

COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Project Case Type (s) and Number(s): CUP190046

Lead Agency Name: Riverside County Planning Department

Address: 4080 Lemon Street, 12th Floor, PO Box 1409, Riverside CA, 92502

Contact Person: Todd Carpenter

Telephone Number: (951) 955-0698

Applicant's Name: Glen Aery

Applicant's Address: 27315 Jefferson Ave. Unit 137, Temecula, CA 92590

I. PROJECT INFORMATION

Project Description:

Glen Aery (Applicant) is requesting the approval of a Development Agreement (DA190037) and a Conditional Use Permit (CUP190046) allowing for the development and operation of a Cannabis Cultivation and Distribution facility. The Project Site is located at 38455 East Benton Road in unincorporated Riverside County (See Figure 1 - Regional Location and Figure 2 - Project Vicinity). The Project Site is identified as Assessor's Parcel Number (APN) 915-330-040 and is approximately 9.85 gross acres in size.

The Project Site has an existing one-story, 2,086-square-foot residence. A septic system, domestic well, and water storage tank to serve the residence. There is an existing concrete driveway along Benton Road for access to the residence. No change to the existing residence is proposed as part of the Proposed Project. The Proposed Project includes a TPM to subdivide the property into two parcels: Parcel 1 is 5.0 acres and comprises the proposed commercial facility, and Parcel 2 is 4.88 acres and comprises the existing residential area.

A 5.33-acre portion of the eastern portion of the Project Site would be incorporated into the Multiple Species Habitat Conservation Plan Reserve Assembly as Additional Reserve Land. A fence is proposed along the perimeter of this area. The proposed development would occur on the remaining 4.52 acres. The Proposed Project includes 15,864 square-feet of building coverage, and four (4) 5,000-gallon water tanks (See Figure 3 - Site Plan). A new septic system with a 1,000-gallon septic tank with a 50-foot setback from certain structures and features to help ensure public safety and proper functioning of the system would also be included. Two retention basins are proposed. There would be a new well near the northern property line to serve the commercial facility. Development of the Proposed Project involves construction of three (3) 3,472-square-foot (SF) buildings each with grow rooms and storage (Buildings 1A, 2, & 3); and a 1,542-square-foot (SF) building with grow room, storage, and area for logistics (Building 1B). Buildings 2 and 3 each have an additional 1,853-SF covered patio with two 348-SF storage containers. Security fencing would fully enclose the portion of the Project Site to be developed.

Back-up generators would be located adjacent to the proposed buildings 1A, 2, and 3. A solar array with 91 solar panels is proposed near the new water well. Trash disposal areas shall be fully enclosed, shown at the Northeast corner of the site. Cannabis vegetation waste would be disposed of in a separate locked bin within the enclosure. It would be removed by a certified hauler for cannabis waste. A 24-foot-wide access driveway with secure access gates is proposed along Benton Road. The Proposed Project would provide 11 parking spaces, two of which are handicap accessible and 1 as electric vehicle parking. The Proposed Project would require a maximum of seven (7) employees. Operations would consist of 2 shifts: 6:00 AM to 2:00 PM and 2:00 PM to 10:00 PM. Growing season would be year-round with harvesting occurring four times a year.

The Project Site is designated Rural Residential in the Riverside County General Plan and occurs within the Light Agriculture (A-1-10) Zoning district. This zoning classification permits greenhouses, orchards, and herbs gathering in a commercial scale. The Proposed Project is a cannabis cultivation facility that would be consistent with the A-1-10 zoning.

The Proposed Project would harvest all water collected from HVAC cooling coils and dehumidifiers. In addition, the facility would implement an automated load-shifting system during peak hours (4PM to 9PM). During peak hours, lights would be turned off and HVAC use would be minimized.

