| | |
|---|---|
| | INITIAL STUDY/MITIGATED NEGATIVE DECLARATION |

| | |
|---|---|
| Project Title: | Cannabis Cultivation Facility |
| Case No. | CUP-2023-0017 & DP-2023-0020 |
| Assessor's Parcel No. | 666-402-003 & 666-402-005 |
| Lead Agency Name and Address: | City of Palm Springs<br>3200 E. Tahquitz Canyon Way<br>Palm Springs, California 92262 |
| Project Location: | 19070 Ruppert Street, Palm Springs, CA 92262 |
| Project Sponsor's Name and Address: | Ruppert Street, LLC<br>19070 Ruppert Street, Palm Springs, CA 92262 |
| General Plan Designation(s): | RBC (Regional Business Center) with Wind Energy Overlay |
| Zoning: | M-2 (Manufacturing) and "CO" Cannabis Overlay Zone |
| Contact Person: | Noriko Kikuchi<br>City of Palm Springs<br>3200 E. Tahquitz Canyon Way<br>Palm Springs, California 92262 |
| Phone Number: | 760-323-8245 |
| Date Prepared | July, 2024 |

# Table of Contents

# CHAPTER 1: INTRODUCTION AND PROJECT DESCRIPTION

## Description of the Project

The Cannabis Cultivation Facility Project consists of a Conditional Use Permit (CUP) for proposed cannabis cultivation and distribution uses and a Minor Development Permit (DP) for the new construction of a 11.691 square foot building. The CUP and DP will be processed pursuant to Palm Springs Zoning Code (PSZC) Section 94.02.00 and Section 94.04.01(B)(3)(d), respectively. The Project proposes the new construction of an 11,691-square-foot one-story building on two adjacent parcels that total 0.74± acres (APN 666-402-003 & 666-402-005, 0.39 acres and 0.35 acres, respectively) on the east side of Ruppert Street between 19th Avenue and Orr Way (Exhibits 1-4). The Project site is currently vacant. The Project will also include a sidewalk around the proposed 30-foot-tall building, as well as driveways, parking spaces and peripheral landscaping (Exhibit 5). Access to the site will be taken from a driveway on the southwest corner of the property. A stub-out for a future internal driveway accessing a future project to the south is also proposed.

The Project will result in a new cannabis cultivation facility with accessory distribution uses. The facility will have two tiered canopies in all grow rooms and mother & veg rooms. The facility will be a net of 10,872 square feet (excluding interior and exterior walls, see Exhibit 7) with a total occupancy of 60 persons.

Utilities and Service Providers:
The following agencies and companies will provide service to the Project site:

1. Sanitary Sewer: Private septic tanks
2. Water: Mission Springs Water District (MSWD)
3. Electricity: Southern California Edison (SCE)
4. Gas: Southern California Gas Company (SoCalGas)
5. Telephone: Frontier
6. Cable: Spectrum
7. Solid Waste: Palm Springs Disposal Services (PSDS)

## Environmental Setting and Surrounding Land Uses:

North: Commercial/industrial one-story buildings and 19th Avenue
South: Vacant land and Lloyd Pest & Termite Control (commercial)
East: Vacant land and Newhall Street
West: Ruppert Street, industrial projects and vacant land

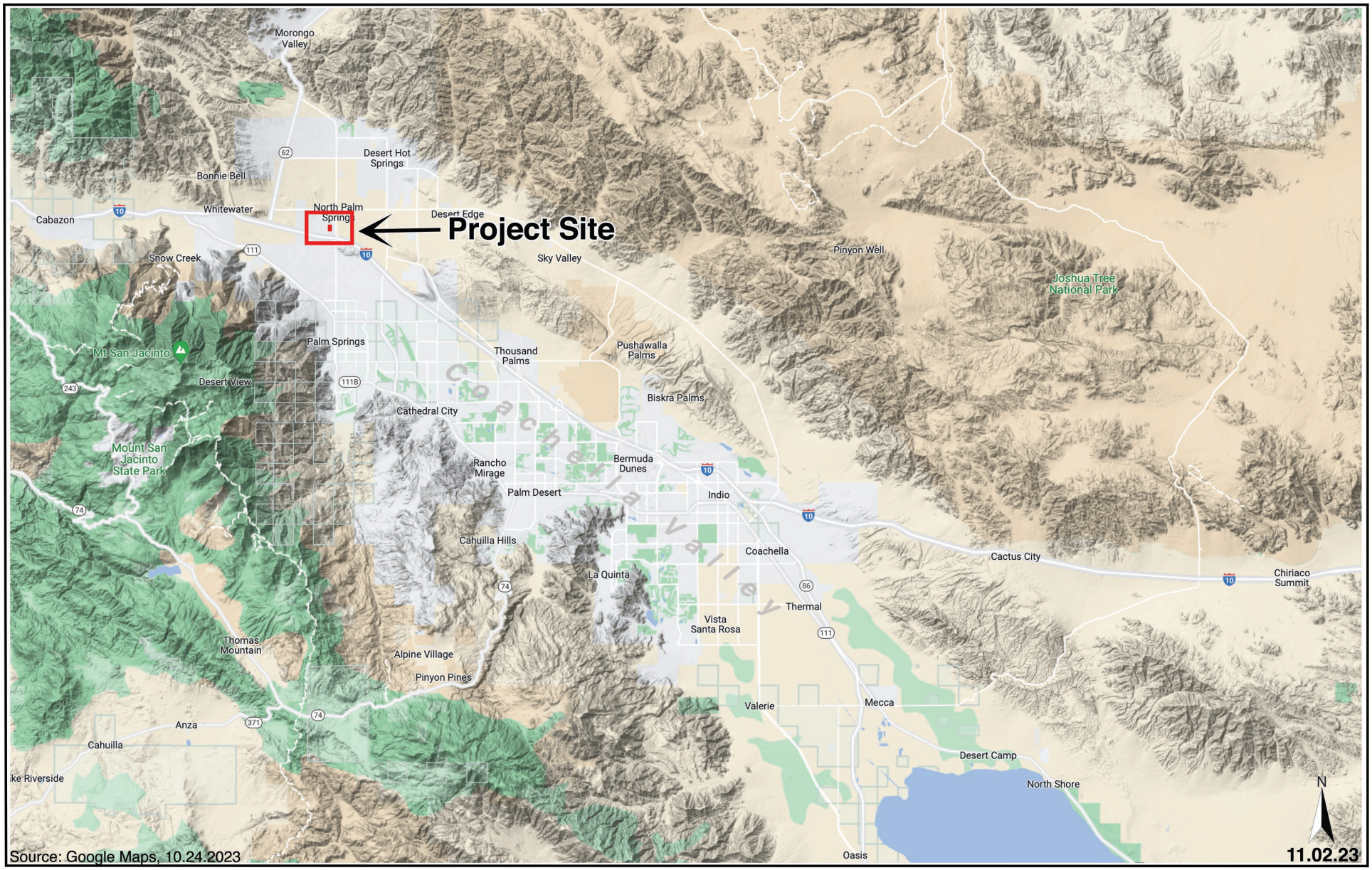
**Other public agencies whose approval is required.**
Bureau of Cannabis Control.
Regional Water Quality Control Board.


11.02.23

TERRA NOVA®
PLANNING & RESEARCH, INC.

**Cannabis Cultivation Facility**
**Regional Location Map**
**Palm Springs, California**

**Exhibit**
**1**




TERRA NOVA®
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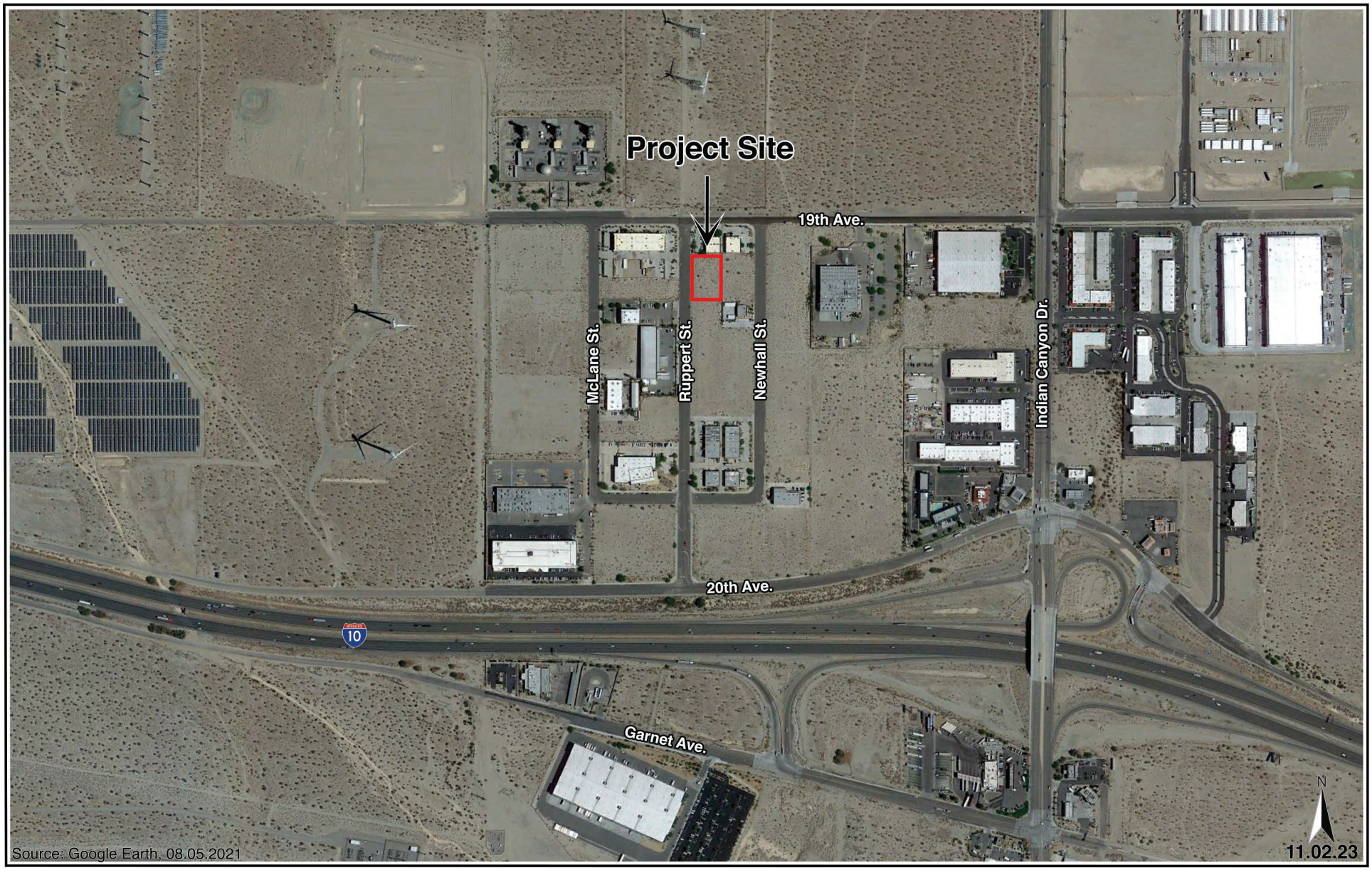
**Cannabis Cultivation Facility**
**Project Vicinity Map**
**Palm Springs, California**

**Exhibit**
**2**

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**Cannabis Cultivation Facility**
**Area Location Map**
**Palm Springs, California**

**Exhibit**
**3**


Source: Google Earth Image, 08.05.2021

11.02.23

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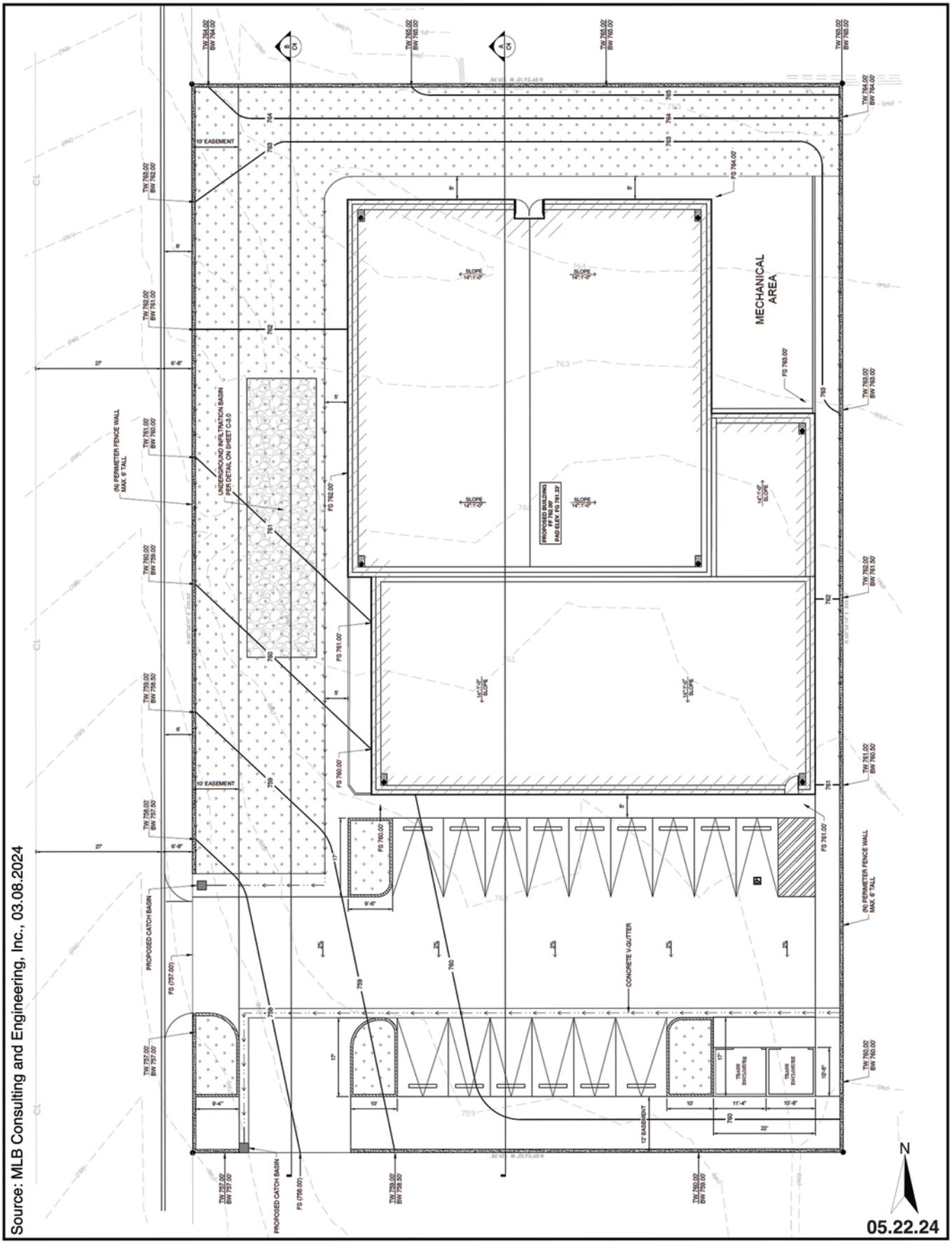
**Cannabis Cultivation Facility**
**Project Location Map**
**Palm Springs, California**

