. Area (sq. ft.)	Bldg. Hight	Occupancy	Bldg. Type
Total Bldg.	86,649 sq. ft.	--	310	--
Cultivation Bldg. A	34,425 sq. ft.	27 ft.	119	Type II-B
Cultivation Bldg. B.	34,425 sq. ft.	27 ft.	119	Type II-B
Processing Bldg. C	17,799 sq. ft.	29 ft.	72	Type II-B
Landscaping	48,381 sq. ft.	--	--	--

Source: MO+RE Design Solutions, Inc.

2.4.2 PHYSICAL CHARACTERISTICS OF THE PROPOSED PHASE 2 PROJECT

Construction of Phase 2 would commence in the 2nd quarter of 2027. Key elements of the proposed Phase 2 project are summarized below.[19]

- *Site Plan. Phase 2* of the project would consist of 5 new buildings totaling 138,110 square feet within the 10.28-acre property located west of Phase 1's buildings. The APN for this property is 3128-011-03. The 5 buildings are referred to as *Buildings F, I, L, O, and P*.
- *Cultivation Buildings.* Buildings F, I, and L would be a single level building and each building would consist of 34,425 square feet of floor area and would be used for cultivation. According to the project architect, the building's construction type would be Type II-B.
- *Processing Buildings.* Building O would be used for processing would consist of 10,160 square feet; Building P would be a single level processing building and would consist of 24,675 square feet of floor area. According to the project architect, the building's construction type would be Type II-B.
- *Open Space.* A 33,207 square foot retention basin would be constructed in the northeast corner of the Phase 2 area.
- *Access and Parking*. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Parking stalls would be located adjacent to the proposed buildings.

2.4.3 PHYSICAL CHARACTERISTICS OF THE PROPOSED PHASE 3 PROJECT

Construction of Phase 3 would commence in the 1st quarter of 2029. Key elements of the proposed Phase 3 project are summarized below.[20]

- *Site Plan.* Phase 3 of the project would consist of 4 new buildings totaling 123,675 square feet within the 11.09-acre property located west of Phase 2 development. The APN for this property is 3128-011-02. These 4 buildings are referred to as *Building E, H, K, and N.*
- *Cultivation Buildings.* Buildings E, H, and K would be a single level building and each building would consist of 34,425 square feet of floor area and would be used for cultivation. According to the project architect, the building's construction type would be Type II-B.

[19] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023

[20] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023

[20] Ibid.

- *Processing Buildings*. Building N would consist of a single level, would be used for processing, and would total 20,400 square feet of floor area. According to the project architect, the building's construction type would be Type II-B.
- *Access and Parking*. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Parking stalls would be located adjacent to the proposed buildings.

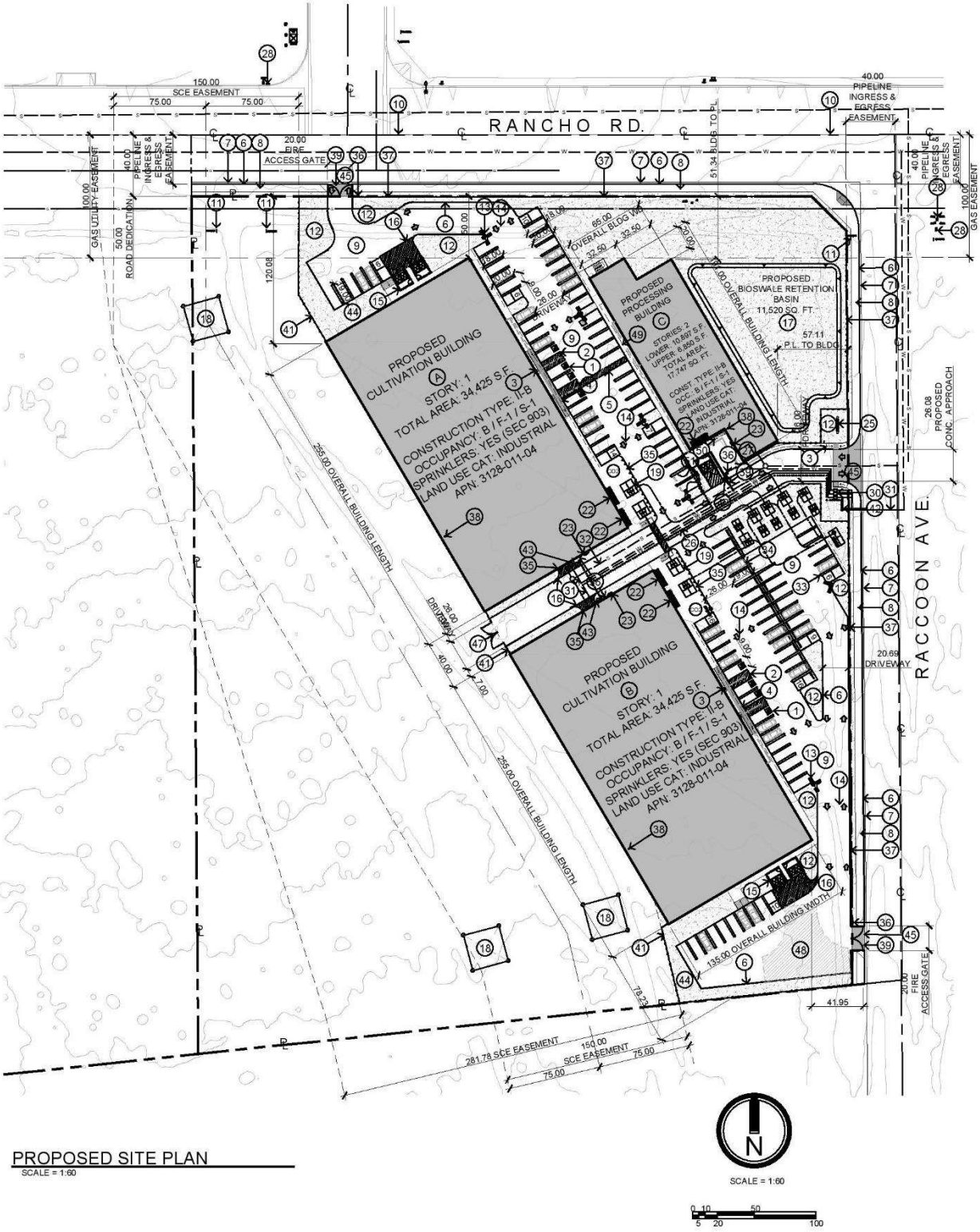
2.4.4 PHYSICAL CHARACTERISTICS OF THE PROPOSED PHASE 4 PROJECT

Construction of Phase 4 would commence in the 1st quarter of 2031. Key elements of the proposed Phase 4 project are summarized below.[21]

- *Site Plan*. Phase 4 of the project would consist of 4 new buildings totaling 131,325 square feet of floor area within the parcel that is shared with Phase 3. The APN for Phase 4 is 3128-011-02. These 4 buildings are referred to as *Building D, G, J, and M*.
- *Cultivation Buildings*. Buildings D, G, and J would be a single level building and each building would consist of 34,425 square feet of floor area and would be used for cultivation. According to the project architect, the building's construction type would be Type II-B.
- *Processing Buildings*. Building M would be a single level processing building and would consist of 28,050 square feet of floor area. According to the project architect, the building's construction type would be Type II-B.
- *Access and Parking*. Access would be provided by an internal drive aisles that would ultimately connect to Rancho Road or Raccoon Avenue. Parking stalls would be located adjacent to the proposed buildings.

The proposed Phase 1 site plan is illustrated in Exhibit 5, building elevations are provided in Exhibits 6 through 8. The entire development (Phases 1 through 4) are shown in Exhibit 9. Table, 2 summarizes the nature and extent of the future development that is proposed for all four phases.

[21] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0*. September 8, 2023



PROPOSED SITE PLAN
SCALE = 1:60

EXHIBIT 5 PHASE 1 SITE PLAN

SOURCE: MO+RE Design Solutions, Inc.

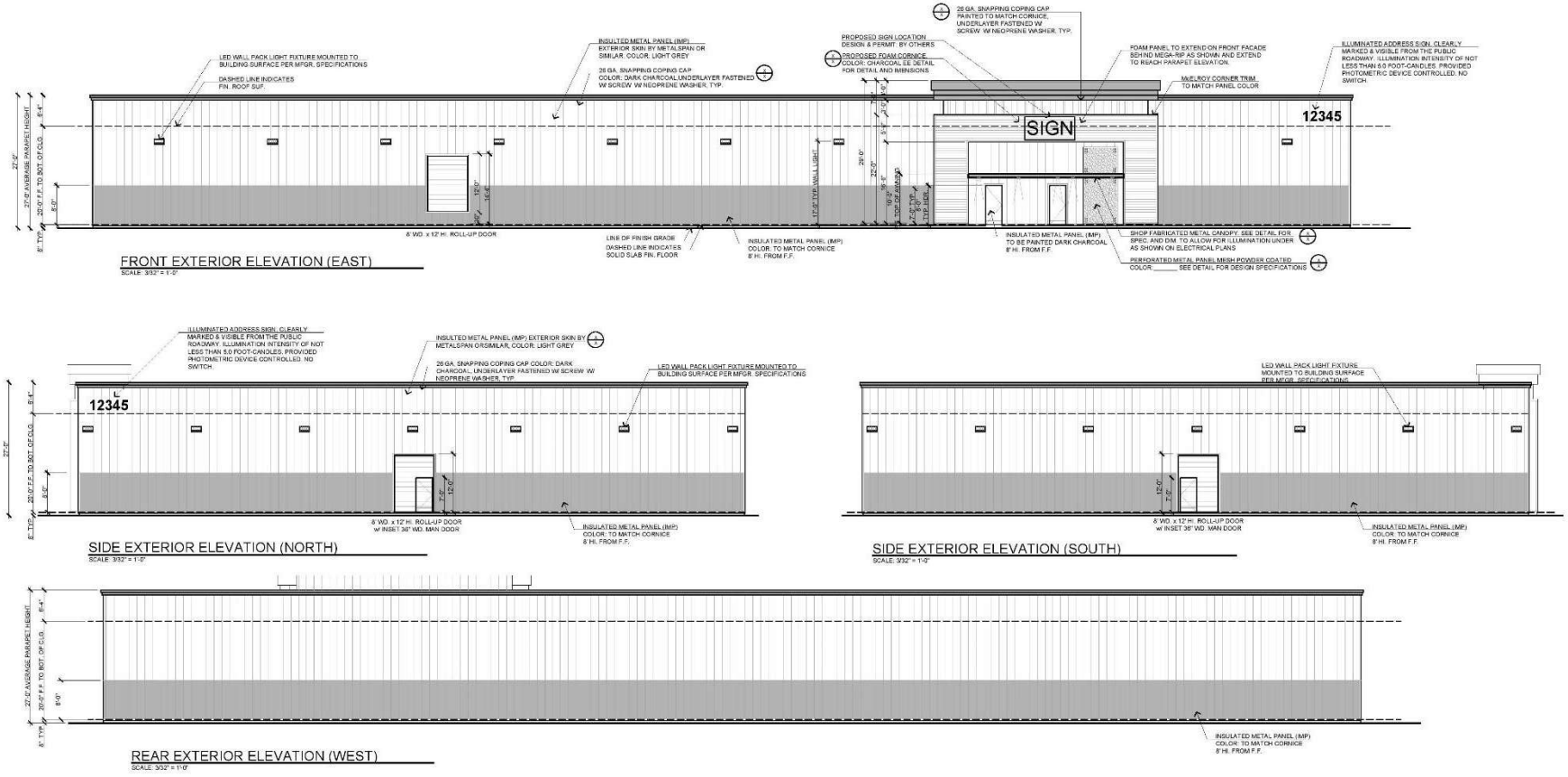


EXHIBIT 6 BUILDING A ELEVATIONS

SOURCE: MO+RE Design Solutions, Inc.