Figure 1

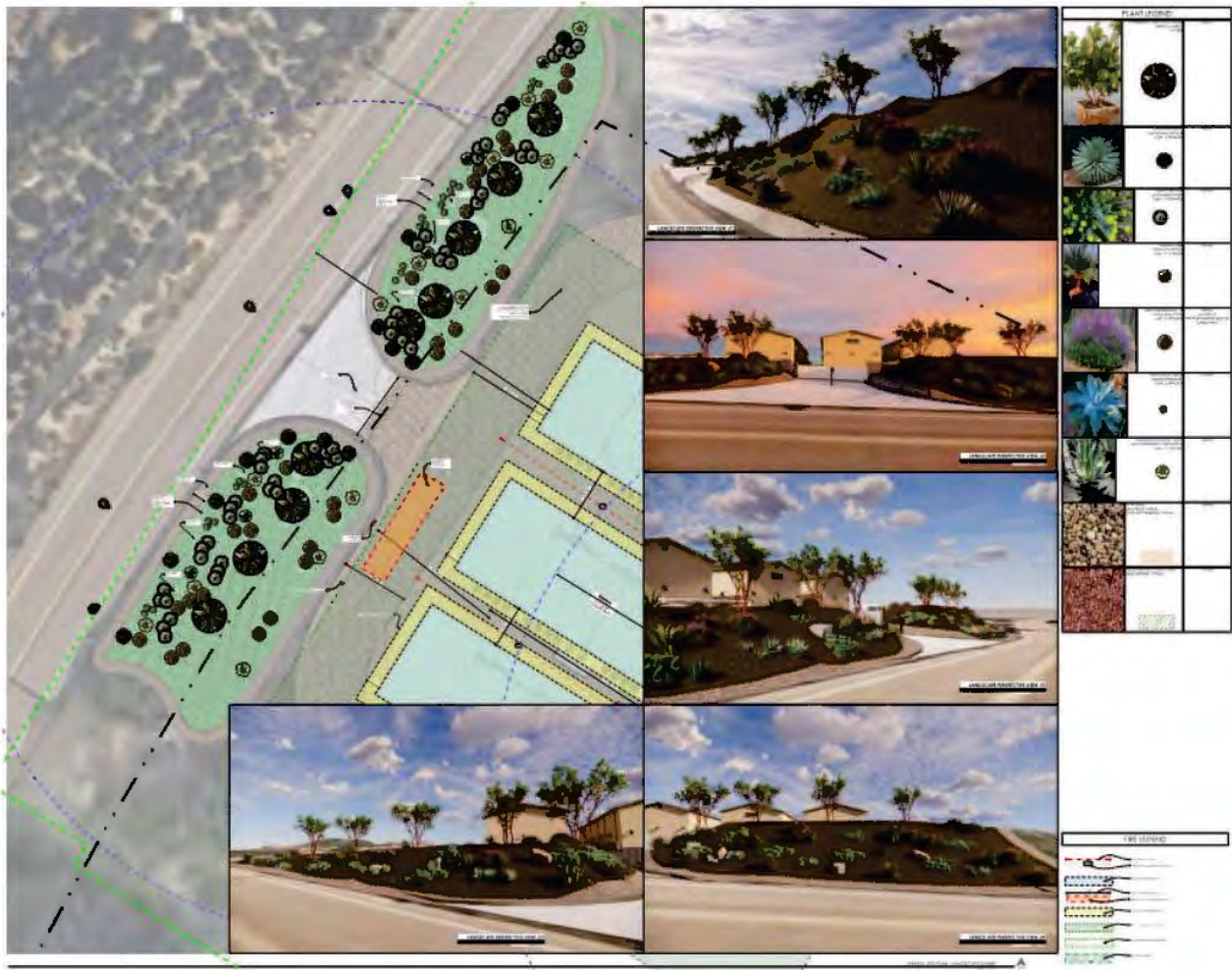