**Exhibit**

**4**




Source: MLB Consulting and Engineering, Inc., 03.08.2024

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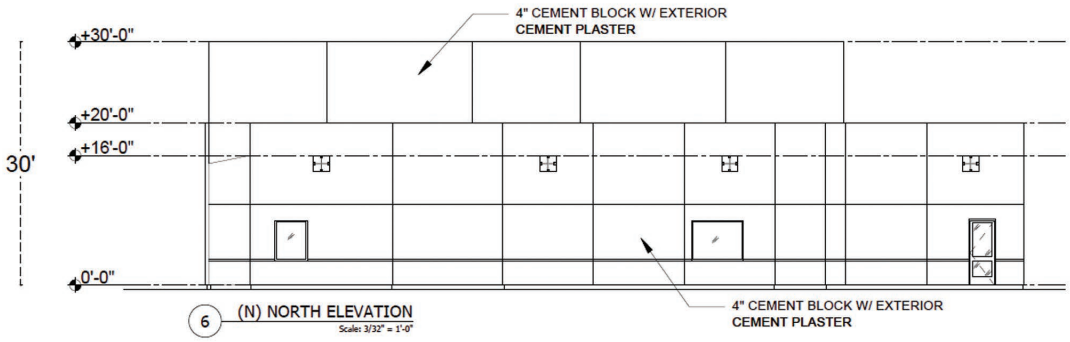
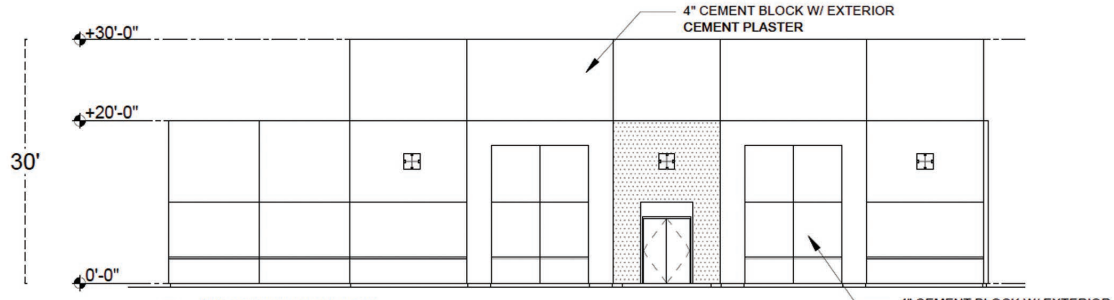
**Cannabis Cultivation Facility**
**Project Site Plan**
**Palm Springs, California**

**Exhibit**

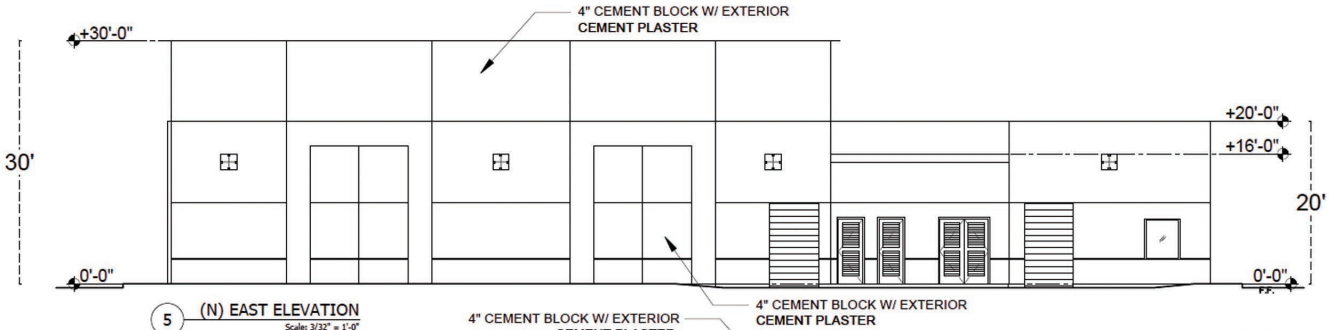
**5**



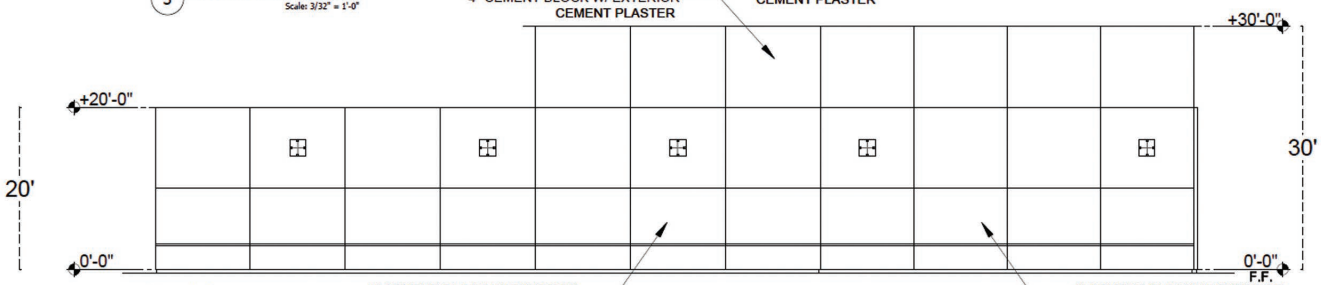

6 (N) NORTH ELEVATION
Scale: 3/32" = 1'-0"




4 (N) SOUTH ELEVATION
Scale: 3/32" = 1'-0"




5 (N) EAST ELEVATION
Scale: 3/32" = 1'-0"




3 (N) WEST ELEVATION
Scale: 1/8" = 1'-0"

Source: RBCAS, LLC, 08.09.2023

**11.02.23**

TERRA NOVA®
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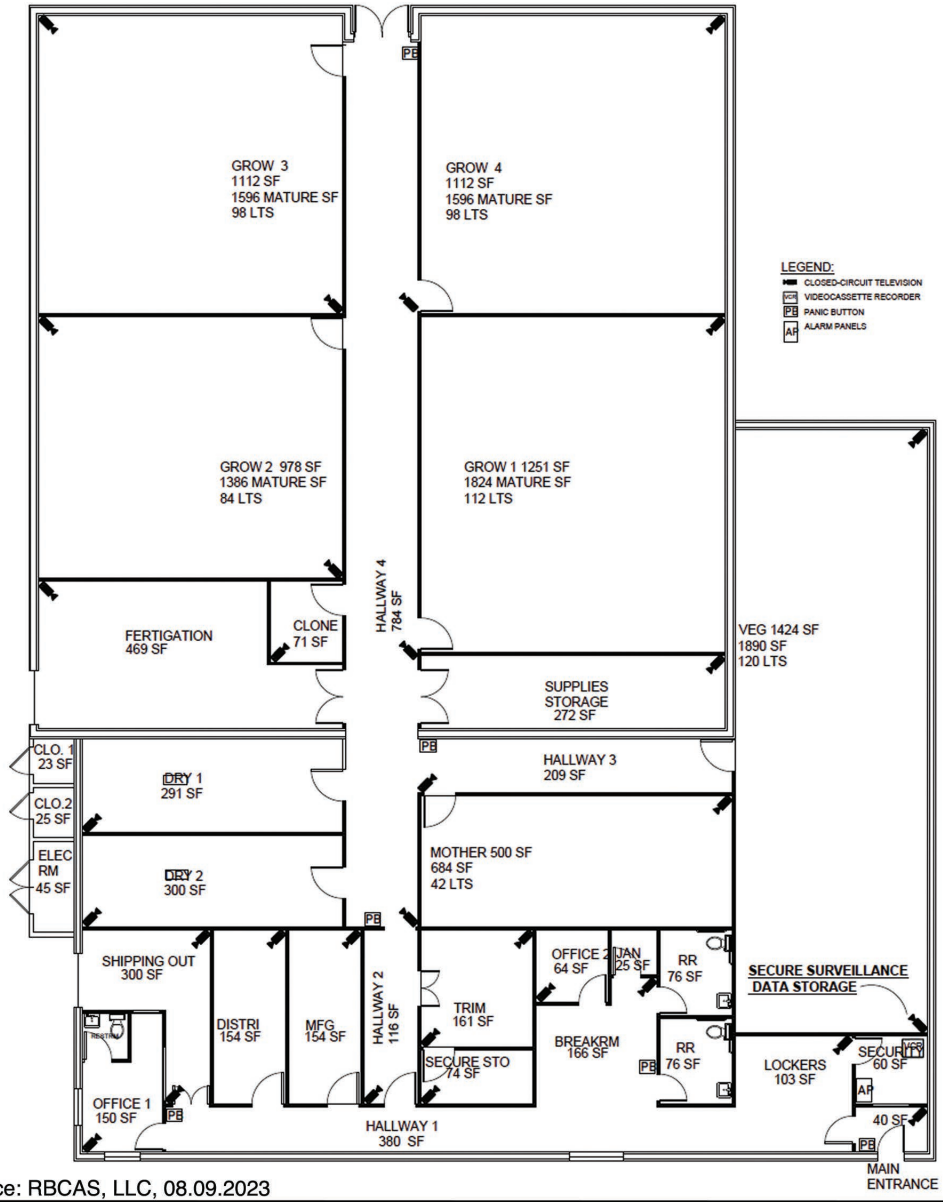
**Cannabis Cultivation Facility**
**Building Elevations**
**Palm Springs, California**

**Exhibit**

**6**




Source: RBCAS, LLC, 08.09.2023

## OCCUPANCY SCHEDULE

*THIS INDICATES NET SF & DOES NOT INCLUDE INT. & EXT. WALLS THICKNESS.

**TOTAL NET SF: 10872 SF**

| ROOM | *SF* | LOAD FACTOR TABLE 1004.5 | OCC |
|---|---|---|---|
| SECURITY | 60 | 150 | 1 |
| LOCKERS | 103 | 15 | 7 |
| JANITOR'S RM | 25 | 300 | 1 |
| TRIM RM PROCESSING | 161 | 200 | 1 |
| BREAKRM | 166 | 15 | 11 |
| SECURE STORAGE RM | 74 | 300 | 1 |
| MFG | 154 | 200 | 1 |
| DISTRO | 154 | 200 | 1 |
| OFFICE 1 | 150 | 150 | 1 |
| OFFICE 2 | 64 | 150 | 1 |
| DRY 1 | 291 | 200 | 2 |
| DRY 2 | 300 | 200 | 2 |
| CLONE RM | 71 | 200 | 2 |
| SHIIPPING OUT | 300 | 300 | 1 |
| MOTHER | 500 | 300 | 2 |
| FERTIGATION | 469 | 300 | 2 |
| GROW 1 | 1251 | 300 | 5 |
| GROW 2 | 978 | 300 | 4 |
| GROW 3 | 1112 | 300 | 4 |
| GROW 4 | 1112 | 300 | 4 |
| VEG | 1424 | 300 | 5 |
| SUPPLIES STORAGE | 272 | 300 | 1 |
| RR 1 | 76 | | |
| RR 2 | 76 | | |
| HALLWAY 1 | 380 | | |
| HALLWAY 2 | 116 | | |
| HALLWAY 3 | 209 | | |
| HALLWAY 4 | 784 | | |
| HALLWAY 5 | 40 | | |

| TOTAL OCC | EXITS REQD | EXITS PROVIDED |
|---|---|---|
| 60 | 2 LENGTH OF STRUCTURE EXCEEDS 75' | 2 |

SIGN TO BE INSTALLED STATING THAT THE "TOTAL OCCUPANCY IS 60 PERSONS"

N

**11.02.23**

TERRA NOVA®
PLANNING & RESEARCH, INC.

# Cannabis Cultivation Facility
# Building Floor Plan
# Palm Springs, California

**Exhibit**

**7**

**Environmental Factors Potentially Affected:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

| | | |
|---|---|---|
| ☐ Aesthetics | ☐ Agricultural and 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 | ☐ Tribal Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

## CHAPTER 2: ENVIRONMENTAL ANALYSIS AND DETERMINATION

**DETERMINATION:** The City of Palm Springs Planning Department

On the basis of this initial evaluation:

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

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

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

☐ I find that 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.

☐ I find that 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.

Edward Robertson
Principal City Planner

7.10.24
Date

**PURPOSE OF THIS INITIAL STUDY**

This Initial Study has been prepared consistent with CEQA Guidelines Section 15063, to determine if the project, as proposed, may have a significant effect upon the environment. Based upon the findings contained within this report, the Initial Study will be used in support of the preparation of a Mitigated Negative Declaration.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross referenced).

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

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impacts to less than significance.

| I. AESTHETICS<br><br>Except as provided in Public Resources Code Section 21099, would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☒ | ☐ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | ☐ | ☐ | ☐ | ☒ |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | ☐ | ☐ | ☒ | ☐ |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☒ | ☐ |

**Setting**

The Project site is in the northern suburban area of the City of Palm Springs in the Coachella Valley. The San Bernardino, Santa Rosa and San Jacinto Mountains rise significantly above the valley floor with elevations of 11,489 feet, 8,716 feet, and 10,834 feet, respectively. Views in the Project area include the San Jacinto Mountains to the south/southwest, San Gorgonio Mountains to the northwest, San Bernardino mountains to the north and Santa Rosa Mountains to the southeast.

The Project site is currently vacant and surrounded by similar vacant desert land, various commercial and industrial uses and roadways. The Project proposes a new cannabis cultivation and distribution facility on the site. The Project will result in the construction of an 11,691-square-foot one-story building with a sidewalk around it as well as driveways, parking spaces and perimeter landscaping. The building will rise to a maximum of 30 feet tall and be constructed with cement block with exterior cement plaster (Exhibit 6).

**Discussion of Impacts**

**a)** **Less Than Significant Impact.** Scenic vistas in the Project area generally include mountain views and windmills. The Project area is partially developed with small clusters of industrial and commercial uses and is expected to continue such development trend. There are and will be no permanent viewers in the area, but mainly travelers on the public streets and employees. The Project will result in a new 11,691-square-foot building up to 30-foot tall and other miscellaneous structures such as slide gates, fencing and landscaping trees and shrubs.

Viewers on 19th Avenue looking south past the Project have minimal top range mountain views as the building to the north blocks most mountain views to the south. Addition of the Project building in similar height to the building to the north would have negligible impact to viewers on 19th Avenue, if any. Viewers on the west and east sides of the building north of the site currently have mid and top range mountain views looking past the Project. The Project would block some of these views as the proposed building will be slightly wider than the building to the north according to the site plan (Exhibit 5). However, such blockage is incidental given the limited size and scale of the proposed building as well as the wide range of similar and better views from 19th Avenue and Ruppert Street. Therefore, this impact is considered less than significant.

Viewers on Newhall Street looking past the Project site to the west can see windmills and mid- to top ranges of the mountains west and south of the site. The Project build out may result in partial blockage of mid-range mountain views and windmills depending on the viewer location, but top-range mountain views would remain. However, similar to the situation above, the proposed building is of limited size and scale compared to the wide range of similar available views in the immediate vicinity, and impacts would be less than significant.

