

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

**Ramona Land Development Project
(Planning Application No. P20-090 and P21-106)**

Lead Agency:

City of San Jacinto
595 S. San Jacinto Ave,
San Jacinto, CA 92583

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October 2024

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INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000, et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines, *California Code of Regulations*, Title 14, Sections 15000 et seq.), this Initial Study (IS) has been prepared in order to determine whether implementation of the proposed Ramona Land Development Cannabis Oriented Business project (proposed Project) could result in potentially significant environmental impacts that would require the preparation of an Environmental Impact Report (EIR). Section 5.0 of this Initial Study has evaluated each of the issue areas contained in Appendix G to the State CEQA Guidelines. The objective of this environmental document is to inform City of San Jacinto (City) decision makers, representatives of other affected/responsible agencies, and other interested parties of the potential environmental effects that may be associated with the proposed Project.

If an IS prepared for a proposed project determines that no significant effects on the environment would occur or that potentially significant impacts can be reduced to less than significant levels with implementation of specified mitigation measures or uniformly applicable development policies, then the Lead Agency can prepare a Negative Declaration (ND) or a Mitigated Negative Declaration (MND) pursuant to the State CEQA Guidelines (14 California Code of Regulations, Sections 15070–15075). An ND or MND is a statement by the Lead Agency attesting that a project would produce less than significant impacts or that all potentially significant impacts can be reduced to less than significant levels with mitigation. If an IS prepared for a proposed project determines it may produce significant effects on the environment and no mitigation measures are identified to reduce the impacts to less than significant levels, an EIR shall be prepared. This further environmental review is required to address the potentially significant environmental effects of the project and to provide mitigation where necessary and feasible.

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of San Jacinto is the Lead Agency and is charged with the responsibility of deciding whether to approve the proposed Project.

Findings of this Initial Study

This IS is based on an Environmental Checklist Form (Form), as suggested in Section 15063(d)(3) of the State CEQA Guidelines. The Form is found in Section 5.0 of this Initial Study. It contains a series of questions about the proposed Project for each of the listed environmental topics. The Form is used to evaluate whether there are any significant environmental effects associated with implementation of the proposed Project. The explanation for each answer is also included in Section 5.0.

The Form is used to review the potential environmental effects of the proposed Project for each of the following areas:

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

As identified through the analysis presented in this IS, the proposed Project would have no potentially significant impacts after implementation of mitigation measures that would require the preparation of an EIR.

Contact Person

The Lead Agency for the proposed Project is the City of San Jacinto. Any questions about the preparation of the IS, its assumptions, or its conclusions should be referred to the following:

Yaneli Hernandez, Associate Planner
City of San Jacinto, Planning Division
595 S. San Jacinto Ave,
San Jacinto, CA 92583

I. EXISTING CONDITIONS

Project Site

Project Location

The proposed Ramona Land Development involves the operation of an outdoor cultivation facility on assessor parcel numbers (APNs) 430-100-013 and 430-100-002 totaling approximately 57 acres in the City of San Jacinto (City) (see **Figure 1 – Vicinity Map**). The site is divided into two sub areas divided by a drainage ditch: an “East Site,” and a “West Site” project site (collectively, the “Project”). The Project is located east of Warren Road and directly south of Ramona Expressway. The Metropolitan Water District (MWD) Aqueduct runs along the southern boundary of the Project site. The Project site is surrounded by existing agricultural operations (**Figure 2 – Aerial Map**). The project is in Section 18, Township 4 south,

Range 1 west, on the Lakeview 7.5' U. S. Geological Survey (USGS) topographic quadrangle, San Bernardino base and meridian (see **Figure 3 – Topography Map**).

Surrounding Area

The properties surrounding and immediately adjacent to the Project site are Residential High Density/Mixed Use/ Commercial Regional to the north; Residential High Density/Business Park to the west; Office Park to the south; and Commercial Regional to the east. The Project site is currently zoned Commercial Regional (see **Figure 4 – Zoning**). The Project is planned for agricultural usage which would include the propagation and packaging of flower crops.

Physical Setting

The Project site is partially developed/vacant land. According to the Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report prepared by LSA Associates, Inc., the Project site is not within an MSHCP designated Criteria Area.

The topography of the Project site is predominately flat, with elevations ranging from approximately 1,448 feet to 1,470 feet above mean sea level (amsl). An existing drainage feature bisects the property site. The study site is moderately disturbed due to historical use of the site for agriculture. Due to this, the Project site primarily consisted of non-native grasslands.

Regulatory Setting

The City of San Jacinto General Plan land use designation for the Project site is Commercial (C), which allows for retail and service-oriented business activities including both small and large scale commercial development with retail, entertainment, and service uses.

The General Plan Designation for the Property is Commercial (see **Figure 5 – General Plan Land Use Map**). The zoning for the Property is Commercial Regional. The City's Development Code allows Outdoor Cultivation on parcels in designated west of North Sanderson Avenue and north of Cottonwood Avenue which have been previously used for agricultural uses. (San Jacinto Development Code section 17.435.040(B)). The City of San Jacinto considers the Project to be consistent with existing agricultural operations surrounding the site.

II. PROJECT DESCRIPTION

The proposed Ramona Land Development Project involves the operation of an outdoor cultivation facility on assessor parcel numbers (APNs) 430-100-013 and 430-100-002 totaling approximately 57 acres in the City of San Jacinto (City) (see **Figure 1 – Vicinity Map**). The site is divided by a drainage ditch into two sub areas: an "East Site," and a "West Site" project site (collectively, the "Project").

Both the East (37.53 acres) and West (14.65 acres) Sites propose several sub-areas within the Project boundaries intended for future individual cultivation leases (License Areas) (see **Figure 6 –Proposed Site Plan**).

City Approvals required for the Project:

- Cannabis Oriented Business Land Use Permit from the City for the West Site (Case No. P21-106);
- Vacation of a portion of Ramona Expressway (Case No. P21-105).

The East Site is comprised of approximately 1,635,360 square feet (SF) outdoor commercial cultivation facility on 37.53 acres divided among four License Areas. The East Site License Area breakdown includes the following:

- 218,300 SF (5.01 acres) within License Area 1;
- 1,105,800 SF (25.38 acres) within License Area 2;
- 56,600 SF (1.30 acres) within License Area 3;
- 254,600 SF (5.84 acres) within License Area 4.

A Cannabis Oriented Business (COB) land use permit for the East Site was approved by the City of San Jacinto on August 26, 2021 (City Case No. P20-090)¹. Only License Area 1 and License Area 4 have completed installing hoop-houses, 128 hoop houses in total. License Area 3 installed 1 hoop-house (30'x60') prior to stopping construction. The remainder of the site is empty. Access to the East Site is provided by a 20'x6' automatic sliding entrance/exit gate from Ramona Expressway.

The West Site has not yet received its COB Land Use Permit from the City of San Jacinto. The West Site permit application proposes the construction and operation an approximately 638,436 sq ft. outdoor commercial cultivation facility on a 14.65-acre area portion of APN 430-100-002. Currently, the West Site has been partially developed with nine vacant hoop-houses (30'x60') installed, but no License Areas have been fully developed. License Area 8 has had seven hoop-houses constructed with the frame only and no covering on any of the frames. License Area 9 has had nine hoop-houses constructed, all with a 30' by 60' covering attached. The West Site portion of the Project includes the following:

- 137,068 SF (3.15 acres) within License Area 5;
- 90,766 SF (2.08 acres) within License Area 6;
- 236,162 SF (5.42 acres) within License Area 7;
- 87,220 SF (2.0 acres) within License Area 8;
- 87,220 SF (2.0 acres) within License Area 9.

Access to the West Site will be provided by a 30' by 6' automatic sliding entrance/exit gate from Ramona Expressway, located west of the driveway that will provide access to the East Site (see **Figure 6 – Proposed Site Plan**). In order to connect these driveways to Ramona Expressway, the area between the Project Site and Ramona Expressway would require off-site improvements, including a vacation of restricted access (City Case No. P21-105). Within the off-site work area, two driveways would be installed to connect Ramona Expressway to the Project Site. The western driveway would be a new 30'

¹ Although the City of San Jacinto already issued a Notice of Exemption (NOE) filed in August 2021 for the issuance of the City's COB permit, the California Department of Fish and Wildlife (CDFW) notified the City that it would not accept the NOE from the City as the CEQA determination necessary to complete the State Cal Cannabis permitting process. Accordingly, Project construction stopped and this environmental document was prepared in order to comply with the State Cal Cannabis process.

by 100' paved driveway. The eastern driveway would convert an existing dirt access road to a 26' by 103' paved driveway. The off-site work area is approximately 6.25 acres.

The applicant has constructed two wells on the Project site, one on the East Site and one on the West Site, both of which are partially completed. Both wells are 700 ft. deep and intended to supply water for firefighting and agricultural uses. Water will be supplied by each well and then distributed on the surface with PVC pipe used to fill various water storage tanks. Irrigation of the plants in the hoop houses will be supplied by these water tanks. Please refer to **Figure 7 – Proposed Well and Water Tank Locations** for the well and water tank locations.

The operation of Project will involve the cultivation of adult-use plant products. The lease sites are in both the East and West Sites will import seedlings from licensed nurseries or utilize a nursery on-site to propagate seedlings. The seedlings will be cultivated at the Project Site through their vegging and flowering stages under permeable shade cloth covered 30 'by 60 'ft hoop-houses in above ground planters or sacks. Any pesticides used for cultivation will be safely stored at designated areas on-site. Once the plants reach maturity, they will be cut down and hung to dry on site in hoops. Once dry (about 7-10 days), the flowers will be bucked, bagged and transported by a licensed distributor to a licensed, offsite facility for curing, trimming and packaging. Testing will be done by a third party, offsite lab while the product is curing. The plants will be harvested throughout the year. The harvest process involves cutting down the flowers from the plants and packaging the flowers for distribution. Plant waste after harvest will be composted on site in a designated compost and waste area. The Project will be used for storage, loading, unloading, and distribution and will be screened from view from the right of way (ROW) with a 6 'high vinyl privacy screen. A small diesel-fueled utility tractor (approximately 33 horsepower in size) is anticipated to be used for soil loading and other site maintenance at the Project Site.

A 30'-0"W x 6'-0"H security chain-link fence will surround the Project area with an entry/exit gate that will be controlled via a remote control and keypad. The Project will employ a total of twenty-one full time employees per shift including one-armed security professional on both the East Site and the West Site during all hours of operation (thirteen regular staff on the East Site, six on the West Site, and one security guard on each Site). The proposed hours of operation are Monday – Friday, 9:00AM - 5:00PM, and weekends and holidays 9:00AM - 12:00PM. Solar remote CCTV surveillance cameras will cover vital areas of the Project with onsite and offsite monitoring and recordings. Security lighting will be installed at the Project site. Lights shall be mounted on poles, directed down towards the ground and shielded to prevent glare or light spilling into neighboring properties. There will be a 10 'x 20 'mobile office with ductless air conditioner for site administrative functions. There will also be portable restrooms at five areas around the Project site to serve all employees. In total, Project construction is anticipated to take approximately three years and seven months. The first seven months will consist of site preparation and paving, followed by three years of hoop house installation.

Environmental Setting

The proposed development sites are located in the city of San Jacinto, east of Warren Road and south of Ramona Expressway. The Project is located in an existing agricultural area of turf farms, dairies and crop agriculture. The Metropolitan Water District of Southern California (MWD) Aqueduct runs along the

southern boundary of the Project site. The Project site is surrounded by existing agricultural operations (**Figure 2 – Aerial Map**).

The Project site was previously used for crop agriculture for the past several decades based on aerial photo historical reviews. Historic aerial photos depict areas of flooding on the site. Currently, the East Site has already been partially developed with the plant hoop-houses under a City COB permit and two of the License Areas (Areas 1 and 4) are fully developed. There are no permanent structures on site.

The City of San Jacinto's General Plan land use designations of the properties surrounding and immediately adjacent to the Project site are High Density Residential (HDR), Mixed Use (MU) and Commercial (C) to the northeast, and Business Park (BP) to the south (southeast and southwest) (**Figure 5, General Plan Land Use**). Directly to the north and northwest of the Project site are areas outside of the bounds of the City of San Jacinto, but still fall within the planning Area Plan boundary for Riverside County. Based on this zoning, the areas north and northwest of the Project site are zoned as a mix of conservation and agriculture (San Jacinto Valley Area Land Use Plan, p. 19).

Drainage

The Project site and properties around it drain northerly towards the San Jacinto River, which is located approximately 1.5 miles to the north of the Project site. Two drainage features currently exist on-site: a square-shaped detention basin along Ramona Expressway; and an earthen box-shaped drainage channel that extends from southern parcel line to the detention basin. The Project site has been dry farmed for decades, and the drainage channel and basin are artificial, man-made features that were created sometime between 1953 and 1961. The channel and basin were constructed in an existing tributary. The existing channel and basin are not part of the Riverside County Master Drainage Plan in their current design, but do act in existing conditions to drain localized stormwater flows off the majority of the site. The existing basin and channel outlet through a culvert underneath Ramona Expressway to the north, and onto private property where a regional collector channel has been created to drain the area to the San Jacinto River near Princess Ann Road. The project site has a direct hydrologic connection to the river. No modifications to the existing drainage features are proposed to be constructed as part of the Project.

Utilities

Southern California Edison will provide electricity for the Project Site. All utilities will utilize existing connections, and no new facilities are proposed. No sewer connections are proposed to be installed or used. Instead, portable restrooms will be used on-site. No natural gas will be supplied to the Project Site.

Hydrology

The Project site is proposing two on-site wells, one on both the East and West sites. The wells will supply water tanks which will be located on the Project site and serve as the water source for cultivation within the hoop-houses as well as firefighting uses (see **Figure 7 – Proposed Well and Water Tank Locations**). Runoff irrigation from the planter boxes within the hoop-houses will fall directly below the boxes back into the soil. There is a drainage channel that runs through the center of the Project site and divides the East and West sites (see **Figure 2 – Aerial Map**) but the hoop-houses have been designed to avoid this channel and thus runoff is expected to be kept at a minimum and not expected to enter the drainage

channel (see **Figure 8 -Watermaster Management Areas**). The Project site is located within the water service area boundary of Eastern Municipal Water District (EMWD); however, the Project applicant will be installing two onsite water wells for its water supply and will not connect to EMWD's potable water system. The Project site is located within an adjudicated groundwater basin and the Project applicant will be opting to be a Non-Participant in the Hemet-San Jacinto Watermaster Water Management Plan activities.

Construction

Out of the nine License Areas on Project Site, two of the Areas have been fully constructed and three Areas have undergone partial construction. License Area 1 and License Area 4, which are both on the East side of the Project site, have both been fully completed as planned. License Area 1 has had a total of 122,600 SF developed. License Area 4 has a total of 254,600 SF developed. License Area 3 has had one of the plant hoop-houses completed with a 30' by 60' covering attached. License Area 8 has had seven hoop-houses constructed with the frame only and no covering on any of the frames. License Area 9 has had nine hoop-houses constructed, all with a 30' by 60' covering attached. Construction will be completed in compliance with the State cultivation licenses for small, outdoor cultivation, medium, outdoor cultivation, and nursery cultivation. All previous construction has been completed in compliance with these designations.

Project construction is anticipated to take approximately three years and seven months. The first seven months will consist of site preparation and paving. Following site preparation and construction of infrastructure, installation of the remaining hoop houses is proposed to occur in three phases over three years, with one third of the total square footage being installed with hoop houses each year. No grading is proposed for either the East or West Site nor has any grading been previously done. There are no permanent structures on site or proposed for the remainder of construction. All planting and plant cultivation will take place within hoop-houses and above ground.

On the Project site, there are two existing driveways, both south of the Ramona Expressway. As part of the Project, the West Site's existing driveway will be relocated approximately 169 feet from the West Site property line. The centerline of the 30' driveway will be approximately 184' from the property line. The Project will consist of 100 feet of asphalt paving for each driveway to connect the existing driveways to Ramona Expressway. Eleven parking spaces are proposed on the West side of the Project site and will be 9'-0" x 20'-0". On the East side of the Project side of the Project, there will be twenty parking spaces which will also be 9'-0" x 20'-0", plus one bus parking space.

III. EXECUTIVE SUMMARY

Through analysis provided in this IS/MND, it was determined that the proposed project has the potential to result in significant environmental impacts with regard to Biological Resources, Cultural Resources, and Tribal Cultural Resources. Mitigation measures are identified that would reduce all impacts to less than significant levels with mitigation incorporated.

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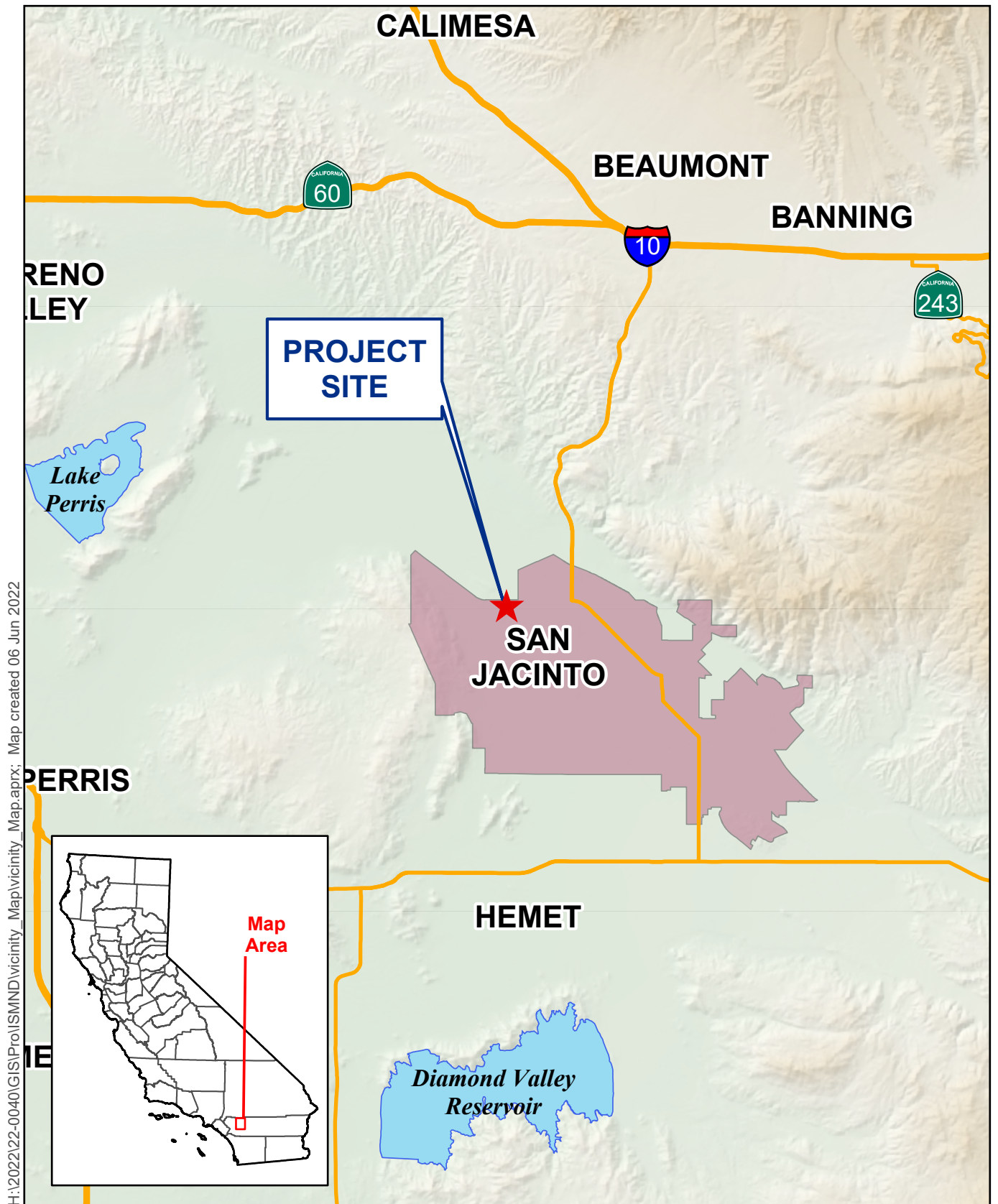
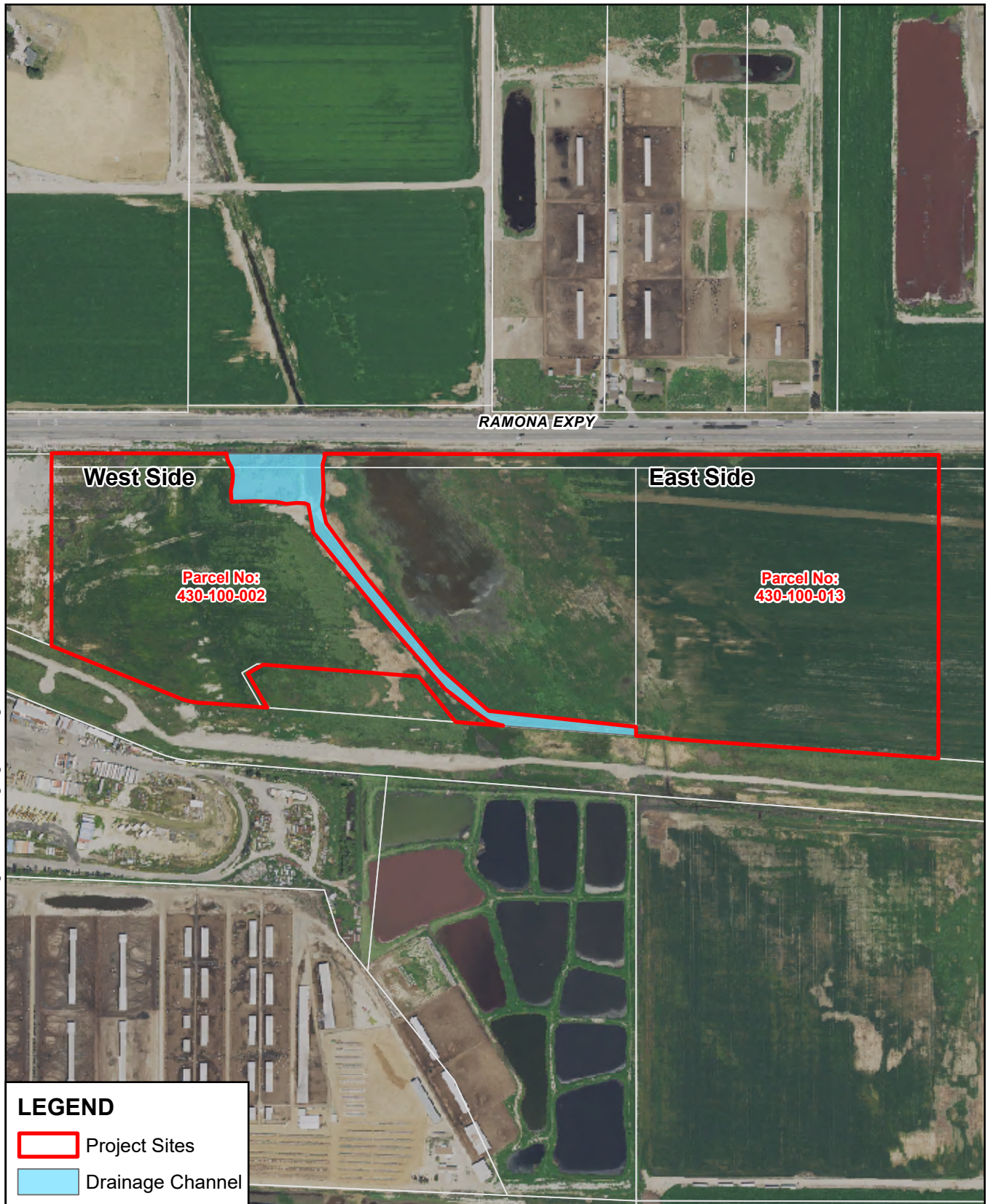