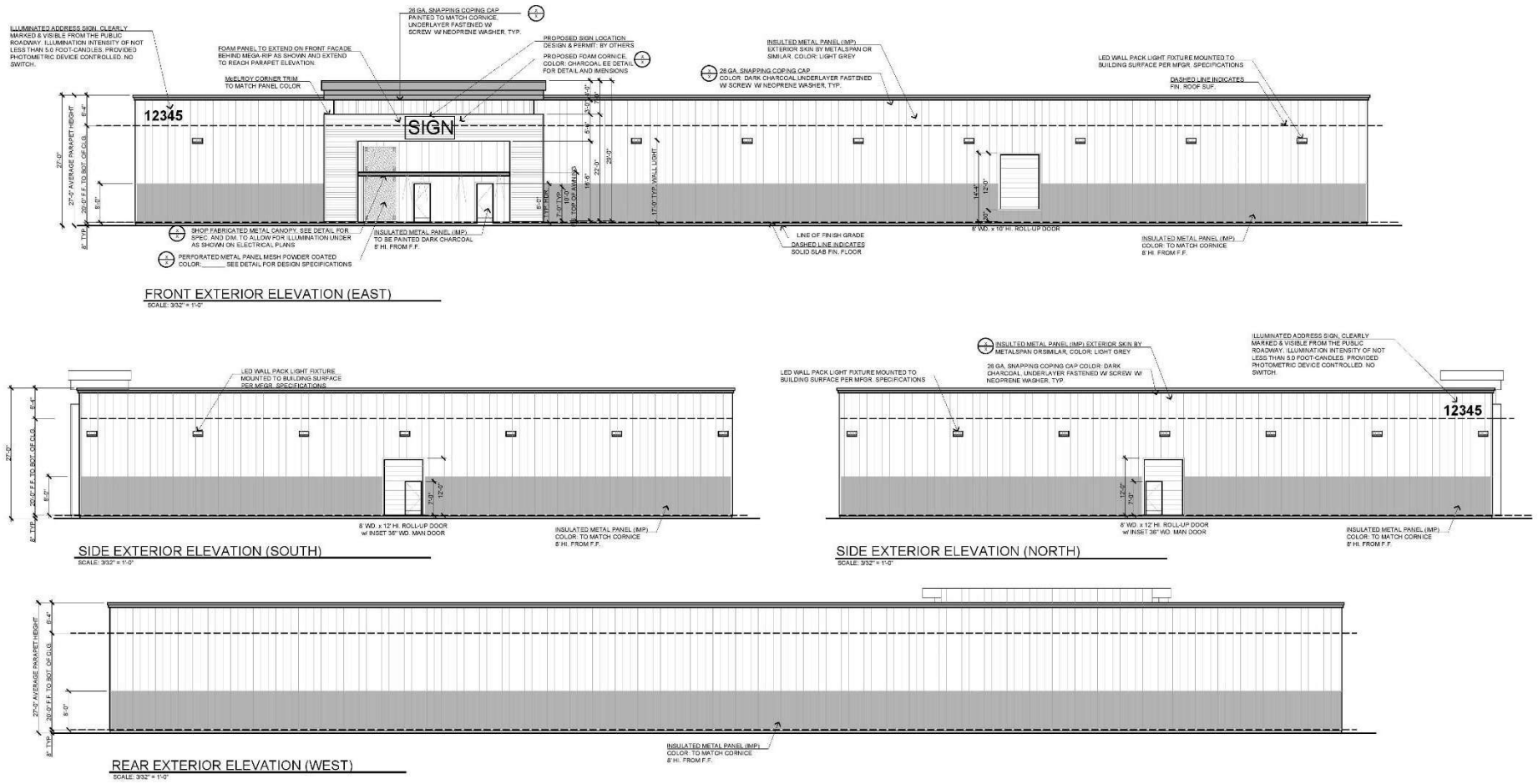


EXHIBIT 7 BUILDING B ELEVATIONS

SOURCE: MO+RE Design Solutions, Inc.

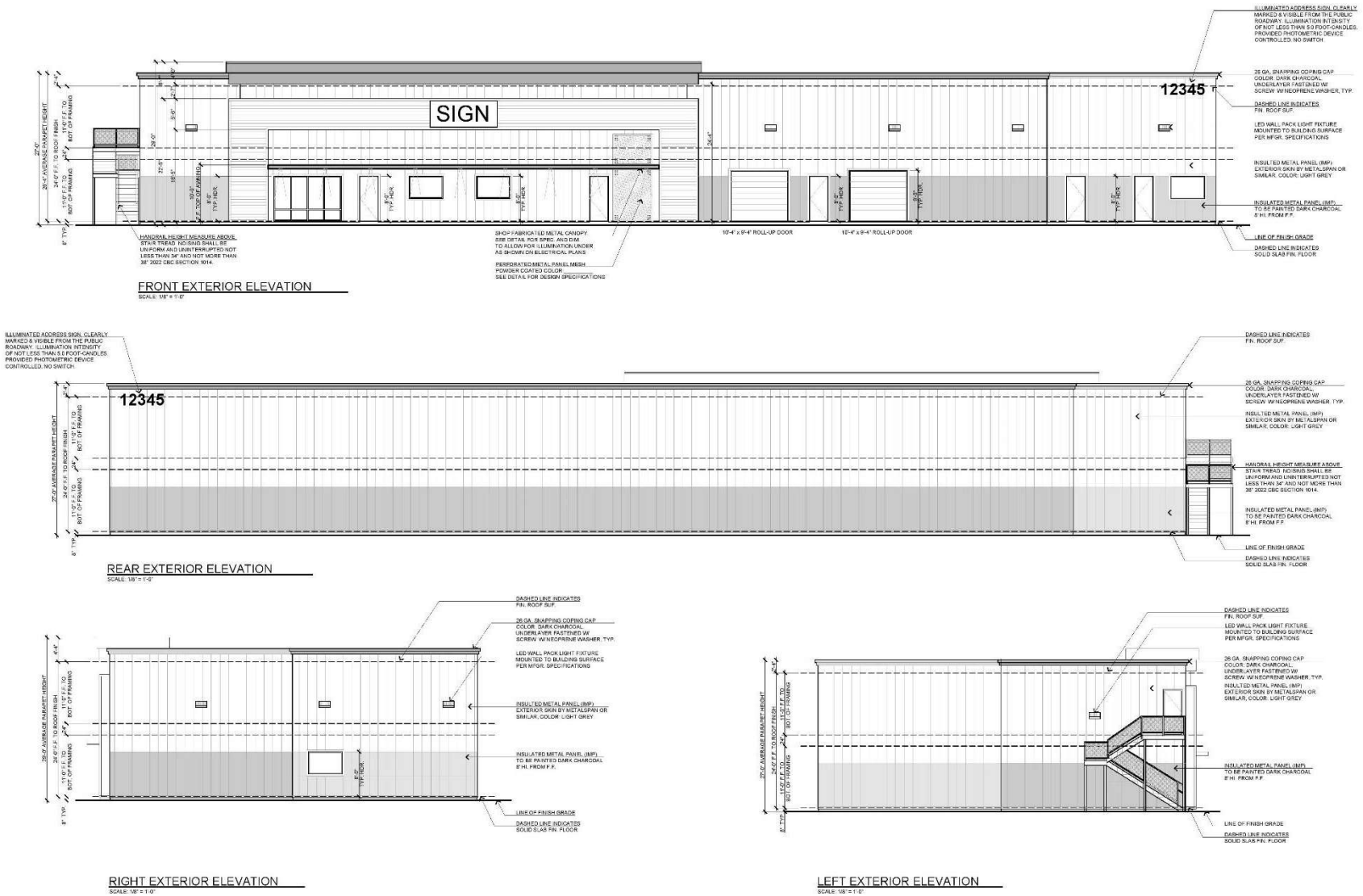


EXHIBIT 8 BUILDING C ELEVATIONS

SOURCE: MO+RE Design Solutions, Inc.

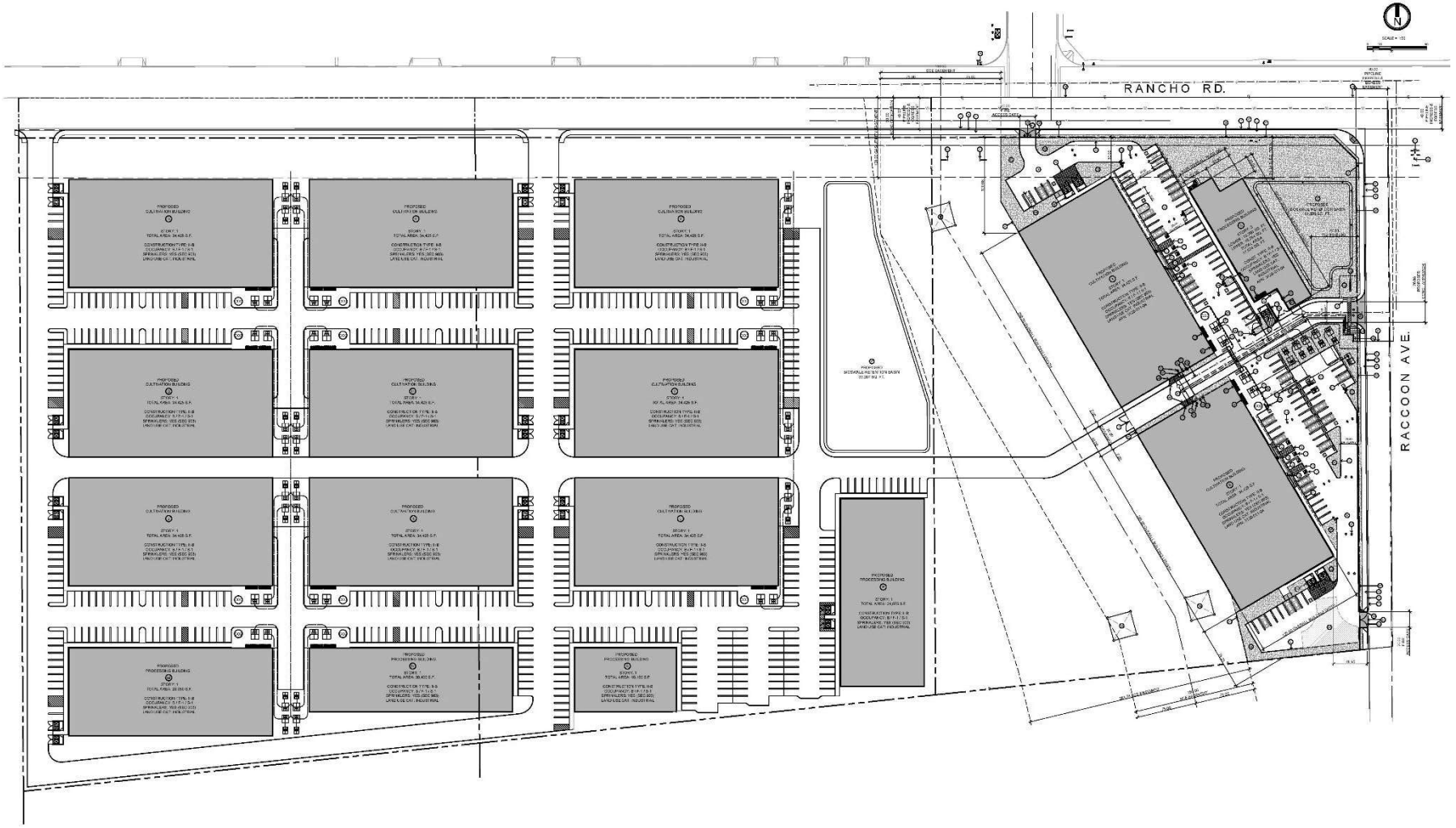


EXHIBIT 9 BUILD-OUT PHASE 1 THROUGH 4

SOURCE: MO+RE Design Solutions, Inc.

Table 2 Phase 1 through Phase 4 Project Summary

Phase	Building	Cultivation	Processing	Total
Phase 1	Building A	34,425 sq. ft.	--	86,649 sq. ft.
	Building B	34,425 sq. ft.	--	
	Building C	--	17,799 sq. ft.	
Phase 2	Building F	34,425 sq. ft.	--	138,110 sq. ft.
	Building L	34,425 sq. ft.	--	
	Building I	34,425 sq. ft.	--	
	Building O	--	10,160 sq. ft.	
	Building P	--	24,675 sq. ft.	
Phase 3	Building E	34,425 sq. ft.	--	123,675 sq. ft.
	Building H	34,425 sq. ft.	--	
	Building K	34,425 sq. ft.	--	
	Building N	--	20,400 sq. ft.	
Phase 4	Building D	34,425 sq. ft.	--	131,325 sq. ft.
	Building G	34,425 sq. ft.	--	
	Building J	34,425 sq. ft.	--	
	Building M	--	28,050 sq. ft.	
Total		378,675 sq. ft.	101,084 sq. ft	479,759 sq. ft.

Source: MO+RE Design Solutions, Inc.

2.4.2 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

As indicated previously, the site is zoned as *Manufacturing/Industrial (MI)*. The 3 new buildings would total 86,649 square feet of floor area. The proposed industrial development will house medical and recreational marijuana cultivation uses. The operational elements of the project are summarized below:

- *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.