Viewers south of the Project site would be at/near the Lloyd Pest & Termite Control building. Looking past the Project site to the north, the buildings north and northeast of the site nearly block out mountain views. Addition of the Project building in similar height to those buildings would most likely have no impact to viewers on the south. These same viewers would have no change in their southerly and southwesterly views of the San Jacinto Mountains, because the building occurs to the north.

Viewers at the nearby business (Technique Designs) and Ruppert Street looking east past the Project site have distant views of top ranges of the Little San Bernardinos northeast of the site. Existing development to the east blocks most of the lower- and mid-range mountain views as well as some top ranges. The Project building would further block some of these views. However, given the limited size and scale of the proposed building, the limited existing views and wide range of similar available views in the vicinity, impacts would be considered less than significant.

Overall, the proposed Project would not have a significant impact on scenic vistas in the surrounding area.

**b)** **No Impact**. The Project is not located near a state scenic highway. Interstate-10 (I-10), located approximately 0.3 miles to the south of the site, is designated a scenic corridor in the General Plan (Figure 9-4). There are no trees, rock outcroppings, or historic buildings on the Project site. Given the distance to the I-10 and the current industrial character of the area, the addition of the Project will not substantially change views in the area or increase existing impacts to the scenic highway. No impact will occur.

**c)** **Less Than Significant Impact.** The Project proposes a new building with sidewalk, parking spaces and landscaping on the site. The Project design conforms to the zoning standards for height, area, and setbacks in the M-2 zone. The overall building area coverage at buildout will be 36%, well below the 60% maximum allowance. The overall massing and style of the proposed building will be similar to existing industrial development in the Project area.

The Project is designed in an industrial style using cement blocks with exterior cement plaster for the building. The north, west and south sides of the property will be landscaped with trees,

shrubs and groundcovers to soften the overall look. The Minor Development Permit process will require approval by the Development Services Department and further ensure that the Project design meets the City's standards. Less than significant impacts are expected on the visual character and scenic quality in the Project area.

**d)** **Less Than Significant Impact**. On the currently vacant Project site, there is existing light from the surrounding businesses to the north, west, southeast and southwest, and streetlights and traffic headlights on Ruppert Street. Future development in the area under the zoning and General Plan land use designations is expected to be industrial in nature, similar to the current conditions. At build out, the Project will operate as an indoor cannabis cultivation facility with distribution use from 6am to 11pm. The facility will not serve any clients, patrons or shoppers directly, and will only have onsite staff and occasional shipping trucks. There will be no significant increase in glare from traffic headlights.

Construction onsite will be limited to daytime hours, 7 am to 7 pm on weekdays and 8 am to 5 pm on Saturdays, per the Palm Springs Municipal Code (Chapter 8.04.220). Therefore, no impact regarding light or glare will occur during construction.

At build out, there will be increased light and glare from building lighting, outdoor safety and security lights, landscape lighting, and automobile traffic. The Project building will not require any special lighting beyond the nominal purposes specified above. There will only be onsite security after 11pm at the facility and minimal lighting from traffic and any other activity. The City's Zoning Code Section 93.21.00 (Outdoor lighting standards) requires proper shielding of light fixtures to minimize spillage onto adjacent properties. The Minor Development Permit process will ensure the Project design complies with zoning requirements, including lighting. Overall, the Project would have less than significant impacts on light and glare in the area.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Project materials; Palm Springs Municipal Code (PSMC); 2007 Palm Springs General Plan.

| **II. AGRICULTURAL AND FORESTRY RESOURCES** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:** | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| c) 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) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e) 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? | ☐ | ☐ | ☐ | ☒ |

**Setting**

While agriculture has been a key component in the Coachella Valley economy, the region is gradually transforming into a tourism and hospitality destination. Commercial agriculture remains in the east valley. There is no agricultural activity in the City of Palm Springs, nor is there forestland or timberland in the City.

According to the Farmland Mapping and Monitoring Program (FMMP) by the California Department of Conservation, the Project site consists of Other Land, and is surrounded by the same type of land and Urban and Built-up Land.

**Discussion of Impacts**

**a-e)** **No Impact.** The Project site is zoned as Manufacturing (M-2) and designated as Regional Business Center and Wind Energy Overlay in the General Plan. The Project area is partially developed with commercial and industrial uses.

**Prime Farmland:** No prime or unique farmland, or farmland of statewide importance exists within the Project site or vicinity. The Project site is not located on or near any property zoned or otherwise intended for agricultural uses. Therefore, no direct or indirect impact to state-designated agricultural land would occur.

**Williamson Act:** No land on or near the Project site is under a Williamson Act contract. The proposed Project will not conflict with zoning for agricultural uses or a Williamson Act contract. No impact would occur.

**Forest Land:** The Project site is located on the Coachella Valley floor and miles away from the nearest San Jacinto Mountains. The General Plan does not include any forestland or forestry land use designations, as the City occurs on the arid Valley floor. The Project site does not contain forest land, timberland, or timberland zoned as Timberland Production. The proposed Project will not result in the loss or conversion of forestland to non-forest use. No direct or indirect impact would occur.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Farmland Mapping and Monitoring Program, 1984-2020, CA Dept. of Conservation; 2007 Palm Springs General Plan.

| **III. AIR QUALITY**<br>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.<br>**Would the project:** | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☒ | ☐ |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |

**Setting**

The City of Palm Springs, including the Project site, lies in the Salton Sea Air Basin (SSAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Existing air quality conditions are measured according to criteria air pollutants at established air quality monitoring stations throughout the SCAQMD jurisdiction. There are three permanent air quality monitoring stations in the Coachella Valley located in Palm Springs (AQS Station ID 060655001), Indio (AQS Station ID 060652002), and Mecca (Saul Martinez- AQS Station ID 060652005).

To comply with the National Ambient Air Quality Standard (NAAQS) and the California Ambient Air Quality Standard (CAAQS), SCAQMD adopts an Air Quality Management Plan (AQMP) which is updated periodically to identify emissions and implement effective reduction strategies to comply with standards in a timely manner. The 2022 AQMP is the latest adopted plan by the SCAQMD to target nonattainment areas that exceed the NAAQS and are thereby required to reduce emissions within the timeframe determined appropriate by the U.S. Environmental Protection Agency (EPA). The 2022 AQMP builds on measures already established from previous AQMPs by including regulations, accelerated deployment cleaner technologies, best management practices, co-benefits from existing programs, incentives, and other measures to achieve attainment. Moreover, the 2022 AQMP is a guide for the State Implementation Plan (SIP) for attainment of air quality standards.

SCAQMD has established short-term construction and long-term operation threshold to set a maximum amount of air pollutants a project is allowed to generate at each stage of development. Table 2 identifies the established construction and operation thresholds against which the proposed Project emissions are measured.

**Table 1**
**SCAQMD Air Quality Significant Threshold**

| Emission Source | CO | VOC | NOx | SOx | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| Construction (pounds/day) | 550 | 75 | 100 | 150 | 150 | 55 |
| Operation (pounds/day) | 550 | 55 | 50 | 150 | 150 | 55 |
| Source: South Coast AQMD, https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25 (accessed April 2024). | | | | | | |

A Project-specific California Emission Estimator Model (CalEEMod) model run was prepared in May 2024 (Appendix A). The following analysis of potential impacts to air quality associated with the Project construction and operation is based on results from CalEEMod.

**Discussion of Impacts**

**a)** **No Impact.** The Project site is located within the Salton Sea Air Basin and is subject to SCAQMD's 2022 Air Quality Management Plan and the 2003 Coachella Valley PM10 State Implementation Plan. As discussed above, these plans stringently regulate and limit the sources of emission in the Coachella Valley and implement comprehensive strategies to reduce pollutants and, in turn, improve air quality to appropriate levels for federal and state attainment. The AQMP is based, in part, on the land use plans of the jurisdiction in the region. Additionally, conformity with growth forecasts can assure the Project's consistency with air quality plans and standards.

The Project is not expected to contribute to population growth as it proposes permanent a small cannabis cultivation facility in an industrial area. The employees likely to be employed at this location are expected to be existing residents of Palm Springs or surrounding communities.

The Southern California Association of Governments (SCAG) adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) to comply with metropolitan planning organization (MPO) requirements under the Sustainable Communities and Climate Protection Act. The RTP/SCS Growth Management chapter forms the basis of land use and transportation controls of the AQMP. Projects that are consistent with the population forecasts are considered consistent with the AQMP. SCAG forecasts that the City of Palm Springs's population will be 61,600 in 2045. [1]

The Project is consistent with the land use designation and permitted uses. The Project will be part of the City's anticipated commercial and industrial growth, as predicted in the General Plan and SCAG forecasts contained in the RTP/SCS. The Project will implement all plans, policies, and rules to be in compliance with state and regional air quality standards. The Project will therefore be consistent with the 2022 AQMD and 2003 CVSIP. No impacts are anticipated.

[1] 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Demographics and Growth Forecast Technical Report, Southern California Association of Governments, adopted September 3, 2020.

**b)** **Less than Significant Impact.** A project is considered to have significant impacts if there is a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. the SSAB portion of the Coachella Valley is classified as "nonattainment" area for PM10 emissions and ozone. As a result, the Project is required to strictly regulate and limit PM10 and ozone emitting sources at every stage of construction and operation, in addition to carbon monoxide (CO), nitrous oxides (NOx) and volatile/reactive organic compounds/gases (VOC or ROG) to ensure emissions do not exceed SCAQMD thresholds.

The following air quality analysis for the proposed Project is based on the Project description and application materials, and projected trip generation based on the Institute of Transportation Engineers (ITE) 11th Edition.

Construction Emissions:
For analysis purposes, it is assumed that construction will occur over a 6-month period with buildout in 2026. The site is currently vacant and will require grading, building construction, asphalt paving and building painting. These have been factored in the modeling shown in Table 2.

As shown in Table 2, emissions generated by construction activities will not exceed SCAQMD thresholds for any criteria pollutant during construction. The data reflects the maximum daily unmitigated emissions over a 6-month construction period including winter and summer weather conditions. Additionally, the Project will be required to implement architectural coating standards and fugitive dust control measures required by SCAQMD under Rule 403 and Rule 1113, and best management practices (BMPs) to further reduce emissions. Therefore, construction related emissions are expected to have less than significant impacts.

**Table 2**
**Maximum Daily Construction-Related Emissions Summary (pounds per day)**

| | **CO** | **$NO_x$** | **ROG** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
|---|---|---|---|---|---|---|
| **Daily Maximum Emissions** | 10.5 | 10.1 | 15.6 | 0.02 | 2.64 | 1.45 |
| **SCAQMD Threshold** | 550 | 100 | 75 | 150 | 150 | 55 |
| **Exceeds?** | No | No | No | No | No | No |

Operational Emissions:
Operational emissions are ongoing emissions that will occur over the life of the Project. They include area source emissions, emissions from energy demand, and mobile source (vehicle) emissions.

According to the Institute of Transportation Engineers (ITE), the proposed Project will generate approximately 45 daily trips (see Section XVII). Table 3 provides a summary of projected emissions during operation of the proposed Project. As shown below, operational emissions will not exceed SCAQMD thresholds of significance for any criteria pollutants for operations.

**Table 3**
**Maximum Daily Operational-Related Emissions Summary (pounds per day)**

| | CO | $NO_x$ | ROG | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| **Daily Maximum Emissions** | 4.87 | 0.57 | 0.61 | 0.01 | 0.88 | 0.24 |
| **SCAQMD Threshold** | 550 | 55 | 55 | 150 | 150 | 55 |
| **Exceeds?** | Yes | Yes | Yes | No | No | No |

Cumulative Contribution:
The SCAQMD does not currently recommend quantified analyses of construction and/or operational emissions from multiple development projects, nor does it provide methodologies or thresholds of significance for assessing the significance of cumulative emissions generated by multiple cumulative projects. However, it is recommended that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts.

The Coachella Valley portion of the SSAB currently exceeds the NAAQS for PM10 and ozone. Therefore, the Valley is classified as a "nonattainment" area by the EPA. Cumulative air quality analysis evaluates emissions on a regional scale, given the nature of pollutant emissions and aggregated impacts from surrounding jurisdictions and air management districts. Any development project or activity located within the SCAQMD jurisdiction of the SSAB that results in the emission of PM10, ozone, or ozone precursors will contribute, to some extent, to regional nonattainment designation of PM10 and ozone.

As shown in the tables above, Project related PM10, CO, NOx and VOC/ROG emissions are projected to be well below established SCAQMD thresholds. For this reason, the proposed project will result in incremental, but not cumulatively significant impacts on regional PM10 or ozone levels. Impacts will be less than significant.

**c)** **Less than Significant Impact.** Sensitive receptors are defined by SCAQMD as residences, schools, playgrounds, childcare centers, retirement homes, hospitals, long-term health care facilities, rehabilitation centers, and convalescent centers. The nearest sensitive receptors to the Project site are residences located ¾ mile to the north on Indian Canyon Drive to the northeast. Because the Project does not exceed SCAQMD thresholds, the Project is downwind of sensitive receptors, and the nearest sensitive receptor is at a substantial distance, the Project would not significantly impact residents during either construction or operation of the building. Impacts would be less than significant.

**d)** **Less than Significant Impact.** A project is considered to have a significant impact if it generates odors that adversely impact a substantial number of people. The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. The Project proposes the construction of a new building to house cannabis cultivation facilities, and may have the potential to generate odors.

The City will require the applicant to implement a City-approved odor control plan to ensure that odors are not detected off-site, as required by Municipal Code Section 5.55.200. The Project proposes indoor cultivation only, and all plants will be grown and stored indoors. The building is proposed to be concrete block construction, which will be effective in controlling odors as it is non-permeable. In addition, all HVAC and air exchange systems will require approval by the City for compliance with odor control provisions. Compliance with the City's standard requirements will ensure that Project impacts related to cannabis plant odors will remain less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: "Final 2022 Air Quality Management Plan," prepared by South Coast Air Quality Management District; South Coast AQMD Air Quality Significance Thresholds, April 2019; "2003 Coachella Valley $PM_{10}$ State Implementation Plan," August 1, 2003; CalEEMod Version 2022.1.1.22; 2020-2045 RTP/SCS Demographics and Growth Forecast by Southern California Association of Governments.

| IV. BIOLOGICAL RESOURCES<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) 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 Game or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☒ | ☐ |
| b) 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 Game or US Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☒ |
| c) 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) 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? | ☐ | ☒ | ☐ | ☐ |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☒ | ☐ |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☒ | ☐ |

**Setting**

The Coachella Valley, including the City of Palm Springs, is on the western edge of the Sonoran Desert subunit of the Colorado Desert. The Sonoran Desert hosts a variety of biological resources that are highly specialized and endemic to the region. The proposed Project is within the boundaries of and subject to the provisions of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP; Figure 8-3). The CVMSHCP is a comprehensive regional plan that balances growth in the Coachella Valley with the requirements of federal and State endangered species laws. The Project site is within the CVMSHCP, but is not located within or adjacent to a CVMSHCP Conservation Area.

Given its location and topography, the City of Palm Springs supports a wide range of biological resources. According to the City's General Plan, due to habitat loss, some of these species have been listed as threatened or endangered by the federal government. Special status species in the City include two plants (Coachella Valley milk-vetch and the triple-ribbed milk-vetch), three amphibians (arroyo southwestern toad, mountain yellow-legged frog, and California red-legged frog), two reptiles (desert tortoise and Coachella Valley fringe-toed lizard (CVFTL)), two birds (least Bell's vireo and southwestern flycatcher) and one mammal species (Peninsular bighorn sheep). These species are covered under the CVMSHCP, except the mountain yellow-legged frog and California red-legged frog. These two frog species are not expected to occur in the Project area due to lack of water and associated habitat.