Figure 1 – Vicinity Map
Ramona Land Development



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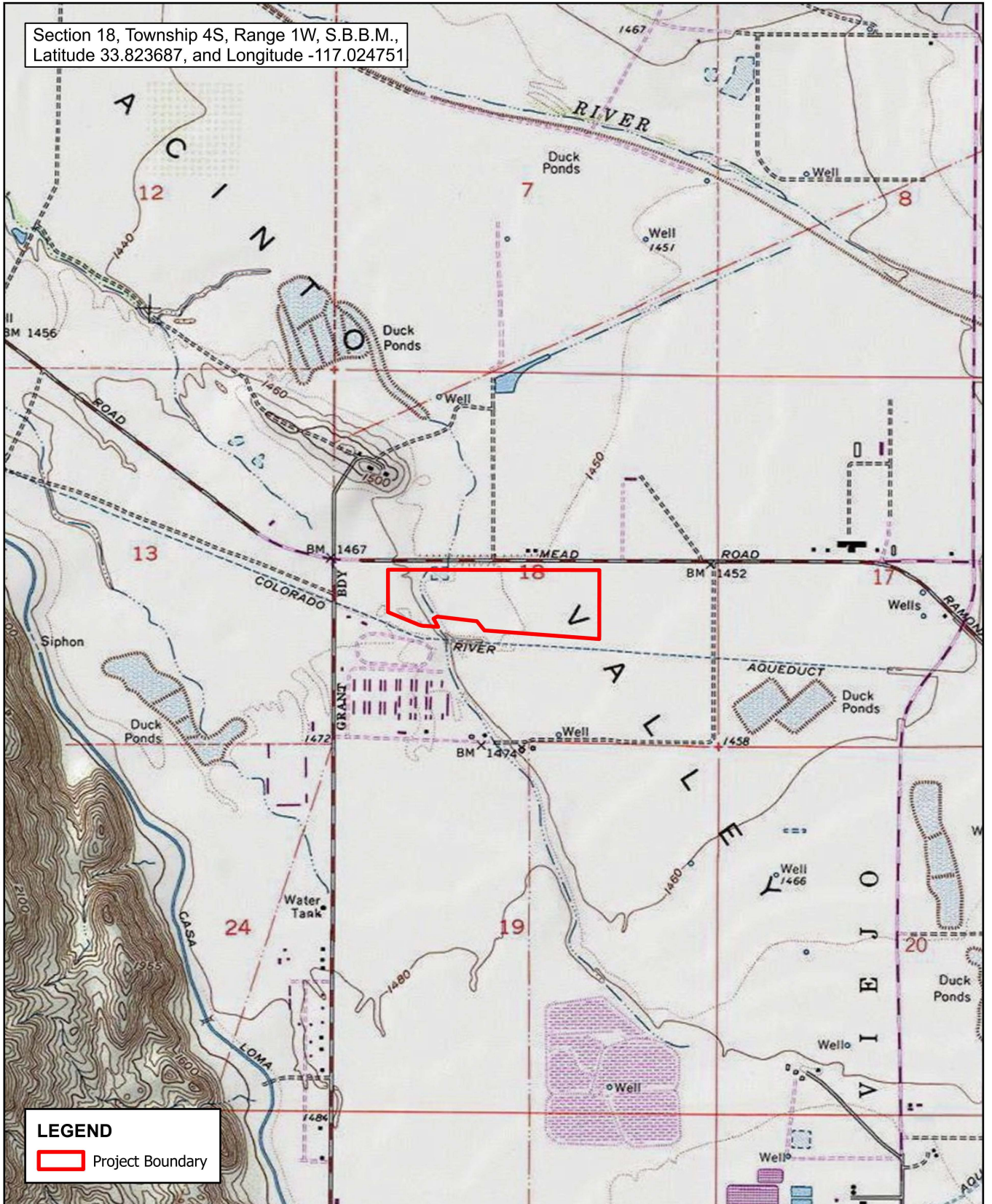
Sources: Riverside Co. GIS, 2020

Figure 2 - Aerial Map
Ramona Land Development

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Section 18, Township 4S, Range 1W, S.B.B.M.,
Latitude 33.823687, and Longitude -117.024751

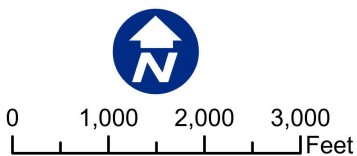
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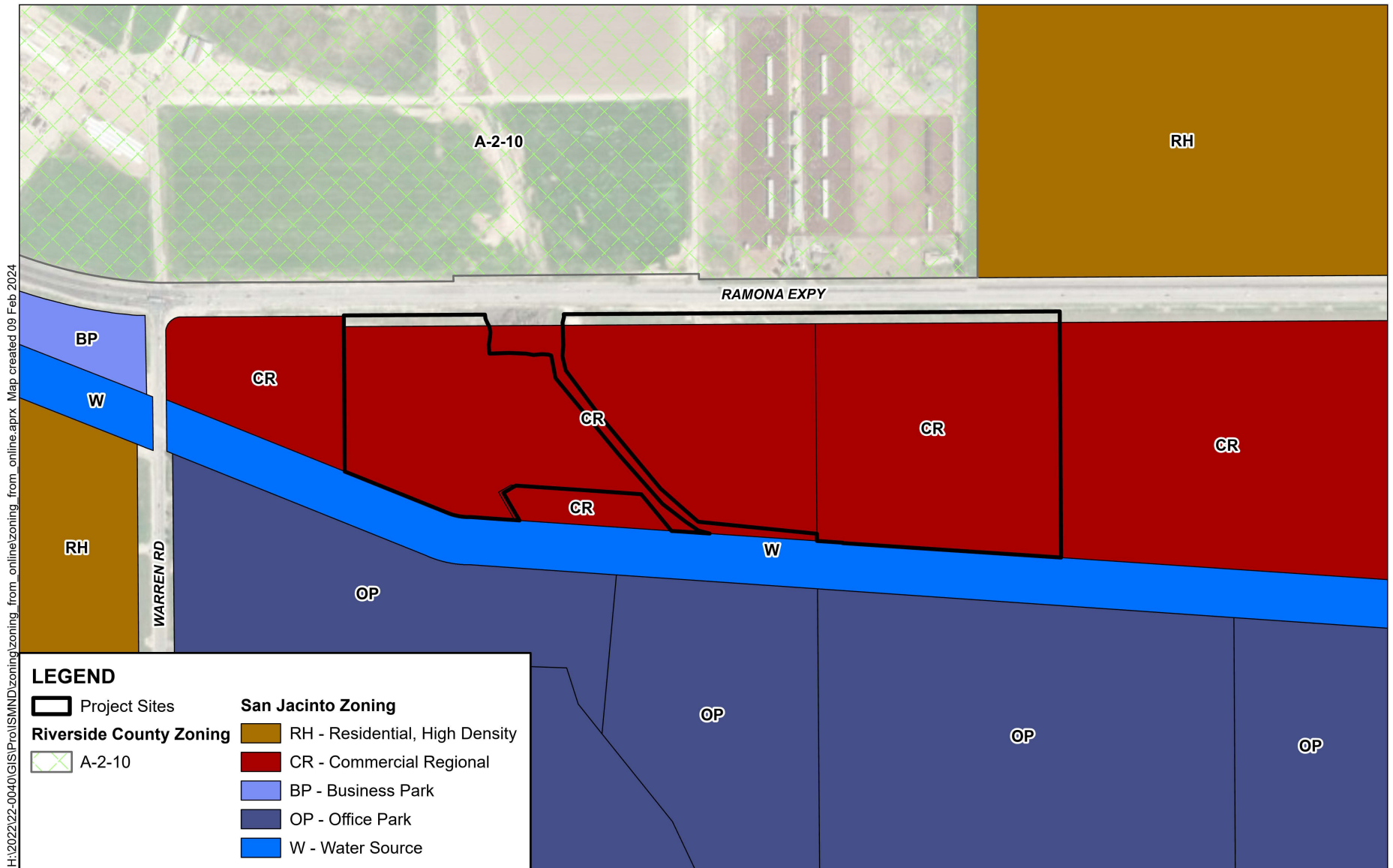
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 Project Boundary

Sources: ESRI / USGS 7.5min Quad: Riverside Co.

Figure 3 - Topography Map
 Ramona Land Development



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Source: Esri imagery, 2023;
San Jacinto Zoning Map, Nov. 15, 2022.

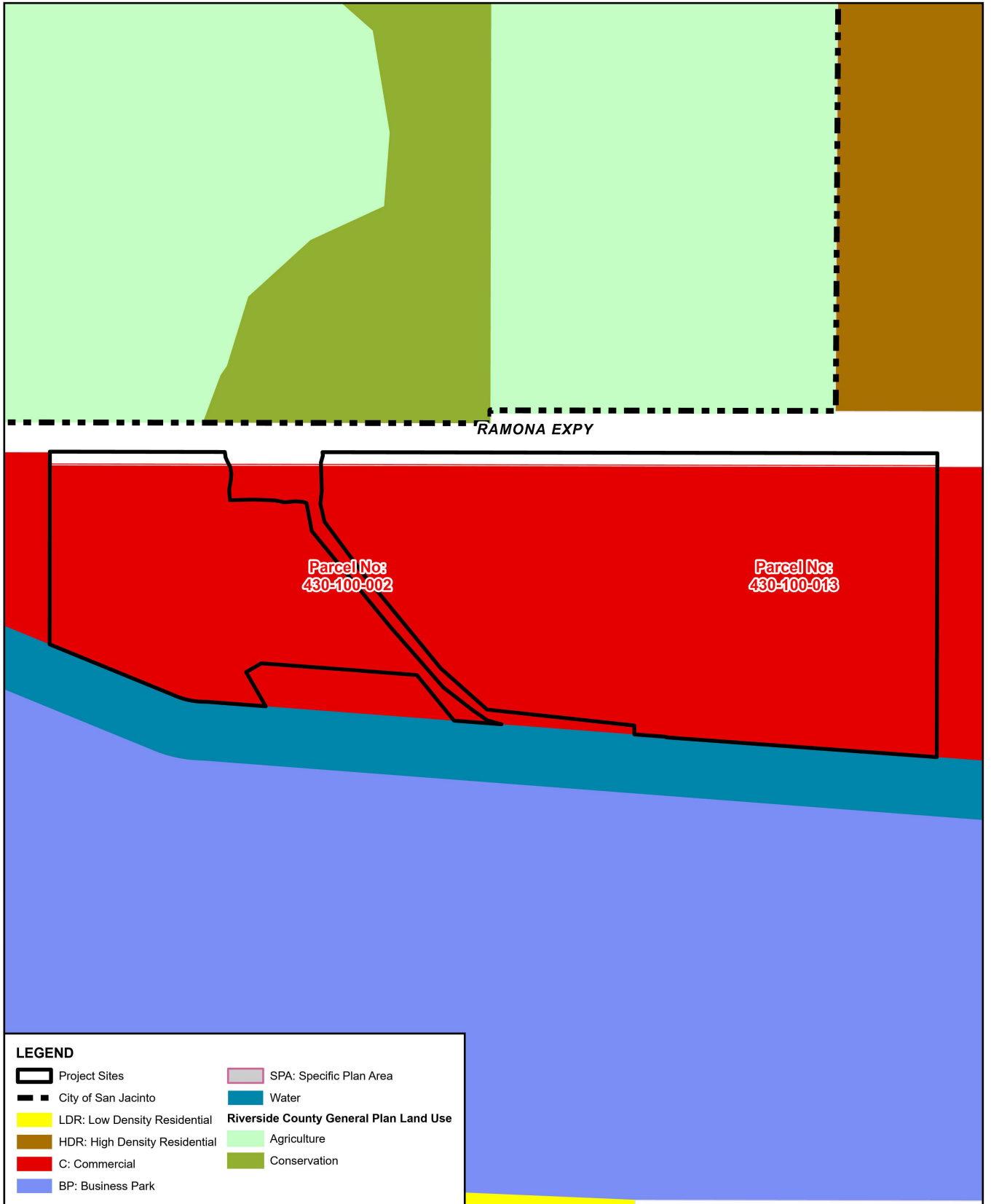


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Figure 4 - Zoning
Ramona Land Development

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Sources: Riverside Co. General Plan Land Use, 2022;
San Jacinto General Plan Land Use, 2022.

Figure 5 - General Plan Land Use
Ramona Land Development



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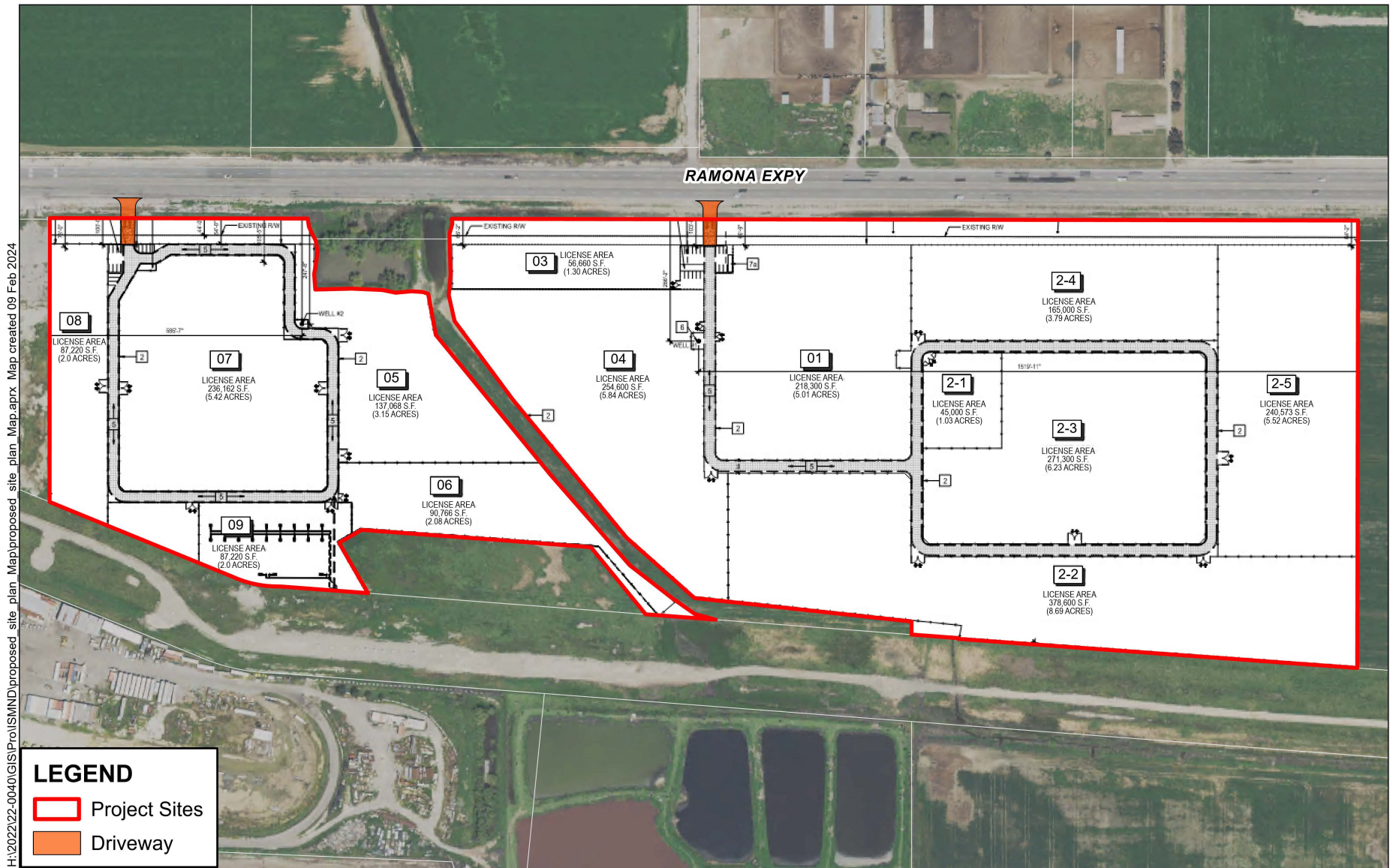


Figure 6 - Proposed Site Plan



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LEGEND

- Project Sites
- Well Sites
- Water Tanks

Map Labels:

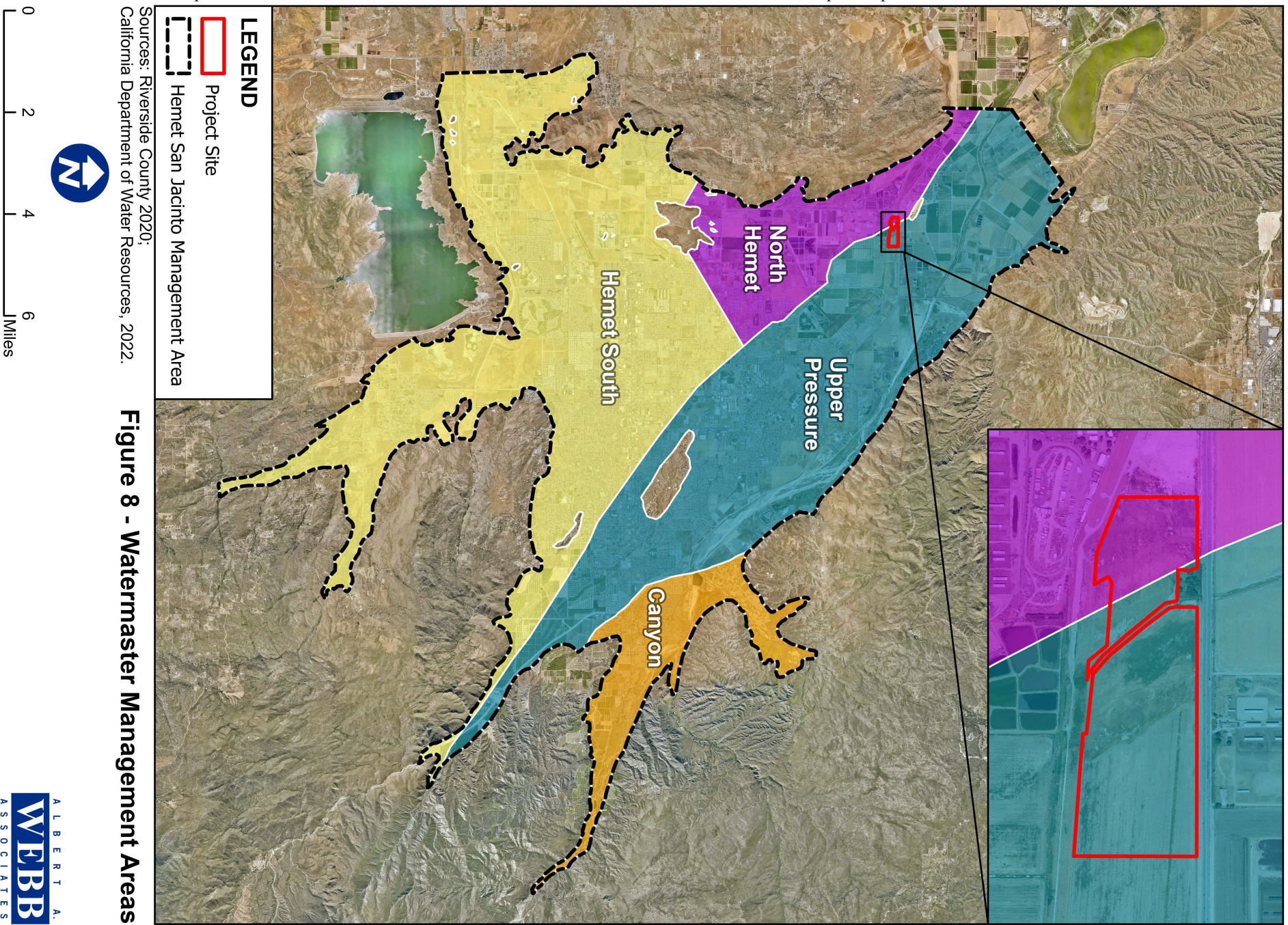
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- 02: LICENSE AREA 165,000 S.F. (3.79 ACRES)
- 03: LICENSE AREA 86,660 S.F. (1.30 ACRES)
- 04: LICENSE AREA 254,600 S.F. (5.84 ACRES)
- 05: LICENSE AREA 137,068 S.F. (3.15 ACRES)
- 06: LICENSE AREA 90,766 S.F. (2.08 ACRES)
- 07: LICENSE AREA 236,162 S.F. (5.42 ACRES)
- 08: LICENSE AREA 87,220 S.F. (2.0 ACRES)
- 09: LICENSE AREA 87,220 S.F. (2.0 ACRES)
- 2-1: LICENSE AREA 45,000 S.F. (1.03 ACRES)
- 2-2: LICENSE AREA 378,600 S.F. (8.63 ACRES)
- 2-3: LICENSE AREA 271,300 S.F. (6.23 ACRES)
- 2-4: LICENSE AREA 165,000 S.F. (3.79 ACRES)
- 2-5: LICENSE AREA 240,573 S.F. (5.52 ACRES)