- *Utilities*. Power (electrical) would be met with connections to the existing Southern California Edison utility lines. A Southern California Edison transmission line easement extends to the site's south side. Water and sewer lines would have to be extended to Raccoon Avenue. The project will be required to implement mitigation to control odors, air, and volatile organic chemicals (VOC) emissions (refer to Section 3.3 and Section 3.8).

- *Employment*. The entire project would employ an estimated 310 full-time equivalent employees over three shifts, seven days a week.

- *Hours of Operation*. The hours of on-site operations for the proposed new development would be Monday through Sunday, 8:00 AM to 5:00 PM and 24-hours a day security.[22]

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. The California Department of Cannabis Control (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

2.4.3 CONSTRUCTION CHARACTERISTICS

The key construction tasks that would occur during each of the four construction phases 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 one month 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 eight 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 23-11);
- Approval of a Location & Development Plan (23-27); 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

[22] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0*. September 8, 2023.

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)).

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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).

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?				✕

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on aesthetics if it results in any of the following:

- The proposed project would have an adverse effect on a scenic vista, except as provided in PRC Sec. 21099.
- The proposed project would have an adverse effect on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- The proposed project would substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality. or,
- The proposed project would, except as provided in Public Resources Code Section 21099, create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The evaluation of aesthetics and aesthetic impacts is generally subjective, and it typically requires the identification of key visual features in the area and their importance. The characterization of aesthetic impacts involves establishing the existing visual characteristics including visual resources and scenic vistas that are unique to the area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), and existing light and glare characteristics (e.g., nighttime illumination). Changes to the existing aesthetic environment associated with the proposed project's implementation are identified and *qualitatively* evaluated based on the proposed modifications to the existing setting and the viewers' sensitivity. The

project-related impacts are then compared to the context of the existing setting, using the threshold criteria discussed above.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The 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 east of the project site in Raccoon Avenue. 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.[23] 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.[24] 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 that the development standards for which the new building will conform to. *As a result, no impacts will occur.*

[23] California Department of Transportation. *Official Designated Scenic Highways.*

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

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 0.58 miles northeast 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.
- (b) Light fixtures shall be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture.
- (c) 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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on agriculture and forestry resources if it results in any of the following:

- The proposed project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- The proposed project would conflict with existing zoning for agricultural use, or a Williamson Act contract.
- The proposed project would 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)).
- The proposed project would result in the loss of forest land or conversion of forest land to non-forest use.
- The proposed project would 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 non-forest use.

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important

Farmland. It divides the state's land into eight categories of land use designation based on soil quality and existing agriculture uses to produce maps and statistical data. These maps and data are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this analysis. The highest rated Important Farmland is Prime Farmland. The California Land Conservation Act of 1965, or the Williamson Act, allows a city or county governments to preserve agricultural land or open space through contracts with landowners. The County has areas that are currently agriculture preserves under contract with San Bernardino County through the Williamson Act of 1965. Contracts last 10 years and are automatically renewed unless a notice of nonrenewal is issued.

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.*

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 would 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.[25]*As a result, no impact would occur.*

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 would 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

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

[25]California Department of Conservation. *State of California Williamson Act Contract Land.*

not affect any land under the jurisdiction of the BLM. *As a result, no impacts would occur.*

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 impacts would occur.*

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.

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?		✖		

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on air quality if it results in any of the following:

- The proposed project would conflict with or obstruct implementation of the applicable air quality plan.
- The proposed project would 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.
- The proposed project would expose sensitive receptors to substantial pollutant concentrations.
- The proposed project would result in other emissions (such as those leading to odors adversely affecting a substantial number of people.

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, and damages materials and vegetation. Ozone is formed a 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.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The City is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes.[26] 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 Southern California Association of Governments (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.[27] The proposed project will not introduce new residents and is anticipated to employ approximately 310 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). 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).*As a result, no impacts will occur.*

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.*

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

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

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 and 4. 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 estimated construction emissions for the project's four phases are summarized below in Table 3. 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.2022.1.1.21). For air quality modeling purposes, a twelve-month period of construction for all construction phases were assumed.

Table 3 Estimated Daily Construction Emissions

Construction Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Phase 1 (86,649 sq. ft.)	41.5	15.9	17.2	0.03	3.64	2.05
Phase 2 (138,110 sq. ft.)	33.7	28.0	29.5	0.05	9.07	5.07
Phase 3 (123,675 sq. ft.)	33.2	26.0	28.8	0.05	8.98	4.99
Phase 4 (131,325 sq. ft.)	34.9	24.3	28.5	0.05	8.94	4.95
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2022.1.1.21

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts would 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 4 also used the CalEEModV.2022.1.1.21 computer model. The analysis summarized in Table 4 indicates that the operational (long-term) emissions will be below the MDAQMD daily emissions thresholds.

Table 4 Estimated Operational Emissions in lbs./day

Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Phase 1 (86,649 sq. ft.)	3.78	2.40	20.2	0.04	3.43	0.93
Phase 2 (138,110 sq. ft.)	5.84	3.44	29.5	0.07	5.47	1.48
Phase 3 (123,675 sq. ft.)	5.0	2.70	23.8	0.06	4.89	1.32
Phase 4 (131,325 sq. ft.)	5.20	2.67	24.0	0.06	5.19	1.39

Total Operational Emissions	19.82	11.21	97.5	0.23	18.98	5.12
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2022.1.1.21

The analysis presented in Tables 3 and 4 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3 and 4, 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 further reduce the potential impacts. *As a result, the impacts will be less than significant.*

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

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. No sensitive receptors are located near the project site. The nearest sensitive receptor are residential homes located approximately 1.02 miles north of 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. 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.[28] 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:

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

- *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. Mitigation measures will be required to control odors and to ensure that the indoor air is safe for the workers. *These two mitigations would 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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- The proposed project would 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.
- The proposed project would 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 US Fish and Wildlife Service.
- The proposed project would 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.
- The proposed project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- The proposed project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- The proposed project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Sensitive biological resources include a variety of plant and animal species that are specialized and endemic to a particular habitat type. Due to loss of habitat, some of these species have been designated by either, or both, the federal and state government resource agencies as threatened or endangered. Species listed as threatened include those whose numbers have dropped to such low levels and/or whose populations are so isolated that the continuation of the species could be jeopardized. Endangered species are those with such limited numbers or subject to such extreme circumstances that they are considered in imminent danger of extinction. Other government agencies and resource organizations also identify sensitive species, those that are naturally rare and that have been locally depleted and put at risk by human activities. While not in imminent danger of jeopardy or extinction, sensitive species are considered vulnerable and can become candidates for future listing as threatened or endangered.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The project was assessed for the presence/absence of several species designated as Species of Special Concern (SSC) by the California Department of Fish and Wildlife (CDFW), threatened or endangered under the California Endangered Species Act (CESA) or federal Endangered Species Act (ESA), or protected by city or county ordinance. The presence/absence and the potential for the following species to occur onsite was assessed through literature review and field survey: Mojave desert tortoise (Gopherus agassizii), Mohave ground squirrel (Xerospermophilus mohavensis), Burrowing Owl (Athene cunicularia), Joshua tree (Yucca brevifolia), Swainson's Hawk (Buteo swainsoni), LeConte's Thrasher (Toxostoma lecontei), Loggerhead Shrike (Lanius ludovicianus), and beaver dam breadroot (Pediomelum castoreum). Biological surveys were conducted between 9 April and 8 July 2023, for a total of 21 survey days. The project site is comprised of one vegetation community: creosote bush-white bursage (Larea tridentata-Ambrosia dumosa) shrubland alliance. An unnamed dirt road passes through the eastern region of the site and the site is moderately disturbed. Field surveys followed the requirements provided in the applicable species-specific protocols developed by the U.S. Fish and Wildlife Service (USFWS) and CDFW. Mojave desert tortoise, Mohave ground squirrel, and Burrowing Owl were found to be absent from the survey area. Thirty-four (34) Joshua trees are present throughout the project site in a scattered distribution. Of the 34 trees, 16 are less than 1 m in height, 15 are greater than or equal to 1 m and less than 5 m in height, and 3 are 5 m or taller. One Loggerhead Shrike was observed onsite but did not appear to be nesting within the project boundary. Habitat suitability for Swainson's Hawk, LeConte's Thrasher, and beaver dam breadroot is low and these species are unlikely to occur in the vicinity of the Project. Nesting birds were observed within 500 ft of the Project. No wetland or water resources are present onsite.[29]

The project site consists of a vacant lot with moderate disturbance in the form of a dirt road, utility infrastructure, unofficial walking paths, off-road vehicle use, trash and refuse dumping, and sign of feral dog presence. There is no known previous development at the site with the exception of the utility

[29] Bloom Biological Inc. *Ranch 30 LLC. Biological Assessment Report*. September 12, 2023.

transmission lines and towers. Habitat assessments and focused surveys were conducted for the following species: Joshua tree, Burrowing Owl, Mojave desert tortoise, and Mohave ground squirrel. Additionally, the site was assessed for the presence of the following sensitive species through a combination of literature review and site surveys: Swainson's Hawk, LeConte's Thrasher, Loggerhead Shrike, and beaver dam breadroot.

A botanical inventory of the project site was conducted on April 9, 2023. All plant species encountered were identified to the lowest allowable taxonomic level and recorded. Naming of native plant species with a California Rare Plant Rank (CRPR) follows the CNPS online Inventory of Rare and Endangered Plants (2023). For plant species without a CRPR, naming follows the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California. A Joshua tree survey and inventory of the site was conducted on 9 April 2023 in order to inventory all Joshua trees present onsite. A pedestrian survey of the project site was conducted, walking along predetermined transect lines spaced at 15 m, allowing for visual detection of Joshua trees of all heights. Surveyors walked parallel transects, pausing at each Joshua tree encountered to record measurements and note the health of the tree. Measurements of tree height, diameter at 4.5 ft above ground level (also known as Diameter at Breast Height; DBH), and overall tree health were recorded for all Joshua trees observed onsite. Each Joshua tree stem or trunk arising from the ground is considered an individual tree, regardless of proximity to any other Joshua tree stem of trunk [WJTCA, Section 1927.4 (b)].[30]

Wildlife detected on and adjacent to the project site consists of 20 bird, 4 mammal, 3 reptile, and 5 insect species. Most notably, there are an abundance of small mammal burrows present at the base of creosote and white bursage bushes onsite and nests belonging to Horned Lark (Eremophila alpestris) and Verdin (Auriparus flaviceps) were observed. Additionally, an active Red-tailed Hawk (Buteo jamaicensis) nest was observed 490 ft to the east of the project site. This nest was located in one of two adjacent utility transmission towers, with an active Common Raven (Corvus corax) nest present in the neighboring tower. The following species were identified during the surveys:[31]

- *Mojave Desert Tortoise.* The Mojave population of desert tortoise includes tortoises north and west of the Colorado River in California, Arizona, Utah, and Nevada. They occupy a variety of habitats including sandy flats, rocky foothills, alluvial fans, washes, and canyons in areas of sparse vegetation, but are most commonly found on valley bottoms and bajadas in the Mojave Desert. Peak activity occurs between March through June and September through October when temperatures are above 75°F. This species is strictly herbivorous and consumes a variety of herbs, grasses, cacti, and wildflowers. The Mojave Desert is rich in winter annuals which are an important food source as well as perennial grasses, with woody perennials and cacti being an important late-season and drought source of food. In California, this species most frequently occurs in creosote scrub, cactus scrub, shadscale scrub, and Joshua tree woodland with soil friable enough for digging burrows and firm enough that the burrows will not collapse with the upper parts of bajadas and alluvial fans generally being too rocky for burrow construction. The highest density of desert tortoises in the Mojave Desert is found in the Fremont Valley near California City, California, where relatively uniform creosote is preset in light gravel to sandy soil. Mojave desert tortoises were listed by the U.S. Fish and Wildlife Service (USFWS) as "threatened" in April 1990 (USFWS 1990) and are now also protected as a "threatened" species under the CESA. A review of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database for

[30] Bloom Biological Inc. *Ranch 30 LLC. Biological Assessment Report*. September 12, 2023.