**Discussion of Impacts**

**a)** **Less than Significant Impact.** The Project proposes the new construction of a cannabis cultivation facility on a 0.74-acre site. The Project site consists of vacant desert land. The Project will entail the construction of an 11,691-square-foot one-story building as well as driveways, parking spaces and perimeter landscaping.

The Project site is surrounded by Ruppert Street on the west, a light industrial building on the north, and vacant land on the east and south. The Project area is partially developed with commercial and industrial uses. The Project site is mapped as urban developed areas in the CVMSHCP Natural Communities and Development map (Figure 3-1).

The Project site is sparsely covered by native plant species, such as those associated with Sonoran creosote bush scrub. The site has been subject to disturbance from adjacent development, including roadway improvements an the existing project to the north. No special status species are known to occur on the site. The site is isolated and provides fragmented, degraded native habitat. However, the existing shrubs may provide some nesting opportunities for birds covered under the Migratory Bird Treaty Act (MBTA), as discussed in detail in subsection d) below. The Project site is in the CVMSHCP boundary, and will be required to pay the mitigation fee, which is designed to mitigate impacts to covered species for projects on the Valley floor (see subsection e & f below). The Project would result in less than significant impacts regarding sensitive or special status species.

**b, c)** **No Impact.** The Project site and surrounding area do not contain any streams, riparian habitat, marshes, protected wetlands, vernal pools or sensitive natural communities protected by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No Project-related impacts would occur.

**d)** **Less than Significant with Mitigation.** The Project site is surrounded by roadways and existing development on two sides. The vacant lands on the other two sides are of limited size and isolated by existing development and roadways in the immediate vicinity. Therefore, the Project site and adjoining vacant lands would have minimal potential to serve as a wildlife movement corridor for any native resident or migratory species, or as a native wildlife nursery site, because of habitat fragmentation and disturbance due to the existing development in the area. The City's General Plan identified wildlife corridors in northwestern Palm Springs located in the San Gorgonio Pass, Santa Rosa and San Jacinto Mountains, the Whitewater River, as well as other canyons and washes. The Project site is in a semi-developed area in Northern Palm Springs and not near any of the identified wildlife corridors. No impact would occur.

The site may offer limited nesting sites for birds protected by the Migratory Bird Treaty Act (MBTA). Under the MBTA, nesting birds are protected from disturbance until birds have fledged. In the case of the Project site, this includes native and migratory species, and burrowing owl. Impacts to nesting birds would be considered significant without mitigation. To comply with the MBTA, any vegetation or tree removal, or other ground disturbing activities occurring between January 1 and August 31 with the potential to impact nesting birds shall require a qualified biologist to conduct a nesting bird survey to determine if there is a potential impact to such species. Conducting construction activities outside of the breeding season (September 1 to December 31) can avoid mandatory implementation of such measures. If active nests of any native bird are found onsite, they will be avoided until after the young have fledged. Completion of pre-construction surveys will ensure impacts to MBTA species are reduced to less than significant levels (Mitigation Measure BIO-1).

**e,f)** **Less than Significant Impact.** The subject property is located within the boundaries of the CVMSHCP; therefore, the Project is required to pay the Development Mitigation Fee for the vacant site. This fee payment will serve to mitigate potential impacts to CVMSHCP covered species, including those identified to occur in the City. The site is not within or adjacent to a CVMSHCP-designated Conservation Area, and thus will not be subject to additional mitigation measures or provisions.

The Project will provide new landscaped areas featuring local desert-scape plants. The City implements requirements for low-water using, drought tolerant landscaping, consistent with regional standards. The Project will not conflict with any policies or ordinances that protect biological species, or any habitat conservation plans or natural community conservation plans. Impacts are expected to be less than significant.

**Mitigation Measures:**

BIO-1. To comply with the MBTA, any vegetation or tree removal, or other ground disturbing activities occurring between January 1 and August 31 shall require a qualified biologist to conduct a nesting bird survey within 14 days of the initiation of any ground disturbing activity.

All vegetation and suitable nesting habitat (including open ground) on the Project site, whether it will be removed or disturbed, shall be surveyed for nesting birds. The consulting biologist shall establish buffer areas if active nests are found. No ground disturbance can occur within these buffer areas until the biologist confirms that birds have fledged. If the pre-construction survey identifies the presence of burrowing owl, the requirements of the CDFW's Staff Report for Burrowing Owl (2012) will be implemented.

If no nests are present, this condition will be cleared. Conducting construction activities outside the breeding season (September 1 through December 31) can avoid mandatory implementation of these measures.

**Monitoring:**

BIO-A. A report of findings shall be provided to the City by the consulting biologist prior to any ground disturbance on the Project site.
**Responsible Parties:** City Department of Planning Services
**Schedule:** Prior to issuance of any permit for ground disturbance.

Sources: "Coachella Valley Multiple Species Habitat Conservation Plan," 2007; CVMSHCP Open Data, https://mshcp-cvag.hub.arcgis.com/apps/b462273abc38456b8db8eb58e4a1d774/explore, updated April 3, 2023; 2007 Palm Springs General Plan.

| V. CULTURAL RESOURCES<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | ☐ | ☒ | ☐ | ☐ |
| c) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The City of Palm Springs is located in the Coachella Valley, where the Cahuilla Indians have dwelled for 8,000 to 12,000. The Cahuilla Indians were a Takic-speaking people and hunter-gatherers. Among them were distinct groups that occupied different areas, including the Pass Cahuilla in the modern-day San Gorgonio Pass and Palm Springs area, the Mountain Cahuilla in the San Jacinto and Santa Rosa Mountains, and the Desert Cahuilla in the eastern Coachella Valley. The Cahuilla people lived in villages along the shores of ancient Lake Cahuilla and migrated to canyons and alluvial fans in the mountains during the lake's dry cycles.

The Cahuilla population prior to European contact is estimated between 3,600 to 10,000 people that spanned over 2,400 square miles of territory. In the 19th century, the population dwindled as Native peoples encountered European diseases to which they had no immunity. Native Americans of Pass and Desert Cahuilla lineages lived on in the Coachella Valley and are mostly affiliated with the nearby Indian reservations such as Agua Caliente, Morongo, Cabazon, Torres Martinez, and Augustine.

The Agua Caliente managed hundreds of plant resources and developed complex communities in Palm, Murray, Andreas, Tahquitz, and Chino Canyons. The Agua Caliente interacted with other tribes in southern California via a network of trailways.

European explorations of the Coachella Valley were first noted in the 1820s. By the 1870s, non-native settlements started to spread across the Coachella Valley, as new federal laws opened lands for new settlers. In 1853, United States Topographical Survey Engineers described the combination of palm trees and warm springs they encountered as 'Palm Springs', which became a common name after several years. Palm Springs turned into a modern city after World War II and became a renowned resort and vacation destination.

**Discussion of Impacts**

**a)** **No Impact**. Many properties in the City of Palm Springs are listed by the federal government, State of California, and the City as historically significant. Two prehistoric archaeological districts are listed on the National Register of Historic Places: Andreas Canyon and Tahquitz Canyon. Frances Stevens School is listed on the California Register of Historic Resources. Four sites are designated by the state as Points of Historic Interest: original Palm Springs, Desert Inn,

Palmdale railroad, and the El Mirador Hotel and Tower. The City also designates historic resources as Class 1, 2 or 3 for over 50 resources as set forth in the Municipal Code Chapter 8.05 Historic Preservation. None of these occur in or near the Project area.

The Project area is partially developed with commercial/industrial uses. The Project site consists of vacant desert land and is surrounded by similar vacant land, roadways and commercial/industrial development. The Project site and vicinity do not contain any listed or potential historic resources, nor is it in a designated historic district. No impact would occur.

**b)** **Less than Significant with Mitigation.** The City's General Plan mapped areas that are known or have the potential to contain prehistoric and archaeological resources, including Whitewater, Chino, Tahquitz, and Palm Canyons and areas in/near the foothill of the San Jacinto Mountains. The Project is not located within or near an area of known archaeological sites identified in the General Plan (Figure 5-6). The Project site is also located well out of any areas identified as likely to have prehistoric resources such as rock shelters, lithic workshops, milling features, prehistoric village sites, and pottery and lithic scatters (General Plan Figure 5-5).

The Project site is on the desert floor and far from water sources in the canyons. Therefore, the site has very low potential to contain significant archaeological resources. However, there is a possibility that unknown archaeological resources may be uncovered during site disturbance and excavation in the Project construction phase. Implementation of archaeological monitoring as detailed in Mitigation Measure CUL-1 will ensure that any potential impact on buried archaeological resources remain less than significant.

**c)** **No Impact**. No cemeteries or human remains are known to occur onsite. It is unlikely that any human remains will be encountered during construction of the proposed Project. However, should any previously unidentified human remains be discovered during Project construction, California law (Health and Safety Code Section 7050.5) requires that all activity stop, and that the coroner be notified to determine the nature of the remains and whether Native American consultation will be required. Compliance with this requirement of law will assure that no impact would occur to cemeteries or human remains.

**Mitigation Measures:**

CUL-1 Earth-moving activities including grading, grubbing, trenching, or excavations at the site shall be monitored by a qualified archaeologist and an Agua Caliente Band of Cahuilla Indians (ACBCI) monitor at the expense of the applicant. If during excavation, grading or construction, artifacts or other archaeological resources are discovered, the archaeologist and Tribal monitor shall recover artifacts quickly to avoid construction delays but shall have the power to temporarily halt or divert construction equipment to allow for controlled archaeological recovery if a substantial cultural deposit is encountered. The monitors shall determine when excavations have reached sufficient depth to preclude the occurrence of cultural resources, and when monitoring should conclude. Work shall resume after consultation with the City of Palm Springs and implementation of the recommendations of the archaeologist and/or tribal monitor. If artifacts are discovered, these shall be processed, catalogued, analyzed, and prepared for permanent curation in a repository with permanent retrievable storage that would allow for additional research in the future.

**Monitoring:**

CUL-A. The applicant shall provide the City with fully executed agreements with a qualified archaeologist and a Tribal monitor prior to the issuance of any earth moving permit on the property.

CUL-B. The Project archaeologist shall, within 30 days of the conclusion of monitoring activities, provide the City with a report of findings to be kept on file by the City.

**Responsible Parties:** City Department of Planning Services, applicant and Project archaeologist.
**Schedule:** Prior to and during earth moving activities.

Source: 2007 Palm Springs General Plan.

| VI. ENERGY<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☒ | ☐ |

**Setting**

Electricity
Southern California Edison (SCE) provides electricity to the City of Palm Springs, including the Project area. Currently, SCE delivers power to 15 million people in its 50,000-square-mile service area.[2] SCE has engaged millions of customers in energy efficiency programs and continues to increase the share of renewable energy, such as solar and wind power, in its portfolio.[3] High-voltage transmission lines of up to 500 kilovolts cross the Coachella Valley on an east-west trending utility corridor generally located north of Interstate-10 and the Project site.

Natural Gas
Southern California Gas Company (SoCalGas) provides natural gas services to the City of Palm Springs. Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the valley near and parallel to Interstate-10 and continue west to Los Angeles. The pipelines include one 30-inch line and two 24-inch lines, with pressures of 2,000 pounds per square inch (psi).

Renewable Energy and Energy Efficiency
Both SCE and SoCalGas offer various rebates, incentives and assistance programs for customers who conserve energy. The City of Palm Springs promotes energy efficiency programs like the Home Energy Assessment Rebate and Commercial Energy Efficiency Program and is recognized as a national leader in advancing solar energy. The City is a member of Desert Community Energy (DCE), a community-based, locally controlled electricity provider of clean, carbon free power at competitive rates. Starting in April 2020, all electricity accounts were automatically enrolled into DCE's 100% Carbon Free plan. Customers also have the choice to opt down to a lower cost plan or opt out. In all scenarios, SCE still delivers, maintains and services electricity in the City.

**Discussion of Impacts**

**a,b)** **Less than Significant Impact**. The proposed Project will require energy resources during construction and operation. Construction related energy demand comes from operation of construction equipment and manufacturing of construction materials. At build out, the Project will operate as a cultivation/distribution facility and generate energy demand from

2 https://www.sce.com/about-us/who-we-are, accessed 10/26/2023.

3 Ibid.

building/site lighting, HVAC systems, shipping and transportation, and cultivation activities that require highly regulated lighting, irrigation, and temperature control. The structure will be constructed with masonry and further insulated per the 2022 Building Energy Efficiency Standards (Energy Code, Title 24, Part 6). It is not expected that the Project will utilize natural gas. The Project will not consume energy in a wasteful, inefficient, or unnecessary manner.

Adherence to the applicable state standards enforced by SCE will ensure the Project is consistent with current energy standards and conservation goals laid out in the City's Sustainability Plan (2016). Impacts related to energy are expected to be less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: 2007 Palm Springs General Plan; City of Palm Springs Sustainability Plan.

| VII. GEOLOGY AND SOILS<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) 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. | ☐ | ☐ | ☐ | ☒ |
| ii) Strong seismic ground shaking? | ☐ | ☐ | ☒ | ☐ |
| iii) Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☐ | ☒ |
| iv) Landslides? | ☐ | ☐ | ☐ | ☒ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ |
| c) 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) 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? | ☐ | ☐ | ☐ | ☒ |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | ☐ | ☐ | ☒ | ☐ |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The Coachella Valley lies in the Salton Trough, a northwest-southeast trending tectonic depression extending from the San Gorgonio Pass to the Gulf of Mexico. The Salton Trough is dominated by several northwest trending faults, most notably the San Andreas Fault system. The Salton Trough is bounded by the Santa Rosa and San Jacinto Mountains on the southwest, San Bernardino Mountains on the north, and Little San Bernardino – Chocolate – Orocopia Mountains on the east.

The Coachella Valley's geologic composition and seismicity are heavily influenced by the nearby San Andreas Fault system, which passes through the northeastern portion of the valley, and other active faults. The region is susceptible to various geologic hazards based on specific location and soil composition, such as ground rupture, major ground shaking, slope instability, and collapsible and expansive soils.

Episodic flooding of major drainages, including the Whitewater River, results in the deposition of sand and gravel on the valley floor. Strong sustained winds emanating from the San Gorgonio Pass cause wind erosion and transport and deposit dry, finely granulated, sandy soils on the valley floor. Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream deposited) and aeolian (wind deposited) sediments on the central valley floor.

**Discussion of Impacts**

**a)**

**i) No Impact.** According to the General Plan Seismic Hazards Map (Figure 6-1), the Project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone. The nearest mapped fault zone is associated with the Banning Pass Fault and runs approximately 0.66 miles north of the site. Therefore, no fault rupture is expected onsite, and no impact would occur.

**ii) Less Than Significant Impact**. The Project site is near several active faults, including the Banning Pass Fault to the north, Garnet Hill Fault, South Pass Fault and Palm Canyon Fault to the south, and San Gorgonio Pass Fault Zone to the west. The closest is the Banning Pass Fault, located approximately 0.66 miles north of the Project site. These faults are capable of producing earthquakes and severe ground shaking in the City. Studies have shown that the Coachella Valley has been subject to a major earthquake up to Richter scale magnitude 7.9 every 150 years, on average, although no major earthquake has occurred in the last 300 years.