Other Labels:

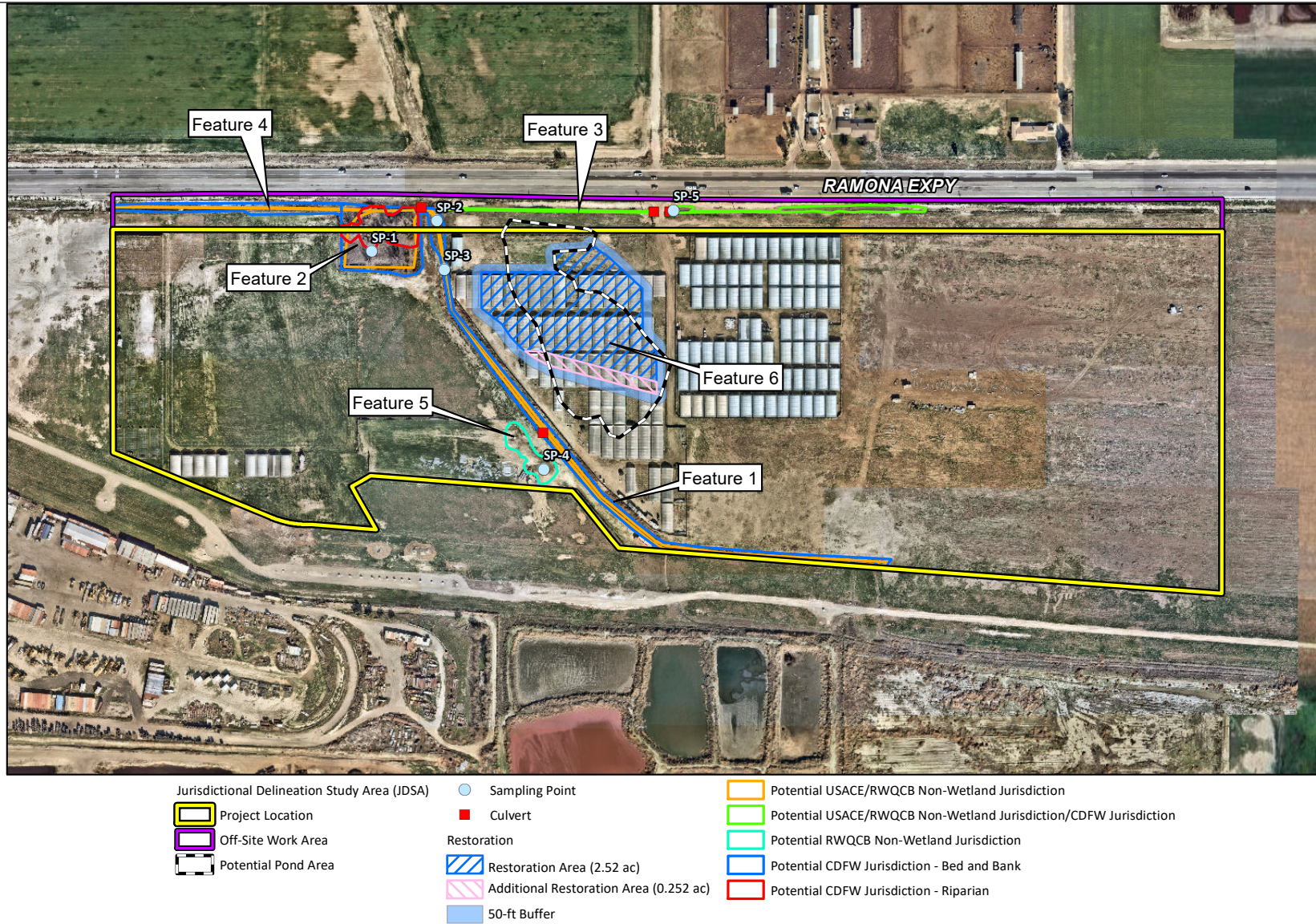
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ALBERT A.
WEBB
ASSOCIATES

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Source: Ramona Land Development Project, LSA, July, 2024.

Figure 9 - Riparian/Riverine Impacts and Restoration
Ramona Land Development



Not to Scale

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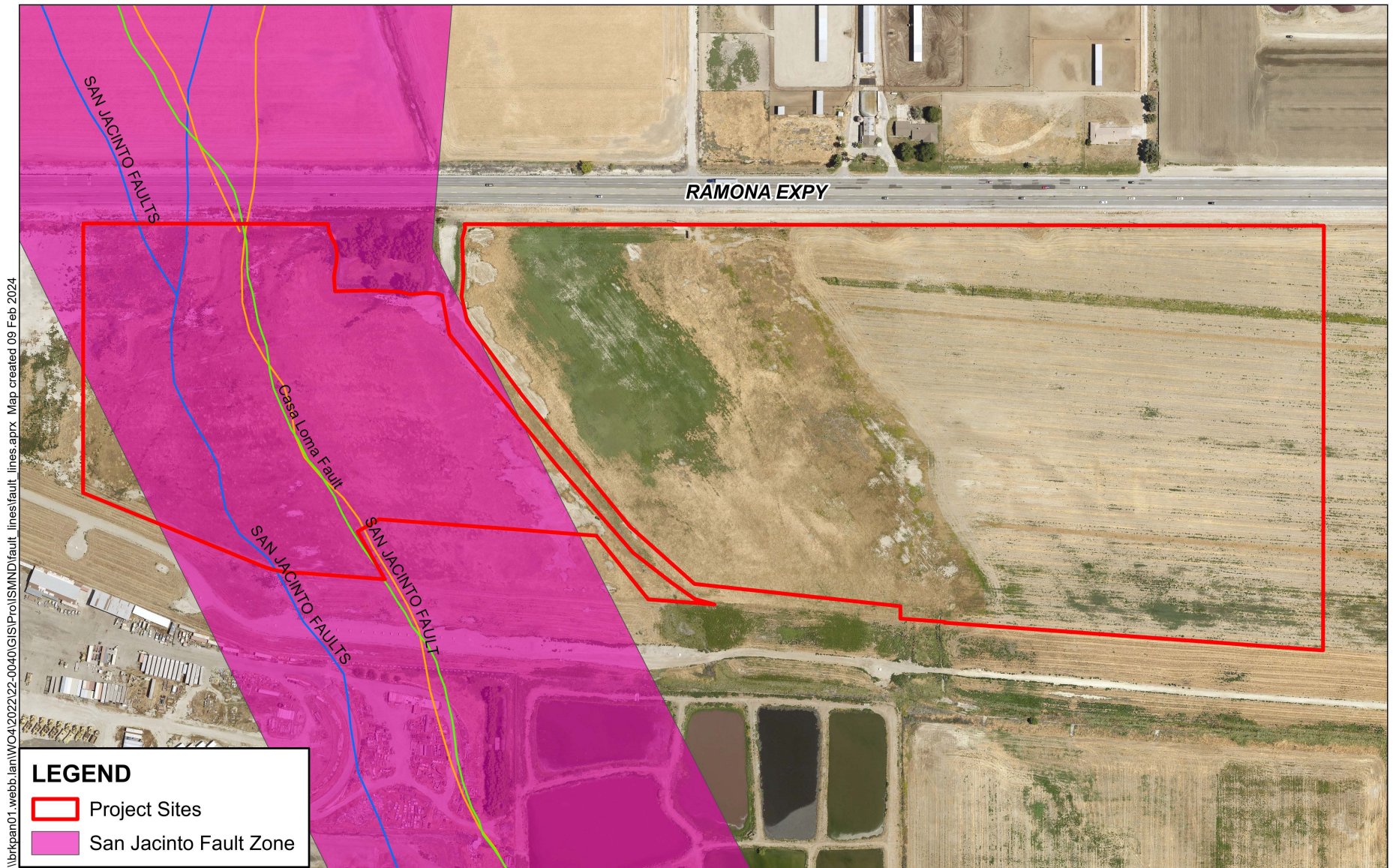


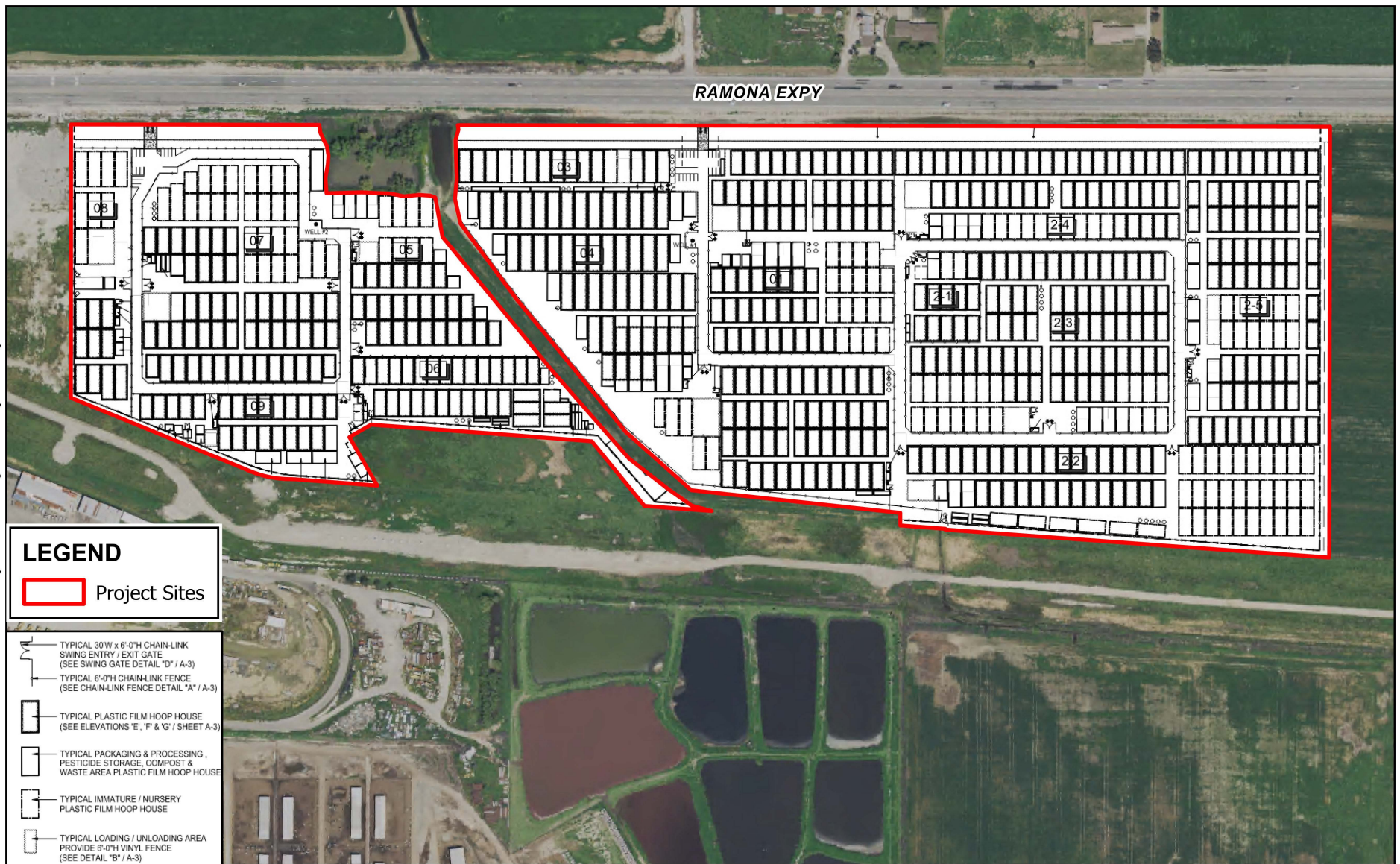
Figure 10 - Fault Line Map



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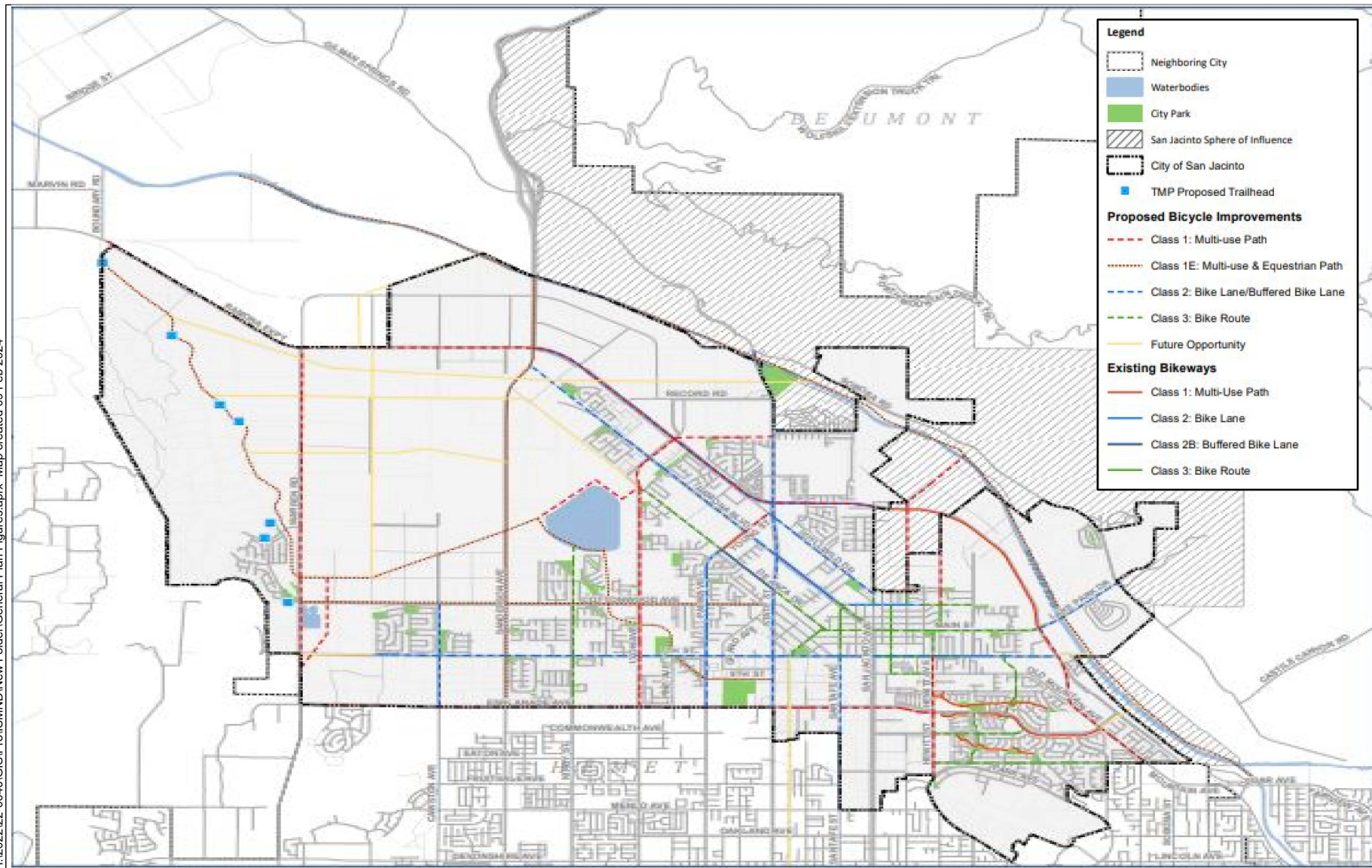
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Sources: Riverside Co. GIS, 2020.

Figure 11 - Hoop House Locations

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Source: San Jacinto General Plan EIR

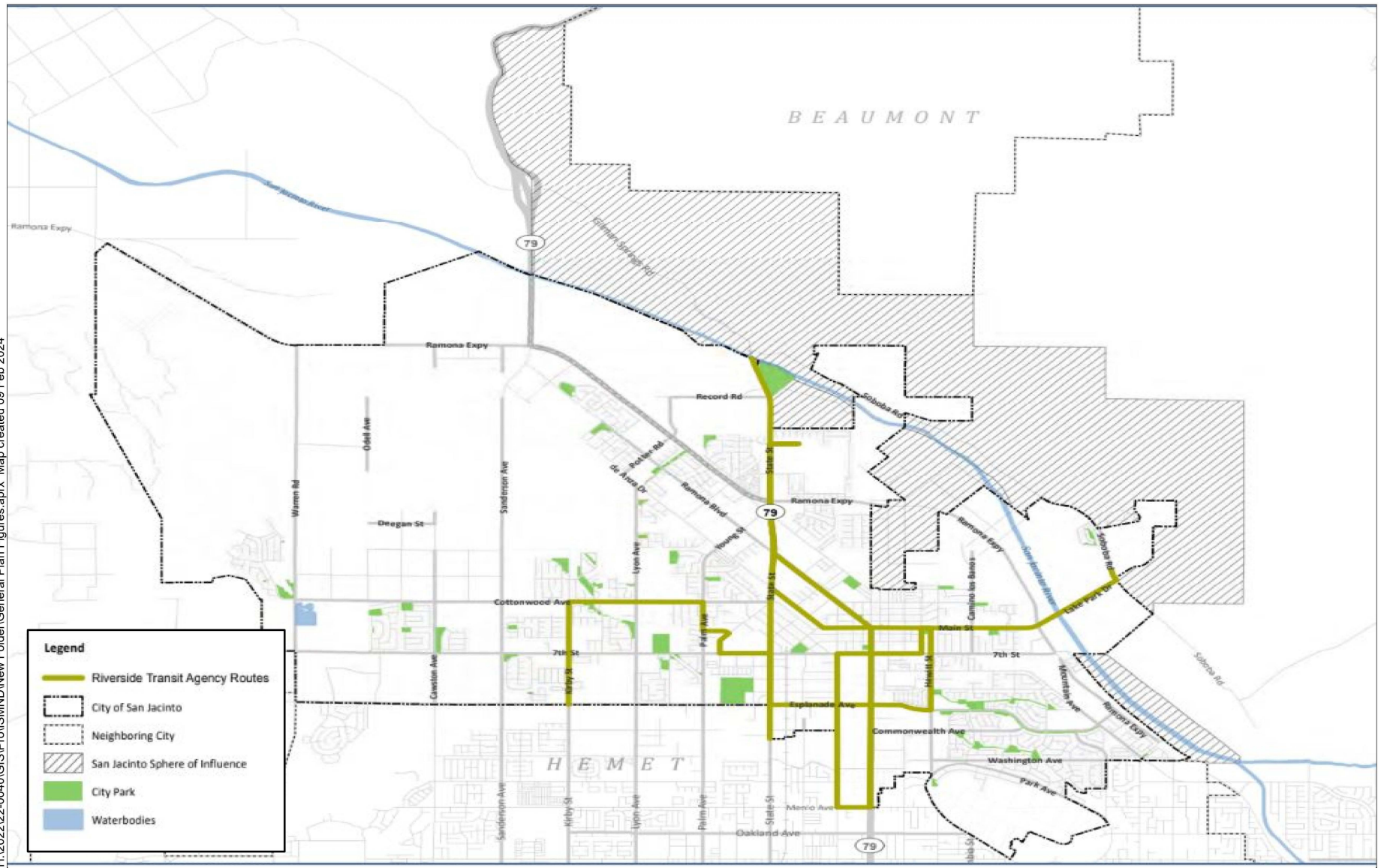
Figure 12 - Existing and Proposed Trail and Bicycle Facilities

Ramona Land Development



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Source: San Jacinto General Plan EIR

Figure 13 - Existing Transit Routes
Ramona Land Development



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IV. ENVIRONMENTAL CHECKLIST FORM

A. BACKGROUND

1. **Project Title:**

Ramona Land Development Project (Planning Application No. 20-090 and 21-106)

2. **Lead Agency Name and Address:**

City of San Jacinto, 595 S. San Jacinto Avenue, San Jacinto, California 92583

3. **Contact Person and Phone Number:**

Yaneli Hernandez, Associate Planner; (951) 487-7330

4. **Project Location:**

The Project is located east of Warren Road and directly south of Ramona Expressway in the City of San Jacinto, California (see **Figure 1 – Vicinity Map** and **Figure 2 – Aerial Map**). The assessor's parcel numbers (APN) are: 430-100-013 and 430-100-002.

5. **Project Sponsor's Name and Address:**

5 Points Inc.

Attn: Andrew Kotyuk, 220 N San Jacinto Street, Hemet, CA 92543

6. **General Plan Designation:**

Commercial (C)

7. **Zoning:**

Commercial Regional (CR)

8. **Description of Project:**

The proposed Project (**Figure 6 — Proposed Site Plan**) consists of an operation of an outdoor cultivation facility located on approximately 57 acres totaling approximately 1,891,119 square feet (SF) of developed area, consisting of an East and West site, with a total of nine License Areas in total for both sites:

East Site License Areas:

- 218,300 SF (5.01 acres) within License Area 1;
- 1,105,800 SF (25.38 acres) within License Area 2;
- 56,600 SF (1.30 acres) within License Area 3;
- 254,600 SF (5.84 acres) within License Area 4

West Site License Areas:

- 137,068 SF (3.15 acres) within License Area 5;
- 90,766 SF (2.08 acres) within License Area 6;
- 236,162 SF (5.42 acres) within License Area 7;
- 87,220 SF (2.0 acres) within License Area 8;

87,220 SF (2.0 acres) within License Area 9.