[31] Ibid.

desert tortoise presence in the vicinity of the project returned one (1) result. This record is 4.2 miles southeast of the Project where multiple desert tortoises and burrows were observed in 1990, 2003, and 2007. No desert tortoise, desert tortoise sign, or burrows were observed within the Survey Area. While there were many small mammal burrows onsite, likely belonging to white-tailed antelope squirrels (Ammospermophilus leucurus), none were of the shape conducive to desert tortoise presence and when inspect no desert tortoises were observed within the burrows. There were two larger burrows within the Survey Area, 338 ft from the site. These burrows appeared to have been initially dug by squirrels and excavated by either coyote or dogs and no sign of use by desert tortoise was found. All burrows were inspected for the presence of desert tortoise individuals and sign (i.e., scat, tracks, eggshell fragments, bones, shells, etc.) and none had any indication of use by desert tortoise. No sign of desert tortoise presence was detected within the project site or within 500 feet.

- *Mohave Ground Squirrel.* Mohave ground squirrel are small, diurnal squirrels endemic to the western Mojave desert, occupying portions of Los Angeles, Kern, Inyo, and San Bernardino Counties; with a historic distribution estimated at approximately 7,812 square miles from the eastern slopes of the Transverse and Sierra Nevada mountain ranges in the west to the Mojave River in the east, and from Owens Lake in the north to Palmdale in the south. This species occupies desert scrub habitat associations with creosote bush, white bursage, and saltbush (Atriplex spp.) dominant or co-dominant at lower elevations and Joshua tree and blackbrush (Coleogyne ramosissima) communities at elevations >1,500 m amsl. Mohave ground squirrels (MGS) exhibit a seasonal activity pattern (late February to July) followed by an extended period of below ground dormancy annually. During the active period, MGS forage heavily to accumulate sufficient fat stores to both reproduce and survive aestivation and hibernation. Despite the need to approximately double their body mass, MGS are a trap shy species with a low detection probability. Mohave ground squirrel were listed as a "threatened" species under CESA in 1984. No Mohave ground squirrels were identified as a result of focused surveys or camera trapping surveys of the project site. Mammalian species captured included only the white-tailed antelope squirrel (Ammospermophilus leucurus). The nearest known occurrence of Mohave ground squirrel is located 0.6 mi southeast of the project, where one juvenile was captured during protocol trapping in 2011. Since then, the site has been developed as a solar installation. Additional occurrences of Mohave ground squirrel are located 3.2 mi northwest (observed in 2005) and 5 mi north of the project.

- *Burrowing Owl.* Burrowing Owls are unique among North American owls, active day and night, nesting in underground burrows, and typically nesting in small groups. In the breeding range, suitable habitat consists of open, treeless areas, within grassland, steppe, and desert biomes, generally in gently-sloping areas characterized by low, sparse vegetation, and well drained soils. Areas with high human activity such as golf courses, cemeteries, road-sides, airports, and fairgrounds are often used for nesting as well as agricultural fields and vacant urban lots. The presence of potential nest burrows is a critical requirement for this species, and they are often found alongside high densities of burrowing mammals such as prairie dogs. In California, burrows are most often dug by California ground squirrel (Otospermophilus beecheyi) and round-tailed ground squirrel (Xerospermophilus tereticaudus). They will also utilize holes dug by badger (Taxidea taxus), coyote (Canis latrans), and fox (Vulpes sp.). Rock cavities, debris piles, culverts, and pipes are also used for nesting and roosting. Adult male Burrowing Owls home range has been documented to comprise between 280 to 600 acres with size depending on the habitat type. In California, the breeding season typically occurs between 1 February and 31 August with the peak

of the breeding season between 15 April and 15 July, when most Burrowing Owls have active nests. Burrowing Owls are a CDFW Species of Special Concern and a USFWS Bird of Conservation Concern. A review of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database for Burrowing Owl presence in the vicinity of the project returned thirteen (13) results, distributed to the southeast, east, and northeast of the project. The records nearest to the project are 2.9 miles to the northeast and 3.2 miles to the southeast. The most recently active burrow within 5 miles of the project was active in 2009 and is located 4.6 miles to the southeast. No Burrowing Owls, Burrowing Owl sign, or suitable burrows were observed within the Study Area. While there were many small mammal burrows onsite, likely belonging to white-tailed antelope squirrels (Ammospermophilus leucurus), nearly all were too small to allow for Burrowing Owl occupancy. There were two burrows within the survey area, 338 feet from the site, of large enough size for Burrowing Owl. These burrows appeared to have been initially dug by squirrels and excavated by either coyote or dogs and no sign of use by Burrowing Owls was found. All burrows were inspected for the presence of Burrowing Owls (i.e., whitewash, pellets, prey remains, etc.) and none had any indication of use by Burrowing Owl. No sign of Burrowing Owl presence was detected within the project site or within 500 feet.

- *Swainson's Hawk*. Swainson's Hawk are relatively large-bodied hawks which have a long history of nesting in the deserts of the southwest including in the vicinity of Adelanto and Victorville (Bloom 1980). However, the statewide population experienced a catastrophic decline between 1930 and 1979 due to undocumented causes, leading to their listing as "threatened" under the CESA. While the Central Valley population has recovered and the Antelope Valley population appears to be increasing, areas such as Adelanto and Victorville do not appear to have rebounded. There have been no documented Swainson's Hawk nests in the vicinity of Adelanto since 1946, when two eggs were collected from a nest with the location noted as, "10 miles north of Adelanto." The nearest documented nest to the project is 2.4 miles to the northeast where eggs were collected from a nest in 1939 (CDFW 2023). Swainson's Hawks are known to nest in a variety of native and non-native trees including Joshua trees in the Mojave Desert region as documented by several nest sites in the Antelope Valley. While potential nesting and foraging habitat in the form of scattered Joshua trees and creosote bush-white bursage shrubland is present within the project and vicinity, the level of existing human disturbance is not conducive to Swainson's Hawk use. The potential for Swainson's Hawks to nest or forage in the vicinity is extremely low. No Swainson's Hawk nests were observed within 500 feet of the project site and more focused surveys for nests at greater distances from the site are not recommended due to the level of human disturbance in the vicinity.

The results of the botanical survey detected 23 species of plants present within the project site (refer to Appendix D in the Biological Report). The dominant species onsite include creosote bush, white-bursage, old han schismus (Schismus barbatus), and brome (Bromus sp.). Vegetation onsite site has been moderately disturbed by anthropogenic sources including foot traffic, off-road vehicle use, utility infrastructure maintenance, trash and refuse dumping, and invasion of non-native species with species cover greater for non-natives. Thirty-four (34) Joshua trees were observed onsite of varying ages and health. Mitigation measures were recommended.[32] The following avian species were identified in the surveys:[33]

[32] Bloom Biological Inc. *Ranch 30 LLC. Biological Assessment Report*. September 12, 2023.
[33] Bloom Biological Inc. *Ranch 30 LLC. Biological Assessment Report*. September 12, 2023.

- *LeConte's Thrasher*. LeConte's Thrashers are an uncommon, non-migratory, resident of the deserts of the southwestern U.S. and northwestern Mexico. They primarily feed on insects excavated from beneath desert vegetation litter and will chase grasshoppers or pick insects from vegetation when available. Their typical habitat consists of sparsely vegetated desert flats, dunes, alluvial fans, or gently rolling hills often with saltbush or shadscale (Atriplex spp.) and/or cholla cactus (Cylindropuntia spp.). This species is rarely found in habitats consisting entirely of creosote. LeConte's Thrashers are a CDFW Species of Special Concern and a USFWS Bird of Conservation Concern. This species was not detected within or in the vicinity of the project site. While there is some potential habitat for this species, the dominance of creosote bush is likely a deterrence. This species is not expected to occur onsite.

- *Loggerhead Shrike*. Loggerhead Shrikes occupy a variety of habitat types largely characterized by open county and short vegetation, including pastures with fence rows, old orchards, mowed roadsides, cemeteries, golf courses, agricultural fields, riparian areas, and open woodlands. In the southwestern desert region, this species is non-migratory, typically living in pairs on permanent territories. Loggerhead Shrikes prefer nesting in trees with cover and thorns for increased protection from predators and when trees or shrubs are lacking, they will also build nests in brush piles, Russian thistle, or "hardwood debris". This species begins nesting as early as February. Loggerhead Shrike feed opportunistically on arthropods, amphibians, small to medium-sized reptiles, small mammals, and birds, favoring fence lines, utility lines, and utility poles for perching. This species is considered a CDFW Species of Special Concern. An individual Loggerhead Shrike was observed within the project site during nearly all of the survey dates. While onsite, the individual was not observed exhibiting any nesting specific behavior. They appeared to be foraging onsite, perching occasionally on Joshua trees, and stooping for prey. While there were no nests belonging to this species detected onsite, it is likely that there is a nest territory nearby which was active this season.

- *Nesting Birds*. Verdin, Horned Lark, Red-tailed Hawk, and Common Raven were observed nesting in the vicinity of the project site. The Verdin were observed nesting in one of only several cholla onsite, along the western border of the project, within the project boundary. There are several Verdin nests present in this cholla and at least two appeared to have been rebuilt during the 2023 nesting season. The Verdin were first observed in the vicinity of the cholla exhibiting territorial behavior during the survey on 9 April. They continued to be present in the vicinity of the nest throughout the entire duration of the surveys, observed near the nests during the final survey on 8 July. While nest success was not documented for this species, it is clear that this site has been used by this nesting pair for at least several years as indicated by multiple nests present in the cactus. The Horned Lark nest was observed at the base of a creosote bush in the central region of the project site on 21 May. Four hatchlings were observed on 25 May. Nest success was not documented for this species. There were many other Horned Lark present onsite, and it is possible that there were additional nests present which went undetected within the denser creosote bush onsite. Red-tailed Hawks were observed nesting in a utility tower 558 ft southeast of the project site. Two adults were present at the nest on 9 April, with one (presumed female) in an incubation posture and the second (presumed male) defending the territory from the Common Ravens nesting in the adjacent tower. Both adults were again observed on 10 April, with one adult present on the nest and the second adult foraging in the vicinity. During the survey on 1 May, no adults were observed, and the nest appeared to have failed. Common Ravens nested in a utility tower 596 ft east of the project site, with two adults present on 9 April. Both adults remained on the nest territory through 8 July. However, no nestlings or fledglings were observed. It is likely that this

nesting attempt failed prior to hatching young or shortly after.

Future development activities are expected to grade the property and remove the vegetation from the 9.48-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 mitigation measures are listed below under mitigation measures as *Biological Resources Mitigation Measure No. 1 through 6*.[34]

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, behavioral thermoregulation (Beiswenger 1977), and migration. Phototaxis, a phenomenon that results in attraction and movement toward light, can disorient, entrap, and temporarily blind wildlife species that experience it. 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 listed as *Biological Resources Mitigation Measure No. 7.*

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. (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 cures (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. 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. Considering the above, CDFW recommends the mitigation measure *Biological Resources' Mitigation Measure No. 8* to restrict the use of equipment to hours least likely to disrupt wildlife and to suppress device noise.

The mitigations listed under mitigation measures will reduce the impacts to levels that are less than significant.

[34] Bloom Biological Inc. *Ranch 30 LLC. Biological Assessment Report*. September 12, 2023.

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? ● Less than Significant Impact.*

The project is approximately 12.5 miles west of the Mojave River. A review of the USFWS NWI and the NHD as well as a survey of onsite conditions returned no results of the presence of water resources present onsite. An ephemeral stream/river shown in the NHD is present 50 meters to the east of the site. It is likely that this stream/river was present historically; however, the development to the north of Rancho Road has channelized this once ephemeral stream, redirecting it into the storm drain network, prior to crossing Rancho Road. The project site does not contain any wetland features or water resources.[35] *As a result, the impacts would be less than significant*.

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? ● Less than Significant Impact.*

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act. The project falls within the southwestern region of the Mojave Watershed. This watershed encompasses roughly 4,500 square miles of land surrounding the Mojave River spanning from the Providence Mountains within the Mojave National Preserve in the east, west to the San Bernardino and Los Angeles County boundary, and from the Tiefort Mountains in the north near Fort Irwin, south to the San Bernardino National Forest. The project is approximately 12.5 miles west of the Mojave River. A review of the USFWS NWI and the NHD as well as a survey of onsite conditions returned no results of the presence of water resources present onsite. An ephemeral stream/river shown in the NHD is present 50 meters to the east of the site. It is likely that this stream/river was present historically; however, the development to the north of Rancho Road has channelized this once ephemeral stream, redirecting it into the storm drain network, prior to crossing Rancho Road. The project site does not contain any wetland features or water resources.[36] *As a result, the impacts would be less than significant.*

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 project site was analyzed for sign of and potential for wildlife movement and corridors. While wildlife is known to utilize and move through the site, it does not constitute a wildlife corridor. There is an unofficial dirt walking path that crosses the site from north to south. During several survey visits, a man was observed walking this path during the morning hours traveling from the businesses north of Rancho Road., south across the project site, then returning to the businesses utilizing the path. This walking path appears to be a result of this individual's morning exercise routine. Vegetation onsite is conducive to the

[35] Ibid.