The proposed building on the Project site will be required to be constructed in accordance with the most recent edition of the California Building Code (CBC) and Palm Springs Municipal Code Chapter 8.04 to provide collapse-resistant design. According to the General Plan, the entire City is located within Seismic Zone 4 and is potentially subject to the highest acceleration due to seismic shaking. Adherence with the provisions in the latest CBC as adopted in the Municipal Code (Chapter 8.04) will ensure that potential risk to life and property is minimized and ground shaking impacts will be less than significant.

**iii) No Impact**. Liquefaction occurs when loose, soft, unconsolidated, or sandy soils become saturated with water during an earthquake, which causes such soil to lose strength and may cause structural damage. Liquefaction requires coexistence of three conditions: liquefaction-susceptible soils; groundwater within 50 feet or less below ground surface; and strong seismic shaking. According to the General Plan Seismic Hazards Map (Figure 6-1), the Project site is classified as "Low Liquefaction Susceptibility – Fine-grained granular sediments susceptible to liquefaction, but with groundwater depths greater than 50 feet."

According to the United States Department of Agriculture Web Soil Survey, underlying soils at the Project site consist of 100% ChC (Carsitas cobbly sand, 2 to 9 percent slopes). Because the groundwater depth is greater than 50 feet below ground surface in the Project area, liquefaction is not expected to occur onsite. The sands would not be prone to consolidation under the building load during ground shaking. No impact is expected.

iv) **No Impact.** The Project site sits on the desert floor and is surrounded by generally flat terrain. The nearest foothill slope of Garnet Hill is located approximately 0.75 miles to the southeast. Therefore, there would be no impact regarding landslides on the Project site.

b) **Less Than Significant Impact.** The proposed Project development has the potential to cause soil erosion during site preparation, grading, and building construction. However, the applicant will be required to adhere to erosion control measures imposed by the City during grading and building permit processes, including SCAQMD Rule 403.1 that requires a fugitive dust control plan, and NPDES standards and best management practices to prevent erosion from surface water. At buildout, there will be a low potential for soil erosion given the generally level topography and that the Project site will be covered by the new building, impervious pavement and stabilized landscaped areas. Therefore, impacts regarding soil erosion and loss of topsoil would be less than significant.

c) **Less Than Significant Impact.** As discussed above in subsections (a) iii-iv), the Project site is not subject to landslide or liquefaction hazards. Lateral spreading is often associated with liquefaction and occurs when soils move laterally during seismic shaking. Given the generally flat site topography and low risk associated with liquefaction and related hazards in the Project vicinity, the likelihood of lateral spreading onsite is low.

Ground subsidence is considered a regional issue and mainly associated with groundwater extraction in the Coachella Valley. The City's General Plan Action SA2.4 calls for a groundwater monitoring program to combat ground subsidence. Local water agencies have implemented programs to conserve water and replenish groundwater basins to reverse the overdraft situation in the valley, which will in turn help mitigate subsidence.

Soil collapse can cause structural damage, but can be mitigated through standard engineering practices such as over-excavation and re-compaction. The proposed Project will involve grading and construction on vacant undeveloped land. The City will require a site-specific soil and geotechnical analysis, as necessary, to determine whether additional soil remediation or compaction is required. The Project would be required to comply with this standard requirement prior to issuance of grading and building permits. Implementation of any necessary soil remediation procedures as part of the building permit process will ensure that impacts associated with unstable soils remain less than significant.

d) **No Impact.** Expansive soils can retain moisture and have shrink/swell potential due to moisture content. In the Coachella Valley, expansive soils are generally associated with clay deposits. As noted, the site soil consists of ChC (Carsitas cobbly sand), which has a texture of cobbly or gravelly sand. According to the USDA Official Soil Series Descriptions, the clay content ranges from 0 to 5 percent for ChC. The site soil is therefore not considered expansive. No impact would occur.

e) **Less Than Significant Impact.** Mission Springs Water District (MSWD) provides water and sewer services to Desert Hot Springs, West Garnet, and North Palm Springs, including the Project site. About half of MSWD's service area has sewer service, with 6,116 wastewater connections mainly to residents and non-residential customers in central Desert Hot Springs.[4] In areas without sewer lines or a wastewater collection system, customers are required to use septic tanks. There is no sanitary sewer service or infrastructure in the immediate Project area. MSWD is currently developing a new Regional Water Reclamation Facility between 19th and 20th

[4] Mission Springs Water District Wastewater System Comprehensive Master Plan, April 4, 2007.

Avenue, east of the Project site, to expand its wastewater service area and increase wastewater treatment capacity. The Project will have access to the new plant when the plant and associated conveyance system are operational. Until MSWD extends sewer lines in the Project area, the proposed Project will need to install on-site septic tanks capable of handling the anticipated wastewater generated by the proposed Project. The onsite underlying soils consist of cobbly and gravelly sands that are excessively drained and feature free percolation. These soils are generally considered suitable for septic tanks, but would require proper filtration to protect groundwater. The City's Municipal Code Section 15.14.010 requires that private sewer systems be designed, constructed, installed, and maintained to standards approved by the City engineer and the Riverside County Health Department. Because the Project proposes cannabis cultivation, it will also be subject to the requirements of the Regional Water Quality Control Board (RWQCB), which requires these facilities to test and maintain septic systems through a permitting and monitoring process. The Project will be subject to this permitting requirement and required to meet or exceed RWQCB standards. These standard requirements will ensure impacts related to septic tanks onsite will be less than significant.

**f)** **No Impact.** The site is underlain by recently deposited alluvium and is unlikely to contain paleontological resources. The Riverside County General Plan Draft EIR (Figure 4.9.3) designates the City as a low sensitivity area for paleontological resources. No deep excavation is expected for the proposed cannabis facility construction because of its single-story construction, and potential impacts on paleontological resources are expected to be negligible.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: 2007 Palm Springs General Plan; Web Soil Survey, https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx, U.S. Department of Agriculture Natural Resources Conservation Service, accessed October 28, 2023; County of Riverside Draft Program EIR No. 521, February 2015.

| VIII. GREENHOUSE GAS EMISSIONS<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Generate gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

**Setting**

Greenhous gases (GHG) occur naturally in the atmosphere to preserve energy from sunlight. These naturally occurring GHG, such as water vapor, carbon dioxide (CO2), methane (CH4), and ozone absorb and re-radiate energy to warm the planet, thus making Earth habitable. However, with the introduction of human activities, the concentration of greenhouse gases has sharply increased to the extent of altering Earth's climate and weather patterns, known as global climate change or global warming. Cardon dioxide (CO2), nitrous oxide (N2O), and methane (CH4), along with synthetic fluorinated compounds are largely contributing to the greenhouse effect and Earth's imbalance. Carbon dioxide is the most significant greenhouse gas as it accounts for 80% of global human-caused emissions and has the longest global atmospheric lifetime of any GHG, ranging from 300 to 1,000 years.

State laws, such as Assembly Bill 32 (AB 32) and Senate Bill 32 (SB 32), require all cities to reduce greenhouse gas emissions to 1990 levels by the year 2020. SB 32 is the extension of AB 32 which requires the state to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030. The City of Palm Springs prepared a Climate Action Plan in 2013 and updated its Sustainability Plan in 2016 to achieve goals identified in state laws.

GHG Thresholds

On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 $MTCO_2e$/yr that only applies to industrial uses' stationary sources where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document that also recommended a threshold for all projects using a tiered approach.

It was recommended by SCAQMD staff that a project's greenhouse gas emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the project below an absolute threshold (10,000 $MTCO_2e$/year for industrial projects; 3,000 $MTCO_2e$/year for residential and commercial projects)?
- Tier 4: Is the project below a (yet to be set) performance threshold?
- Tier 5: Would the project achieve a screening level with off-site mitigation?

The analysis provided below is based on this tiered approach.

**Discussion of Impacts**

**a, b)** **Less Than Significant Impact.** The proposed Project will generate GHG emissions during both construction and operation. As described above in Section III, Air Quality, the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.22 was used to quantify air quality emission projections, including greenhouse gas emissions (Appendix A).

Construction
Short-term GHG emissions for the Project will be those associated with equipment operation and construction worker commute. Construction emissions are projected to be 66.4 $MTCO_2e$ in 2025 over the estimated construction period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, the construction emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 4, below).

Operation
GHG emissions are generating by energy usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing associated with periodic maintenance on the existing building and parking area), and mobile sources. As shown in Table 4, operational emissions are projected to be 624.97 $MTCO_2e$/year, including amortized construction emissions of 2.21 $MTCO_2e$/year, with energy emissions representing about 71% of all operational emissions. The proposed Project will be required by the City to comply with its Climate Action Plan, and will be conditioned to be powered through the City's DCE electricity program, which ensures the use of renewable energy for power generation. As a result, the Project will comply with Tier 2, and impacts will be less than significant.

**Table 4**
**Projected GHG Emissions Summary**

| Phase | CO2e (MT/YR) |
|---|---|
| **Construction** | |
| 2025 | 66.4 |
| **Operation** | |
| Area | 0.17 |
| Energy | 445 |
| Mobile | 169 |
| Waste | 4.53 |
| Water | 5.77 |
| Refrigerants | 0.5 |
| Construction: 30-year amortized | 2.21 |
| **Total Operational** | **624.97** |

The City of Palms Springs Sustainability Plan was updated in 2016, which provides guiding principles and specific action items to achieve the AB 32 goals. The Project is consistent with the Sustainability Plan by maintaining the existing desert-scaping and sealing existing rooms with caulk and paint which will help conserve energy. All components of the renovation, including equipment, materials, and management practices, would be subject to current and future SCAQMD rules and regulations related to greenhouse gases such as low-VOC paint and coatings (Rule 1113).

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Palm Springs Climate Action Plan (2013); Palm Springs Sustainability Plan (2016); CalEEMod Version 2022.1.1.22; Palm Springs General Plan, 2007.

| IX. HAZARDS AND HAZARDOUS MATERIALS<br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☐ | ☒ |
| d) 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) 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) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | ☐ | ☐ | ☐ | ☒ |

**Setting**

Hazardous materials include commonly used products such as paint, household cleaning products, and industrial products such as gasoline, solvents, refrigerants, and similar substances. The proper management of hazardous materials is a common concern for all communities including the City of Palm Springs. Starting in the 1970s, governments at the federal, state, and local levels became increasingly concerned about the impacts of hazardous materials on human health and the environment. Laws and regulations at different levels were developed to investigate and mitigate these impacts. As a result, the generation, storage, use, transport, and disposal of hazardous materials are highly regulated by federal, state, and local laws and regulations.

The City of Palm Springs has many businesses that manufacture, transport, store, use, and dispose of hazardous materials; most are centered in the urban core area. Most of the hazardous materials generators within the City are located within five miles of the Garnet Hill and Banning faults, which have a relatively high probability of generating an earthquake in the next 30 years. Fourteen hazardous materials facilities have been identified as being located between the 100- and 500-year floodplain for the Whitewater River. Hazardous materials are transported through the City on Highway 111, Interstate 10, and the Southern Pacific Railroad.

According to the State Water Resources Control Board's GeoTracker and Department of Toxic Substances Control's EnviroStor data management systems, no sites at or near the Project site have previously experienced state or federal regulation. No sites within the Project vicinity were identified in these database searches, and no impact relating to existing hazardous materials is expected to occur on the Project site.

The Project proposes a new cannabis cultivation facility with accessory distribution. Cleaners, solvents, fertilizers and pesticides may be used on-site for routine cleaning and cultivation.

**Discussion of Impacts**

**a,b)** **Less Than Significant Impact.** The Project construction phase would require heavy equipment onsite, which uses small amounts of oil and fuels and other potentially flammable substances. During construction, equipment would require refueling and minor maintenance on site that could lead to fuel and oil spills. The contractor will be required to identify a staging area for storing materials and comply with laws and regulations regarding the handling, storage, and use of hazardous materials during construction, including those implemented by the California Occupational Health and Safety Administration (CalOSHA), Riverside County Department of Environmental Health, and Regional Water Quality Control Board. These requirements assure that impacts associated with construction will remain less than significant.

The Project operation includes cultivation activities, distribution and routine cleaning. Because quantities of chemicals involved in cultivation and routine cleaning will be limited to those for immediate use, and no large storage area is proposed, none of these chemicals will be used in sufficient quantities to pose a threat to humans or cause a foreseeable chemical release into the environment.

The proposed facility will be required to obtain cultivation and distribution licenses from the state Department of Cannabis Control (DCC) and subject to various cannabis waste management requirements. The Project waste will be stored, recycled, and disposed of per applicable state and license-specific regulations.

Overall, given the limited amount of potential hazardous materials expected to be on the site and implementation of regulations on cannabis waste, Project impacts regarding hazardous materials will be less than significant.

**c)** **No Impact.** The nearest school to the Project site is Vista Del Monte Elementary School, located approximately 3.78 miles to the southeast. There is no school within ¼ mile of the Project site. As discussed above, the Project will have less than significant impacts regarding hazardous materials. Given the distance between the Project site and schools, no impact is expected on schools.

**d)** **No Impact**. Based on a records review on the State of California GeoTracker and EnviroStor systems, the Project site is not included in any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The proposed Project will not create a significant hazard to the public or environment. No impact would occur.

**e)** **No Impact.** The nearest airport to the Project site is the Palm Springs International Airport, located approximately 4.87 miles to the southeast. The Project site is well outside the boundaries of the airport's land use compatibility plan. There will be no safety or noise hazards for people working in the area as a result of the proposed Project. No impact would occur.

**f)** **No Impact**. The Project site is currently vacant and undeveloped, and fronts Ruppert Street on the west. The Project proposes access via Ruppert Street. Ruppert Street is designated as a local street in the City's Circulation Element (Figure 4-1). In the Project vicinity, 19th Avenue is designated as a Secondary Thoroughfare (4–lane undivided), and Newhall Street and Orr Way are local streets. 20th Avenue to the south of the Project site is designated as a Collector (2-lane undivided), and Indian Canyon Drive is designated as a Major Thoroughfare (6-lane divided) to the east. These roadways, along with Interstate 10, will serve as local and regional emergency routes to and from the City. The Project will not interfere with the existing circulation pattern, as no change in the existing street grid is proposed.

During the conditional use permit application process, the City Fire and Police Departments will review the Project site plans to ensure adequate driveways and access are provided for emergency vehicles. The site can be accessed from Ruppert Street in an emergency event. The City may require a construction plan to assure that the Project development does not interfere with emergency access. Compliance with these standard requirements will ensure that the Project would have no impact on emergency response.