9. Surrounding Land Uses and Setting:

ADJACENT LAND USE, LAND USE DESIGNATION, AND ZONING			
Location	Current Land Use	General Plan Land Use Designation	Zoning
North	Agricultural	Agricultural/ Conservation ¹ ; High Density Residential	Conservation/ Agriculture ² ; Residential High- Density
South	Truck Yard	Business Park (BP)	Office Park
West	Agricultural	Commercial	Commercial Regional
East	Agricultural	Commercial	Commercial Regional
^{1, 2} : General Plan Land Use and Zoning Designations were sourced from Riverside County, Map My County (https://gis1.countyofriverside.us/Html5Viewer/?viewer=MMC_Public)			

10. Other Public Agencies Whose Approval May Be Required:

- Santa Ana Regional Water Quality Control Board
- California Department of Fish and Wildlife
- State of California Cannabis permitting process
- South Coast Air Quality Management District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The City of San Jacinto sent notice to tribes that have requested to be notified of projects pursuant to Assembly Bill (AB) 52 and Public Resources Code Section 21080.3.1. The City has completed consultations with the Soboba Band of Luiseño Indians (please refer to section VI.18 of the Initial Study, Tribal Cultural Resources).

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project involving at least one impact that is “Less Than Significant Impact with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

C. DETERMINATION

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 of the incorporated mitigation measures and 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.

City Representative

Yaneli Hernandez, Associate Planner

Date

Applicant

Pursuant to Section 15070(b)(1) of the California Environmental Quality Act, as the project applicant, I agree to revisions of the project plans or proposals as described in this Initial Study/Mitigated Negative Declaration to avoid or reduce environmental impacts of my project to a less than significant level.

Andrew Kotyuk

Date

5 Points INC. Applicant

ENVIRONMENTAL ANALYSIS

1. Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact 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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (<i>Public views are those that are experienced from publicly accessible vantage point</i>). 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?			✓	

DISCUSSION

a) **No impact.** Scenic vistas can be defined as the view of an area that is visually or aesthetically pleasing. Development projects can potentially impact scenic vistas in two ways: 1) directly diminishing the scenic quality of the vista, or 2) by blocking the view corridors or “vistas” of scenic resources. The proposed Project site is located within the City and the terrain is generally flat. Within the Project site, the elevation ranges from approximately 1450-1470 feet in elevation. The City has a number of scenic vistas, due to the eastern and northern borders being defined by steep sloping hillsides and ridgelines associated with the San Jacinto Mountain Range. (GPEIR, p. 5.1-3.) Surrounding the Project site, the surrounding properties also fall within this general elevation range. Due to the Project’s flat terrain the Project site does offer views to the Lake View Mountain toward the west and San Timoteo Badlands towards the northwest. (GPEIR, p. 5.1- 3.)

As previously mentioned, this site has previously been used for agriculture and the surrounding sites are also developed with agricultural and commercial developments. The Land Use policy LU-3.1 of the San Jacinto Land Use Element ensures the compatibility of new development with surrounding uses and the ability of new development to enhance the character of the surrounding area. (GP, p. LU-13.) Land Use policy LU-5.3 identifies and preserves the positive characteristics and features of a site, such as viewsheds, heritage trees, and rock outcroppings, during the design and development of new projects. (GP EIR, p. 5.1- 8.) Additionally, San Jacinto Development Code (SJDC) Article 2, Zones, Allowable Land Uses, and Zone-Specific Standards would regulate development characteristics based on zoning district to protect scenic vistas. (GPEIR, p. 5.1-8.) The Project is proposing the site to be used for commercial cultivations purposes therefore implementation of the Project would not drastically alter views to the

surrounding mountain ranges since structures proposed would not exceed 12 feet. The Project would be required to comply with LU-3.1 and LU-5.3 and Article 2, Zones, Allowable Land Uses, and Zone-specific Standards outlined above through compliance the Project would have no impact to scenic vistas.

b) **No Impact.** The California Department of Transportation (DOT) has identified State Route (SR) 74 as an “eligible” state scenic highway. (CDOT) SR-74 is located approximately 5.44 miles south of the Project site. (Google Earth) The nearest officially designated State Scenic Highway is SR-243, located approximately 11.27 miles northeast. (GPEIR, p. 5.1-3.) The County of Riverside General Plan Land Use Element and Circulation Element officially recognizes several county roadways as County Eligible Scenic Highways, one of them being SR 79, which passes through the City of San Jacinto. (GPEIR, p. 5.1-3.) Nonetheless, the Project site is located approximately 1.75 miles west of SR-79. Moreover, as previously stated the Project site has previously been used for agricultural purposes, therefore scenic resources such as trees, rock outcroppings and historic buildings do not occur on the Project site, Thus, no impacts would occur.

c) **Less Than Significant Impact.** CEQA Section 21071(a) defines an incorporated city as being an urbanized area if it meets either of the following criteria:

(1) Has a population of at least 100,000 persons.

(2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

The City is categorized as an urbanized area because while (1) the City’s population is not at least 100,000 persons, it does meet (2) the combined population of both the City and the City of Hemet (the only contiguous city) equals more than 100,000 persons. Based on July 1, 2021 United States Census Bureau data San Jacinto has a population of approximately 55,290 persons and Hemet has a population of 90,436 persons, totaling to a population of approximately 145,726 persons. (USCB.) The January 1, 2022, California Department of Finance population estimate for San Jacinto and Hemet is approximately 54,503 and 89,137, respectively. (DOF.) Since the City is in an urbanized area, this analysis is based on whether the Project conflicts with applicable zoning and other regulations governing scenic qualities.

As previously mentioned, the Project site has been previously used for agricultural purposes. Additionally, the Project site has a general plan land use designation of Commercial” and a zoning of Commercial Regional. According to City of San Jacinto Development Code (SJDC) Section 17.435.040 (B.) Permitted Locations, the Project site is a permitted outdoor cultivation site. (SJDC, p. 4-200.) Therefore, the Project is consistent with applicable zoning codes. Therefore, less than significant impacts would occur.

d) **Less Than Significant Impact.** Light pollution may result due to introduction of new artificial light sources. The International Dark-Sky Association (IDSA) defines light pollution as any adverse effect of artificial light including sky glow, glare, light trespass, light clutter, decreased visibility at night and energy waste (IDA). Night lighting and glare can affect human vision, navigation, and other activities; however, it can also affect nocturnal wildlife particularly night-hunting or foraging animals, such as owls, rodents, and others. Glare which refers to reflected sunlight or artificial light that interferes with vision or navigation, may also arise from new development, for example, from the use of reflective materials on building exteriors.

As previously mentioned, the Project proposes to incorporate security lighting within the Project site. However, the proposed Project will not introduce substantial new daytime glare to the area because the Project development will consist of hoop-houses for cultivation, which won’t use reflective materials. Additionally, the proposed security lighting will comply with SJDC Section 17.300.080 – Outdoor Light and

Glare regulations which requires all exterior lighting fixtures to be shielded or modified and located so as to eliminate spill over illumination or glare beyond the property line or upward into the sky. (SJDC, p. 3-10.) The lighting will be mounted on poles, directed down towards the ground and shielded to prevent glare or light spilling into neighboring properties. Therefore, introduction of new light sources would not substantially affect day or nighttime view in the area. Therefore impacts are considered to be less than significant.

MITIGATION MEASURES

None required.

2. Agriculture 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 Impact 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?				✓

DISCUSSION

a) **No Impact.** The proposed Project site is classified as Farmland of Local Importance by the Farmland Mapping Management Program (FMMP, GPEIR, p. 5.2-15.). Per Section 21060.1 of the State CEQA Guidelines, Farmland of Local Importance is not considered Farmland. Because there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance at the Project site, there will not be any new significant impacts related to conversion of Farmland. Thus, no impact will occur.

b) **No Impact.** Historically the City of San Jacinto has been an agricultural community, with its rich valley soils providing a wide variety of agricultural crops. (GPEIR, p. 5.2-1.) The central, western, southwestern,

and northwestern portions of the City primarily comprised of field croplands, with some dairy and livestock feed yards intermixed throughout the agricultural areas. (GPEIR, p. 5.2-1.) There are also agricultural preserve areas within the western and northwestern portions of the City. Within City limits, there are approximately 3,272 acres of non-preserved agricultural land and approximately 514 acres of preserved agricultural land in use. Within the City's sphere of influence, there are approximately 112 acres of non-preserved land in use and no preserved agricultural land in use. Despite there being some preserved agricultural lands within City limits, there are no active Williamson Act Contract lands within the City (GPEIR, p. 5.2-1).

As part of the General Plan Update, land use designations for 18 parcels totaling 514 acres located within the western area towards the northern perimeter of the City limits, will allow for non-agricultural uses. (GPEIR, p. 5.2-9.) Previously the project site was identified as being within an agricultural preserve. Nonetheless with Land Use Action LU-2f, the City of San Jacinto would be required to work with property owners and agricultural operation interested in remaining agricultural land to identify ways to maintain agricultural production; agricultural conservation easements may be applied to land desired to remain as agricultural land. Therefore, the Project, which is proposing to utilize the site for agricultural purposes would still be able to do so. Furthermore, because the Project is zoned Commercial Regional which allow for outdoor cultivation per SJC Section 17.435.040 (B.) the Project would not conflict with existing zoning for agricultural and will not conflict with the Williamson Act Contract. Thus, no impacts would occur.

c) **No Impact.** The Project site is zoned as Commercial Regional. Additionally, the Project site has previously been used for agricultural uses, and is moderately disturbed. The Project site primarily consists of non-native grasslands. No forestland or timberland is located on or near the Project site. The Project applicant proposes to continue to use the site for agricultural uses. There is no existing or proposed zoning of forest land, timber land or Timberland Production Zones within the City. Therefore, implementation of the proposed Project would have no impact of forestland, timberland, or a Timberland Production zone. Thus, no impacts would occur.

D) **No Impact.** As discussed in *Threshold 2c*, above, here there is no land zoned for forest land within the City and there is no forest land on or near the Project site. Further, there are no existing land use designations explicitly for timber production zones or other commercial timber activities within the larger County of Riverside area (COR GP; Figure OS-3a – Forestry Resources Western Riverside County Parks, Forests and Recreation Areas). Therefore, implementation of the proposed Project will have no impact on land zoned for forest land and will not result in the conversion of forest land to non-forest uses. Thus, no impact would occur.

e) **No Impact.** As discussed in *Threshold 2a – 2d*, above, the Project site is not categorized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance nor is the site designated as forest land. There is also no designated or protected Farmland or forestland in the immediate vicinity of the Project site. The Project applicant proposes continuing agricultural uses on the Project site. Therefore, implementation of the Project will not result in the conversion of Farmland to non-agricultural use since it will continue the agricultural uses or the conversion of forest land to non-forest use. Thus, no impact would occur.

MITIGATION MEASURES

None required.

3. Air Quality

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	

This section summarizes the methods and findings of the air quality modeling for the Project using the California Emissions Estimator Model (CalEEMod). The results are included as Appendix 1.0, CalEEMod Output. The following discussion was prepared to determine the impact on air quality from the proposed Project. Greenhouse gas emissions modeling was also prepared using CalEEMod and those results are also included as Appendix 1.0.

DISCUSSION

a Less Than Significant Impact. The Project site is located within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) prepares the Air Quality Management Plan (AQMP) for the Basin. The AQMP sets forth a comprehensive program that will lead the Basin into compliance with all federal and state air quality standards. The AQMP's control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed.

The proposed Project consists of the construction and operation of an outdoor cultivation facility that does not directly impact population projections or conflict with local land use plans. Thus, no impacts will occur. For these reasons, the Project does not conflict with or obstruct implementation of the AQMP. Therefore, no direct, indirect, or cumulative impacts will occur. No mitigation is required.

b Less than Significant Impact. The portion of the Basin within which the proposed Project site is located is designated as a non-attainment area for ozone, particulate matter less than 10 microns in diameter (PM-10), and particulate matter less than 2.5 microns in diameter (PM-2.5) under the state standards and in a non-attainment area for ozone and PM-2.5 under federal standards. (CARB-A.) The SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. (SCAQMD-A.) Therefore, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. Based on SCAQMD's regulatory jurisdiction over regional air quality, it is reasonable to rely on its thresholds to determine whether there is a cumulative air quality impact.

Air quality impacts can be described in a short- and long-term perspective. Short-term impacts will occur during site grading and Project construction. Long-term air quality impacts will occur once the Project is in operation. The short-term and long-term emissions from the Project are discussed further below.

The Project will also be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that actively disturb 50 or more acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of this Project's disturbance area (approximately 52 acres), a Fugitive Dust Control Plan or a Large Operation Notification Form may be required.

As stated above, the Project's emissions were modeled using the CalEEMod program, version 2022.1 (**Appendix 1.0**).

During construction, short-term emissions consist of fugitive dust and other particulate matter, as well as exhaust emissions generated by construction-related vehicles. The default parameters within CalEEMod were used, except as identified below, and these default values generally reflect a worst-case scenario, which means that Project emissions are expected to be equal to or less than the estimated emissions.

The estimated construction period for the proposed Project is approximately three years and seven months as identified in **Table 1 – Estimated Construction Schedule**.

Table 1 - Estimated Construction Schedule.

Construction Activity	Start Date	End Date	Total Working Days
Well Construction	October 1, 2024	October 14, 2024	10 days
Paving	October 15, 2024	October 16, 2024	2 days
Site Preparation	October 17, 2024	March 19, 2025	153 days
License Area Set Up	March 20, 2025	May 12, 2027	783 days

The equipment to be used for each construction activity is shown in **Table 2 – Construction Equipment List**. The equipment to be used for each activity is shown below based on Applicant-provided estimates and CalEEMod defaults. The engine tier for each piece of equipment is calculated using CalEEMod defaults for the statewide fleet average emissions factors. Note that License Area Set Up does not require the use of off-road equipment.

Table 2 - Construction Equipment List

Construction Activity	Off-Road Equipment	Unit Amount	Hours
Well Construction	Bore/Drill Rigs ¹	2	9
	Welders ²	2	9
Paving	Rollers	1	8
	Pavers	1	8
Site Preparation	Rubber Tired Dozers	2	8
	Tractors/Loaders/Backhoes	2	8

Construction Activity	Off-Road Equipment	Unit Amount	Hours
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Note: ¹Bore/Drill Rigs estimated to be 450 horsepower (hp).

²Welders were modeled to represent 46 hp Mud Shakers.

Additional assumptions include:

- To evaluate Project compliance with SCAQMD Rule 403 for fugitive dust control, the Project utilized the mitigation option of watering the Project site three times daily which achieves a control efficiency of 74 percent for PM-10 and PM-2.5 emissions. Two (2) one-way vendor trips per day were added to the well construction at each well, site preparation and paving activities to account for water truck trips.
- Forty (40) one way worker trips per day were added during the License Area Set Up and sixteen (16) one way vendor trips were added to account for material delivery.
- Eight (8) one way hauling trips per day were added to account for two truckloads of soil import per day and two truckloads of miscellaneous supplies during the License Area Set Ups.
- Approximately the first 100 feet of each driveway entrance will be paved with asphalt concrete.
- The Well Construction footprint for each well was assumed to be 50 feet wide by 50 feet long on the East Site and West Site of the Project site.

Maximum daily emissions from Project construction are summarized in **Table 3 – Estimated Maximum Daily Construction Emissions** and compared to the SCAQMD’s daily regional thresholds:

Table 3 – Estimated Maximum Daily Construction Emissions

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Construction Thresholds	75	100	550	150	150	55
2024 ¹	2.40	23.30	21.50	0.05	4.59	2.74
2025	0.20	1.39	3.41	0.01	0.82	0.22
2026	0.19	1.33	3.18	0.01	0.82	0.22
2027	0.18	1.28	2.96	0.01	0.82	0.22
Maximum ²	2.40	23.30	21.50	0.05	4.59	2.74
Exceeds Threshold?	No	No	No	No	No	No

Note: ¹ Emissions for 2024 are the greater of either Well Construction or Cultivation activities since they do not overlap.

² Maximum emissions are shown in bold and reflect the maximum daily emissions from summer or winter from all construction years.

As shown in **Table 3**, the maximum daily criteria pollutant emissions from construction of the proposed Project will be below the SCAQMD daily regional thresholds for all criteria pollutants. Impacts would be less than significant. No mitigation is required.

SCAQMD also developed localized significance thresholds (LST) and methodology (SCAQMD-B) that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts (both short- and long-term). LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). The Project site is located in SRA 28.

According to the LST methodology, only on-site emissions need to be analyzed. Emissions associated with vendor and worker trips are mobile source emissions that occur off site. The emissions analyzed under the LST methodology are NO₂, CO, PM-10, and PM-2.5. SCAQMD has provided LST lookup tables to allow users to readily determine if the daily emissions for proposed construction or operational activities could result in significant localized air quality impacts for projects five acres or smaller. Although the Project site disturbs approximately 52 acres total, consistent with SCAQMD guidance,² the LST for the two-acre site was used. The LST tables can be used as a screening tool to determine if additional modeling would be necessary.

The LST are estimated using the maximum daily disturbed area (in acres) and the distance of the Project to the nearest sensitive receptors (in meters). The closest sensitive receptors to the Project site are existing residences associated with the dairy farms north of the Project site at approximately 40 meters (130 feet) and residences associated with businesses along Warren Road, southwest of the Project site at approximately 130 meters (425 feet). Therefore, a receptor distance of 25 meters (85 feet) was used to ensure a conservative analysis. The results are summarized below:

Table 4 – LST Results for Daily Construction Emissions

Pollutant	Peak Daily Emissions (lb/day)			
	NO _x	CO	PM-10	PM-2.5
LST for 2-acre at 25 meters	234	1,100	7	4
Well Construction	9.97	12.50	0.35	0.33
Paving	2.54	3.07	0.13	0.12
Site Preparation	23.20	20.70	1.03	0.95
License Area Set Up	0.00	0.00	0.00	0.00
Maximum	23.20	20.70	1.03	0.95
Exceeds Threshold?	No	No	No	No

Note: Maximum emissions are shown in bold.

As shown in **Table 4**, all concentrations of pollutants would be below the SCAQMD's short-term LST. Therefore, short-term localized air quality impacts would be less than significant. No mitigation is required.

Long-term emissions are evaluated at build-out of a project. The Project is assumed to be fully operational in 2027. Mobile source emissions refer to on-road motor vehicle emissions generated from the Project's traffic and based on the trip generation derived from the number of expected employees (21) and expected delivery trips for the Project operation, which may include routine fertilizer/and or soil delivery and waste removal, and service of the portable restrooms. Although some of these deliveries may only occur weekly, monthly, or just a few times a year and may not occur on the same day, for modeling purposes, these trips were assumed to occur daily to provide a conservative analysis.

Area source emissions typically include the use of consumer products, residential hearths (fireplaces), yard and landscape maintenance, and an average building square footage to be repainted each year. Energy source emissions are associated with natural gas usage (non-hearth). The Project does not propose

² <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2>

natural gas use. CalEEMod computes area and energy source emissions based upon default factors and land use assumptions. CalEEMod defaults were utilized.

On-site equipment source emissions include any off-road equipment (e.g., forklifts, cranes, loaders, generator sets) used during operational activities on a project site. A small diesel-fueled utility tractor (approximately 33 horsepower in size) is anticipated to be used for soil loading and other site maintenance at the Project site (both the East and West Site). The tractor is anticipated to be used approximately 40 hours per month. For analytical purposes, it is anticipated that a 38 horsepower off-highway tractor would each operate for a maximum time of eight hours per day and 60 days per year.

Maximum daily emissions from Project operation are summarized in **Table 5 – Estimated Maximum Daily Operation Emissions** and compared to the SCAQMD’s daily regional thresholds:

Table 5 – Estimated Maximum Daily Operation Emissions

Source	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Area	0.35	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.56	0.73	6.62	0.02	1.63	0.42
On-Site Equipment	0.13	1.04	1.35	0.00	0.03	0.03
Total	1.04	1.77	7.97	0.02	1.66	0.45
Exceeds Threshold?	No	No	No	No	No	No

Note: Emissions reported as zero are rounded and not necessarily equal to zero. Emissions shown are the greater of either summer or winter.

As shown in **Table 5**, above, the criteria pollutant emissions from operation of this Project will not exceed the SCAQMD regional daily thresholds for any pollutant. The long-term emissions from the Project, as discussed above, are primarily in the form of mobile source emissions from vehicles traveling to and from the site and off-road equipment emissions operating on the Project site, with no stationary sources of emissions present. According to the LST methodology, LSTs only apply to the operational phase if a project includes stationary sources or attracts mobile sources that may spend long periods of time idling at the site, such as warehouse/transfer facilities. The Project does not propose stationary source equipment for operation and the single small utility tractor usage is limited. The proposed water wells will be powered by electricity and emergency generators are not proposed. As such, long-term LST analysis is not required.

In sum, the Project’s short-term and long-term emissions do not exceed the SCAQMD established thresholds of significance on either a regional or localized level. For the reasons stated above, the Project will not result in a cumulatively considerable net increase in criteria pollutant emissions for which the Project region is non-attainment and thus direct, indirect, and cumulative impacts are considered less than significant. No mitigation measures are required.

c) **Less Than Significant Impact.** People most likely to be affected by air pollution, as identified by the SCAQMD, may include children, the elderly, and people with cardiovascular and chronic respiratory diseases. Sensitive receptors may include residences, schools, playgrounds, athletic facilities, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. (SCAQMD-C).

As stated in Threshold 3b, above, the closest sensitive receptors to the Project site are existing residences associated with the dairy farms north of the Project site at approximately 40 meters (130 feet) and residences associated with businesses along Warren Road, southwest of the Project site at approximately 130 meters. As evaluated in Threshold 3b, above, the Project will not result in localized air quality impacts.

Hence, the Project will not expose sensitive receptors to substantial pollutant concentrations and direct, indirect, and cumulative impacts are considered less than significant. No mitigation is required.

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an EIR's air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (cited herein as SCAQMD 2015 and referred to as the "Brief"), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.

The Brief cites the author of the CARB methodology, which reported that a PM-2.5 methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_x or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects (unlike the proposed Project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 pounds (lbs.)/day of NO_x and 89,180 lbs./day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to ozone.