Figure 2

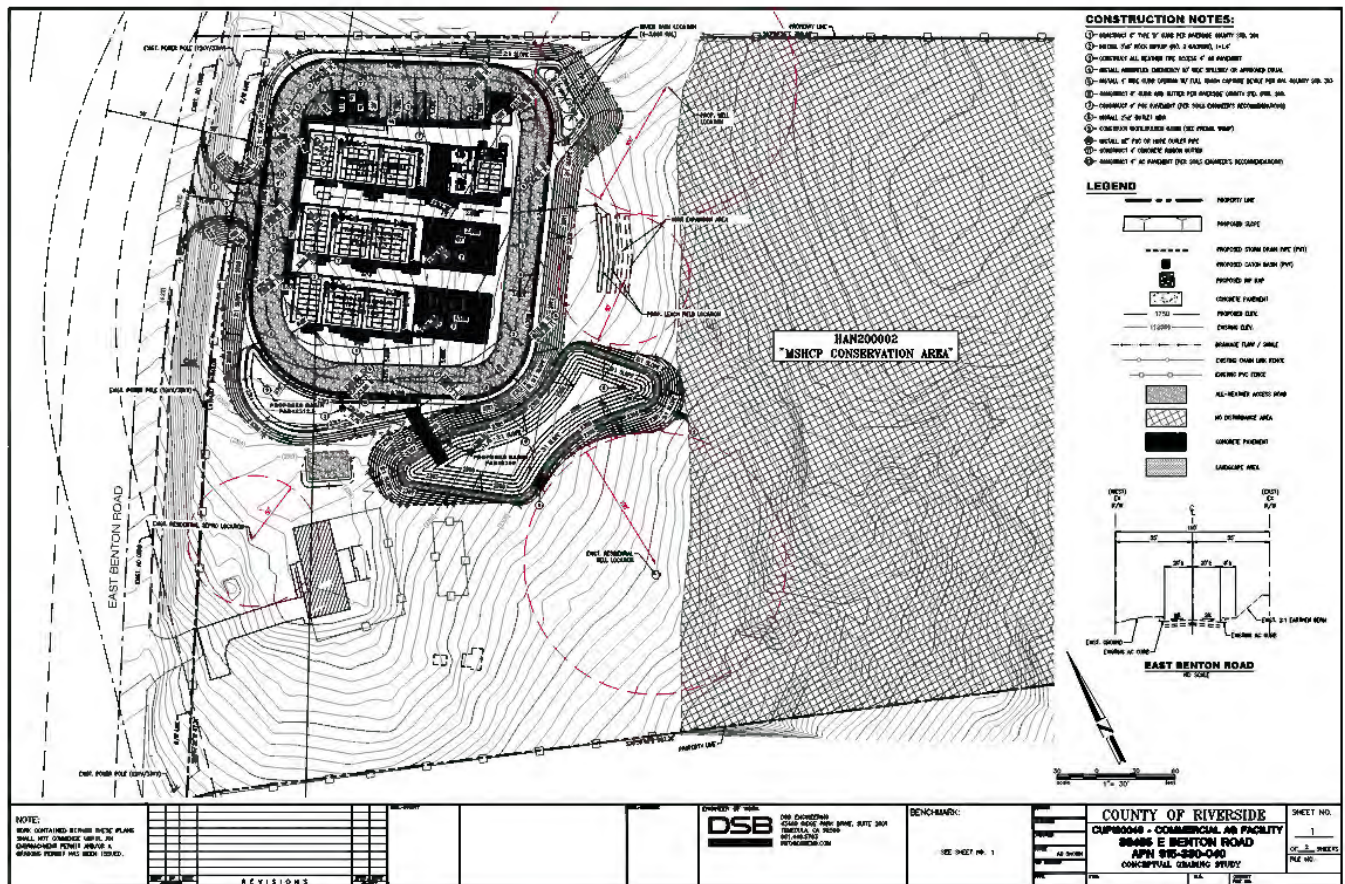