**g)** **No Impact**. According to the Fire Hazard Severity Zones maps by CalFire, the Project site is not located within or near any fire hazard zone. The Project is located miles away from mountainous areas with potential wildfire hazards. No impact is anticipated.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: 2007 Palm Springs General Plan; California Department of Toxic Substances Control EnviroStor Database, accessed October 30, 2023; State Water Resources Board GeoTracker, accessed October 30, 2023; "Riverside County Airport Land Use Compatibility Plan Policy Document," March 2005; Fire and Resource Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection.

| X. HYDROLOGY AND WATER QUALITY<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | ☐ | ☐ | ☒ | ☐ |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | ☐ | ☐ | ☒ | ☐ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | ☐ | ☐ | ☐ | ☐ |
| (i) result in substantial erosion or siltation on- or off-site; | ☐ | ☐ | ☒ | ☐ |
| (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; | ☐ | ☐ | ☒ | ☐ |
| (iii) 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 | ☐ | ☐ | ☒ | ☐ |
| (iv) impede or redirect flood flows? | ☐ | ☐ | ☒ | ☐ |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | ☐ | ☐ | ☐ | ☒ |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | ☐ | ☐ | ☐ | ☒ |

**Setting**

Domestic Water

The Project site is located within the service area of Mission Springs Water District (MSWD). MSWD provides domestic water service to the City of Desert Hot Springs, northern Palm Springs, and ten small communities in Riverside County, which total 135 square miles of service area and a service population of approximately 43,000.

MSWD's water supply source is 100 percent groundwater extracted from thirteen wells owned by MSWD. The service area is underlain by the Coachella Valley Groundwater Basin. MSWD produces water primarily from the Mission Creek Subbasin via eight active wells, also from the Indio Subbasin (including the Garnet Hill Subarea) via three active wells, and the San Gorgonio Pass Subbasin via two active wells. Total storage capacities of these basins are approximately 2.6, 2.2, and 1.0 million-acre feet, respectively.

The existing MSWD distribution system consists of three independent water systems: 1) Desert Hot Springs and surrounding area system, 2) Desert Crest System, and 3) West Palm Springs Village System. MSWD constructed numerous storage tanks at varying elevations to provide adequate pressure throughout its service area. The entire MSWD system has over 1.25 million linear feet of pipelines with a total storage capacity of 19.65 million gallons (MG).

Wastewater

The Project site is within the MSWD boundaries for sewer services. MSWD provides sewer service to approximately 26,000 people in Desert Hot Springs, Desert Crest Country Club and Dillon Mobile Home Park. The Horton Wastewater Treatment Plant serves the City of Desert Hot Springs and adjacent unincorporated areas with a capacity of 2.3 million gallons per day (MGD). The Desert Crest Wastewater Treatment Plant serves the Desert Crest community and a mobile home park with a capacity of 0.18 MGD.

MSWD is developing a new Regional Water Reclamation Facility (RWRF) east of Indian Canyon Drive, near I-10 in the City of Desert Hot Springs. The RWRF will expand the sewer service area and produce recycled water. The RWRF will also lessen flows to the Horton Wastewater Treatment Plant and extend its operational life. The RWRF will also provide close access to wastewater treatment for the I-10/Indian Canyon commercial corridor which includes properties in the cities of Palm Springs and Desert Hot Springs, including the Project site.

Currently, there is no sanitary sewer service in the Project area. The proposed Project will use septic tanks until the new Regional Plant and associated conveyance systems are operational.

MSWD currently does not have recycled water use within its service area; however, MSWD is planning on producing recycled water at the RWRF to meet demands such as replenishment of the Mission Creek Subbasin and irrigation for public green areas, golf courses and play fields in the future.

Flood Control

Palm Springs is susceptible to flash flooding, due to a combination of desert climate and unpredictable seasonal rainfall, steep terrain in the surrounding mountains with impervious rocks, and scarcity of vegetation. Portions of the City have the potential for storm-induced flooding of the Whitewater River and other manmade and natural channels. Sheet flow can also cause flooding on alluvial fans in parts of the City. The Riverside County Flood Control and Water Conservation District (RCFCWCD) has built and maintains regional flood control structures which help reduce flood risk in the City. The City implements a master drainage plan prepared in conjunction with RCFCWCD. The City requires on-site detention and/or retention basins for all new development to manage surface water flows and reduce runoff from sources such as stormwater and landscape irrigation (Municipal Code Section 8.70.100).

Surface Water Quality

Land uses can heavily influence the water quality of regional surface waters, especially agriculture, industrial, and urban land uses. Runoff from stormwater and irrigation can collect and transport pollutants on the ground surface and affect water quality of receiving streams, rivers, and channels.

Several local and regional flood control facilities within the City drain into the Whitewater River and ultimately the Salton Sea.

**Discussion of Impacts**

**a)** **Less Than Significant Impact.** All water providers in the Whitewater River watershed, including the Mission Springs Water District, are required to comply with Regional Water Quality Control Board (RWQCB) standards for the protection of water quality, including the preparation of site-specific Water Quality Management Plans (WQMP) for surface waters. The applicant has prepared and submitted a preliminary WQMP, which will be finalized prior to the initiation of grading on the site. The best management practices (BMP) included in that document require the maintenance of drainage facilities, the protection of slopes and the maintenance of landscape irrigation systems, among others, to control surface runoff and protect groundwater quality.

There is no sanitary sewer in the Project area. MSWD has plans to extend sewer services through the developing RWRF and pipelines; the Project would have the opportunity to connect to the public sewer system once it is in operation. Until then, the Project will install and use on-site septic tanks. These are regulated by the RWQCB, including specific regulations for the monitoring of cannabis cultivation facilities, to protect groundwater resources.

The Project will operate as an indoor cannabis cultivation facility at buildout. The Project wastewater will include grey water containing organic nutrients and/or partially decomposed natural organic pesticides, both of which are biodegradable. The Project's septic system will be regulated by the RWQCB, which implements standards for testing and controlling discharge into septic systems from cannabis facilities. Prior to installation of the septic system, the applicant will be required to submit plans to MSWD, the City of Palm Springs, Riverside County Department of Environmental Health, and Colorado River Basin RWQCB for approval. Given the proposed cannabis cultivation activities, the Project's future sewer discharge into the public sewer system will be subject to MSWD's wastewater standards, as well as those of the Riverside County Department of Environmental Health, Colorado River Basin RWQCB, and the City of Palm Springs.

In order to protect surface waters, the City operates under the Whitewater River Watershed plan (MS4), under permit by the Colorado River Basin RWQCB. The regulatory requirements include the preparation of a WQMP, described above, and Stormwater Pollution Prevention Plan (SWPPP) for project-specific surface water management. The WQMP and SWPPP will include best management practices (BMPs) that control, manage, and/or eliminate pollution in surface waters. These standard requirements and conditions of approval will ensure that the Project will not violate any water quality standards or waste discharge requirements. Impacts would be less than significant.

**b)** **Less Than Significant Impact.** The Project will generate water demand primarily from cultivation and landscape irrigation during operation. Construction-related water demand will be temporary and nominal, primarily for site watering during grading. Recently approved water supply assessments for cannabis cultivation projects in the MSWD service area have applied a water demand factor of 4.55 acre-feet per year per acre (AFY/acre)[5]. Based on this factor and site acreage (0.74-acre±), the Project has the potential to generate a demand of 3.37 AFY. In addition, the Project is projected to generate a demand of 0.25 acre-feet per year for

[5] Per total site acreage.

landscaping water demand, based on the MSWD's drought tolerant landscaping formula.[6] Total water demand for the Project would be 3.62 acre-feet per year.

As discussed in detail below in Section XI, the Project is consistent with the General Plan land use designation. MSWD works with the City of Palm Springs and other jurisdictions and regularly updates its Urban Water Management Plan (UWMP) partly based on land use plans. According to the latest 2020 Coachella Valley Regional UWMP, MSWD has sufficient supply to serve existing and future development in the northern Palm Springs area, including the Project site, now and in the future, with the implementation of conservation strategies.

The total water demand in 2045 is projected at 17,495 acre feet in the MSWD service area. Per the 2020 Coachella Valley Regional UWMP, MSWD has sufficient supplies to meet water demand in the area in a normal year, single dry, and multiple dry years. The Project water demand will represent approximately 0.02% of the 2045 total water demand. The Project will be required to comply with MSWD's water efficiency requirements, including limited irrigation on the proposed desertscape landscaping areas. Therefore, the Project will have less than significant impacts on groundwater supply and recharge.

**c)**

**i-iii) Less Than Significant Impact.** The following analysis is based on the hydrology report prepared for the proposed Project by MLB Consulting & Engineering.

The Project proposes a new cannabis cultivation facility on a 0.74-acre flat, vacant lot and will result in a new building and paved and landscaped areas. Because the Project will increase the impervious area onsite, it has the potential to increase stormwater runoff and thus proposes a retention basin onsite to accommodate runoff. The Project hydrology report recommended that the new impervious roof and hardscape areas be treated with stormwater best management practices. The hydrology study determined that 7,748 cubic feet must be retained in a 100-year, 24 hour storm, which requires a 900 square-foot retention basin with 8.6-foot depth to collect on-site runoff from roof areas and hardscape via a system of V-gutters. The basin will collect and treat all the runoff and overflow if necessary to the street. Impacts associated with storm water retention are expected to be less than significant.

The City of Palm Springs Water Quality Ordinance enforces the implementation of the WQMP. The proposed Project is required to implement BMPs included in the Project-specific WQMP to reduce discharge of pollutants into stormwater runoff from the site. The proposed BMPs include structural source control BMPs such as storm drain inlet stenciling and signage, landscape and irrigation system design and protection of slopes and channels, as well as proper design of trash storage areas and air/water supply area drainage. The City also requires on-going maintenance of these facilities, as included in recommended nonstructural source control BMPs to assure that silt and sand do not build up and reduce system efficiency. With implementation of these requirements, the Project will not contribute to receiving water impairment. Approval of the WQMP and the required BMPs will reduce impacts to surface waters by reducing siltation and eliminating pollutants in storm flows. Implementation of this standard requirement would reduce impacts associated with surface water pollution to less than significant levels.

[6] MSWD's Maximum Applied Water Allowance (MAWA) Formula = (93.9 inches) x (0.5) x (Landscaped Area in sq.ft.) x (0.62) = gallons per year. The Project landscaped area is 2,814 square feet.

The Project site design is required to demonstrate adherence to City requirements, including WQMP BMPs, which will ensure no erosion or siltation on- or off-site occurs. Implementation of these and other applicable requirements will prevent the Project from creating or contributing runoff water which would exceed the capacity of existing or planned drainage systems or providing substantial additional sources of polluted runoff.

iv) **Less Than Significant Impact.** The Project site is located in Zone X, an area defined as having 0.2% annual chance of flooding on FEMA's Flood Insurance Rate Maps. The site is not located in a Special Flood Hazard Area designated by FEMA. Implementation of the proposed onsite stormwater retention basin will ensure that the Project will have less than significant impacts on impeding or redirecting flood flows.

**d)** **No Impact.** There is no water body or dam within or near the Project area. No hazard from dam failure, tsunami, or seiche would occur in the Project area. No impact is anticipated.

**e)** **No Impact**. The Project will be required to comply with all applicable water quality standards and implement the Project-specific WQMP and SWPPP upon approval by the City and the Regional Water Quality Control Board during Project construction and operation. The Project will have no impact on a water quality control plan. Given the marginal increase in water demand attributed to the proposed Project (around 0.02% of the MSWD 2045 total water demand), the Project will have negligible impacts on a groundwater management plan.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Hydrology Report Rupert St. Lot 30/31 APN:666-402-003 / 666-402-005, prepared by MLB Consulting & Engineering, October 24, 2023; Preliminary Water Quality Management Plan prepared by RAMON BAGUIO CAS LLC, October 03, 2023; 2020 Coachella Valley Regional Urban Water Management Plan, prepared by Water Systems Consulting, Inc., 6/30/2021; Comprehensive Wastewater Facilities Strategic Plan for Mission Springs Water District, prepared by TETRA TECH, Inc. September 17, 2008.

| XI. LAND USE AND PLANNING<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b) 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? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The Project site is currently vacant and undeveloped. The site is designated as Regional Business Center (RBC) with Wind Energy Overlay on the General Plan land use map. The RBC designation allows industrial and commercial uses at up to 0.5 floor-area-ratio (FAR) and office use at up to 0.35 FAR. The Wind Energy Overlay permits clean energy uses up to 15 percent of the total acreage within the industrial and RBC land uses. The subject property is zoned as Manufacturing (M-2) and also has a "CO" Cannabis Overlay Zone. The M-2 zone allows cannabis cultivation facilities with a conditional use permit (CUP). The "CO" Cannabis Overlay Zone is intended to provide for the development of cannabis-based businesses in an area where impacts to established neighborhoods will be reduced. Uses permitted and development standards are to be as provided in the underlying zone upon which the "CO" zone is overlaid.

**Discussion of Impacts**

**a)** **No Impact**. The Project will not physically divide an established community. The Project site is surrounded by Ruppert Street on the west, commercial/industrial uses on the north and southeast, and vacant parcels on the south and east. The various commercial/industrial properties in the Project vicinity are not related to and operate independently of the Project facility. The Project proposes a new cannabis cultivation facility with distribution. No impact would occur.

**b)** **No Impact**. At buildout, the Project building will cover 36% of the entire site, which is under the maximum allowed coverage (60%) for the M-2 zone. The Project will be built out at 0.36 FAR, consistent with the General Plan land use designation provisions (0.5 FAR). The Project is also consistent with other zoning requirements, including building height (maximum of 40 feet). The proposed building will be 30 feet tall and under the maximum height. The Project applicant must secure a Conditional Use Permit for the cultivation portion of the Project; the distribution portion is allowed under the M-2 zone. The land use is compatible with the uses surrounding the site, and does not impact residential neighborhoods, as intended in the CO overlay. No impact would occur regarding conflict with any land use plan, policy or regulation.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Project materials; Palm Springs Municipal Code (PSMC); 2007 Palm Springs General Plan.

| XII. MINERAL RESOURCES<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) 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) 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? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The primary mineral resources in the Coachella Valley and the City of Palm Springs are sand and gravel, collectively referred to as aggregate. There is one active sand-and-gravel mining operation within the City's incorporated boundaries, southeast of the Project site on the east side of North Indian Canyon Drive, south of I-10. Two smaller mines are located just beyond the northern boundary of the City. These mines specialize in providing boulders and other crushed rock.

The State of California Geological Survey Mineral Resources Project provides the most recent and accurate information about mineral resources and assigns different Mineral Resource Zones (MRZs) designations. These include:

MRZ 1: Areas where adequate information indicates that no significant mineral deposits are present or likely to be present.
MRZ 2: Areas where significant mineral deposits are present or likely to be present and development should be controlled.
MRZ 3: Areas where the significance of mineral deposits cannot be determined from the available data.

The Project site is located in an MRZ 3 area.

**Discussion of Impacts**

**a, b)** **No Impact.** The Project area is designated as MRZ 3, which refers to areas containing known or inferred mineral occurrences of undetermined mineral resource significance. There are no known mineral resources in the Project area.

The Project site is vacant and undeveloped and designated for industrial/commercial development. The surrounding area consists of similar vacant land and industrial and commercial development in an urban setting. There is no land designated for mining or related uses in the Project vicinity. Therefore, the Project would have no impact on loss of known mineral resources or mineral resource recovery sites.

The nearest active mining facility is located approximately 1.37 miles to the southeast of the Project site. The mining facility operates independently on its own land and will not be affected by the proposed Project. No impact associated with mineral resources would occur due to implementation of the proposed Project.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Project materials; 2007 Palm Springs General Plan; California Geological Survey Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the Palm Springs Production-Consumption (P-C) Region, Riverside County, California 2007.

| XIII. NOISE<br><br>Would the project result in: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Generation of 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) Generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

**Setting**

In the City of Palm Springs, there are two major types of noise sources: mobile noise sources such as motor vehicle, truck, aircraft, and rail activity; and stationary sources including commercial, industrial, manufacturing and residential activities.