The proposed Project does not generate anywhere near 6,620 lbs/day of NO_x or 89,190 lbs/day of VOC emissions. The proposed Project would generate up to 23.30 lbs/day of NO_x during construction and 1.77 lbs/day of NO_x during operations (less than 0.004% and 0.0003% of 6,620 lbs/day, respectively). Additionally, the proposed Project would also generate a maximum of 2.40 lbs/day of VOC emissions during construction and 1.04 lbs/day of VOC emissions during operations (essentially 0% of 89,190 lbs/day, respectively). Therefore, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Notwithstanding, this analysis does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_x, PM-10, and PM-2.5 by comparing the proposed Project's on-site emissions to the SCAQMD's applicable LST thresholds. As evaluated herein, the proposed Project would not result in emissions that exceeded the SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM-10, and PM-2.5.

d) Less Than Significant Impact. The proposed Project presents the potential for generation of other emissions such as odors in the form of diesel exhaust during construction in the immediate vicinity of the proposed Project site. Odors generated during construction will be short-term and will not result in a long-term odorous impact to the surrounding area.

The California Air Resources Board (CARB) has developed an Air Quality and Land Use Handbook to outline common sources of odor complaints, including sewage treatment plants, landfills, recycling facilities, and petroleum refineries (CARB-B). The Project applicant proposes to operate a cannabis cultivation with on-site composting, which is not included on CARB's list of facilities that are known to be prone to generate odors. The Project will comply with the City's development code §17.435 Cannabis Oriented Businesses and chapter 9.28 of the City's Municipal Code, Regulation of Cannabis Uses, which include provisions

regarding odor. (SJ DC; SJMC). The Project is also subject the SCAQMD Rule 402 (nuisance odors). Through compliance with existing regulations, the Project will not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and direct, indirect, and cumulative impacts are considered less than significant. No mitigation is required.

MITIGATION MEASURES

None required.

4. Biological Resources

Issues: Would the project:	Potentially Significant Impact	Less Than Significant Impact 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 Wildlife 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 Wildlife or U.S. 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?		✓		

This section restates the summarization of the methods and findings of the following study:

- Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report dated July 2024 (Biological Report) conducted by LSA Associates, Inc. (LSA-A). The purpose of the report is to address compliance with MSHCP and the California Environmental Quality Act (CEQA). The report also conducted several focused surveys throughout 2022 and sought to identify any potential jurisdictional waters. The report is included as Appendix 2.0.
- Determination of Biologically Equivalent or Superior Preservation Report dated July 2024 (DBESP), prepared by LSA (LSA-B). The purpose of this report is to document the Project's findings, as required under the MSHCP, that the project design (including mitigation) is biologically equivalent or would have superior preservation to what would have occurred without the Project. The report is included as Appendix 3.0.

DISCUSSION

a) **Less Than Significant Impact with Mitigation Incorporated.** The Project site has been historically subject to active agricultural operations. The construction of hoop-houses on the East Site and the ones proposed for West Site are in keeping with the historical agricultural uses on the site. Limited areas for native habitat occur on the site from past agricultural activities. Little to no native habitats were observed on site during surveys and from historical aerial review. Based on LSA's report, the site has the following vegetation habitat communities: Mulefat scrub (*Baccharis salicifolia*), Goodding's willow woodland (*Salix gooddingii*), mouse barley (*Hordeum murinum*), rescue grass (*Bromus catharticus*), red brome (*Bromus rubens*), wheat (*Triticum aestivum*), slender wild oat (*Avena barbata*), pepperweed (*Lepidium sp.*), smooth tarplant (*Centromadia pungens ssp. laevis*), redstem filaree (*Erodium cicutarium*), summer cypress (*Bassia scoparia*), seaside barley (*Hordeum marinum*), Russian thistle (*Salsola tragus*), London rocket (*Sisymbrium irio*), smooth tarplant, and Burning bush (*Kochia scoparia*).

Plants

A focused MSHCP Plant Species Survey was conducted by LSA in 2022.

The Project site is located within NEPSSA 3 which requires a focused survey for the following plant species if suitable habitat is present: Munz's onion (*Allium munzii*), San Diego Ambrosia (*Ambrosia pumila*), Many-stemmed dudleya (*Dudleya multicaulis*), spreading navarretia (*Navarretia fossalis*), California Orcutt grass (*Orcuttia californica*), and Wright's trichocoronis (*Trichocoronis wrightii var. wrightii*). During LSA's survey, no NEPSSA 3 plant species were observed on the Project site and there are no expected impacts from Project activities on these plant species and no Determination of Biologically Equivalent or Superior Preservation (DBESP) is required for Section 6.1.3 compliance.

During the survey, two additional sensitive plant species were identified: smooth tarplant and Coulter's goldfields (*Lasthenia glabarata ssp. Coulteri*). The Project Site does not fall within an MSHCP survey area for these two species. These species are considered sensitive per California Rare Plant Rank 1B but they are not listed as threatened or endangered on the state or federal level, therefore no CEQA mitigation is necessary. Additionally, impacts to these two species are covered through compliance with the MSHCP, and no Determination of Biologically Equivalent or Superior Preservation, based on the Biological Report, is required because the Project Site was not in a survey area for these species. A full list of the plants observed on the Project site is included as Appendix B of the Biological Report (LSA-A, pp. B-1-B-2).

Animal Species

According to the California Natural Diversity Database (CNDDB), four federal and/or state-listed species have been reported to occur within 3 miles of the Project site: tricolored blackbird (*Agelaius tricolor*), coastal California gnatcatcher (*Polioptila californica californica*), San Bernardino kangaroo rat (*Dipodomys merriami parvus*), and Stephens' Kangaroo Rat (*Dipodomys stephensi*). For all four species, the Biological Report determined that the Project site does not contain any suitable habitat for any of the species.

Burrowing Owl

The Project site is within the MSHCP Section 6.3.2 survey area for burrowing owls (*Athene cunicularia*) and suitable habitat was identified thus, focused breeding season surveys were conducted May 4, 2022, June 9, 2022, July 15, 2022, and August 29, 2022. No owls or signs of their presence (i.e. feathers, pellets, whitewash, and prey remnants) were observed by LSA during the focused surveys, though three burrows which may be suitable for burrowing owl occupation were identified (LSA, Figure 9 – Burrowing Owl Survey Results). Although no signs of burrowing owls were present on site, a pre-construction survey

would be required within 30 days of any ground-disturbing activities on the remaining areas of the West and East Sites. This will be set forth as **MM BIO-1**.

Nesting Birds

On the northern side of the Project site not within the Project boundaries, within an existing detention basin (LSA, Figure 6 – Jurisdictional Delineation Map) there is some riparian habitat present. The habitat present is small and spread out and consists of Goodding’s willow woodland and mulefat scrub with very little overlap between the two species. The riparian habitats associated with the detention basin would be avoided by all Project activities and thus, surveys for riparian birds were not conducted. Additionally, the Project site has been disturbed for many years prior to the development of any hoop- houses. Based on the historical imagery surveyed in the LSA Report, no other riparian habitat was identified on the Project site. Despite there being no presence of nesting birds on-site, a preconstruction nesting bird survey will still be conducted and set forth as **MM BIO-2**.

Fairy Shrimp Invertebrates

The Project site was assessed for the presence of fairy shrimp habitat and it was determined that no listed fairy shrimp habitat is present. LSA conducted a fairy shrimp survey in both the wet and dry season in 2022. The dry season survey was conducted on July 20, 2022, and the samples were processed on August 2 and 6, 2022. The wet season survey was conducted from January 5 to April 11, 2022. Versatile fairy shrimp (*Branchinecta lindahl*) were the only fairy shrimp identified on the Project site, and this species is not listed as threatened, endangered, or sensitive. These fairy shrimps were identified in two wet season surveys within low-lying areas of the Project site. These shrimps were identified to exist outside of existing and proposed hoop-house locations (LSA, Figure 7 – Fairy Shrimp Survey- Features Sampled). During the dry season sampling, *Branchinecta* eggs were also identified in four of the six sampled features during the dry season. A species determination was not able to be made since *Branchinecta* eggs are not differentiated enough to be able to make a species determination. (LSA, p.10). Because no listed fairy shrimp were identified during the wet and dry season fairy shrimp surveys and the areas where non-listed fairy shrimp were found in areas where no hoop-house construction is proposed, impacts are considered less than significant and no mitigation or DBESP is required.

b) **Less Than Significant Impact with mitigation.** As stated above, there is riparian habitat on site related to the detention basin for the regional drainage facilities, referred to as Feature 2 on **Figure 9 – Riparian/Riverine Impacts and Restoration** (LSA-A p.7). This detention basin appears to have been in this location for at least 20 years. Riparian vegetation growing within this basin will not be impacted as part of the Project. No riparian habitat was identifiable from historic aerial photo reviews in the areas where the hoop houses are located now, nor any in Feature 1. Therefore, it is concluded that no riparian habitat will be impacted by the Project.

However, in meetings between LSA and California Department of Fish and Wildlife (CDFW) in the fall of 2023, CDFW identified an additional pond feature within the limits of their jurisdiction in the central portion of the project site. That pond feature is identified as Feature 6 on **Figure 9**. CDFW communicated the limits of the pond feature on six different aerial images (May 2023, March 2011, February 2016, October 2016, February 2018, and August 2018) (LSA-B, p. 8). It should be noted that the pond feature identified by CDFW was not delineated in LSA’s 2022 Jurisdictional Delineation Report.

The construction of the hoop houses on the East Site of the Project have impacted approximately 2.52 acres of the CDFW-identified pond feature. Accordingly, a DBESP was prepared for the Project, and restoration areas were identified (Appendix 3.0). As a result of this acknowledged historical area of

ponding, the applicant will remove the hoop houses from the area of historical ponding. Additionally, Mitigation Measures **MM BIO 3** through **MM BIO 8** shall be implemented in order to reduce this impact to less than significant.

Based on the DBESP, impacts are less than significant related to riparian habitats and no mitigation is necessary. Impacts to CDFW considered sensitive habitats have been mitigated through implementation of **MM BIO 3** through **MM BIO 8**.

c) **Less Than Significant Impact with Mitigation.** The San Jacinto Valley is well known for low lying ponding associated with season rains and flooding as part of the San Jacinto River basin and floodplain. The soils on the site and in the area are alkali soils that can hold pond water easily. The Project site was previously constructed with hoop-houses for the adult flowering plant cultivation and no baseline biological information was collected for the area prior to when the hoop-houses were constructed.

A survey was conducted by LSA on March 16, 2022 to assess the presence of potential vernal pools on the current site with the hoop-houses present on the East Site. The assessment searched for depressions in the land which may provide sufficient ponding of water to sustain hydrophytic vegetation and create hydric soil conditions during the growing season.

The historical aerial review conducted by LSA did not determine there were vernal pools or ponded areas on the Site now, nor within the portion of the site that contains the hoop houses currently.

The project would only impact Features 3, 4, and 5 (see **Figure 9**) due to offsite roadway improvements (driveways) and installation on west side. However, the Project has been designed to avoid Features 1 and 2, including all riparian habitat associated with Feature 2. In addition, Feature 6 was impacted as part of the previous project activities. Therefore, Feature 6 was the only riparian/riverine feature that would be impacted as Features 3–5 are not considered riparian/riverine. Nevertheless, all impacts to jurisdictional waters are noted below in Table C.

In meetings between LSA and California Department of Fish and Wildlife (CDFW) in the fall of 2023, CDFW identified a pond feature within the limits of their jurisdiction in the central portion of the project site (LSA-B, p. 8). That pond feature is identified as Feature 6 on **Figure 9**. CDFW communicated the limits of the pond feature on six different aerial images (May 2023, March 2011, February 2016, October 2016, February 2018, and August 2018). It should be noted that the pond feature identified by CDFW was not delineated in LSA's 2022 Jurisdictional Delineation Report. As a result, the construction of the hoop houses on the East Site of the Project have impacted approximately 2.52 acres of the CDFW-identified pond feature. Accordingly, a DBESP was prepared for the Project and restoration areas were identified (Appendix 3.0). As a result of this acknowledged historical area of ponding, the applicant will remove the hoop houses from the area of historical ponding (See **Figure 9**). Mitigation Measures **MM BIO-3** through **MM BIO-8** shall be implemented to reduce impacts to the ponded areas to **less than significant**.

Additionally, LSA did not identify any other wetlands or riparian/wetland habitat that would be impacted on site during their surveys. Due to the historical aerial reviews and site visits by LSA indicating that no riparian habitat or wetlands are identified on site, impacts are considered less than significant and no mitigation for wetlands or riparian habitat is necessary.

d) **Less Than Significant Impact.** Wildlife corridors connect otherwise isolated pieces of habitat and allow movement or dispersal of plants and animals. Corridors can be local or regional in scale; their functions may vary temporally and spatially based on conditions and species present. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of their daily routine. Animals

use these corridors, which are often hillsides or tributary drainages, to move between different habitats. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations.

The study area is not located within any MSHCP Criteria Cells, and therefore not in any designated Linkages or Constrained Linkages, which are areas within the Plan Area that are identified as having the potential to facilitate wildlife movement. The Project site is bordered by Ramona Expressway to the north, which is a well-traveled, four-lane paved road. The other sides of the Project site are bordered by developed land including agriculture and dairy. Movement throughout and around the Project site is limited due to the fact that the area is frequently disturbed and developed. The closest undeveloped area is approximately 0.8 miles southwest of the Project site. The San Jacinto River is considered an area for wildlife movement and is approximately 1.0 northeast of the Project site (LSA-A, p. 31). Since the study area does not connect two or more large habitat areas, the study area is not considered a regional wildlife corridor. Therefore, impacts would be less than significant.

e) **Less Than Significant Impact.** The City of San Jacinto Municipal Code Chapter 12.20, *Street Trees and Shrubs*, outlines the City's tree planting and street improvement plan and requires authorization for the planting, removal, and replacement of City trees within public parks, public grounds, public streets, and/or parking places. The Project site does not have any trees that would be removed which would conflict with this policy. San Jacinto Development Code (SJDC) Chapter 17.200, *Establishment of Zones, Adoption of Zoning Map*, establishes the City's Open Space General (OSG) and Open Space Recreation (OSR) zones, which are intended to provide open space for active and passive recreational activities and the conservation of natural and scenic resources. The Project involves the continued use of the site as agriculture, which will not conflict with this SJDC Chapter.

SJDC Chapter 17.520, *Natural Resource Conservation*, provides uniform standards for proposed development and new land uses within the City to ensure the protection of important habitat, plant, soil, and water resources. SJDC Section 17.520.030, *Plant and Habitat Conservation*, ensures development projects comply with the applicable terms of the Western Riverside County MSHCP, including, but not limited to, the payment of mitigation fees, narrow endemic surveys, riparian/riverine policy, and other applicable surveys. Additionally, it requires applicants for a discretionary permit for property located in Criteria Area/Criteria Cell(s) as designated in MSHCP to submit a Habitat Evaluation and Acquisition Negotiation Strategy (HANS) application to the Riverside County Environmental Programs Department and subsequently to the Western Riverside Regional Conservation Authority (RCA) for Joint Project Review (JPR). As outlined below, the Project will be consistent with the MSHCP. Therefore, impacts are considered to be less than significant, and no mitigation is required.

f) **Less Than Significant Impact with Mitigation Incorporated.**

The study area is located within the Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP) and the Project applicant is required to pay a Stephens' kangaroo rat mitigation fee for incidental take authorization under the SKRHCP. Other than the SKRHCP and MSHCP, the Project site is not subject to any other adopted Habitat Conservation Plans (HCP) and no additional mitigation is required.

The project was evaluated for consistency with the MSHCP because the City of San Jacinto is a Permittee to the MSHCP. The following aspects of the MSHCP need to be evaluated for projects in the City:

MSHCP Reserve Assembly requirements

The Project site is not located in a Criteria Cell of the MSHCP. Therefore, the Project is not subject to the Reserve Assembly requirements of the MSHCP.

Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)

According to LSA (LSA-B, p. 9-10, there were six features identified and evaluated for Section 6.1.2 resources. Of the six resources, three were determined to meet the definition of MSHCP riparian/riverine resources. The most prominent riparian/riverine feature on the site is identified as Feature 1, which is an ephemeral drainage ditch extending through the middle of the site. Feature 1 is considered riverine, as it has connectivity to the San Jacinto River and conveys ephemeral flows. No riparian vegetation is present in this feature, therefore it's only considered riverine per the MSHCP. The Project will not impact this feature, and therefore, no impacts to this feature will occur as a result of the Project.

Feature 2 is an excavated manmade detention basin located at the northwest portion of the site and detains flows from Feature 1 as well as detains roadside runoff from Ramona Expressway via Feature 4 (not considered MSHCP riparian/riverine LSA-B, p. 10) before the flows are conveyed under Ramona Expressway and ultimately to the San Jacinto River. Feature 2 is identifiable on historic aerial photos and does support riparian habitat. Therefore, Feature 2 is considered MSHCP riparian/riverine. The Project, however, will not impact or change the functions of Feature 2.

Feature 6 is an area that was identified from historical aerial photographs that indicated there were areas of ponding. CDFW also identified this same area as being an area of previous ponding. The hoop houses that were constructed in 2020 are not located on this area of Feature 6, so therefore during the LSA surveys, no actual areas of ponding, vegetation or vernal pool resources were identified in Feature 6. Feature 6 is considered a riverine resource, since it was present in the past, but could not be identified/verified due to current conditions. Therefore, a DBESP has been prepared to mitigate the loss of this historic ponded feature (LSA-B).

No feature on site met the definition of vernal pools or having listed fairy shrimp. According to LSA, the Project site contains fairy shrimp habitat and therefore wet and dry season surveys were conducted in 2022. No listed shrimp were identified during those two protocol surveys (LSA-A, p.11).

LSA determined that there are no vernal pools on the site currently. Historically it is difficult to determine if vernal pools existed in the areas where hoop houses currently exist. As stated above, there was a determination by CDFW that some historical ponded areas were located on site. Therefore, per the DBESP prepared by LSA, the Project will be revised per **MM BIO-3** to remove the existing hoop houses from the site and to conduct biological restoration in the areas that were disturbed by the hoop houses. **Figure 9** shows the area proposed to be rehabilitated and where the hoop houses will be removed. No other areas of the site contain vernal pools, occupied fairy shrimp habitat, riparian or riverine habitats. Therefore, the Project is consistent with Section 6.1.2 of the MSHCP with the incorporation of **MM BIO-3**.

Section 6.1.3 (Protection of Narrow Endemic Plant Species):

The study area is located within a NEPSSA. Surveys were conducted on April 18 and June 16, 2012 by LSA and no NEPSSA plants were observed on the Project site.

Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface)/Construction Guidelines Section 7.5.3

The Project site is not subject to MSHCP Urban/Wildlands Interface requirements because it is not located within or adjacent to an identified Conservation area.

Section 6.3.2 (Additional Survey Needs and Procedures)

The study area is not located in a CASSA, Amphibian Species Survey Area, or Mammal Species Survey Area as outlined in Section 6.3.2 of the MSHCP. Therefore, project impacts to CASSA species or sensitive

amphibian or mammal species are not anticipated. The project is in the survey area for BUOW. The MSHCP requires a habitat assessment and focused surveys if suitable BUOW habitat occurs on the study area. Surveys were conducted by LSA on May 4, June 9, July 15, and August 29, 2022. Based on these focused surveys, no owls or signs of owls were observed on the Project site but three burrows which may be suitable for burrowing owl occupation were identified (LSA-A, Figure 9 – Burrowing Owl Survey Results). Suitable habitat in the form of non-native and ruderal grassland were also present on-site. Although the focused BUOW surveys did not locate any owls or signs of owls on the site or within the survey buffer, a 30-day pre-construction survey is required in accordance with MSHCP requirements (**MM BIO-1**). Therefore, the proposed project would be consistent with Section 6.3.2 of the MSHCP.

Section 6.4 (Fuels Management)

The study area is not adjacent to an MSHCP Conservation Area. Therefore, fuel modification impacts would not extend into a Conservation Area. The project is consistent with Section 6.4 of the MSHCP.

Through compliance with MSHCP as outlined above and as demonstrated in the LSA report (Appendix 2.0), the Project is considered to have less than significant impacts with mitigation incorporated.

MITIGATION MEASURES

- BIO-1** Since the Project has the potential to support burrowing owls inhabiting the site, even though no burrowing owls were identified on the site during the focused surveys, in order to comply with the MSHCP, preconstruction burrowing owl surveys will be conducted. Within 30 days prior to initiating ground disturbing activities, the Project Proponent shall retain a qualified biologist to complete a pre-construction avoidance survey, in accordance with the MSHCP guidelines. If the pre-construction survey is negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further mitigation would be required. If BUOWs have colonized the study area prior to initiation of construction, the Project Proponent shall immediately inform RCA and the wildlife agencies (CDFW and USFWS). A BUOW Protection and Relocation Plan shall be prepared in accordance with CDFW's guidance on burrowing owl protection and relocation prior to initiating ground disturbance.
- BIO-2** Vegetation clearing on the remaining East Site as well as the West Site shall be conducted outside the avian nesting season, which is generally defined as February 1 to August 31. If vegetation clearing must take place during the nesting season, a qualified biologist shall perform a pre-construction Nesting Bird Survey no more than seven (7) days prior to vegetation impacts. Results of the survey shall be submitted to the City for review and approval prior to initiating impacts during the breeding season. If active bird nests are confirmed to be present during the pre-construction survey, the project biologist shall delineate an appropriate buffer between 100 and 300 feet (500 feet for raptors) around each nest. Construction activities within the buffer shall not be permitted until nesting behavior has ceased, nests have failed, or young have fledged. The project biologist may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds.
- BIO-3** The project will compensate for impacts to the historical pond feature (identified as Feature 6 on **Figure 9**) through a combination of on-site restoration and/or off-site conservation. The following tasks are proposed to complete the required compensation:
- A Habitat Management and Monitoring Plan (HMMP) will be prepared for the pond area. The HMMP will identify methods for site rehabilitation and maintenance as well as goals/success criteria to restore the pond. Measures in the HMMP will include:

- Relocation of all structures and roads currently located within the limits of the pond feature to areas outside the limits of the pond.
- Placement of an additional 25 feet buffer to prevent inadvertent intrusion into the pond.
- Recontouring of the pond to re-establish the natural contour of the area to a condition similar to that prior to the installation of roads and structures.
- Trash removal.
- Reseeding of the pond with smooth tarplant and Coulter's goldfields, which are the predominant native species in ponding habitat areas on the site.
- Weed control efforts and performance criteria focused on the most problematic non-native species.
- Biological monitoring and reporting.
- Access control (fencing and signage placement, replacement, and repair)
- Law enforcement measures.
- To compensate for temporal losses of 2.52 acres of CDFW jurisdictional area, the project will mitigate for these impacts at a minimum of a 0.1:1 ratio (0.252 acre) using either or a combination of the options listed below.
 - Option #1: Restore an additional area onsite consistent with and included in the HMMP as discussed above.
 - Options #2: The applicant will purchase credits at an off-site and agency-approved mitigation bank such as Riverpark Mitigation Bank, or other agency-approved mitigation bank.