[36] Bloom Biological Inc. *Ranch 30 LLC. Biological Assessment Report*. September 12, 2023.

free movement of wildlife through the site and there are signs of rodent paths leading to burrows. Additionally, scat and digging of burrows observed onsite indicates that coyotes (Canis latrans) forage and pass through the site. It is expected that other mammals may occasionally pass through the site such as raccoons, skunks, and rabbits. However, the site is not characteristic of a wildlife corridor.

Existing industrial development to the north, east, and west has limited wildlife use of the site. While construction of the project would prohibit wildlife use of the site, it would concentrate development into a centralized area, leaving vast regions of undeveloped desert to the west and smaller regions of undeveloped desert to the north, south, and east. Additionally, undeveloped parcels immediately east and 500 feet to the west of the site would allow for wildlife travel from north to south through this region. *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 found throughout the Mojave Desert typically at elevations between 1,200 to 5,400 ft (366 to 1646 m) amsl. Contrary to their name, Joshua trees are in fact arborescent succulents; while resembling trees in their growth and appearance, they are not trees. This species has been documented to reach 300 years of age (Gilliland et al. 2006) and provides valuable habitat for many birds, mammals, and insects. Along with many other species, Joshua trees are experiencing the negative impacts of climate change, urbanization, and increased fire frequency and have experienced a significant contraction to their range. It is forecasted that widespread population losses may continue to occur in response to climate change (Cole et al. 2011). In examining the potential impacts of climate change on this species, St. Clair and Hoines (2018) found increased reproduction, but decreased establishment success as a result of increasing temperatures. In response to the losses of Joshua trees, a petition was filed with the California Fish and Game Commission ("Commission") to provide protection for Joshua trees under the California Endangered Species Act (CESA). A formal vote on the listing of the species as endangered or threatened under CESA has yet to occur, thus Joshua tree retains its candidacy status for listing. In July 2023 the Western Joshua Tree Conservation Act (WJTCA) was passed to conserve western Joshua trees and their habitat. The WJTCA prohibits the importation, export, take, possession, purchase, or sale of any western Joshua tree in California unless authorized by CDFW. Additionally, the WJCTA authorizes CDFW to issue permits for incidental take of Joshua trees if the permittee meets certain conditions.

Permittees may pay fees in lieu of conducting mitigation activities which will contribute to the Western Joshua Tree Conservation Fund. There are 34 Joshua trees present in scattered density throughout the project site (Appendix E). Per CDFW permitting and mitigation requirements, Joshua trees present onsite have been divided into the following categories: Category A (height ≥5 m), Category B (height ≥1 m and < 1 m) (Table 1). There are 3 Category A, 15 Category B, and 16 Category C Joshua trees. Of the 34 trees, 5 are dead, 7 are in poor condition, 15 are moderately healthy, and 7 are healthy.[37] For more detailed information pertaining to Joshua trees onsite, as well as photographs of each individual tree, please refer to the Rancho 30 LLC, Joshua Tree Survey & Inventory Report included as Appendix E of the Biological Resources study. *Mitigation measures identified under mitigation measures would apply.*

[37] Bloom Biological Inc. *Ranch 30 LLC. Biological Assessment Report*. September 12, 2023.

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. Prior to construction, the Project proponent is required to obtain an Incidental Take Permit (ITP) through CDFW for the take of western Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Adelanto falls within an area of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1.Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.

Biological Resources Mitigation Measure No. 2. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction presence or absence survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). The survey shall utilize a perpendicular survey route and would consist of one complete (100% coverage) survey of the action area prior to the initiation of construction at any time of year. The survey should be conducted by a CDFW-approved Biologist no more than 48 hours prior to Project activities or construction and after any pause in Project activities lasting 30 days or more. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until 2 negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the survey shall be submitted to CDFW prior to the start of Project activities. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If desert tortoise is found on the project site during preconstruction

surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. The Project proponent shall submit to CDFW for review and approval the desert tortoise-specific avoidance plan. If complete avoidance cannot be achieved, the Project proponent shall not undertake Project activities and Project activities shall be postponed until appropriate authorization [i.e., California Endangered Species Act (CESA) Incidental Take Permit under Fish and Game Code section 2081] is obtained.

Biological Resources Mitigation Measure No. 3. A biological monitor should be present onsite daily during construction to monitor for the presence of desert tortoise. If desert tortoise is found on the Project during the construction phase, all work shall cease in the vicinity of the animal. Work shall proceed only after the animal is allowed to leave the area and is no longer at risk, or the animal is relocated by the biologist after approval from CDFW and USFWS. In both cases, the approved biologist shall contact USFWS and CDFW and shall consult regarding any additional necessary avoidance, minimization, or mitigation measures. If desert tortoise us found on the project site during the operation and maintenance phase of the Project, all grounddisturbing operations and maintenance activities should cease in the vicinity of the animal. CDFW and USFWS shall be contacted and consulted regarding potential relocation of the animal and any additional necessary avoidance, minimization, or mitigation measures. Work shall not resume in the vicinity of the animal until the relevant agencies have responded and all recommended measures are taken. A report shall be prepared by the Project proponent to document the activities of desert tortoise within the site; all fence construction, modification, and repair efforts; and compliance with other measures recommended by the agencies. This report should be submitted to the agency representatives and the City.

Biological Resources Mitigation Measure No. 4. Prior to the initiation of construction activities ((i.e., grubbing, clearing, staging, digging), a "take avoidance survey" should be conducted by a qualified Biologist for the project site and surrounding 500 ft radius utilizing the methodology provided in CDFW's 2012 Staff Report on Burrowing Owl Mitigation. This survey should be conducted no more than 14 days prior to initiation of ground disturbance activities. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. Should no Burrowing Owls be detected during the initial "take avoidance survey", the survey should be repeated within 24 hours prior to ground disturbance 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 active burrows or signs thereof are found within the development footprint during the preconstruction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist that 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. All occupied burrows shall be mapped in an aerial photo. At least 7 days prior to the expected start of any Project-related ground disturbance activities, or restart of activities, the City of Adelanto shall provide a burrowing owl survey report and mapping to CDFW. 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.

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 the California Department of Fish and Wildlife (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 Incidental Take Permit (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 preconstruction 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 Project Proponent shall consult with CDFW on next steps, including obtaining an ITP, and the observation shall be immediately reported to CDFW.

Biological Resources Mitigation Measure No. 6. To reduce impacts to less than significant, it is recommended that the following mitigation measure be employed: Regardless of the time of year, a pre-construction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, 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. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 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. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Biological Resources Mitigation Measure No. 7. 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. 8. 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.

Biological Resources Mitigation Measure No. 9. Prior to construction and issuance of any grading permit, the City of Adelanto should 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.

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?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- The proposed project would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- The proposed project would disturb any human remains, including those interred outside of formal cemeteries.

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

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high 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.[38]

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 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. Data from the South Central Coastal Information Center (SCCIC) revealed that 11 previous cultural resource studies have taken place resulting in one cultural resource identified within the 0.5-mile research radius of the project site. The project site has not been subject to previous cultural resources assessment and no cultural resources have been previously identified within its boundaries.[39] The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[40] The 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

[38] U. S. Department of the Interior, National Park Service. National Register of Historic Places. http://nrhp.focus.nps.gov. 2010.

[39] 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 January 23, 2023

[40] California Department of Parks and Recreation. *California Historical Resources*. Website accessed on January 23, 2023.

(SHPO). The project site is vacant and does not have any historical or cultural significance. *Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.*

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

The project is 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 during grading, 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 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;
- Ground stone artifacts, including mortars, pestles, and grinding slabs;
- Dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, ground stone, and fire affected rocks.

Therefore, mitigation is required and listed under mitigation measures. *Adherence to the mitigations would 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.[41] 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):

[41] Google Earth. Website accessed December 4, 2023.

> "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 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?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on energy resources if it results in any of the following:

- The proposed project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during the proposed project's construction or operation.
- The proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod. In addition, it was assumed the new buildings would be constructed pursuant to the 2022 CALGreen standards, which was considered in the CalEEMod inputs.

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 growing (cultivation) of cannabis is an agricultural production process where the environmental conditions, temperature, and humidity are tightly controlled to optimize the quality of the cannabis plants and to reduce crop loss. The quality and amount of light provided is the primary variable affecting crop yield and quality once air temperature and humidity needs are met. Dehumidification is generally achieved mechanically by sub-cooling the air to remove water and then reheating the air to the desired supply air temperature through traditional dehumidification units or by absorbing moisture in the air through a desiccant dehumidifier. The indoor air conditioning will also involve electrical consumption. For indoor grow operations (as opposed to greenhouse operations), LED lighting fixtures are being successfully applied to vegetative rooms, saving up to 50% of the lighting energy compared to the standard practice. For flower rooms, double ended, high-pressure sodium (HPS) fixtures save 20-25% compared to the standard HPS fixtures. While less common, some growers are successfully applying LED fixtures or LED/HPS hybrid designs for up to 30-40% energy savings in flower rooms. For cooling and dehumidification, smaller grow

operations are saving energy by using split ductless air conditioning units in place of standard rooftop units. Medium and large-sized grow operations are using chilled water systems 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.[42] 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 Phase 1 project would consume approximately 35,591 kWh of electricity on a daily basis. The entire development, consisting of all four phases, would consume 193,049 kWh. Table 5 indicates the estimated energy consumption for the four project phases. This rate will be reduced by 35% by employing the energy conservation measures discussed previously. Assuming a 35% reduction with mitigation, the projected total electrical consumption would be 125,482 kWh/day.

Table 5 Estimated Electrical Energy Consumption

Phase	Daily Consumption Rate	Electrical Consumption (35% Reduction w/Mitigation)
Phase 1 (86,649 sq. ft.)	0.411 kWh/sq. ft./day	35,591 kWh/day (23,134 kWh/day)
Phase 2 (138,110 sq. ft.)	0.411 kWh/sq. ft./day	52,653 kWh/day (34,224 kWh/day)
Phase 3 (123,675 sq. ft.)	0.411 kWh/sq. ft./day	50,830 kWh/day (33,040 kWh/day)
Phase 4 (131,325 sq. ft.)	0.411 kWh/sq. ft./day	53,975 kWh/day (35,064 kWh/day)
Total Operational Emissions		193,049 kWh/day (125,482 kWh/day)

Source: Blodgett Baylosis Environmental Planning

According to the Energy Information Administration, the typical American home uses 10,632 kWh of electricity on a monthly 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 mitigations shown under mitigation measures to reduce electrical consumption. *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) Title24, 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.

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

The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned commercial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. The Adelanto Municipal Code (Section 14.28.10) has adopted and incorporated by reference the 2022 California Energy Code published by the California Building Standards Commission and to be codified in California Code of Regulations Title 24, Part 6. *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.

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?		✖		

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on geology and soils if it results in any of the following:

- The proposed project would, 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 (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides?

- The proposed project would result in substantial soil erosion or the loss of topsoil.

- The proposed project would 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.

- The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

- The proposed project would 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.

- The proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed project's potential seismic and soils risk was evaluated in terms of the site's proximity to earthquake faults and unstable soils.

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 most relevant local geologic units expected to be present at the site are summarized in this section. A general description of the dominant soils that form the geologic units is provided as follows: *Quaternary Alluvium (map symbol Qal).* These alluvial deposits consist predominately of interlayered light brown to light grayish brown, sandy silt and clayey sand and occasional silty sand. These deposits were generally noted to be in a slightly moist to moist, loose to dense state.[43]

Significant ground shaking will likely impact the site within the design life of the proposed project, due to the project being located in a seismically active region. The geologic structure of the entire southern California area is dominated by northwest-trending faults associated with the San Andreas Fault system. The San Andreas Fault system accommodates for most of the right lateral movement associated with the relative motion between the Pacific and North American tectonic plates. The subject property is not located within an Alquist-Priolo Fault Rupture Hazard Study Zone, established by the State of California to restrict the construction of habitable structures across identifiable traces of known active faults. No active faults are known to project through the proposed project. As defined by the State of California, an active fault has undergone surface displacement within the past 11,700 years or during the Holocene epoch.