The City has established land use noise standards and restrictions on private activities through its Noise Ordinance (Municipal Code Chapter 11.74). The Project site is located in a semi-developed area with commercial and industrial uses. Ruppert Street borders the Project on the west. Based on the future (2025) roadway noise contours, the Project site will fall within the 60-65 dBA CNEL range (General Plan Figure 8-4; Future Roadway Noise Contours Detail (Northern Area)).

**Discussion of Impacts**

**a)** **Less Than Significant Impact.** The Project site is undeveloped and consists of vacant desert land. The Project proposes a new cannabis cultivation facility with accessory distribution. The surrounding area consists of vacant land, roadways, and commercial/industrial uses. There are no residential uses or schools, churches, or nursing homes within at least a half mile radius of the Project site.

<u>City's Noise Standards</u>
The City's General Plan Noise Element adopted the land use compatibility matrix for community noise prepared by the California Office of Noise Control (Figure 8-2). For industrial, manufacturing, utilities, and agriculture land uses, the normally acceptable community noise levels range from 50 to 75 dBA.

The City's Municipal Code Section 8.04.220 limits construction activity to between 7 a.m. to 7 p.m. on weekdays and 8 a.m. to 5 p.m. on Saturdays. No construction activity is permitted on Sundays and holidays.

Impacts of the Proposed Project on Surrounding Development

During construction, noise will be generated from activities such as site preparation, excavation, grading, paving, and building construction. The highest noise levels can be expected to be generated by heavy equipment, such as graders, bulldozers and similar vehicles during site grading. Heavy equipment can generate noise levels ranging from 70 to 90 dBA at a distance of 50 feet from the source.

Construction activities are exempt from the noise level limits; however, construction is limited to the less sensitive daytime hours, as specified above. The only sensitive receptor in the Project area is a motel located just north of Interstate 10 and approximately 0.23 miles southeast of the Project site. Given the distance between the motel and the Project site, construction noise levels at the motel would be lower than 70 dBA. Construction noises will be temporary and cease upon build out, and impacts are considered less than significant on surrounding land uses.

At build out, the Project will operate as a cannabis cultivation facility with all activities occurring indoors. During operation, the Project facility will have a similar vehicle mix and land use activities to the surrounding land uses. The Project will not serve any customers or patrons directly, and vehicles accessing the site would be limited to employee commute and delivery activities. The Project is not expected to increase traffic levels significantly (see Section XVII) and will not increase ambient noise levels beyond the noise level forecast at General Plan build out. Operational activities would be indoors only, and the associated noise levels would be consistent with those of light industrial uses and would not exceed City standards.

Impacts of Off-Site Noise Sources on the Proposed Project

The future noise contour of the Project site and vicinity is between 60-70 dBA CNEL, which falls within the normally acceptable noise levels of 50-75 dBA identified in the General Plan for industrial uses. The Project area is currently semi-developed, and the Project site will be surrounded by similar industrial/commercial uses as the area is built out. Future development will be subject to City standards for noise generation and would not have significant impacts on surrounding properties including the proposed Project.

Overall, impacts associated with ambient noise levels in the Project area would be less than significant.

**b)** **Less Than Significant Impact.** The Project proposes the development of a new cannabis cultivation facility. Operation of such a facility will not generate groundborne vibration or noise. During construction of the Project, heavy equipment may generate groundborne vibration and/or noise (described as a rumbling sound) that can be heard and felt by adjacent land uses. The Project is surrounded by vacant land, roadways and industrial/commercial development. The nearest sensitive receptor is the motel (Motel 6 North Palm Springs) located approximately 0.23 miles to the southeast of the site.

The human threshold of perception for vibration is 0.0018 inches/second, and the City's Noise Ordinance defines a vibration perception threshold at 0.01 inches/second. Caltrans set significance thresholds for human annoyance at 0.2 inches/second PPV and 0.3 inches/second PPV for structures. Construction of the proposed Project would not necessitate

the use of pile drivers, which are known to generate substantial construction vibration levels. The highest degree of groundborne vibration would be generated during the paving phase from the operation of a vibratory roller.

Based on Federal Transit Administration (FTA) data, vibration velocities from vibratory roller operations are estimated to be approximately 0.1980 inches/second PPV at 26 feet from the source of activity. Therefore, the vibration levels beyond a 26-feet distance from the construction site would be below the Caltrans threshold for human annoyance and impact on structures. The nearest structure to the Project site is the commercial/industrial building immediately north of the site. Based on the Project site plan, the area adjacent to the existing building on the north will be landscaped, and pavement will be at least 5 feet away from the existing building. While the vibratory roller may operate within 26 feet of the existing building, the duration and frequency will be limited to parking lot pavement only. The proposed structure will be 51 feet south of the existing building. As such, the nearest structure and/or people in the Project vicinity may experience levels of groundborne vibration or noise close to the Caltrans thresholds, but such exposure would be temporary and very limited.

Operation of the cannabis cultivation facility is not expected to generate vibration, as the activities associated with cultivation do not generate a need for heavy equipment use. Impacts are expected to be less than significant regarding generation of groundborne vibration and noise.

**c)** **No Impact**. The Project site is located approximately 4.87 miles northwest of the Palm Springs International Airport. The Project site is located well outside of the noise contours of the Airport (General Plan; Figure 8-6). The Project will not expose employees to excessive noise levels generated by the airport. No impact would occur.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Project materials; 2007 Palm Springs General Plan.

| XIV. POPULATION AND HOUSING<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) 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) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The City of Palm Springs has a population of 44,092 as of 2023, with an average household size of 1.77 persons. There are a total of 35,697 housing units in the City, of which 24,533 units are occupied.

**Discussion of Impacts**

**a)** **No Impact.** The Project proposes a new cannabis cultivation facility with accessory distribution. Construction and operation of the Project will generate jobs. However, construction jobs are expected to be fulfilled by the local labor market. At buildout, the Project facility is designed for a maximum occupancy of 60 persons. Given the limited scale of the proposed facility, it is more likely that the new jobs will be filled by existing residents than new residents attracted to the area by the proposed Project. Even if all new positions are filled by people that move into Palm Springs for new employment and housing opportunities, the increase in population would be minimal. The Project does not propose new homes or extension of roads or other infrastructure. The proposed Project will not have a direct or indirect impact on substantial unplanned population growth in the City.

**b)** **No Impact.** The Project site is currently vacant and undeveloped. The nearest residential land use is approximately 0.75 miles away. The Project will not impact or eliminate any housing or residential land use, nor displace any person. No replacement housing would be needed, and no impact would occur.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Project materials; State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2021-2023. Sacramento, California, May 2023.

| XV. PUBLIC SERVICES | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | 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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| i) Fire protection? | ☐ | ☐ | ☒ | ☐ |
| ii) Police protection? | ☐ | ☐ | ☒ | ☐ |
| iii) Schools? | ☐ | ☐ | ☐ | ☒ |
| iv) Parks? | ☐ | ☐ | ☐ | ☒ |
| v) Other public facilities? | ☐ | ☐ | ☐ | ☒ |

**Setting**

Fire Protection: The Palm Springs Fire Department provides fire protection, emergency response, and community risk reduction services in the City. To meet fire department and fire prevention bureau requirements for cannabis facilities, the City established "Fire Code Requirements - Cannabis Related Occupancies" which will apply to the proposed Project. The nearest fire station is Fire Station 3, located at 590 E Racquet Club Road and approximately 3.95 miles southeast of the Project site. Fire Station 3's primary response area is east to Gene Autry Trail bordered to the south at Tachevah Drive to the western and northern City limits.

Police Protection: The Palm Springs Police Department provides police protection, community policing, and code compliance services in the City. The police station is located at 200 South Civic Drive, approximately 6.41 miles southeast of the Project site.

Schools: The City of Palm Springs and the Project site are within the boundaries of the Palm Springs Unified School District (PSUSD). Currently, PSUSD has sixteen elementary schools, five middle schools, four high schools, as well as alternative education programs. The nearest school is Vista Del Monte Elementary School at 2744 North Vía Miraleste, approximately 3.78 miles southeast of the Project site.

Parks: The City owns and maintains over 160 acres of developed parkland in 12 parks, approximately 305 acres dedicated to golf courses open to the public, as well as miles of developed greenbelts along major thoroughfares in the City. The nearest park to the Project site is Desert Highland Park, located at 480 W Tramview Rd, approximately 2.80 miles south of the site.

Other public facilities: Other public facilities include the Palm Springs Public Library and the City Hall, located in the center of the City. There are a variety of public arts, museums, as well as cultural facilities associated with the Agua Caliente Band of Cahuilla Indians throughout the City.

**Discussion of Impacts**

**a) i) Less Than Significant Impact.** The Project proposes a new cannabis cultivation facility with accessory distribution. At build out, the new facility may marginally increase the demand for fire service. However, the proposed building will be constructed as Type II and sprinklered in compliance with the City and state building codes, which will reduce the demand for fire services.

The Project is also subject to Fire Department review of site plans during the entitlement process, and inspections during and following build out. In addition, the Project will be required to pay Development Impact Fees to contribute its fair share toward future facilities. The Project will also be required to pay the cannabis cultivation tax, which will create revenue for the City's general fund expenses. The Project is expected to have less than significant impacts on fire protection services and would not require the construction or expansion of fire services or facilities.

**ii) Less Than Significant Impact.** At build out, the new facility may result in a marginal increase in demand for police services. The Project site will take access from Ruppert Street. Police personnel will have access to the site via regional and local roadways including Interstate-10 and Indian Canyon Drive.

The Project facility will have onsite security guards 24 hours per day. The facility will have fully enclosed fence/wall along the site boundary. Sliding gates are proposed at the access points on Ruppert Street. The Project has a comprehensive security plan in compliance with Municipal Code Chapter 5.55.210, which imposes security measures for adult-use cannabis businesses, including cultivation, such as 24-hour security cameras and lighting and an alarm system.

As noted, the Project is required to pay the cannabis cultivation tax which will create revenue for the City's general fund expenses. The Project will have less than significant impacts on police services and is not expected to require the construction or expansion of police services or facilities.

**iii) No Impact.** The Project proposes a new cannabis cultivation facility. At build out, the Project will have a maximum of 60 employees. These jobs are expected to be filled by local residents, given the limited scale and employment base of the proposed Project.

Should the employees of the Project generate any student population, the number will be very limited and impacts to local schools will be mitigated by the payment of school impact fees. The current PSUSD developer impact fee for industrial/commercial construction is $0.78 per square foot. The Project will be subject to this fee for the new construction. No impact is anticipated.

**Iv, v) No Impact.** As discussed above, the Project is unlikely to generate or attract new population. Even if there are new employees from outside the City, the number will be under 60 and the impact on parks and other public facilities would be minimal. The Project is not expected to increase the demand for parks and other public facilities. No impact is anticipated.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Project materials; 2007 Palm Springs General Plan; City of Palm Springs Parks and Recreation Master Plan Draft, March 2014.

| XVI. RECREATION | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | 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) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The City of Palm Springs offers a variety of recreational opportunities from city parks and golf courses to the Indian canyons and state parks. The City owns and maintains over 160 acres of developed parkland in 12 parks, approximately 305 acres dedicated to golf courses open to the public, and over 2,630 acres of open space lands. Nearly 60 miles of trails in the urban area and desert wilderness are open to the public for hiking, biking, and alternative transportation. The City also has indoor facilities such as Desert Highland Unity Center, Demuth Community Center, and the Leisure Center and Pavilion that provide indoor recreation and programming space, meeting spaces, and other recreational amenities.

**Discussion of Impacts**

**a,b)** **No Impact.** The Project proposes a new cannabis cultivation facility with accessory distribution, which will have a maximum of 60 employees at build out. As discussed throughout this Initial Study, the Project is unlikely to generate or attract new population. Even if all new jobs were to be filled by residents from outside the City, the number would be very limited (under 60) and unlikely to change the demand for citywide recreational resources. The proposed Project is not expected to require the construction or expansion of recreational facilities, nor will it result in a noticeable increase in use, if any. No impact is anticipated.

**Mitigation Measures**: None required.

**Monitoring:** None required.

Sources: Project materials; 2007 Palm Springs General Plan; City of Palm Springs Parks and Recreation Master Plan Draft, March 2014.

| XVII. TRANSPORTATION<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | ☐ | ☐ | ☐ | ☒ |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | ☐ | ☐ | ☐ | ☒ |
| d) Result in inadequate emergency access? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The City's roadway network consists of a hierarchy of streets that provide access to and throughout Palm Springs. The General Plan Circulation Element provides roadway classifications based on their role in the circulation network and relationship to surrounding uses.

The Project site is located on Ruppert Street between 19th Avenue and Orr Way. Ruppert Street and Orr Way are designated as local streets in the City's Circulation Element (Figure 4-1). 19th Avenue is designated as a Secondary Thoroughfare (4–lane undivided). 19th Avenue connects to Indian Canyon Drive, which is designated as a Major Thoroughfare (6-lane divided) east of the Project site. Indian Canyon Drive and Interstate 10 are designated truck routes in the Project vicinity. 20th Avenue to the south of the Project site is designated as a Collector (2-lane undivided). These roadways serve as local and regional emergency routes to and from the City.

A transportation screening assessment was conducted for the Project by Ganddini Group on October 16, 2023.

**Discussion of Impacts**

**a)** **Less Than Significant Impact.** The City established an operation threshold of Level of Service (LOS) D or better for roadways and intersections to be consistent with the Riverside County Congestion Management Program.

Existing Traffic Conditions
Project area roadways included in the General Plan Traffic Analysis include 19th Avenue and Indian Canyon Drive. Based on the General Plan EIR (2007), Indian Canyon Drive (formerly Indian Avenue north of 19th Avenue) was operating at LOS F north of 19th Avenue. The General Plan Circulation Element required improvements at critical intersections including Indian Canyon Drive north and south of 19th Avenue. Some of the improvements have been installed, including adding turning lanes and through lanes Signalization is planned as part of

improvements necessitated by other industrial project in the vicinity. Per the General Plan EIR, completion of the improvements will mitigate the LOS on Indian Canyon Drive to acceptable levels. Indian Canyon Drive south of 19th Avenue is projected to operate at LOS D, with a capacity of 53,900 vehicles per day. 19th Avenue west of Indian Canyon Drive will have a capacity of 25,900 vehicles per day and will operate at LOS A at General Plan buildout.

Project Trip Generation

The Project transportation screening assessment provided a Project trip generation forecast based on rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). Based on review of the ITE land use description, trip generation rates for ITE Land Use Code 190 (Marijuana Cultivation and Processing Facility) were determined to represent the proposed land use and were used for calculation of the Project trip generation.