BIO-4 Prior to site clearing or construction, the applicant will install highly visible exclusionary barriers (e.g., orange construction fencing) along the boundaries of the Project footprint. All construction equipment should be operated in a manner to prevent accidental damage to areas outside the Project footprint. No structure of any kind, or incidental storage of equipment or supplies, will be allowed within these protected zones. Applicant will hire a biological monitor to be present during the fence installation to oversee proper installation.

BIO-5 Applicant will ensure that all equipment maintenance, staging, and dispensing of fuel, oil, or any other such activities will occur in developed or designated non-sensitive upland habitat areas. The designated upland areas will be located in such a manner as to prevent any spill runoff into riverine areas.

- BIO-6** Prior to the completion of construction, the applicant shall ensure that the work areas are returned to their original contours and condition to the greatest extent possible. In addition, the alteration of the CDFW-identified ponding area shall be minimized to the maximum extent possible.
- BIO-7** Prior to construction. Applicant will develop a weed abatement program to minimize the importation of non-native plant material during and after construction. Eradication strategies would be employed should an invasion occur.
- BIO-8** To ensure invasive plant material is not spread from the Project area to other areas by tracking seed on equipment, clothing, and shoes, applicant will ensure that equipment/material imported from an area of invasive plants shall be identified and measures implemented to prevent importation and spreading of non-native plant material within the Project area. All construction equipment accessing unpaved areas shall be cleaned with water to remove dirt, seeds, vegetative material, or other debris that could contain or hold seeds of noxious weeds before arriving to and leaving the Project area. Only certified weed-free straw, mulch, and/or fiber rolls would be used for erosion control.

5. Cultural Resources

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			✓	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			✓	

A Cultural Resources Technical Memorandum was prepared by Applied Earthworks Inc. in July of 2022 (see Appendix 4.0).

DISCUSSION

a) **No impact.** Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or lead agency. Generally, a resource is considered to be “historically significant” if it meets one of the following criteria:

- i. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii. Is associated with the lives of persons important in our past;
- iii. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- iv. Has yielded, or may be likely to yield, information important in prehistory or history.

A *Cultural Resources Technical Memorandum* dated April 22, 2022 was prepared by Applied Earthworks, Inc. (AE-A) and is included as Appendix 4.0 of this IS/MND. The majority of the project site has been disturbed by twentieth-century agricultural and current usage as a new farming facility. According to records search results on file with the Eastern Information Center (EIC), there have been 17 cultural resource searches conducted within an area encompassing a 0.5-mile-wide radius of the proposed Project site (Study Area). Two of the previous study sites overlap with a large portion of the Project site and thus approximately 60 percent of the Project site has been previously surveyed. In addition to the record search with EIC, AE-A also consulted a series of historical maps to assess historical land uses within the Study Area. The previous investigations resulted in the identification of three cultural resources. The findings included one historical resource and two built environment resources. None of these resources are within the Project site. Based on the historical map review, it was also show that there were no historic structures, roads, or other built environment features within the immediate vicinity of the Project site on any of the maps that were consulted.

Additionally, no historical features are noted on any of the reviewed historic topographic maps. As such, there is expected to be a low likelihood of encountering any archaeological resources. Therefore, no impact is expected.

b) **Less Than Significant Impact.** Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. On March 9, 2022, Æ engaged the Eastern Information Center (EIC) of the California Historical Resource Information System, housed at the University of California, Riverside, to complete a literature and records search. The objective of this records search was to determine whether any prehistoric or historical cultural resources have been recorded previously within an area encompassing a 0.5-mile-wide radius of the proposed Project area. The EIC has a record of 17 previously recorded cultural resources surveys within the Study Area. Due to this previous surveying, approximately 60 percent of the Project site had been previously reviewed for cultural resources. Within those surveys, no documented resources or historical features had been previously found within the Project area. As such, it is not expected that any cultural resources are present within the Project site. Based on this, the Project is considered to have less than a significant impact on archaeological resources.

c) **Less Than Significant Impact.** The proposed Project site has been historically used for agriculture. No known cemetery has occurred at this site, so it is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for previously unknown human remains to be discovered at the site during Project construction activities. The Project will be required to comply with Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5(e), and Public Resources Code (PRC) Section 5097.98, which require that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, the City shall halt excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner has been informed and has determined that no investigation of the cause of death is required. If the remains are of Native American origin, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the descendants from the deceased Native Americans have made a recommendation to the landowner or the persons responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98, or the Native American Heritage Commission was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being granted access to the site. With adherence to these existing laws and regulations, impacts with regard to the disturbance of human remains will be less than significant.

MITIGATION MEASURES

None required.

6. Energy

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	

The information below is based on the Project Description as well as the California Energy Commission estimates.

a) **Less Than Significant Impact.** As an agriculture project, the majority of impacts will be short-term from construction and long-term impacts associated with water demand. The Project's short-term construction would last approximately three years and seven months. Project construction would require the use of construction equipment during the first seven months for well construction, site preparation, and paving, as well as construction workers and vendors traveling to and from the Project Site during the entire construction period. Construction equipment requires diesel as the fuel source and construction worker and vendor trips use both gasoline and diesel fuel.

Fuel consumption from on-site heavy-duty construction equipment and construction would be temporary in nature and use a limited number of equipment, which would represent a negligible demand on energy resources. Furthermore, there are no unusual Project site characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the state.

Long-term energy use during operation is typically associated with vehicle usage and energy usage from buildings. The proposed Project would include energy from employee trips and delivery trips, which may include routine fertilizer/and or soil delivery and waste removal, and service of the portable restrooms as well as a limited amount of electricity serving the portable security guard booths, gates, security lighting, office trailers and restrooms. Additionally, a small diesel-fueled utility tractor is anticipated to be used for on-site operations related to soil loading and other site maintenance at the Project site (both the East and West Site). The fuel usage and electricity usage from these uses would be nominal; the Project Applicant has estimated electricity usage to consume approximately 82,344 kilowatt-hours (kWh) per year. The primary source of energy used during Project operations will be from electricity used to pump water from the two agricultural wells. According to the California Energy Commission (CEC), agricultural groundwater pumping is estimated to require approximately 1,140 kilowatt-hours (kWh) of electricity for every one million gallons. (CEC). The estimated 1,140 kWh for one million gallons is less than the energy required for a typical development project in southern California that require 6,807 kWh per million gallons to supply, treat, distribute, and for wastewater treatment (SCAQMD-D). The Project's annual outdoor water demand of approximately 155 million gallons per year was provided by the applicant based on 685 total hoop houses (530 flowering hoops and 155 nursery hoops) each containing 467 plants per each 30-foot by 60-foot hoop-house and different usage rates for summer and winter. Therefore, the Project's estimated electricity consumption is approximately 176 megawatt-hours (MWh) per year. Southern California Edison (SCE) consumed approximately 85 million MWh in 2022, of which approximately 31

million MWh were consumed by the agriculture and water pump sector. Therefore, the Project's electricity use represents a negligible demand on SCE's energy resources. The proposed Project would be required to comply with state and federal energy conservation measures related to construction and operations, as applicable. As such, impacts to obstructing a state or local plan for renewable energy or energy efficiency during construction or operation will be less than significant.

For these reasons, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy during Project construction or operation. Impacts are less than significant. No mitigation is required.

b) **Less Than Significant Impact.** Implementation of the Project will not result in inefficient, unnecessary, or wasteful consumption of energy, as outlined in the response to Threshold 6a. The proposed Project would be required to comply with state and federal energy conservation measures related to construction and operations, as applicable. As such, impacts to obstructing a state or local plan for renewable energy or energy efficiency during construction or operation will be less than significant. No mitigation measures are required.

MITIGATION MEASURES

None required.

7. Geology and Soils

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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 wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			✓	

Inland Foundation Engineering, Inc. (Inland), prepared a Preliminary Geologic and Geotechnical Report dated September 13, 2022 for the proposed project. A Phase I Report was also prepared by R.M. Environmental Inc., dated September 6, 2022. These reports are included as Appendix 5.0 of this Initial Study/ Mitigated Negative Declaration.

DISCUSSION

a) The USDA Web Soil Survey (2022) (USDA) was reviewed to obtain soil survey information of the Project site. The Project site is underlain by Traver fine sandy loam (Tt2), Traver loamy fine sand (Tr2), Traver fine sandy loam (Ts), Chino silt loam (Cg), Grangeville fine sandy loam (CxA; GtA; GvB), Waukena fine sandy loam (Wc), and Chino silt loam (Cf) (Inland, p. 9). Since this Project does not propose any construction or grading, it is not expected that the Project will cause any significant disturbance to the existing state of the soil.

i) **Less Than Significant Impact.** Geomorphically, the subject site is situated within the Lakeview 7.5' Quadrangle. The Project site resides on the San Jacinto – San Jacinto Valley (Casa Loma) fault zone which is a right-lateral, strike-slip fault with a maximum moment magnitude (Mw) earthquake of 7.0 and an associated slip rate of 18 mm/year (see **Figure 10 – Fault Line Map**). Off-site, there are three other fault zones within close proximity to the Project site: The San Jacinto Valley (Claremont) Fault Zone (approximately 3.0 km away); the San Jacinto- Anza (approximately 16.3 km away); and the San Andreas- Southern (approximately 24.3 km away) (Inland, pp. 10-11). Although the project is overlaying a fault zone, the Project does not propose any permanent foundations or buildings nor will there be any permanent residents on-site outside of the proposed operating hours. Therefore, the Project is considered to have less than significant impact and no mitigation is necessary.

ii) **Less Than Significant Impact.** The California Geological Survey broadly groups faults as “Class A” or “Class B”. Class A faults are identified based upon relatively well-defined paleoseismic activity and a fault slip rate of more than 5 millimeters per year (mm/yr). Class B faults are all other faults that are not defined as Class A faults. The San Jacinto Valley Fault runs directly through the proposed Project site and is a right-lateral, strike-slip fault which has an earthquake magnitude of 7.0 and a slip-rate of 18 millimeters/year (Inland, pp. 10-11). Despite the Project being on located on the fault line, there will be no permanent or habitable structures onsite nor will there be anyone inhabiting the site outside of the Project’s business hours. Therefore, the Project is considered to have less than significant impact and no mitigation is necessary.

iii) **Less Than Significant Impact.** According to the Geotechnical Report, the Project site is located in an area that may be subject to liquefaction and it is recommended that liquefaction and seismic settlement analyses be conducted prior to the development of any permanent or habitable structures (Inland, p. 12). However, the Project site will not be using any permanent structures on site nor do any grading which would cause a significant risk for liquefaction. Therefore, impacts are considered less than significant and no mitigation is necessary.

iv) **Less Than Significant Impact.** The site is relatively flat and not surrounded by steep hillsides that would pose a landslide risk. Additionally, according to the Geotechnical Report the Project is not considered to have a risk of landslides due to no large rock outcrops being present at or adjacent to the Project site (Inland, p. 13). Therefore, the Project is considered to have less than significant impact and no mitigation is necessary.

b) **Less Than Significant Impact.** This Project will not be grading or adding any permanent structures to the site. The hoop-houses will be constructed above ground surfaces and will contain planters or sacks that will have a semi-permeable shad cloth beneath them. Additionally, the Project site has been historically disturbed via agricultural usages. The current proposed Project is not proposing to clear or grade any surfaces on the Project site and all agricultural operations will take place above-ground. Therefore, the Project is considered to have less than significant impact and no mitigation is necessary.

c) **Less Than Significant Impact.** See discussions under Thresholds a.iii) and a.iv). The project site is not at risk for landslide, and while the Project is in an area that may be subject to liquefaction, the risk is low due to the fact that there will be no permanent structures onsite. Because of this, the likelihood of onsite lateral spreading, which is the lateral movement of gently to steeply sloping and saturated soils caused by earthquake-induced liquefaction, would be low to remote. The proposed hoop-house structures would not be permanent structures which require any grading or ground-breaking to develop. In addition, the Project site will not be hosting full-time residents, and will only have people onsite during the hours of operation: Monday – Friday, 9:00AM - 5:00PM, and weekends and holidays 9:00AM - 12:00PM . Impacts are less than significant, and no mitigation is required.

d) **Less Than Significant Impact.** The geotechnical analysis (see Appendix 5.0) determined via laboratory expansion index testing that the near-surface soil has a medium to high potential for expansion. This expansion should be considered when constructing concrete slabs or foundations (Inland, p. 14). As mentioned previously, the Project is not proposing the installation of any permanent foundations on-site nor will there be any grading done on-site. Due to this fact, it is expected that the Project will have a less than significant impact on lateral spreading and no mitigation is necessary.

e) **No Impact.** the Project site will not be using any utilities on-site. Portable restrooms will be used around the property and wastewater disposed off-site once a week by a wastewater hauling service. Therefore, the Project will have no impact on septic systems.

f) **Less Than Significant Impact.** Paleontological resources are fossilized remains of past life on earth such as bones, shells, leaves, tracks, burrows, and impressions. Since there will be no ground disturbance or grading, it is expected that the Project activities will not impact unique paleontological features. Therefore, the Project is considered to have less than significant impact and no mitigation is necessary.

MITIGATION MEASURES

None required.

8. Greenhouse Gas Emissions

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse 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?			✓	

Greenhouse gas emissions modeling was prepared using CalEEMod and those results are included as Appendix 1.0.

DISCUSSION

a) **Less Than Significant Impact.** Greenhouse gases (GHG) are evaluated on an annual basis. CEQA Guidelines section 15064.4 addresses the analysis of greenhouse gas emissions, and in doing so states that lead agencies “shall make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions resulting from a project. Several agencies, at various levels, have proposed draft GHG significance thresholds for use in CEQA documents. SCAQMD has been working on GHG thresholds for development projects. In December 2008, the SCAQMD adopted a threshold of 10,000 metric tons per year of carbon dioxide equivalents (MTCO₂E/yr) for stationary source projects where SCAQMD is the lead agency. The most recent draft proposal was in September 2010³ and included screening significance thresholds for residential, commercial, and mixed-use projects at 3,500, 1,400, and 3,000 MTCO₂E/yr, respectively. Alternatively, a lead agency has the option to use 3,000 MTCO₂E/yr as a threshold for all non-industrial projects. Although both options are recommended by SCAQMD, a lead agency is advised to use only one option and to use it consistently. The Project is agricultural and does not fit into any of the listed categories; however, the threshold utilized herein is the 3,000 MTCO₂E/ yr threshold for non-industrial projects.

As stated above, the Project’s emissions were modeled using the CalEEMod program, version 2022.1(Appendix 1.0) and the results are summarized below.

GHG emissions from Project construction were estimated in CalEEMod using the assumptions outlined in Threshold 3b and result from fuel usage by construction equipment and construction-related activities, like construction worker trips. The construction emissions were amortized over an expected project life of 30 years, as recommended by SCAQMD. (SCAQMD-E)

Long-term GHG emissions are associated with area sources, energy-related sources, mobile sources, solid waste, on-site equipment, and water related sources. The proposed Project does not include typical area sources such as landscape equipment emissions, architectural coating, and hearths. Electricity usage will be

³ [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2)

minimal from the portable offices, restrooms, guard booths, gates, and security lighting and was estimated by the Project Applicant to consume approximately 82,344.00 kilowatt-hours (kWh) per year. The proposed hoop-houses are the primary use and do not require electricity. The Project also will not include natural gas use. The mobile source emissions were based on the expected number of employees (21) and expected delivery trips for the Project operation, which may include routine fertilizer/and or soil delivery and waste removal, and service of the portable restrooms. Although some of these deliveries may only occur weekly, monthly, or just a few times a year, for modeling purposes, these trips were assumed to occur daily to provide a conservative analysis. Project operations is also anticipated to utilize a small diesel-fueled utility tractor for soil loading and other site maintenance at the Project site (both the East and West Site). The tractor is anticipated to be used approximately 40 hours per month. For analytical purposes, it is anticipated that a 38 horsepower off-highway tractor would each operate for a maximum time of eight hours per day and 60 days per year. The Project is not expected to generate a substantial amount of solid waste to be disposed in landfills because green waste composting is proposed on site for reuse, allowing organic material on site to break down aerobically and reducing the amount of waste disposed in landfills. The Project's GHG emissions will also result from indirect electricity used to pump water from the two agricultural wells. The proposed Project does not require the typical processes to supply potable water to urban users because it includes portable restrooms that use a limited amount of water service. The proposed hoop-houses will be served by non-potable agriculture well water on-site. The energy intensity factor associated with the supply of agriculture water was changed to 1,140 kWh per million gallons per data provided by the California Energy Commission (CEC). The annual outdoor water demand of approximately 155 million gallons per year was provided by the Applicant based on 467 plants per hoop-house and different usage rates for summer and winter.

As shown in **Table 6 – Total Project-Related GHG Emissions**, using all the emissions sources described above, the total GHG emissions generated from the Project is approximately 367.52 MTCO₂E/yr which includes construction-related emissions amortized over a typical project life of 30 years.

Table 6 – Total Project-Related GHG Emissions

Source	Metric Tons per year (MT/yr)				
	CO ₂	CH ₄	N ₂ O	R	Total CO ₂ E
Amortized Construction	--	--	--	--	27.90
Area	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	13.00
Mobile	290.00	0.01	0.01	0.42	294.00
Solid Waste	0.00	0.00	0.00	0.00	0.00
Water	27.70	0.00	0.00	0.00	27.90
On-Site Equipment	4.70	0.00	0.00	0.00	4.72
Total	315.92	0.01	0.01	0.42	367.52

As demonstrated by **Table 6**, the Project would not exceed the SCAQMD's screening threshold of 3,000 MTCO₂E/yr. As such, Project-related emissions would have a less than significant direct or indirect impact on GHG emissions and no mitigation measures are required.

b) **Less Than Significant Impact.** In addition to SCAG's thresholds as outlined above, several regulations currently exist related to GHG emissions, predominantly Assembly Bill (AB) 32, Executive Order S-3-05, and Senate Bill (SB) 32. AB 32 required that Statewide GHG emissions be reduced to 1990 levels by 2020. Executive Order S-3-05 established the GHG emission reduction target for the State to reduce to the 2000 level by 2010, the 1990 level by 2020 (AB 32), 40 percent below the 1990 level by 2030, and to 80 percent below the 1990 level by 2050 (SB 32). As the proposed Project involves the construction and operation of an outdoor cannabis cultivation facility, it is not considered a significant source of GHG emissions. Indeed, the total GHG emissions expected to be generated from the Project is approximately 367.52 MTCO₂E/yr, far below SCAQMD's screening threshold of 3,000 MTCO₂E/yr. Therefore, the Project will not conflict with any applicable plan, policy, or regulation for the reduction in GHG emissions. Impacts are considered to be less than significant. No mitigation is required.

MITIGATION MEASURES

None required.

9. Hazards and Hazardous Materials

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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 § 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?			✓	

A Phase I Environmental Site Assessment (ESA) was prepared by RM Environmental, Inc. (RME). on September 6, 2022. The entire Phase I ESA can be found in **Appendix 6.0**.

DISCUSSION

a-b) **Less Than Significant Impact** The proposed land uses are consistent with the allowable land uses for the current designated Land Use under the General Plan and consistent with the allowable agricultural land uses under the City's current zoning.

The proposed project is required to comply with all applicable local, state, and federal regulations during project construction and operation. The Riverside County Department of Environmental Health is the Certified Unified Program Agency (CUPA) for Riverside County and is responsible for consolidating, coordinating, and making consistent the administrative requirements, permits, inspections, and

enforcement activities of state standards regarding the transportation, use, and disposal of hazardous materials in Riverside County, including San Jacinto.

The construction and operation of the hoop-houses on site are not expected to use of hazardous materials or substances. Pesticides used for plant cultivation will be safely stored within hoop-houses designated for pesticide storage (see **Figure 11 – Hoop-House Locations**). Pesticides will be stored and handled pursuant to all local, state, and federal guidelines and best practices. Therefore, impacts are considered to be less than significant impact and no mitigation is required.

c) **Less Than Significant Impact.** There are no schools within 0.25-mile of the project site. The closest school is Megan Cope Elementary School which is about 2.4 miles away. Construction and operation of the proposed project would not generate hazardous emissions or require the handling of acutely hazardous materials, substances, or waste. Therefore, the proposed project would result in a less than significant impact and no mitigation is required.

d) **Less Than Significant Impact.** A Phase I ESA was prepared for the Project (see Appendix 6.0). The Phase I ESA was performed in general accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) Phase I ESA Standard E1527-21 (equivalent to the US Environmental Protection Agency's All Appropriate Inquiry [AAI] Standard) and All Appropriate Inquiry Standards found at 40 C.F.R. Part 312. Based upon the site reconnaissance, historical review, regulatory records review, and other information in the report, there was no evidence of recognized environmental conditions, including under- and above-ground storage tanks, organochlorine pesticides, or other hazardous waste in connection with the Project site (see Appendix 6.0).