The nearest known "active faults" are part of the San Andreas system about ~28.04 kilometers distant (USGS Earthquake Hazards Program, Unified Hazard Tool for Conterminous U.S. 2014 (v4.1.1) Deaggregation), capable of producing horizontal ground accelerations of ~8.01 (USGS, 2002). The Mirage Valley Fault is mapped approximately 7.5 miles to the northwest and does roughly trend towards the subject property. However, the potential for surface fault rupture to adversely affect the proposed development is low

From a geotechnical point of view, the subject property is considered suitable for the proposed improvements, provided the design information and conclusions and recommendations herein are incorporated into the plans and are implemented during construction.

[43] CW Soils. Preliminary Technical Interpretive Report [for the] Proposed Farm Development Assessor's Parcel Numbers 3128-011-02-0-000, 3128-011-03-0-000, and 3128-011-04-0-000 South Side of Rancho Road, East of Muskrat Avenue, City of Adelanto, San Bernardino County, California. October 2021.

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.[44] 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.[45]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. From the California Department of Conservation Landslides Map, the City of Adelanto is not located within an area of landslides.[46] *As a result, the potential impacts 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 Helendale, Bryman, Cajon, Mohave Variant, and unnamed soils associations consisting of Helendale-Bryman loamy sands with 2 to 5 percent slopes.[47] The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program.

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

[44]California Department of Conservation. Mirage Valley Fault

[45] San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

[46] California Department of Conservation. *SGS Information Warehouse: Landslides*. Website Accessed January 18, 2024.

[47] UC Davis. *SoilWeb*. Website accessed December 7, 2023.

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 Helendale, Bryman, Cajon, Mohave Variant, and unnamed soils associations consisting of Helendale-Bryman loamy sands with 2 to 5 percent slopes.[48] According to the U.S. Department of Agriculture (USDA), these soils are acceptable for the development of smaller commercial buildings.[49] The applicant is required to adhere to all requirements detailed by the USDA. *As a result, the potential impacts 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. According to the City of Adelanto Sewer Map, there are sewer lines located southwest and northwest to the project site.[50] 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 9.48-acre parcel that is currently vacant. The proposed development will be constructed in the central-western 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.

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

[48] UC Davis. *SoilWeb*. Website accessed December 7, 2023.

[49] United States Department of Agriculture. Natural Resources Conservation Service. Website accessed January 23, 2023.

[50] City of Adelanto. Sewer Map. Updated January 10, 2013.

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

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.

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?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

- The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The proposed project site is located on a 9.48-acre parcel that is currently vacant and undisturbed. The proposed development will be constructed in the southwestern portion of the City of Adelanto. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. The major GHG that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. While water vapor is not considered a pollutant, while it remains in the atmosphere it maintains a climate necessary for life. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to "hold" more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. When water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation. This will allow less energy to reach the Earth's surface thereby affecting surface temperatures.
- *Carbon Dioxide (CO_2)*. The natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO_2 include the burning coal, oil, natural

gas, and wood. Since the industrial revolution began in the mid-1700's, these activities have increased the atmospheric concentrations of CO_2. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC Fifth Assessment Report, 2014) Emissions of CO_2 from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010.

- *Methane (CH_4).* CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO_2. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO_2, N_2O, and Chlorofluorocarbons (CFCs). CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other human-related sources of methane production include fossil-fuel combustion and biomass burning.

- *Nitrous Oxide (N_2O).* Concentrations of N_2O also began to increase at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant.

- *Chlorofluorocarbons (CFC).* CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

- *Hydrofluorocarbons (HFC).* HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.

- *Perfluorocarbons (PFC).* PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). Concentrations of CF_4 in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

- *Sulfur Hexafluoride (SF_6).* SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO_2. Concentrations in the 1990s where about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

The MDAQMD mass emissions threshold is 100,000 tons (90,720 metric tons (MT)) CO2e per year.

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 would involve the construction of three new buildings totaling 86,649 square feet within the 9.48-acre property located on the southwest corner of Rancho Road and Raccoon Avenue. The three new buildings are referred to as *Building A*, *Building B*, and *Building C*. Building A would be a single level cultivation building and would consist of 34,425 square feet; Building B would be a single level cultivation building and would consist of 34,425 square feet; and Building C would be a two level building and would consist of 17,799 square feet. The total floor area of the three new buildings would be 86,649 square feet.[51]

The State of California requires CEQA documents to do 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 greenhouses gases in a common and collective unit. The MDAQMD established the 10,000 MTCO2 threshold for industrial land uses. As indicated in Table 6, the Phase 1 operational CO2E is 1,681 metric tons per year which is well below the threshold of 10,000 MTCO2E. The entire GHG emissions for all four phases would be 9,123 MTCO2E.

[51] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023.

Table 6 Greenhouse Gas Emissions (metric tons per year)

Source	GHG Emissions (Metric Tons per Year (MT/year)			
	CO2	CH4	N2O	CO2E
Phase 1 (86,649 sq. ft.)				
Long-Term – Total Operational Emissions	1,248	1.44	0.05	1,681
Total Construction Emissions	179	0.01	0.01	181
Total Construction Emissions Amortized over 30 Years	5.97	0.00	0.00	6.03
Total Phase 1 Emissions	**1,254**	**1.44**	**0.05**	**1,687**
Phase 2 (138,110 sq. ft.)				
Long-Term – Total Operational Emissions	1,958	2.29	0.07	2,647
Total Construction Emissions	337	0.01	0.01	341
Total Construction Emissions Amortized over 30 Years	11.23	0.090	0.00	11.37
Total Phase 1 Emissions	**1,969**	**2.38**	**0.07**	**2,658**
Phase 3 (123,675 sq. ft.)				
Long Term – Total Operational Emissions	1,702	2.05	0.06	2,318
Total Construction Emissions	428	0.01	0.01	432
Total Construction Emissions Amortized over 30 Years	14.27	0.00	0.00	14.4
Total Phase 3 Emissions	**1,716**	**2.05**	**0.06**	**2,332**
Phase 4 – 131,325 sq. ft.				
Long Term – Total Operational Emissions	1,778	2.17	0.06	2,431
Total Construction Emissions	429	0.01	0.01	434
Total Construction Emissions Amortized over 30 Years	14.3	0.00	0.00	14.47
Total Phase 4 Emissions	**1,792**	**2.17**	**0.06**	**2,445**
Project Total 479,534 sq. ft				
Project Total	**6,732**	**8.04**	**0.24**	**9,123 MTCO2E**
Significance Threshold				**10,000 MTCO2E**

No public customers will visit the project site since the new business will be closed to the general public. Because of security protocols, the mobile emissions related to operations will be limited to employees, vendors, deliveries, and repair/maintenance personnel. As indicated in Table 6, the total project GHG emissions (9,123 MTCO2E/year) is less than the significance threshold. 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 MTCO2e 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).[52]

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.

[52] San Bernardino County. *San Bernardino County Regional Greenhouse Gas Reduction Plan (SBCRGGRP)*. March 2021.

- 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.
- *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. The mitigation measures identified in Section 3.6 (Energy) would also reduce GHG emissions. 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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hazards and hazardous materials if it results in any of the following:

- The proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project would 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.
- The proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- The proposed project would 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.
- The proposed project would result in a safety hazard or excessive noise for people residing or working in the project area 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.

- The proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- The proposed project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

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

- *Mold.* Marijuana production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold. Previous studies of illegal indoor cultivation operations have reported elevated levels of airborne mold spores, especially during activities such as plant removal by law enforcement personnel. Physiological effects include allergic reactions, hypersensitivity, and anaphylaxis to marijuana.
- *Skin Sensitivity.* Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes. As with most sensitizers, initial exposure results in a normal response, but over time, repeated exposures can lead to progressively strong and abnormal responses.
- *Carbon dioxide (CO2).* CO2 is used in the marijuana industry to increase plant growth and to produce concentrates. In addition to the liquid gas form, solid carbon dioxide or dry ice can be used for extraction processes. Compressed gases can present a physical hazard and has additional safety regulations that must be adhered to.
- *Carbon monoxide (CO).* CO is a colorless, odorless, toxic gas which interferes with the oxygen-carrying capacity of blood. At elevated concentrations, CO can overcome persons without warning. Sources of carbon monoxide exposure include furnaces, hot water heaters, portable generators/generators in buildings; concrete cutting saws, compressors; forklifts, power trowels, floor buffers, space heaters, welding, and gasoline powered pumps.

- *Indoor Air Quality*. Workers may encounter ozone as a product of the chemical reaction of nitrogen oxides and volatile organic compounds (e.g., terpenes emitted from the marijuana plant) present inside a cultivation facility. Terpenes and nitric oxides are associated with eye, skin, and mucous irritation. Ozone generators may also be found in facilities for odor control. Ozone can cause decreased lung function and/or exacerbate pre-existing health effects, especially in workers with asthma or other respiratory complications.
- *Pesticides*. Cannabis cultivation facilities may have insecticides and fungicides used within the facility. Some pesticides, including pyrethrins and neem oil are non-persistent and have low volatility (neem oil is an organic pest repellent derived from the neem tree). However, these pesticides have been associated with dermal and respiratory toxicity for the workers who apply them. Depending on the pesticide, requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.
- *Nutrients and Corrosive Chemicals*. Cannabis Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

The 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 adheres 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. Adelanto High School is located approximately 1.56 miles south of the project site. The Victoria Magathan Elementary School is located approximately 1.88 miles to the southeast. 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.[53] The nearest airport to the city is the Southern California Logistics

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

[53] Toll-Free Airline. *Los Angeles County Public and Private Airports, California*.

Airport is located approximately 4.38 miles to the northeast of the project site.[54] The project will not introduce a structure that will interfere with the approach and take off airplanes utilizing any regional airports. *As a result, no impacts related to this issue will occur.*

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

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

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

The project site is not located within a "moderate fire hazard severity zone."[33] *As a result, no impacts will result.*

MITIGATION MEASURES

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

[54] Google Earth. Website accessed December 6, 2023.

[33] CalFire. *Fire Hazard Severity Zones in State Responsibility Area.*

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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hydrology and water quality if it results in any of the following:

- The proposed project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- The proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- The proposed project would 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 which would result in flooding on- or offsite; 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.
- The proposed project would risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.
- The proposed project would 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 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 are 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 project site is largely undeveloped though it has been disturbed. The site consists of 100% impervious surfaces. The project site is largely flat with elevations ranging from approximately 2,945 to 2,960 feet above mean sea level (AMSL) with a slight overall slope towards Rancho Road to the north. Land surrounding the project site consist of similar topography (flat and slightly sloping to the north). Following development,

the majority of the site (approximately 90%) would be covered over in impervious surfaces (buildings, parking areas, and internal roadways). A proposed bioswale, consisting of 11,520 square feet) would be located on the site's northeast corner. A second bioswale, consisting of 33,207 square feet, would be centrally located in the project site. Phase 1 Landscaping would total 48,381 square feet and would be installed throughout the site and along the site's frontages with Rancho Road and Raccoon Avenue.

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. All of the provided drainage would be designed so that the stability of the graded slopes should not be adversely affected. However, satisfactory slope and building pad drainage is essential for the long term performance of the site. Concentrated drainage would not be allowed to flow uncontrolled over any descending slope. As recommended by the project landscape architect, engineered slopes should be landscaped with deep rooted, drought tolerant, maintenance free plant species. Maintaining control over drainage throughout the site is important for the long term performance of the proposed improvements. Roof gutters or an equivalent type of roof collection system for the proposed structures would be provided. Pad and roof drainage would be routed in non-erosive drainage devices to driveways, adjacent streets, storm-drain facilities, or other locations approved by the building official. Drainage should not be allowed to pond on the building pad or near any foundations. Planters located within retaining wall backfill should be sealed to prevent moisture intrusion into the backfill. Planters located next to structures should be sealed to the depth of the footings. Drainage control devices require periodic cleaning, testing and maintenance to remain effective. Building pad drainage should be designed to meet the minimum gradient requirements of the CBC, to divert water away from foundations. These requirements would be standard conditions and are included in the engineer's recommendations. *As a result, the potential impacts will be less than significant.*

D. *Would the project be located 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.[55] 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.[56] As a result, no impacts are anticipated.

D. *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.*

[55]FEMA. Glossary. Flood Zones. Website accessed December 5, 2023.

[56] Google Earth. Website accessed December 7, 2023.

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.