**Table 5**
**Project Trip Generation**

| Land Use | ITE LU Code | Quantity | Daily Rate | Daily Trips | AM Peak Hour | | PM Peak Hour | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Rate | Trips | Rate | Trips |
| Marijuana Cultivation and Processing Facility | 190 | 10.872 TSF (thousand square feet) | 4.11 | **45** | 0.69 | **8** | 0.64 | **7** |

The Project is anticipated to generate a total of 45 trips per day, with 8 and 7 trips during the AM and PM peak hours, respectively. Per the City's Traffic Impact Analysis Guidelines (July 2020), projects that generate less than 100 peak hour trips are generally exempt from the requirement of a LOS transportation impact analysis, as trips under 100 typically do not affect LOS significantly once distributed to the local roadway network. Given the limited trip generation of the Project, LOS impacts to local roadways are presumed to be negligible. Roadways in the Project area, including 19th Avenue and Indian Canyon Drive, are projected to operate at acceptable LOS at General Plan buildout. The proposed Project would add fractional traffic to these roadways; as a consistent land use under the General Plan designation, Project-related traffic is not expected to exceed the projections for General Plan buildout. Impacts would be less than significant.

Active Transportation Plan

According to the Active Transportation Plan (2016) prepared by the Coachella Valley Association of Governments (CVAG), there are currently no bike lanes or any other multi-modal facilities along Ruppert Street, 19th Avenue, and Orr Way.

There are no existing bikeways in the immediate Project vicinity. There is a mixed-use bike route along Indian Canyon Drive to the east of the Project site. A Class II bike lane is identified as a 3rd Priority Project on 20th Avenue south of the Project site in the General Plan (Figure 4-5).

SunLine Transit Agency provides transit services in the Coachella Valley, including six routes in/through the City of Palm Springs. The northern Palm Springs area, including the Project area, is currently not served by any bus route.

The Project is expected to generate limited demand for multi-modal transportation, given the limited employee base and distance from residential and major commercial areas. The Project will not conflict with adopted policies, plans or programs addressing transit, bicycle and pedestrian facilities. No impact is anticipated.

**b)** **No Impact.** Under SB 743, CEQA Guidelines Section 15064.3 was amended to require all lead agencies to adopt vehicle miles traveled (VMT) as a replacement for automobile delay-based level of service (LOS) for identifying transportation impacts. A lead agency may use models or other methods to analyze a project's VMT quantitatively or qualitatively. This statewide mandate went into effect on July 1, 2020. The City of Palm Springs updated its Traffic Impact Analysis (TIA) Guidelines in July 2020 to comply with the new requirements under CEQA.

The City TIA Guidelines identify screening criteria for certain types of projects that typically reduce VMT and may be presumed to result in a less than significant VMT impact. The Project need only satisfy one of the three VMT screening criteria: Transit Priority Area (TPA), Low VMT Area, and Project Type. As shown in Table 5, the proposed Project is forecast to generate 45 daily trips at build out, which is less than 110 daily trips; therefore, the Project satisfies the City-established small project screening criteria under the Project Type screening. The Project is not required to complete a VMT analysis and is presumed to have less than significant impacts regarding VMT in the area. The Project will not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

**c,d)** **No Impact.** As noted, the Project will have access on Ruppert Street. The Project will have direct access to local and regional evacuation routes, but will not modify or impede any of these routes. The Project site plan is subject to review by the Fire Department and the Police Department to ensure compliance with safety requirements, including emergency access and geometric design such as road widths and turning radii. The Project will not result in inadequate emergency access or increase hazards due to a geometric design feature. The Project will be used solely for indoor cannabis cultivation and accessory distribution. No impact will occur regarding incompatible uses.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: Ruppert Street Cultivation Project (CUP 092623) Transportation Screening Assessment GGI Project No. 19677, October 16, 2023; City of Palm Springs Traffic Impact Analysis Guidelines, July 2020; Project materials; 2007 Palm Springs General Plan; City of Palm Springs General Plan Update Environmental Impact Report, June 2007.

| XVIII. TRIBAL CULTURAL RESOURCES<br><br>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: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| i) 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 | ☐ | ☐ | ☐ | ☒ |
| ii) 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. | ☐ | ☒ | ☐ | ☐ |

**Setting**

The Coachella Valley has been home to the Cahuilla Indians for millennia. The Cahuilla were a Takic-speaking people and generally divided into three groups based on geography: the Pass Cahuilla of the San Gorgonio Pass and Palm Springs area, the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains, and the Desert Cahuilla of the eastern Coachella Valley. Abundant tribal cultural resources occur in the canyons and mountain foothills and along the ancient Lake Cahuilla shorelines.

Today, Native Americans of Pass or Desert Cahuilla heritage are mostly affiliated with one or more of the Indian reservations in and near the Coachella Valley, including the Cabazon, Augustine, Torres Martinez, Twenty-nine Palms, Agua Caliente, and Morongo.

Given the location of the proposed Project site, no historical or archaeological resources are known or expected on the site, as discussed above in Section V.

**Discussion of Impacts**

**i)** **No Impact.** As discussed above in Section V, Cultural Resources, no historical or archaeological resources are known to occur on the subject property, nor are any expected because the property is not located in any area identified to have cultural resource sensitivity. The Project site does not contain any tribal cultural resource 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), as confirmed by the City of Palm Springs as the lead agency. No impact would be expected.

**ii)** **Less than Significant with Mitigation.** The City initiated Tribal Consultation in conformance with AB 52 requirements and contacted six tribes in writing in October 2023. The City received responses from the Morongo Band of Mission Indians, declining consultation, and the Agua Caliente Band of Cahuilla Indians (ACBCI) who requested consultation. ACBCI requested formal government to government consultation, a cultural resources inventory of the Project area, a copy of records search with associated survey reports and site records, and copies of any cultural resource documentation for the Project. The ACBCI and the City discussed the City's standard requirement for monitoring of construction activities (see Section V), and the Tribe requested that the City provide the Initial Study for its review.

To protect potential tribal cultural resources, Mitigation Measure CUL-1 is included in Section V to assure protection of resources uncovered during construction. With implementation of this mitigation measure, impacts to tribal cultural resources would remain less than significant.

**Mitigation Measures and Monitoring:** See Section V. CUL-1.

Source: 2007 Palm Springs General Plan.

| XIX. UTILITIES AND SERVICE SYSTEMS<br><br>Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) 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? | ☐ | ☐ | ☒ | ☐ |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | ☐ | ☐ | ☒ | ☐ |
| c) 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) 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) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ |

**Setting**

Domestic Water

Mission Springs Water District (MSWD) supplies 100 percent groundwater from subbasins of the Coachella Valley Groundwater Basin. MSWD's water distribution system includes storage tanks located at various elevations and approximately 1.25 million linear feet of pipelines. There is an existing distribution main within Ruppert Street that provides connections to commercial/industrial uses in the Project vicinity.

Wastewater Treatment

MSWD provides sewer service to Desert Hot Springs, Desert Crest Country Club and Dillon Mobile Home Park. In addition to the Horton Wastewater Treatment Plant and Desert Crest Wastewater Treatment Plant serving those areas, MSWD is developing a new Regional Water Reclamation Facility (RWRF) north of I-10 in the City of Desert Hot Springs. The RWRF will provide close access to wastewater

treatment for the I-10/Indian Canyon commercial corridor which includes the Project area. There is currently no sewer service in the Project area. The Project will use an onsite septic system.

Flood Management
The Riverside County Flood Control and Water Conservation District (RCFCWCD) has built and maintains flood control structures in the City. The City implements a master drainage plan prepared in conjunction with RCFCWCD. New development in the City is required to provide on-site detention and/or retention basins to manage surface water flows and reduce runoff from sources such as stormwater and landscape irrigation (Municipal Code Section 8.70.100).

Solid Waste
Palm Springs Disposal Services (PSDS) provides solid waste collection and disposal services to the City. PSDS collects and processes a wide range of products in its recycling program, including commercial organics waste. Non-hazardous solid wastes are transported to the Edom Hill Transfer Station (EHTS) in Cathedral City. EHTS is owned and operated by Burrtec Waste Management, and is permitted to receive 3,500 tons of waste per day. Waste is sorted before entering the Riverside County Waste Management waste stream and sent to Lamb Canyon Landfill in Beaumont. Lamb Canyon is permitted to receive 5,000 tons of waste per day, with a remaining capacity of 19,242,950 cubic yards and a projected closing date in 2032.

Electricity
Southern California Edison (SCE) provides electricity to the City of Palm Springs. The Project area is served by underground electric facilities.

Natural Gas
The Southern California Gas Company (SoCalGas) provides natural gas to the City of Palm Springs. There is an existing gas main within 19th Avenue north of the Project site.

Telecommunications
Landline phone and internet services in the City are mainly provided by Frontier Communications Corporation and Charter Spectrum.

**Discussion of Impacts**

**a-c) Less Than Significant Impact.**

Water
The proposed Project will require connections to the existing domestic water main in Ruppert Street. As discussed in Section X, Hydrology and Water Quality, total water demand for the Project is projected to be 3.62 acre-feet per year. In the 2020 Coachella Valley Regional Urban Water Management Plan (UWMP), MSWD determined that there are sufficient supplies to meet water demand in its service area in a normal year, a single dry year, and a multiple dry year. The total water demand in 2045 is projected at 17,495 acre feet in the MSWD service area. The Project water demand will represent approximately 0.02% of the 2045 total water demand. Furthermore, the proposed Project will be required to comply with MSWD's and the City's water efficiency requirements, including limited irrigation on the proposed desert-scape landscaping areas. The Project is not expected to demand new or expanded water facilities. Impacts on the water system would be less than significant.

Wastewater Treatment

MSWD plans to extend sewer services along 19th Avenue and 20th Avenue. Until then, the Project will construct and use an onsite septic system. Waste discharges from a cultivation facility typically include sediment, irrigation runoff, fertilizers, pesticides/herbicides, petroleum, agricultural related chemicals, cultivation related waste, refuse, and human waste.

The State Water Board has adopted principles and requirements for cannabis cultivation water usage to protect subsurface water reservoirs from potential contamination (Water Code Section 13149). Therefore, all indoor and outdoor cannabis activities that discharge wastewater into a community sewer system or discharge irrigation tailwater or hydroponic wastewater to an on-site wastewater treatment system must obtain regulatory authorization for the wastewater discharge.

The septic system on-site will be subject to MSWD's wastewater standards. In addition, the use, sizing and placement of the system will be subject to review and approval by the County of Riverside Department of Environmental Health, Regional Water Quality Control Board, and City of Palm Springs (State Water Resources Control Board Order WQ 2017-0023-DWQ). Compliance with standard requirements and regulations of these agencies will ensure that the Project impacts would be less than significant on wastewater treatment facilities.

Stormwater Drainage

As discussed in detail in Section X, the Project will require treatment of the new impervious roof and hardscape areas with stormwater management practices. The hydrology study determined that 7,748 cubic feet must be retained in a 100-year, 24 hour storm, which requires a 900 square-foot retention basin with 8.6-foot depth to collect on-site runoff from roof areas and hardscape via a system of V-gutters. The basin will collect and treat all the runoff and overflow if necessary to the street. This system will be subject to review and approval by the City Engineer to ensure it meets City standards. The Project would have less than significant impacts on the stormwater drainage facilities.

Electricity, Natural Gas & Telecommunications

The commercial/industrial uses in the Project vicinity are served by existing electricity, natural gas, and telecommunications infrastructure. The Project will require local connections to the existing infrastructure. While the Project would result in new demand for energy and telecommunications, such demand/consumption is finite and planned, and will not demand the addition or expansion of energy or telecommunications facilities and infrastructure.

**d,e)** **Less Than Significant Impact.** Solid waste generated by the Project facility will be collected by Palm Springs Disposal Services (PSDS), sorted for recycling and hauled to the Edom Hill Transfer Station (EHTS). EHTS is permitted to receive 3,500 tons of waste per day. After sorting, waste is sent to Lamb Canyon Landfill, which is permitted to receive 5,000 tons of waste per day with a remaining capacity of 19,242,950 cubic yards.

CalRecycle provides estimated solid waste generation rates; however, there is no specific waste generation factor for cannabis cultivation projects. The most recent (2006) and closely aligned would be an industrial source at 8.93 lb/employee/day. The Project facility will have a maximum occupancy of 60 persons. To provide a conservative analysis, the Project will have the potential to generate 535.8 pounds of solid waste per day, or 195,567 pounds (97.8 tons) per year. The Project waste generation would constitute less than 0.008% of the permitted daily capacity at Edom Hills Transfer Station, and less than 0.008% of the Lamb Canyon landfill's

remaining capacity.[7] These estimates do not consider the mandated 50 percent waste diversion under current statutes. PSDS and Riverside County are responsible for meeting the applicable local, state and federal standards for waste handling. Given the limited quantity of waste to be generated by the Project and compliance with standard requirements, Project impacts associated with solid waste disposal would remain less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

Sources: 2007 Palm Springs General Plan; Solid Waste Information System and Estimated Solid Waste Generation Rates, www2.calrecyle.ca.gov, CalRecycle, accessed November 2023; Project materials.

[7] Assumes that 1 CY of commercial organics waste is equivalent to 135 lbs. "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

| XX. WILDFIRE<br><br>**If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:** | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☐ | ☒ |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | ☐ | ☐ | ☐ | ☒ |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | ☐ | ☐ | ☐ | ☒ |

**Setting**

The California Department of Forestry and Fire Protection (CalFire) has mapped areas of significant fire hazards in the state through its Fire and Resource Assessment Program (FRAP). These maps classify lands within State Responsibility Areas (SRA) into different Fire Hazard Severity Zones (FHSZ), using a hazard scoring system for factors such as existing and potential fuel (natural vegetation), fire history, terrain, and typical fire weather for the area where urban conflagration could result in catastrophic losses. The subject property is designated as a local responsibility area, not located in or near an SRA or designated as a very high fire hazard severity zone (VHFHSZ).

**Discussion of Impacts**

**a-d)** **No Impact.** According to the FRAP maps by CalFire, VHFHSZ in the City are limited to the southern portions near the San Jacinto Mountains. There are no SRA in the City. The nearest VHFHSZ is located approximately 4.18 miles to the southwest of the Project site. The nearest SRA is located approximately 3.43 miles to the northwest, which is classified as a moderate fire hazard severity zone. Given the distance from the nearest SRA and VHFHSZ, the Project will have no impact associated with wildfires.

**Mitigation Measures**: None required.

**Monitoring:** None required.

Source: Fire and Resource Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection.

## XXI. MANDATORY FINDINGS OF SIGNIFICANCE

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | 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? | ☐ | ☐ | ☒ | ☐ |

**a)** **Less than Significant with Mitigation.** As discussed above, there is potential for the Project to impact biological (migratory birds) and cultural resources (archaeological and Tribal). The mitigation measures provided in Sections IV and V of this Initial Study will ensure that potential impacts associated with these resources remain less than significant.

**b)** **Less than Significant Impact.** The Project's impacts will not be cumulatively considerable because the proposed use of the Project site is consistent with the anticipated uses allowed in the General Plan and analyzed in the General Plan EIR. Employment and/or population growth, if any, from the Project will not exceed those analyzed in General Plan EIR. The Project's incremental effects are not considerable when viewed in connection with other projects. Impacts will be less than significant.

**c)** **Less than Significant Impact.** The proposed Project will not result in substantial adverse effects on human beings. Compliance with applicable laws and regulations will ensure impacts to human beings are reduced to less than significant levels.

Appendix A
CalEEMOD Air Quality and GHG Modeling
(Available for review at City Hall)