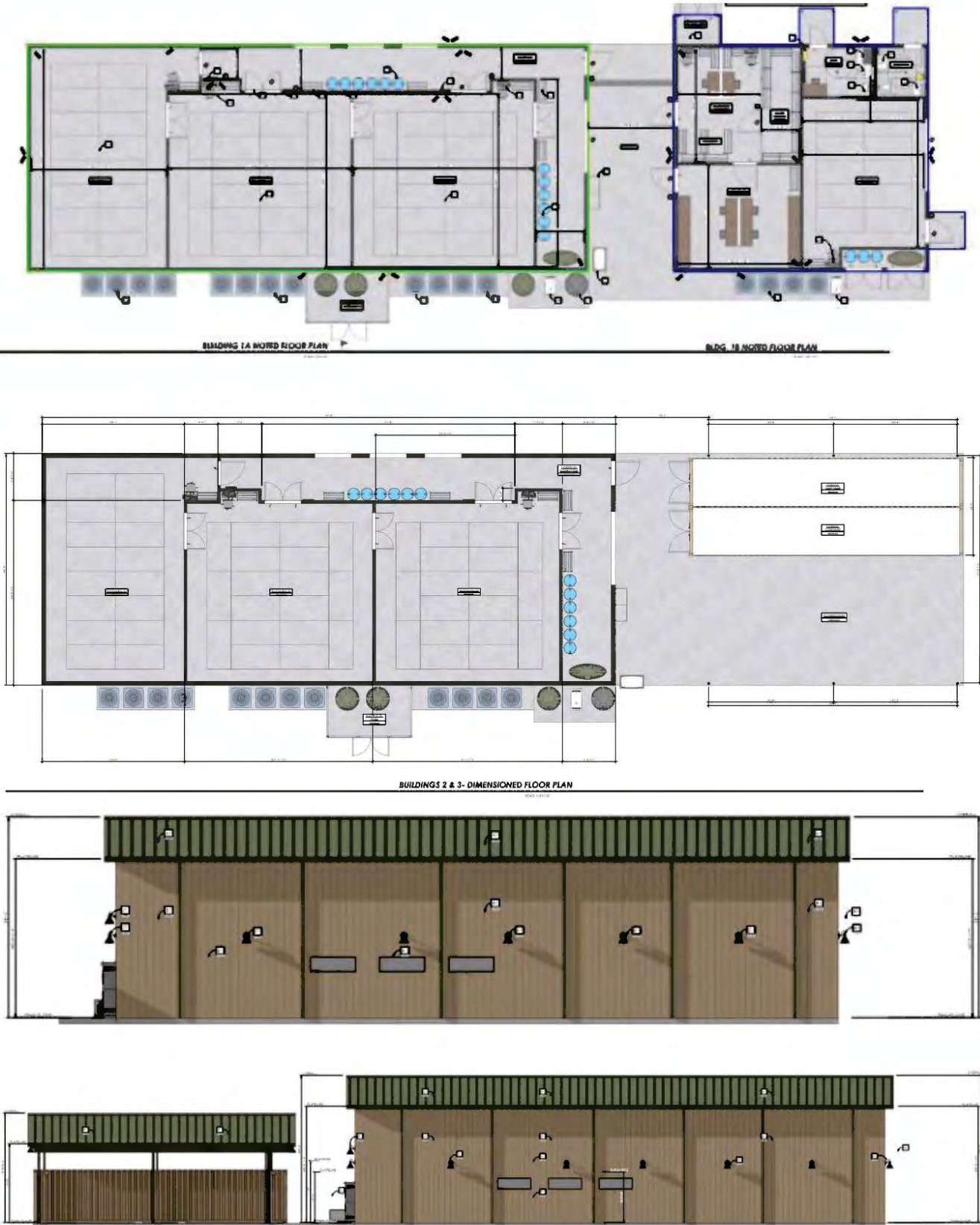