The subject site is not listed on the reviewed databases dealing with hazardous material/waste generation, storage, and disposal. The subject site has also not been listed as a cleanup site by agencies such as the United States Environmental Protection Agency (USEPA), Department of Toxic Substance Control (DTSC), or the Regional Water Quality Control Board (RWQCB). The EDR report databases were cross checked with Geotracker, a publicly available online resource for properties under environmental review. The site was not listed on the Geotracker database. Properties in the nearby vicinity of the subject site were listed on databases searched in the EDR report. Based on the database review performed in the Phase I ESA, no evidence of recognized environmental conditions in relation to the Project site were identified and impacts related to being on a site with previous contamination are considered to be less than significant and no mitigation is required.

e) **Less Than Significant Impact.** There are no airports within the City and the closest airport is the Hemet-Ryan Airport which is located approximately seven miles south of the City. Additionally, according to the Airport Land Use Compatibility Plan, the city of San Jacinto is not located within an Airport Influence Area (GP EIR, p. 5.9-34). Therefore, the proposed project would result in less than significant impact and no mitigation is necessary.

f) **Less Than Significant Impact.** The Project does not propose any permanent structures on-site nor will the development of the Project hinder access from Ramona Expressway. One driveway will be located on the West Site and one driveway will serve the East Site. Both left and right turns are expected. There will 21 employees on-site daily who will be commuting to and from the Project site daily. The GP Update includes policies which seek to ensure that there is adequate fire protection and emergency services to all parts of the City, including new development areas. (GP EIR, p. 5.15-16). Per Policy PS 5.7 of the GP Update, the City shall work with Riverside County Sheriff's Department (RCSD) to maintain, update, and regularly exercise emergency access routes within the City. These routes are also to be assessed for their effectiveness under different emergency scenarios (GP EIR, p. 5.9-16). The Project site will comply with all

emergency routes designated by RCSD and it is not expected that utilization of Ramona Expressway for project access will negatively impact evacuation routes. Therefore, impacts are expected to be less than significant.

g) **Less Than Significant Impact.** According to Figure PS-2, Fire Hazard Severity Zones located within the San Jacinto General Plan Update, the Project site is not located within a fire hazard zone on neither State Responsibility Area nor Local Responsibility Area (SJGP, p. PS-27). Additionally, the Project site will not have any permanent residents who will remain on-site outside of business hours. Therefore, the impacts are considered less than significant and no mitigation is necessary.

MITIGATION MEASURES

None.

10. Hydrology and Water Quality

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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 a 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 offsite;			✓	
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?			✓	

DISCUSSION

a) **Less Than Significant Impact.** Water will be generated on site and discharged on site. The proposed Project will require water for irrigation of the plant cultivation and the source is expected to be local groundwater produced from two new onsite wells (see **Figure 7- Proposed Well and Water Tank Locations**). The Project site will be reliant on two on-site wells which will be used for agricultural and fire-suppression purposes. The Project site has historically been used for agriculture and the proposed usage for this Project is also agriculture. Plants will not be directly cultivated in the soil, but rather within above-ground planter boxes which will reside within the hoop-houses on-site. No water treatment is expected and any runoff from irrigation will seep into the ground at the source; over-watering and excess runoff will be controlled by the operators to ensure the most efficient use of the water for the crops. Groundwater quality is not expected to be impacted since over irrigation will be minimized. Additionally, the State Water Resources Control Board (SWRCB) has a Cannabis Cultivation Policy which sets forth policies and best practices to ensure that the diversion of water and discharge of waste associated with cannabis cultivation does not have any negative impacts on water quality, aquatic habitats, riparian habitats, wetlands, or springs (SWRCB, p. 6). The Project will additionally be compliant with the guidelines set forth by the SWRCB. Therefore, water quality standards will not be affected. Impacts are considered less than significant, and no mitigation is necessary.

b) **Less Than Significant Impact.** The Project site has historically been used for agriculture and reportedly one on-site well provided irrigation water from local groundwater for the site operations. The Project also includes the continued use of the site for agricultural operation and also proposes to utilize groundwater for irrigation. The proposed Project will require water for plant cultivation and the source is expected to be local groundwater produced from onsite wells (see **Figure 7- Proposed Well and Water Tank Locations**). The site already has two partially constructed wells on-site. The Project site will not be under the jurisdiction of any local Watermaster agreements or local water districts. The two on-site wells have an estimated yield of 300 gallons/minute which will be used to supply water for cultivation operations. The Well Completion Report is attached as Appendix 6.0 to this IS/MND.

The site will not be paved, and underneath the hoop-houses will be open to the ground for any runoff from irrigation to percolate back into the ground. Although the site has not been used officially for groundwater recharge in the past, the proposed Project will not impede the use of the site for groundwater recharge. The majority of the site will be unpaved and mostly permeable. Although there is limited paving associated with driveway approaches to the site, these would not reduce groundwater recharge potential for the site.

Therefore, it is expected that impacts will be less than significant.

c)

i, ii) **Less Than Significant Impact.** The Project applicant does not propose any permanent foundations or grading for construction, nor will the Project site be utilizing or installing any utilities. There is an existing man-made drainage feature that bisects the Project site. The proposed hoop-houses will not affect this drainage; no vehicle crossings and no utilities are planned to connect to this drainage feature. Irrigation run off is planned to be controlled and reduced through measured watering. Rainfall will still be able to percolate into the ground naturally. Because of this, the Project will not be altering any existing drainages or storm drains on-site, this impact is less than significant.

iii) **Less Than Significant Impact.** As previously mentioned, the Project site has historically been used for agricultural and the Project similarly will be used for agricultural purposes. The Project will not utilize the drainage feature on the Project site for operational drainage. Runoff from the site may

enter the drainage as it does in the current condition naturally during higher storm events and the drainage on site will continue to convey flows from upstream properties through the site north to the San Jacinto River. Therefore, it is expected that impacts will be less than significant.

iv). **Less Than Significant Impact.** The Project site is not expected to alter or redirect any existing drainage patterns on-site, nor is it expected to have any potential irrigation run-off be channeled into any existing on-site drainages. Run-off from cultivation is expected to fall directly below planter boxes and the planter boxes will not be overlaying any on-site drainages.

The Project site is designated by the Federal Emergency Management Agency (FEMA) as being within a 100-year flood zone (SJDP, p. PS-29). Flows currently coming onto the Project site will continue to convey flows into the drainage feature through the middle of the site. Thus, the Project is expected to have less than significant impact and no mitigation is necessary.

d) **Less Than Significant Impact.** The Project site is designated by the Federal Emergency Management Agency (FEMA) as being within a 100-year storm event flood zone (SJDP, p. PS-29). However, the Project site is not in an area that is subject to seiche, mudflow, or tsunami due to the absence of any nearby bodies of water and mud/debris channels. The hoop-houses and planter boxes will not overlay any on-site drainages and the run-off from irrigation is not expected to channel into a single flow, but rather directly beneath each planter box. Therefore, impacts are considered to be less than significant and no mitigation is necessary.

e) **Less Than Significant Impact.** The proposed Project will require water for plant cultivation and the source is expected to be local groundwater produced from onsite wells (see **Figure 7- Proposed Well and Water Tank Locations**). The Project is located within a Management Area of the Hemet- San Jacinto Ground Water Basin. The Hemet-San Jacinto Groundwater Basin is an adjudicated basin according to the Stipulated Judgment which was entered into the Superior Court of the State of California for the County of Riverside for Eastern Municipal Water District v. City of Hemet, et al. (Case Number RIC 1207274) in April 2013 (“Judgment”). The purpose of the Judgment is to manage groundwater usage. The Judgment appointed a Hemet-San Jacinto Watermaster as the governing body for the Management Area which include the Project site. Within this Basin, the Project site is located within the Hemet North and San Jacinto Upper Pressure Management Areas (see **Figure 8 – Watermaster Management Areas**), which are both a part of the Stipulated Judgment.

The Watermaster prepares an annual report to document estimated groundwater supplies and projected demands for the Management Area. This report includes the Safe Yield which is the “long term, average quantity of water supply in the Management Area that can be pumped without causing undesirable results, including the gradual reduction of natural Groundwater in storage over long-term hydrologic cycles” (Stipulated Judgment, p. 11). Within the most recent Annual Report prepared by the Watermaster in 2020, it was estimated that the groundwater Safe Yield for the Management Area is approximately 45,000-acre feet per year (AFY) with an estimated long-term basin Overdraft to be approximately 10,000 AFY (Hemet/San Jacinto Groundwater Management Area 2020 Annual Report, pp. 5-6). Overdraft is defined as a condition where pumping in the Management Area exceeds the Safe Yield (Stipulated Judgment, p. 9). Groundwater production from water suppliers and private pumpers in the San Jacinto Upper Pressure Area in 2020 totaled approximately 21,383 AF, and production from the Hemet North Area was 2,263 AF (Annual Report, p. 13). Of these totals, private pumpers like the proposed Project made up approximately 26 percent (10,542 AF) of the total groundwater production during the year (40,323 AF) (Annual Report, p. 27).

The Judgment states that Private Pumpers (i.e., a Person who owns land with an Overlying Right or other right in the Management Area and pumps more than 25 acre-feet per year. Private Pumper includes New Pumpers (p. 10)) may choose to opt into the Watermaster's Water Management Plan or choose to be a Non-Participant (Stipulated Judgment, p. 17). The Project applicant will be electing to be a Non-Participant, which is defined by the Stipulated Judgment as, "a Private Pumper who elects not to participate in the [Water] Management Plan, or to be a Party to this Judgment" (p. 9). The Water Management Plan is, "the plan adopted by the Watermaster, as it may be modified from time to time, to implement the Physical Solution, to ensure adequate and reliable source of future water supply for the Management Area, and to protect the prior rights of the Soboba Tribe" (p. 12). As stated in the Stipulated Judgment, "A Private Pumper can elect not to participate in the Water Management Plan and not to formally acknowledge its existence...Non-Participants shall continue to exercise whatever water rights they may hold under California law unaffected by the [Water Management] Plan. However, the Parties do not waive their rights to challenge any new or expanded use of water or water rights. Non-Participants will not have the option of intervening as a Party under the Judgment at a later date" (p. 17). The "Parties" include EMWD, Lake Hemet Municipal Water District, City of Hemet, City of San Jacinto, and the other Persons listed in Exhibit B to the Stipulated Judgment (p. 10). The Project proposes to drill and equip two onsite groundwater wells to satisfy the irrigation water demand of the Project. These new irrigation wells will serve the Project's East and West sites (see **Figure 2 – Aerial Map**). The Project applicant has applied for a permit with the Riverside County Department of Environmental Health. According to the Project's State of California Well Completion Report, the two irrigation wells are expected to produce 300 gallons per minute (see Appendix 8.0). Because the Project applicant has chosen to be a Non-Participant to the Water Management Plan, then the Project applicant will not participate in the Hemet-San Jacinto Watermaster's Groundwater Monitoring Program.

The Project includes two types of hoop-houses on site which will be used for cultivation purposes, the Typical Plastic Film Hoop-House (Typical Hoop-House) and the Typical Immature/Nursery Plastic Film Hoop-House (Nursery Hoop-House). (**Figure 11 – Hoop-House Locations**). There are 530 Typical Hoop-Houses and 155 Nursery Hoop-Houses proposed for the Project site covering both the East Site and West Site. Each Hoop-House will host approximately 523 plants. For the Typical Hoop-houses, it is estimated that 2 gallons of water per plant per day will be required. For the Nursery Hoop-Houses, the water demand is expected to be half of the Typical Hoop-Houses, with the requirement being 1 gallon of water per plant per day. This water demand estimate is the water demand that is expected for the warmer, summer season. In the winter, it is expected that each of these water requirements will be approximately half of the summer demand. However, this analysis assumes that the summer demand will be used for the entire year in order to make a conservative estimate of the overall water demand of the Project site. Based on the assumptions stated here, the annual water demand for the Typical Hoop-Houses is estimated to be 180.5 million gallons per year (622 AFY) and the annual water demand for the Nursery Hoop-Houses is 26.4 million gallons per year (92 AFY) for a total of 207 million gallons per year (635 AFY). These calculations are included as Appendix 7.0. Therefore, since the Project is afforded the ability to be a Non-Participant per the Stipulated Judgment which manages the groundwater usage in the Project area, and since new wells will be providing irrigation water to ongoing agricultural uses already allowed and occurring in the managed groundwater basin, impacts are considered less than significant, and no mitigation is required.

MITIGATION MEASURES

None required.

11. Land Use and Planning

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?				✓

DISCUSSION

a) **No Impact.** The Project site is vacant and partially developed with existing hoop-houses on the East Site. The surrounding areas are a mixture of existing agricultural operations and rural residential uses. There are no communities on the site or surrounding the site that would be physically divided by the Project. As a result, the proposed Project will have no impact on physically dividing an established community and no mitigation measures are necessary.

b) **No Impact.** The existing agricultural use on the site is not being changed by the operation of the Project. The Project site is located within a land use designated area of Commercial (C) and a zoning area of Commercial Regional. The proposed project is consistent with both zoning ordinance and land use designations assigned by the General Plan. The Project otherwise would not conflict with any goals, objectives, policies, or regulations of land use and planning documents applicable to the Project area which have been adopted to avoid an environmental impact. The City is also a permittee to the MSHCP which is another plan adopted to avoid or minimize environmental affects to species. See Biological Resources section (f) above for the Project's consistency with the MSHCP. Therefore, since the project is consistent with the City's land use plans for the site, impacts are considered less than significant, and no mitigation is necessary.

MITIGATION MEASURES

None required.

12. Mineral Resources

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?				✓

DISCUSSION

a) **No Impact.** The Surface Mining and Reclamation Act of 1975 (SMARA) classification systems uses 4 categories; MRZ-1 refers to areas where adequate geological information indicated that there are no significant mineral deposits present or where it is judged that mineral deposits are unlikely to exist. MRZ-2 refers to areas where geological data indicates that significant measured, indicated, or inferred mineral resources are present. MRZ-3 refers to areas containing known or inferred mineral resources deposits that may qualify as mineral resources and MRZ-4 refers to areas where geological information does not rule out either the presence or absence of mineral resources. (GPEIR, p. 5.12-1.) The City of San Jacinto is entirely classified as MRZ-3. As mentioned above, MRZ-3 indicates that the significance of the mineral deposits is undetermined. (GPEIR, p. 5.12-3.) No subsurface disturbance is proposed by the Project since the ongoing agricultural uses will be above ground in hoop-houses with the plants elevated off the ground in planter boxes or sacks. Therefore, because there is no disturbance proposed to the ground and there are no known mineral resources within the Project site, no impacts are anticipated, and no mitigation is necessary.

b) **No Impact.** As mentioned in *Threshold 12 a*, above, there are no known mineral resources within the City of San Jacinto. Additionally *Figure 5.12-1 Mineral Resource Zone* in the General Plan EIR, doesn't contain any "locally important mineral resource recovery sites." (GPEIR, p. 5.12-3.) Therefore, Project implementation would not result in the loss of locally- important mineral resources recovery sites. As a result, no impacts would occur, and no mitigation is necessary.

MITIGATION MEASURES

None required.

13. Noise

Issues, would the project result in:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan 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?				✓

DISCUSSION

a) **Less Than Significant Impact.**

Construction

The construction activities for the project include well construction, site preparation, and paving. The Project does not propose any permanent foundations or grading.

City of San Jacinto has established specific construction activity noise regulations in Municipal Code (MC) Section 8.40.90. (SJMC). According to the MC construction activities are limited to Monday through Saturday from 7:00 A.M. to 7:00 P.M. Therefore, no construction activities shall occur on Sundays nor holidays. (SJMC) Sensitive receptors are located southwest from the Project site; these are single homes associated with agricultural properties. Project construction is temporary and would not include the use of heavy machinery to move earth or make significant changes to the landform which would generate significant noise from equipment. The hoop house construction is expected to take a few months and there are no homes directly adjacent to the site. Therefore, compliance to specified construction hours, stated above, Project construction noise levels would considered less than significant.

Operation

As previously stated, the Project site would be used for agricultural purposes. The Project applicant is proposing 52.18 acres as cultivation area of the total 57 acres. The nearest sensitive receptors are located approximately 1.70 miles southwest from the Project site. Nonetheless, the City of San Jacinto has ordinances designated for land use type, as shown below in **Table 6 - Allowable Exterior Noise Level**.

Table 6 – Allowable Exterior Noise Level

Noise Zone	Type of Land Use	Allowed Equivalent Noise Level, L_{eq}	
		7:00 A.M. to 10:00 P.M.	10:00 P.M. to 7:00 A.M.
I	Single-Family Residential	65 dBA	45 dBA
II	Multifamily Residential, Mobile Home Parks	65 dBA	50 dBA
III	Commercial Property	65 dBA	60 dBA
IV	Residential Portion of Mixed Use	70 dBA	70 dBA
V	Manufacturing and Industrial, Other Uses	70 dBA	70 dBA

Source: San Jacinto MC Section 8.40.040

Based on **Table 17**, the Project will be considered Zone III, with the allowable noise level of 65 dBA during daytime hours and 60 dBA during nighttime hours. However, per MC Section 8.40.060 (F) the following activities are exempt from the Allowable Exterior Noise Levels shown in **Table 17**.

8.40.060 – Exemptions

The following activities shall be exempted from the provisions of this chapter:

(F) – All mechanical devices, apparatus or equipment associated with agriculture operations; provided, that:

1. Operations do not take place between eight p.m. and seven a.m. on weekdays, including Saturday, or at any time on Sunday or a federal holiday, or
2. Such operations and equipment are utilized for the protection or salvage of agricultural crops during periods of potential or actual frost damage or other adverse weather conditions, or
3. Such operations and equipment are associated with agricultural pest control through pesticide application, provided the application is made in accordance with permits issued by or regulations enforced by the California Department of Agriculture;

A small diesel-fueled utility tractor (approximately 33 horsepower in size) is anticipated to be used for soil loading and other site maintenance at the Project Site. While this agricultural equipment could generate an increase in noise level, use of mechanical devices associated with agricultural operations are exempt from noise levels under the specific conditions stated above. Furthermore, the Project site has previously been used for agricultural purposes, the Project applicant intends to continue using the site for agricultural purposes.

Therefore, compliance with MC Sections 8.40.090 and 8.40.060 (F) would ensure construction and operational noise level impacts would be considered less than significant.

b) Less Than Significant Impact.

Ground borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance (FTA, p. 182). The Project site does not propose any ground-breaking activities or grading for the purposes of construction. The site has been historically used for agriculture and will continue to operate as an agricultural site. It is not expected that the construction nor the operation of the Project site will generate any excessive noise. Therefore, impacts are considered to be less than significant and no mitigation is required.

c) **No Impact.** The City of San Jacinto is not located within any adopted airport land use plan, there are no private airstrips in the vicinity of the City, and there are no public airports located within two miles of the City. (GPEIR, p.5.13-47.) Therefore, the proposed project would not expose people residing or working in the area to excessive noise levels. Therefore, no impacts are anticipated.

MITIGATION MEASURES

None.

14. Population and Housing

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	

DISCUSSION

a) **Less than significant.** The proposed Project is to allow for the continued use of the site for agriculture which is meant to be utilized for the Property owner's production and yield of flower crops. The Project area is surrounded by other agricultural land along with rural residential. The Project does not propose to build any new homes; therefore the Project would not have any impact on population growth within the area. The proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. Once the Project is constructed, it is expected to maintain 21 full-time employees year-round. However, it is anticipated that the majority of new jobs would be filled by workers who already reside in the general Project vicinity and that the Project would not attract a significant number of new residents to the City and, therefore, create a substantial demand for new housing in the City. For this reason, impacts are considered less than significant and no mitigation measures are necessary.

b) **Less than significant.** The Project site has been and will continue to be used for agriculture, not residential uses. Based on aerial historic photographs, the Project site has been used as agricultural land for the past several decades and is currently being developed again for crop production. Consequently, there will not be any construction needed for replacement of housing elsewhere. There will not be any substantial numbers of people displaced. Impacts are considered less than significant and no mitigation measures are necessary.

MITIGATION MEASURES

None required.

15. Public Services

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a) Fire protection?			✓	
b) Police protection?			✓	
c) Schools?			✓	
d) Parks?			✓	
e) Other public facilities?			✓	

DISCUSSION

a) **Less Than Significant Impact.** The Riverside County Fire Department (RCFD) provides fire protection and safety services to the City of San Jacinto. (GPEIR, p. 5.20-3.) The City's fire service is provided by two fire stations located within the city. RCFD Fire Station 78 (San Jacinto Station 78) located at 2450 Cottonwood Avenue, approximately 2.5 miles southeast from the Project site. RCFD Fire Station 25 (San Jacinto Station 25) located at 132 S. San Jacinto Avenue, approximately 4.64 miles southeast of the Project site. (SJRCF) (GPEIR, p. 5.20-3.) As previously mentioned, the Project consists of agricultural operations, which coincides with previous uses. Since this site has previously been serviced by RCFD and will continue to receive services from RCFD no new changes will substantially impact facilities or service ratios from the RCFD. Nonetheless, the Project applicant will be required to pay development impact fees, per General Plan Resource Management Action, Action RM-6f. Based on Action RM-6f, future developers will contribute funds for fire services through the adopted developer fees. (GPEIR, p. 5.15-20.) The proposed Project is not expected to result in activities that create unusual or excessive fire protection needs. During the entitlement process, the Project is also reviewed by the Riverside County Fire Department to ensure there are no excessive fire risks or hazards. As such, through compliance with Action RM-6Ff impacts related to fire protection are considered less than significant and no mitigation is necessary.

b) **Less Than Significant Impact.** The City of San Jacinto contracts with the Riverside County Sheriff Department (RCSD) for law enforcement services. The City's police services contract consists of 39 personnel assigned to general law enforcement patrol services, a traffic enforcement team, a special enforcement team, investigations, and a police K9 unit. (GPEIR, pp. 5.15-3 – 5.15-4.) The nearest police department facility is located at 160 W 6th St in San Jacinto, approximately 4.5-miles southeast of the project site. As mentioned in *Threshold 15a*, above, the Project applicant proposes to use the site for agricultural purpose, which coincides with previous uses. However, the Project will consist of 21 full time employees. Therefore, the proposed population growth is minimal. Additionally, the Project site has been previously serviced by RCSD and will continue to be serviced by RCSD. Since the Project is consistent with previous uses, Project implementation is not anticipated to cause substantial impacts to facilities or

service ratios. Nonetheless, the project applicant is required to pay standard development impact fees, per General Plan Resource Management Action, Action RM-6a. Future developers will contribute funds for police services through the adopted developer fees. (GPEIR, p. 5.15-23.) It is not expected that the Project will cause an increased need in police protection. Therefore, this impact related to police protection is considered less than significant.

c) **Less Than Significant Impact.** The Project site is located within the San Jacinto Unified School District (SJUSD) boundary. (USD-B) The Project site is served by Megan Cope Elementary School, Monte Vista Middle School, and San Jacinto High School. (USD-A) However, the Project proposes to use the site for agricultural uses. As previously mentioned, the Project consists of 21 full-time employees per shift. Given the low numbers of employees needed for the site, no new or physically altered school facilities will be needed as a result of the Project. Therefore, with payment of school fees, impacts related to schools is considered less than significant.

d) **Less Than Significant Impact.** The City of San Jacinto owns and manages 36 public parks with a combined acreage of over 170 acres: Aaron Ward Park, Almaden Park, Belicia Park, Bolander Park, Catalpa Park, Colonel Lewis Millett Park, Cutting Park, Daniel Neajera Park, Druding Park, Durango Park, Francisco Estudilo Heritage Park, Hafliger Park, Haugen Park, Hoffman Park, Lynden Trail Park, Mistletoe Park, Parkside Village, Pocket Parks at the Cove, Potter Ranch Park, Rancho San Jacinto Parks, RSI Park, Sagecrest Parks, Sallee Park, San Jacinto River Park, Caseros Park, Sandalwood Park, Skyview Park, Soboba Springs Park, Solana II Park, Stallions Crossings Park, Tamarisk Park, Terrazzo Park, Ward Park and Warneke Park. (GPEIR, pp. 5.16-1 – 5.16-4). The City has established a parkland standard of five acres per 1,000 residents as explained in General Plan Resource Management Action, RM-7a. (GP, p. RM-20.) However, the Project would employ 21 full-time employees per shift. It is anticipated that these positions would be filled by workers who already reside in the area. Additionally, the City of San Jacinto does not require developmental fees toward park and open space facilities, for non-retail commercial use sites. Therefore, the proposed Project would not introduce a substantial additional population that would create a demand on public parks, as the Project is intended for agricultural uses. Project impacts to parks is considered less than significant.

e) **Less Than Significant Impact.** The City of San Jacinto has one public library, San Jacinto Public Library (SJPL) located at 595 S. San Jacinto Avenue, approximately 4.85 miles southeast of the Project site. (SJLS) The SJPL has been operated by the Riverside County Library Systems and Services. (GPEIR, p. 5.15-8.) The Project will not generate a substantial increase in population, as it will provide 21 full-time employees who will work per shift, annually. It is anticipated that these positions will be filled by works already residing in the area, therefore not creating a substantial population growth. Additionally, the Project site has previously been used for agricultural uses and is proposed to continue to be used for agricultural purposes. The Project is not expected to result in activities that create unusual demands on other public facilities; impacts are less than significant.