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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would physically divide an established community.
- The proposed project would 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 project site consists of a vacant lot with moderate disturbance in the form of a dirt road, utility infrastructure, unofficial walking paths, off-road vehicle use, trash and refuse dumping, and signs of feral dog presence. There are no known previous developments at the site with the exception of the utility transmission lines and towers. The project site is largely flat with elevations ranging from approximately 2,945 to 2,960 feet above mean sea level (AMSL) with a slight overall slope towards Rancho Road to the north. Land surrounding the project site consist of similar topography (flat and slightly sloping to the north). Common native plants onsite and in the area include creosote, cacti, rabbit bush, interior golden bush, cheese bush, species of sage, buckwheat at higher elevations and near drainages, Joshua trees, and various grasses. Common native animals include coyotes, cottontails and jackrabbits, rats, mice, desert tortoises, roadrunners, raptors, turkey vultures, and other bird species. There are 34 Joshua trees present in scattered density throughout the project site. The site and the surrounding area are illustrated in Exhibit 4. The project site's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*. Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* Rancho Road extends along the project site's north side. Various industrial uses are located further north of the aforementioned roadway. These parcel's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[57]

[57] Google Maps. Site and Adelanto Zoning Map, Site Accessed, December 4, 2023.

- *East of the project site:* Raccoon Avenue extends along the project site's east side. Vacant, undeveloped land is located further east, along the east side of the aforementioned roadway. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[58]
- *South of the project site:* Vacant, undeveloped land is located to the south of the project site. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.
- *West of the project site:* An industrial use is located to the west of the project site. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[59]

An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4. 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). The project site's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*. A CUP is required for this project. *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.

[58] Google Maps. Site and Adelanto Zoning Map, Site Accessed, December 4, 2023.

[59] Ibid.

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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would 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.
- The proposed project would 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.

The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[60] 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. The project site is located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.[61]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. No mineral extraction activities are located on the adjacent properties. 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.

[60] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*.

[61] California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed December 7, 2023.

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 ground borne vibration or ground borne noise levels?			✖	
C. For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on noise if it results in any of the following:

- The proposed project would 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.
- The proposed project would result in the generation of excessive ground borne vibration or ground borne noise levels.
- For a proposed 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?

Noise levels may be described using a number of methods designed to evaluate the "loudness" of a particular noise. 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. Noise level increases of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. 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

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 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. Chapter 9.110 of the City of Adelanto Municipal Code serves as the City's Noise Control Ordinance. The "standard" noise level for the manufacturing zones is 75 dB(A). Unless otherwise permitted, noise levels shall not exceed this ambient noise level by the following dB(A) levels for the cumulative period of time specified below:

A. Less than five (5) dB(A) for a cumulative period of more than thirty (30) minutes in any hour;
B. Less than ten (10) dB(A) for a cumulative period of more than fifteen (15) minutes in any hour;
C. Less than fifteen (15) dB(A) for a cumulative period of more than five (5) minutes in any hour;
D. Less than twenty (20) dB(A) for a cumulative period of more than one (1) minute in any hour; and,
E. Twenty (20) dB(A) or more for any period of time.

Construction, alteration, and demolition activity on private properties are exempt during the construction period as long as such activities are essential to the completion of a project.

There are no noise sensitive land uses located in the vicinity of the site. [62] The nearest sensitive receptor are residential homes located approximately 1.02 miles north of the project site. Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. All of the cultivation and manufacturing of cannabis products will occur indoors. In addition, the operation of the facility will not expose any surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. All of the manufacturing and cultivation activities would be located within the individual buildings. As a result, the proposed project will not expose sensitive receptors to excessive operational noise levels. *As a result, the impacts would be less than significant.*

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

Once in operation, the proposed project will not significantly raise ground-borne noise levels. All of the manufacturing and cultivation activities would be located inside enclosed and secure buildings. In addition, no noise sensitive land uses are located in the area. The project site is located within a manufacturing zone district. The nearest sensitive receptor are residential homes located approximately 1.02 miles north of the project site. Slight increases in ground borne noise levels could occur during the construction phase. The limited duration of construction activities and the distance to any noise sensitive receptors would reduce

[62] Bugliarello, et. al. *The Impact of Noise Pollution,* Chapter 127, 1975.

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 not located within an airport land use plan. The nearest airport is Adelanto Airport located 1.46 miles to the southwest of the project site. The Southern California Logistics Airport (SCLA) is located approximately 4.38 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.

[63] Google Earth. Website accessed December 7, 2023.

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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on population and housing if it results in any of the following:

- The proposed project would 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).
- The proposed project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

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

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently undeveloped though it has been disturbed. All land use surrounding the property has been previously designated for industrial uses.
- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only.
- *Extension of infrastructure and other improvements.* The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment 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 310 persons at full capacity. The normal peak 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. According to the Southern California of Associate Governments, the City of Adelanto growth forecast for employment is expected to grow from 6,100 in 2016 to 10,000 employments in 2045.[64] The proposed project will not result in any unplanned growth as it is already accounted for by the SCAG. The jobs for this project would be filled by the local labor market. *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 entire project would employ an estimated 310 full-time equivalent employees over three shifts, seven days a week. Of the total floor area of 479,325 square feet, 378,675 square feet would be cultivation uses and 100,859 square feet would be involved in processing. The project site is vacant though it has been disturbed. 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.

[64] Southern California Association of Governments. *Demographics and Growth Forecast*. Adopted September 3, 2020

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 any of the public services:			✖	
i). Would the project result in substantial adverse physical impacts associated with Fire protection?			✖	
ii). Would the project result in substantial adverse physical impacts associated with Police protection?			✖	
iii). Would the project result in substantial adverse physical impacts associated with Schools?			✖	
iv). Would the project result in substantial adverse physical impacts associated with Parks?			✖	
v). Would the project result in substantial adverse physical impacts associated with Other public facilities?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- The proposed project would 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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: 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 Phase 1 project would involve the construction of three new buildings totaling 86,649 square feet within the 9.48-acre property located on the southwest corner of Rancho Road and Raccoon Avenue. The three new buildings are referred to as *Building A*, *Building B*, and *Building C*. Building A would be a single level cultivation building and would consist of 34,425 square feet; Building B would be a single level cultivation building and would consist of 34,425 square feet; and Building C would be a two level building and would consist of 17,799 square feet. The total floor area of the three new buildings would be 86,649 square feet. Access to the proposed development would be provided by three new driveway connections.

One connection would be with the south side of Rancho Avenue and two driveway connections would be with the west side of Raccoon Road. The southernmost connection on Raccoon Avenue would be for emergency access only. A total of 112 parking spaces would be provided. A proposed bioswale would be located on the site's northeast corner. Landscaping would total 48,831 square feet and would be installed throughout the site and along the site's frontages with Rancho Road and Raccoon Avenue.[65]

i). *Would the project have fire protection? Less than Significant Impact.*

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 nearest fire station is the San Bernardino County Fire Station 322 located 1,300 feet northeast of the project site. 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. The project would not hinder the fire station's operations such as response times. In addition, the proposed project would be required to implement all pertinent Fire Code Standards including the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by County Fire officials to ensure adequate fire service and safety as a result of project implementation. *As a result, the impacts would be less than significant.*

ii). *Would the project have police protection? Less than Significant Impact.*

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 San Bernardino County Sheriff's Department is located approximately 2.36 miles northeast of the project site. Due to the short distance from the project site, the station would have the ability to serve the project site in a timely manner. The proposed project will not be open or 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 impacts will be less than significant.*

iii). *Would the project be near schools? Less than Significant Impact.*

Adelanto High School is located approximately 1.56 miles south of the project site. The Victoria Magathan Elementary School is located approximately 1.88 miles to the southeast. 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 will be less than significant.*

[65] MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023.

iv). *Would the project be near parks? Less than Significant Impact.*

The nearest park to the project site is John Mgrdichian Park, located 3.29 to the southeast of the project site. 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, the impacts will be less than significant.*

v). *Would the project have other public facilities? Less than Significant Impact.*

The proposed project would not create direct demand for other governmental service. *As a result, the impacts will be less than significant.*

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.

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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on recreation if it results in any of the following:

- The proposed project would 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.

- The proposed project would 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 nearest park to the project site is John Mgrdichian Park, located 3.29 to the southeast of the project site. Given the proposed project's industrial use, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. *As a result, no impacts are anticipated.*

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

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site. The nearest park to the project site is John Mgrdichian Park, located 3.29 to the southeast of 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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on transportation and circulation if it results in any of the following:

- The proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- The proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- The proposed project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- The proposed project would 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.*

Access to the proposed development would be provided by three new driveway connections. One connection would be with the south side of Rancho Avenue and two driveway connections would be with the west side of Raccoon Road. The southernmost driveway connection with Raccoon Avenue would be used for emergency access only. Internal site access to the individual buildings would be provided by an internal, 26-foot wide, drive aisle.[66] A total of 112 parking spaces would be provided. Of this total, 102 spaces would be standard size stalls, 8 stalls would be ADA stalls, and 2 stalls would be reserved for bicycles.[67] Truck loading areas would be located to the south of Building A and the north side of Building B. Two roll-up

[66] Ibid.

[67] Ibid.

doors would be located on the front (north) elevations of Building A and Building B. According to "Trip Generation, 11th Edition", published by the Institute of Transportation Engineers (ITE), a marijuana cultivation and processing facility is a free-standing facility where marijuana is propagated, planted, grown, harvested, dried, cured, graded, labeled, tagged for tracking or trimmed. The applicable trip generation rates for the proposed cannabis facility are provided in Table 7.

Table 7 Project Trip Generation

Land Use Trip Type	Unit	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Trip Generation Rates								
Cannabis Cultivation (ITE Code 190)	1,000 sq. ft.	6.90	0.69	93%	7%	0.64	28%	72%
Projected Trip Generation (Cannabis Cultivation, ITE Code 190)								
Phase 1 Development	86,649 sq. ft.	598	412	396	29	383	107	276
Phase 2 Development	138,110 sq. ft.	953	658	612	46	610	171	439
Phase 3 Development	123,675 sq. ft.	584	403	375	28	374	105	269
Phase 4 Development	131,325 sq. ft.	906	625	581	44	580	162	418
Total		**3,041**	**2,098**	**1,964**	**147**	**1,947**	**545**	**1,402**

Source: Institute of Transportation Engineers, 11th Edition

Table 7 shows the trip generation for the proposed use. The proposed project's total daily trip generation would be 3,041 vehicle trip ends. Of this total, 2,098 trips would be AM (morning) peak hour trips and 1,947 trips would be PM (evening) peak hour trips.

The CEQA threshold for this issue is whether or not the proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed project is consistent with the land use designation that is assigned to the project site. Furthermore, the proposed development would not be inconsistent with the policies included in the City's Mobility Plan. Ranchero Road, located to the north of the site, is a designated a Major Street consisting of four travel lanes. As part of the proposed project's Conditions of Approvals (COAs), the Applicant would be required to improve both Rancho Road and Racoon Avenue to meet City Standards. *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)? • Less Than Significant No Impact.*

The City of Adelanto has adopted vehicle miles travelled (VMT) thresholds based on the California Emission Estimator Model (CalEEMod) as its preferred method to evaluate VMT impacts. In other words, the City's adopted threshold assumes that if a project's GHG emissions are below thresholds for that land use, the project could be screened out from a VMT analysis. The threshold for GHG emissions is 10,000 MTCO2e per day. a less than significant impact to the environment. As indicated herein in Section 3.8, the Greenhouse gas emissions would be below this threshold. It is also important to note that the proposed project is also consistent with the City's Zoning and General Plan. As a result, the proposed project would also conform to all regional growth projections. *As a result, the impacts will be less than significant.*

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 proposed development would be provided by three new driveway connections. One connection would be with the south side of Rancho Avenue and two driveway connections would be with the west side of Raccoon Road. The southernmost driveway connection with Raccoon Avenue would be used for emergency access only. Internal site access to the individual buildings would be provided by an internal, 26-foot wide, drive aisle.[68] The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. *As a result, the potential impacts would be less than significant.*

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

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

MITIGATION MEASURES

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

[68] Ibid.

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 Tribe5020.1(k)?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- The proposed project would 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).

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

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.*

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).

In accordance with Public Resources Code Section 21080.3.1, subs. (b), the City of Adelanto formally requested AB-52 consultation with the following tribes.

- Denise Torres, Cultural Resources Manager, *Morongo Band of Mission Indians;*
- Ryan Nordness, San Manuel Director of Cultural Resources Management, San Manuel Band of Mission Indians;
- Wayne Walker, Co-Chairperson, Serrano Nation; and,
- Joseph Ontiveros, Tribal Historic Preservation Officer, *Soboba* Band of Luiseño Indians.

The Applicant's adherence to the mitigation measures outlined in Section 3.3 herein would ensure that cultural resources encountered during ground disturbance activities would be conserved. 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 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 Tribe5020.1(k)? ● Less than Significant Impact.*

The project site is located on recognized Yuhaaviatam/Maarenga'yam (Serrano) ancestral territory.[69] 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.*

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.

[69] Native Land.ca. Website Accessed December 1, 2023

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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- The proposed project would 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.
- The proposed project would negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals.
- The proposed project would 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 City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The Treatment Plant is operated by the City of Adelanto and manages the sewage generation from residents, industries, and commercial users in the City of Adelanto. The facility is located at the intersection of Johnathan Street and Auburn Avenue, located approximately 3.2 miles northeast from the project site. Wastewater from Adelanto's water service area is collected and treated at the City-owned 4.0 MGD activated sludge wastewater treatment facility through an operations and maintenance contract with the PERC Water Corporation. 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. On average, indoor cannabis cultivation water consumption is 2.5 gallons of water per day, per plant. Overall, cannabis cultivation uses 27,154 gallons of water per day per acre.[70] This translates into an average rate of 0.623 gallons per square foot of cultivation area on a daily basis. The anticipated water demand for the proposed project (314,400 gallons per day) is summarized in Table 8, The applicant will need a letter from the Adelanto Water Department (VWD) in order to ensure water can be served to the site. The proposed project will be required to implement all pertinent water conservation measures including hydroponics. *As a result, the impacts will be less than significant.*

[70] https://www.marijuanaventure.com/report-on-water-usage/

Table 8 Projected Water Consumption

Project Phase	Consumption Rate	Project Consumption
Phase 1 (86,649 sq. ft.)		
Cultivation (68,850 sq. ft.)	0.623 gals./sq. ft./day	42,894 gals./day
Processing (17,799 sq. ft.)	0.140 gals/sq. ft./day	2,485 gals./day
Phase 2 (138,110 sq. ft.)		
Cultivation (137,700 sq. ft.	0.623 gals./sq. ft./day	85,787 gals./day
Processing (34,835 sq. ft.)	0.140 gals/sq. ft./day	4,877 gals./day
Phase 3 (123,675 sq. ft.)		
Cultivation (137,700 sq. ft.)	0.623 gals./sq. ft./day	85,787 gals./day
Processing (20,400 sq. ft.)	0.140 gals/sq. ft./day	2,856 gals./day
Phase 4 (131,325 sq. ft.)		
Cultivation (137,700 sq. ft.)	0.623 gals./sq. ft./day	85,787 gals./day
Processing (28,050 sq. ft.)	0.140 gals/sq. ft./day	3,927 gals./day
Total		314,400 gals./day

Source: MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023.

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 projected effluent generation is summarized below in Table 9.

Table 9 Projected Effluent Generation

Project Phase	Consumption Rate	Project Consumption
Phase 1 (86,649 sq. ft.)	0.01 gals./sq. ft./day	866 gals./day
Phase 2 (138,110 sq. ft.)	0.01 gals/sq. ft./day	1,381 gals./day
Phase 3 (123,675 sq. ft.)	0.01 gals/sq. ft./day	1,237 gals./day
Phase 4 (131,325 sq. ft.)	0.01 gals/sq. ft./day	1,313 gals./day
Total		4,797 gals./day

Source: MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023.

The effluent that would be generated by the proposed project would be minimal and limited to effluent from the restrooms, kitchens, and due to maintenance. Water consumed for cultivation would be reused as part of the hydroponics and other water conserving measures. *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.*

Solid waste collection services are provided by AVCO for disposal into area landfills and materials recovery facilities (MRFs). The nearest landfill to the project site is the Victorville Sanitary Landfill located at 18600 Stoddard Wells Road. According the CalRecycle, the Victorville Sanitary Landfill has a daily throughput of 3,000 tons per day and a remaining capacity of 93,400,000 cubic yards. The expected closure is October 1, 2047. As such, there is adequate landfill capacity to serve the Project. The projected solid waste generation is summarized below in Table 10.

Table 10 Projected Solid Waste Generation

Project Phase	Generation Rate	Project Generation
Phase 1 (86,649 sq. ft.)	6.0 lbs./day/1,000 sq. ft.	520 lbs./day
Phase 2 (138,110 sq. ft.)	6.0 lbs./day/1,000 sq. ft.	828 lbs./day
Phase 3 (123,675 sq. ft.)	6.0 lbs./day/1,000 sq. ft.	738 lbs./day
Phase 4 (131,325 sq. ft.)	6.0 lbs./day/1,000 sq. ft.	786 lbs./day
Total		2,872 lbs./day

Source: MO+RE Design Solutions, Inc. *Site Plan and Property Info. Sheet A-0.* September 8, 2023.

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

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

Avco Disposal currently provides solid waste collection services to the City. Avco is required to provide these services in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste. 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. In addition, Chapter 8.01 includes provisions for waste collection, recycling, and disposal, recycling, and food waste. The proposed project would be required to conform to all pertinent to City requirements. *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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on wildfire risk and hazards if it results in any of the following:

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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.

- The proposed project would, 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.

- The proposed project would, 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.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[71] 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.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[72] The project site is located in the midst of an industrial 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.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[73] 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.*

[71] CalFire. *Fire Hazard Severity Zones in State Responsibility Area.*
[72] Ibid.
[73] Ibid.

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.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[74] 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.

[74] Ibid.

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:

The following mitigation measures have been incorporated herein to further reduce the potential air quality impacts to levels that are less than significant.

*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.

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. Prior to construction, the Project proponent is required to obtain an Incidental Take Permit (ITP) through CDFW for the take of western Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but

less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Adelanto falls within an area of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1.Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.

Biological Resources Mitigation Measure No. 2. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction presence or absence survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). The survey shall utilize a perpendicular survey route and would consist of one complete (100% coverage) survey of the action area prior to the initiation of construction at any time of year. The survey should be conducted by a CDFW-approved Biologist no more than 48 hours prior to Project activities or construction and after any pause in Project activities lasting 30 days or more. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until 2 negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the survey shall be submitted to CDFW prior to the start of Project activities. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If desert tortoise is found on the project site during preconstruction surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. The Project proponent shall submit to CDFW for review and approval the desert tortoise-specific avoidance plan. If complete avoidance cannot be achieved, the Project proponent shall not undertake Project activities and Project activities shall be postponed until appropriate authorization [i.e., California Endangered Species Act (CESA) Incidental Take Permit under Fish and Game Code section 2081] is obtained.

Biological Resources Mitigation Measure No. 3. A biological monitor should be present onsite daily during construction to monitor for the presence of desert tortoise. If desert tortoise is found on the Project during the construction phase, all work shall cease in the vicinity of the animal. Work shall proceed only after the animal is allowed to leave the area and is no longer at risk, or the animal is relocated by the biologist after approval from CDFW and USFWS. In both cases, the approved biologist shall contact USFWS and CDFW and shall consult regarding any additional necessary avoidance, minimization, or mitigation measures. If desert tortoise us found on the project site during the

operation and maintenance phase of the Project, all grounddisturbing operations and maintenance activities should cease in the vicinity of the animal. CDFW and USFWS shall be contacted and consulted regarding potential relocation of the animal and any additional necessary avoidance, minimization, or mitigation measures. Work shall not resume in the vicinity of the animal until the relevant agencies have responded and all recommended measures are taken. A report shall be prepared by the Project proponent to document the activities of desert tortoise within the site; all fence construction, modification, and repair efforts; and compliance with other measures recommended by the agencies. This report should be submitted to the agency representatives and the City.

Biological Resources Mitigation Measure No. 4. Prior to the initiation of construction activities ((i.e., grubbing, clearing, staging, digging), a "take avoidance survey" should be conducted by a qualified Biologist for the project site and surrounding 500 ft radius utilizing the methodology provided in CDFW's 2012 Staff Report on Burrowing Owl Mitigation. This survey should be conducted no more than 14 days prior to initiation of ground disturbance activities. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. Should no Burrowing Owls be detected during the initial "take avoidance survey", the survey should be repeated within 24 hours prior to ground disturbance 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 active burrows or signs thereof are found within the development footprint during the preconstruction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist that 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. All occupied burrows shall be mapped in an aerial photo. At least 7 days prior to the expected start of any Project-related ground disturbance activities, or restart of activities, the City of Adelanto shall provide a burrowing owl survey report and mapping to CDFW. 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.

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 the California Department of Fish and Wildlife (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 Incidental Take Permit (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 preconstruction 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 Project Proponent shall consult with CDFW on next steps, including obtaining an ITP, and the observation shall be immediately reported to CDFW.

Biological Resources Mitigation Measure No. 6. To reduce impacts to less than significant, it is recommended that the following mitigation measure be employed: Regardless of the time of year, a pre-construction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, 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. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 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. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Biological Resources Mitigation Measure No. 7. 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. 8. 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.

Biological Resources Mitigation Measure No. 9. Prior to construction and issuance of any grading permit, the City of Adelanto should 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.

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.

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.

The monitoring and reporting for the mitigation measures, including the period for implementation, monitoring agency, and the monitoring action, are identified in Table 4-1.

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
AIR QUALITY			
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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
BIOLOGICAL RESOURCES			
Biological Resources Mitigation Measure No. 1. Prior to construction, the Project proponent is required to obtain an Incidental Take Permit (ITP) through CDFW for the take of western Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Adelanto falls within an area of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1.Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 2. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction presence or absence survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). The survey shall utilize a perpendicular survey route and would consist of one complete (100% coverage) survey of the action area prior to the initiation of construction at any time of year. The survey should be conducted by a CDFW-approved Biologist no more than 48 hours prior to Project activities or construction and after any pause in Project activities lasting 30 days or more. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until 2 negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the survey shall be submitted to CDFW prior to the start of Project activities. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If desert tortoise is found on the project site during preconstruction surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. The Project proponent shall submit to CDFW for review and approval the desert tortoise-specific avoidance plan. If complete avoidance cannot be achieved, the Project proponent shall not undertake Project activities and Project activities shall be postponed until appropriate authorization [i.e., California Endangered Species Act (CESA) Incidental Take Permit under Fish and Game Code section 2081] is obtained.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 3. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction presence or absence survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). The survey shall utilize a perpendicular survey route and would consist of one complete (100% coverage) survey of the action area prior to the initiation of construction at any time of year. The survey should be conducted by a CDFW-approved Biologist no more than 48 hours prior to Project activities or construction and after any pause in Project activities lasting 30 days or more. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until 2 negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the survey shall be submitted to CDFW prior to the start of Project activities. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If desert tortoise is found on the project site during preconstruction surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. The Project proponent shall submit to CDFW for review and approval the desert tortoise-specific avoidance plan. If complete avoidance cannot be achieved, the Project proponent shall not undertake Project activities and Project activities shall be postponed until appropriate authorization [i.e., California Endangered Species Act (CESA) Incidental Take Permit under Fish and Game Code section 2081] is obtained.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 4. Prior to the initiation of construction activities ((i.e., grubbing, clearing, staging, digging), a "take avoidance survey" should be conducted by a qualified Biologist for the project site and surrounding 500 ft radius utilizing the methodology provided in CDFW's 2012 Staff Report on Burrowing Owl Mitigation. This survey should be conducted no more than 14 days prior to initiation of ground disturbance activities. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. Should no Burrowing Owls be detected during the initial "take avoidance survey", the survey should be repeated within 24 hours prior to ground disturbance 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 active burrows or signs thereof are found within the development footprint during the preconstruction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist that 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. All occupied burrows shall be mapped in an aerial photo. At least 7 days prior to the expected start of any Project-related ground disturbance activities, or restart of activities, the City of Adelanto shall provide a burrowing owl survey report and mapping to CDFW. 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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
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 the California Department of Fish and Wildlife (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 Incidental Take Permit (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 preconstruction 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 Project Proponent shall consult with CDFW on next steps, including obtaining an ITP, and the observation shall be immediately reported to CDFW.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 6. To reduce impacts to less than significant, it is recommended that the following mitigation measure be employed: Regardless of the time of year, a pre-construction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, 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. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 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. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Biological Resources Mitigation Measure No. 7. 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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*During the project's operational phase.*	Date: Name & Title:
Biological Resources Mitigation Measure No. 8. 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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 8. Prior to construction and issuance of any grading permit, the City of Adelanto should 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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
CULTURAL RESOURCES			
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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
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 the 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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
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 finalization.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
ENERGY			
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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
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.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Energy Mitigation Measure No. 3. The project must use motion activated lighting in the greenhouse areas to reduce energy use at night.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

SECTION 5. REFERENCES

5.1 PREPARERS

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5.2 REFERENCES

The references that were consulted have been identified using footnotes.

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