MITIGATION MEASURES

None required.

16. Recreation

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	

DISCUSSION

a) **Less than Significant.** As mentioned in *Threshold 15d*, the City of San Jacinto manages 36 public parks, and has a parkland standard of five acres per 1,000 residents. (GPEIR, pp. 5.16-1 – 5.16-4, GP, p. RM-20.) However, the Project would not significantly increase population growth, as it is proposing to employ a total of twenty-one full time employees per shift. It is anticipated that these positions would be filled by workers who already reside in the area. Therefore, since the Project would not substantially increase population growth, construction of a new park space or other citywide recreation facilities would not be required. Less than significant related to the physical deterioration of existing recreation parks or facilities are anticipated.

b) **Less than Significant.** The Project consists of using the site for agricultural purposes which coincides with previous uses. The Project site will not incorporate recreational facilities. As previously stated, the Project proposes employing a total of twenty-one full time employees per shift. Thus, the Project does not substantially increase population. Therefore, the proposed Project would not be required to construct or expand any recreational facilities. Therefore, impacts are considered less than significant related to recreational facilities.

MITIGATION MEASURES

None required.

17. Transportation

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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 § 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?			✓	

A Vehicle Miles Traveled (VMT) Screening Evaluation analysis was prepared by Albert A. Webb Associates on September 16, 2022. That study is included as Appendix 9.0 to this Initial Study. This Project site will not be open to the public and there will be 21 full-time employees who will work during the proposed hours of Monday-Friday 9:00am – 5:00pm with holiday and weekend operations with proposed hours of 9:00am – 12:00pm. Access to the Project site is proposed via two existing driveways on Ramona Expressway. According to the City of San Jacinto, Projects which generate less than 500 daily vehicle trips are considered to have less than significant impacts on VMT and would not likely lead to a significant increase in vehicle travel. The Institute of Transportation Engineers' (ITE) *Trip Generation Manual* does not include trip generation rates for agricultural uses. The Manual provides trip generation rates for General Light Industrial land uses (110) which is ITE designation most similar to the Project's uses. For ITE 110, the average daily trip generation rate is 3.1 trips per employee. For the sake of the VMT analysis, it was considered a daily trip generation rate of 6 trips per employee. At this rate, the daily trips for 21 employees were approximately 126 total daily trips, which is below the City's 500 daily trip threshold for VMT (Appendix 9.0).

a) Less Than Significant Impact.

Bicycle and Pedestrian Facilities

Two proposed bicycle improvements which will be in proximity to the Project site. There is a proposed Class 1: Multi-Use Path proposed north of the Project site on Ramona Expressway. East of the site there is a proposed Class 1E: Multi-use and Equestrian path along Sanderson Avenue (see **Figure 12 – Existing and Proposed Trail and Bicycle Facilities**). The Project has two existing access points off Ramona Expressway which will be used for entry to the Project site. The existing two-way left-turn median on Ramona Expressway would allow for both inbound and outbound left turns from the Project access points. Right turn acceleration and deceleration lanes are proposed at both Project access points to facilitate right-turn access and merging into traffic on Ramona Expressway. The Project will not include operations that would cause a meaningful increase in traffic. Since the Project will not affect the construction and use of these two bike trails, impacts are considered less than significant and no mitigation is necessary.

Transit

The Project site is currently served by Riverside Transit Authority (RTA), a public transit agency serving various jurisdictions within Riverside County. There are no existing bus routes surrounding the Project site (see **Figure 13 – Existing Transit Routes**). Additionally, in connection with consideration of the Project, the RTA will review the Project to ensure it is compliant with all relevant policies. Therefore, it is not expected that the Project will have an impact on local transit routes.

For the reasons set forth in the preceding paragraphs, impacts related to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities are less than significant and no mitigation is necessary.

b) **Less Than Significant Impact.** According to CEQA Guidelines Section 15064.3 subdivision (b), vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. VMT is the impact of individuals driving in and around and creating trips. The focus of VMT analysis is based on the land use of the Project and what, if any additional VMT would be generated by the Project. The City of San Jacinto's VMT Guidelines state that local-serving land uses such as those proposed by this Project are exempt from VMT analysis. As stated above, the Project is expected to not exceed the City's threshold of 500 daily vehicle trips and thus, impacts are considered to be less than significant and no mitigation is necessary.

c) **Less Than Significant Impact.** The project will take access off an existing roadway, Ramona Expressway, which is a straight and fully developed roadway. The proposed Project would gain access to the property via two access points. There are no design hazards related to the proposed land uses and the project will be using driveways which are based on existing traffic conditions. Impacts are less than significant and no mitigation is necessary.

d) **Less Than Significant Impact.** The project has two existing access points off Ramona Expressway-site which will be used for vehicle access to the east and west side portions of the site. There are 21 proposed employees who will be on-site during business hours only. There are no proposed changes to the access points of the Project site and thus, impacts are expected to be less than significant, and no mitigation is necessary.

MITIGATION MEASURES

None.

18. Tribal Cultural Resources

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:				
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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		✓		

DISCUSSION

a)

i-ii) **Less Than Significant Impact with Mitigation Incorporated.**

Assembly Bill (AB) 52 established a formal consultation process for California tribes within the CEQA process. The Bill specifies that any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to “begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project.” Section 21074 of AB 52 also defines tribal cultural resources as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and that are either listed on, or eligible for, the California Register of Historical Resources or a local historic register, or the lead agency chooses to treat the resource as a significant resource.

City of San Jacinto AB 52 Outreach

The City of San Jacinto sent out its AB 52 Consultation letter on August 16, 2022 to Native American tribes. Letters were sent out to seven Tribes: (1) Morongo Band of Mission Indians; (2) Pechanga Band of Mission Indians; (3) Rincon Band of Luiseno Indians; (4) Soboba Band of Luiseno Indians; (5) Agua Caliente Band of Cahuilla Indians; (6) San Manuel Band of Mission Indians; and (7) Torres Martinez Desert Cahuilla Indians. A response was received from Torres Martinez Desert Cahuilla Indians who deferred to the Soboba Band of Mission Indians. The Soboba Band of Mission Indians requested Tribal Consultation. The Soboba Tribe gave the City of San Jacinto conditions of approval for the Treatment and Disposition Agreement with Soboba which are set forth as **MM TRI-1** and **MM TRI-2**.

It should be noted that no grading or excavation is proposed as part of the Project. However, with the inclusion of mitigation measures **TRI-1** and **TRI-2**, any potential impacts to tribal cultural resources stemming from other activities at the Project site would be mitigated to a less than significant impact with mitigation incorporated.

MITIGATION MEASURES

TRI-1 Prior to site disturbance for hoop house construction on either the West or East Sites, the developer shall enter into a Treatment and Disposition Agreement (TDA) with the Soboba Band of Luiseño Indians to address treatment and disposition of archaeological, or Tribal Cultural Resources and human remains associated with the Soboba Band of Luiseño Indians that may be uncovered or otherwise discovered during ground-disturbing activities related to the project, if monitoring deemed necessary by Soboba Band of Luiseño Indians. The TDA will establish provisions for tribal monitoring and shall be submitted to the Planning Division once it has been executed.

TRI-2 If human remains, grave goods, ceremonial items, and/or sacred items are encountered, work will immediately halt within the immediate area and any nearby area reasonably suspected to overlie adjacent remains, and a 100-foot ESA boundary will be established to protect the find from impact, and the Soboba Band of Luiseno Indians and the City of San Jacinto Planning Division shall be immediately notified.

In accordance with Section 7050.5 of the California Health and Safety Code and State CEQA Guidelines Section 15064.5(e), if human remains are found, the Riverside County Coroner's office shall be notified by the permittee within 24 hours of the discovery. County Coroner's determination regarding the origin of the remains and any required notification is described in Section 7050.5 of the California Health and Safety Code and State CEQA Guidelines Section 15064.5(e). No further excavation or disturbance of the potential human remains, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made, any notifications have been sent and received, and the Riverside County Coroner's Office has cleared the site.

19. Utilities and Service Systems

Issues, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	

DISCUSSION

a) Less than Significant Impact.

Water

The Project site has one well on the East site and one well on the West side of the Project site. The wells are proposed to be used for agricultural and firefighting only and will thus not be serviced by any local water districts. No treatment of the well water is proposed for the agricultural irrigation and firefighting purposes.

The source of the water from the two wells is the local groundwater basin. The Project is located within the Hemet-San Jacinto Groundwater Basin. The Project site is located within two Management Areas, the Hemet North and San Jacinto Upper Pressure (see **Figure 11 – Hoop-House Locations**). The Hemet-San Jacinto Groundwater Basin is an adjudicated basin according to the Stipulated Judgment which was entered into the Superior Court of the State of California for the County of Riverside for Eastern Municipal Water District v. City of Hemet, et al. (Case Number RIC 1207274) in April 2013 ("Judgment"). The purpose of the Judgment is to manage groundwater usage. The Judgment appointed a Hemet-San Jacinto Watermaster as the governing body for the Management Area which include the Project site. However, the Project site has opted to be a Non-Participant of the Watermaster's Water Management Plan, which affords them the ability "...not to formally acknowledge [the Plan's] existence" pursuant to the Judgment;

however, “the Parties do not waive their rights to challenge any new or expanded use of water or water rights”(Stipulated Judgment, p. 17). The “Parties” include EMWD, Lake Hemet Municipal Water District, City of Hemet, City of San Jacinto, and the persons listed on Exhibit B of the Stipulated Judgment. The use of the onsite wells for agricultural uses is consistent with the past uses and sources of water on the site. As discussed above, each well on site is expected to generate 300 gallons per minute (gpm) each (or, approximately 158 million gallons per year per well). Because the water demand of both the West and East Sites is approximately 207 million gallons per year, and the expected groundwater well production of the two wells combined is approximately 315 million gallons per year, the Project water demand is expected to be met by the Project water supply. Since water supply will be generated on site, and since the Stipulated Judgment for the groundwater basin allows for Non-Participant, the Project will not need new or expanded water facilities to serve the site that would create environmental impacts. Therefore, impacts are considered to be less than significant, and no mitigation is necessary.

Wastewater Treatment

The Project is not going to be utilizing septic or wastewater services. Instead, there will be portable restrooms brought onto the site and will be emptied off site by a contracted company. Therefore, no new or expanded wastewater treatment facilities would create environmental impacts. Impacts are considered less than significant.

Stormwater

The proposed Project does not require construction of any new onsite storm drain facilities. No formal or constructed stormwater conveyance is proposed; any stormwater will percolate into the ground or sheet flow to the drainage feature bisecting the Project site. Therefore, since no stormwater facilities are needed or proposed, impacts are considered less than significant and no mitigation is required.

Electricity and Natural Gas

The project site would not require connection to natural gas lines. Southern California Edison will provide electricity for the Project Site for security lighting, wells, and gates, using existing connections. The Project site will use solar remote CCTV surveillance cameras to monitor vital areas of the Project site. Based on the foregoing, it is not expected that the Project will have a significant impact on electricity or natural gas installation or usage. Therefore, impacts are considered less than significant and no mitigation is necessary.

b) **Less Than Significant Impact.** Currently, the Project has one partially constructed well on the East site of the Project area, and one partially constructed well on the West Site of the Project site. These wells are proposed to only be used for agriculture irrigation and firefighting purposes. It is expected that the Project will maintain a similar water demand to its previous agricultural irrigation usages and the wells related to the Project will be able to provide 300 gpm each (600 gpm total). Since there will be two onsite wells and water demand is expected to be consistent with agricultural uses, and, as described above, the Stipulated Judgment (adjudication) of the groundwater basin allows for Non-Participants in the groundwater basin, it is expected that the proposed Project will have a less than significant impact on available water supply and no mitigation is necessary.

c) **Less than Significant Impact.** The Project site will not be reliant on any sewage or waste systems and instead will use portable restrooms which will be brought onsite and emptied offsite. Because of this, the Project is not expected to impact capacity or demand of any sewer lines and will not require servicing by any local wastewater treatment providers. The Project is expected to have less than significant impact on wastewater and no mitigation is necessary.

d) **Less Than Significant Impact.** The Project does not propose any grading or ground-breaking construction activities. It is expected that any plant or hoop-house material waste produced from construction will be minimal and hauled off site using waste hauling contractors. Any waste produced by the Project will be properly contained and disposed of in accordance with local and state policies and procedures. Additionally, the State Water Resources Control Board (SWRCB) has a Cannabis Cultivation Policy which sets forth policies and best practices to ensure that the diversion of water and discharge of waste associated with cannabis cultivation does not have any negative impacts on water quality, aquatic habitats, riparian habitats, wetlands, or springs (SWRCB, p. 6). The Project will additionally be compliant with the guidelines set forth by the SWRCB. Therefore, impacts will be less than significant and no mitigation is necessary.

e) **Less Than Significant Impact.** The construction and operation of the Project could result in plant and hoop-house material waste during construction and operation. The Solid Waste Reuse and Recycling Access Act of 1991 requires that adequate areas be provided for collecting and loading recyclable materials such as paper, products, glass, and other recyclables. City of San Jacinto Municipal Code Section 8.34.060 regulates solid waste handling and mandates that sufficient receptacles be in place onsite to accommodate refuse and recycling. Compliance with state law and the City's Municipal Code would ensure the project would result in a less than significant impact and no mitigation is necessary.

MITIGATION MEASURES

None required.

20. Wildfire

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 Impact 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?			✓	

a) **Less Than Significant.** The proposed Project site is not located within any Fire Hazard Severity Zones (Moderate, High, Very High) within the State Responsibility Area (SRA). (CAL-A) However, approximately 1 mile southeast of the Project site the Lakeview Mountains are categorized as a Very High Fire Hazard Severity Zone (VHFHSZ) in Local Responsibility Area (LRA). Nonetheless, the City relies on major routes to remain open during emergency scenarios (GP EIR, p. PS-5.7) The General Plan Update identifies major arterials as the primary routes for evacuation; however, evacuation routes would depend upon the emergency event and area affected. The General Plan Update includes policies and actions to address emergency response and evacuation (GP EIR, p. 5.9-35). Access to Ramona Expressway from the Project will include two driveways. No impediment to the access of Ramona Expressway from the Project would occur. Therefore, the Project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surroundings during construction and post-construction. Therefore, impacts are considered less than significant and no mitigation is necessary.

b) **Less Than Significant.** As mentioned in *Threshold 20a*, above, the City is not located in a designed high fire risk area, and the Project site is in the open valley surrounded by other agricultural areas. The closest VHFHSZ is the Lakeview Mountains located about 1 mile to the southeast. Additionally, the City does not have high-speed prevailing winds, and average wind speeds are approximately 6.8 miles per hour during the windier part of the year, from November to June (Weather Spark 2022). Additionally, as previously mentioned in *Threshold 20a*, above, the project site is not within a Very High Fire Severity Zone. Therefore, impacts are considered less than significant, and no mitigation is necessary.

c) **Less Than Significant.** The project site would not require expansion of connection to utility infrastructure such as electricity, water, and sewer. The Project site will not be utilizing electricity on site

and does not propose the expansion of any electrical service lines. Energy, will come from solar panels on the hoop-houses and would be within compliance with city ordinances. The Project will not be utilizing any public water lines or propose any additional expansion to water services for the property since it will use on site agricultural wells for irrigation and fire protection. The Project will also not utilize or install any sewer facilities on site and instead will use portable restrooms which will be emptied offsite. Due to the fact that the Project is not expected to require any additional construction of utility infrastructure and will not make usage of these utilities onsite, the expected impact to fire risk is less than significant and no mitigation is necessary.

d) **Less Than Significant.** The Project site is relatively flat with elevations ranging from approximately 1450-1470 feet in elevation. Additionally, the Project does not propose any grading or permanent foundations which may disturb the soil. The Project is located within a FEMA Designated 100-year Flood Zone (GP EIR, Figure 5.10-4- FEMA Flood Map). Despite this, the Project does not propose any permanent foundations which may alter the landscape of the site. Additionally, the Project is not located within a Fire Hazard Severity Zone (SJPD, p. PS-27). Thus, the impacts from flooding in fire prone areas is considered to be less than significant and mitigation is not necessary.

MITIGATION MEASURES

None.

V. MANDATORY FINDINGS OF SIGNIFICANCE

Issues, does the project:	Potentially Significant Impact	Less Than Significant Impact 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?		✓		

DISCUSSION

The following mandatory findings of significance are in accordance with CEQA Guidelines Section 15065.

a) **Less Than Significant Impact with Mitigation Incorporated.** Based on the evaluations and discussion in this IS/MND, the proposed project has a very limited potential to incrementally degrade the quality of the environment. With the implementation of mitigation measures **BIO-1** through **BIO-8**, the project will have a less than significant impact on biological resources. Additionally, with the implementation of **TRI-1** and **TRI-2**, the Project will have a less than significant impact on tribal cultural resources. Therefore, the proposed project would not significantly affect the environment after implementation of the mitigation measures in this IS/MND. Therefore, any impacts would be considered less than significant with mitigation incorporated.

b) **Less Than Significant Impact with Mitigation Incorporated.** The proposed Project has been historically used for agriculture and is surrounded by developed and disturbed land. The Project will continue to be used for agricultural purposes and thus, it is not expected that it will cause any additional impact to the existing condition. Additionally, it is not expected that the Project will use any additional resources than have been historically used. Through the implementation of the mitigation measures listed in Threshold a), the Project is expected to have a less than significant impact.

c) **Less Than Significant Impact with Mitigation Incorporated.** The proposed project does not have the potential to significantly adversely affect humans, either directly or indirectly. Although a number of

impacts were identified as having potential to significantly impact humans, with implementation of the identified mitigation measures and standard conditions and requirements, these impacts are less than significant. With implementation of the identified mitigation measures, the proposed project is not expected to cause significant adverse impacts to humans. Therefore, the project does not have any environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Furthermore, because this document analyzes long-term and short-term impacts and mitigates all potential impacts to a less than significant level, the proposed project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals. Any impacts are considered less than significant with mitigation incorporated.

Acronyms

AFY	Acre Feet Per Year
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BMP	Best Management Practices
BP	Business Park
BUOW	Burrowing Owl
CalEEMod	California Emissions Estimator Model
CalEEMod™	California Emissions Estimation Model, Version 2020.4.02
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CASSA	Critical Area Species Survey Area
CDFW	California Department of Fish and Wildlife
CDOT	California Department of Transportation
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CITY	City of San Jacinto
CNDDB	California Natural Diversity Database
CO	Carbon Monoxide
COB	Cannabis Oriented Business
COR	County of Riverside
dB	decibel
dBA	A-weighted decibel
DEIR	Draft Environmental Impact Report
DOF	California Department of Finance
DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
ESA	Environmental Site Assessment (Phase I)
EVC	Electrical Vehicle Charging
EVCS	Electrical Vehicle Charging Station
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
GHG	Greenhouse Gas
GPEIR	General Plan Environmental Impact Report
IDA	International Dark-Sky Association
IDSA	International Dark-Sky Association
ILB	Pounds
IS	Initial Study
ITE	Institute of Traffic Engineers
Km	Kilometer
LST	Localized Significance Threshold

Acronyms

LU	Land Use
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MTCO ₂ E/yr	metric tonnes per year of carbon dioxide equivalents
Mw	maximum moment magnitude
MWh	Megawatt hours
ND	Negative Declaration
NEPSSA	Narrow Endemic Plant Species Survey Area
NO _x	Oxides of Nitrogen
PM	Atmospheric Particulate Matter
PM-2.5	Particulate Matter less than 2.5 microns in diameter
PM-10	Particulate Matter less than 10 microns in diameter
RCFD	Riverside County Fire Department (RCFD)
ROW	Right of Way
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SF	Square Feet
SJDC	San Jacinto Development Code
SKR	Stephens' Kangaroo Rat
SLF	Sacred Lands File
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SMARA	California Surface Mining and Reclamation Act
SO _x	Sulfur Oxides
SP	Specific Plan
SR	State Route
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TDA	Treatment and Disposition Agreement (TDA)
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UWIG	Urban/Wildlands Interface Guidelines
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WA	Williamson Act

VI. REFERENCES

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