Figure 3



A. Type of Project: Site Specific ☒; Countywide ☐; Community ☐; Policy ☐.

B. Total Project Area:

Residential Acres: N/A	Lots: N/A	Units: N/A	Projected No. of Residents: N/A
Commercial Acres: 4.52	Lots: 1	Sq. Ft. of Bldg. Area: 17,959	Est. No. of Employees: 7
Industrial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Other:			

C. Assessor's Parcel No(s): 915-330-040

Street References:

D. Section, Township & Range Description or reference/attach a Legal Description:
Township 7 South, Range 1 West, Section 13 of the Sage, California 7.5' quadrangle

E. Brief description of the existing environmental setting of the project site and its surroundings:

The Project Site is dominated by a mix of chaparral vegetation, sparse rock outcroppings, one single-family residential structure, and a well with storage tank. The Project Site is in a non-urbanized area, and is surrounded by vacant land and scattered rural residential properties.

F. Other Public Agency Involvement:

California Department of Cannabis Control:

The Department of Cannabis Control (DCC) regulates, issues licenses to, and enforces compliance of all commercial cannabis business activity in California (Bus. & Prof. Code, Section 26103(a)). The project applicant will be required to submit an application for a CalCannabis Cultivation License through the DCC. The DCC will have an opportunity to review and comment on the Initial Study/Mitigated Negative Declaration.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- 1. Land Use:** (Rural Residential) The Proposed Project land use designation is Rural Residential. This land use designation allows one single-family residence per five acres, as well as limited animal-keeping and agricultural activities. Limited recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses, and governmental uses are allowed within this designation. Neighborhood-serving small-scale commercial uses that are compatible with the surrounding uses are allowed. The zoning classification for the Project Site is Light Agriculture (A-1-10). This zoning classification permits greenhouses, orchards, and herbs gathering in a commercial scale. The Proposed Project is a cannabis cultivation facility that would be consistent with the A-1-10 zoning.
- 2. Circulation:** The Project Site is located adjacent to and east of Benton Road. The Proposed Project would have adequate circulation to and within the Project Site and is therefore consistent with the Circulation Element of the General Plan. The Proposed Project meets the Regional Urban and Rural Trails and all other applicable circulation policies of the General Plan.

3. **Multipurpose Open Space:** The Project Site does not have a land use designation or zoning designation that is intended to conserve or preserve resources. However, 5.33 acres in the eastern portion of the Project Site would remain as open space and incorporated into the Multiple Species Habitat Conservation Plan Reserve Assembly as Additional Reserve Land. The California Important Farmland Finder Interactive Map identifies the Project Site as “Other Land” and “Farmland of Local Importance.” The Proposed Project is an agricultural activity in the form of cannabis cultivation. The Proposed Project would not interfere with the goals set forth in the County’s General Plan Multipurpose Open Space Element.
4. **Safety:** The Proposed Project is not located in a floodplain or a fault zone. The Project Site is not located in an area susceptible to liquefaction and seismically-induced landslides. The Proposed Project meets all other applicable Safety element policies.
5. **Noise:** The Proposed Project would permanently increase the ambient noise levels in the project vicinity above existing levels without the Proposed Project. However, noise levels are expected to remain below the County’s exterior daytime noise threshold of 65 dBA and the County’s nighttime exterior noise threshold of 45 dBA.
6. **Housing:** There is a residential structure currently on the Project Site that will remain. No additional housing is proposed or anticipated to be removed.
7. **Air Quality:** The Proposed Project is located within the South Coast Air Basin. According to the California Emissions Estimator Model (CalEEMod) v. 2022, the Proposed Project is anticipated to meet all South Coast Air Quality Management District (SCAQMD) standards and thresholds with incorporation of Mitigation Measure AQ-1.
8. **Healthy Communities:** The Proposed Project meets all applicable Healthy Community element policies.

(a) **Environmental Justice Summary:** The Project Site is not located in or near an environmental justice community.

- B. **General Plan Area Plan(s):** Riverside Extended Mountain Area Plan (REMAP)
- C. **Foundation Component(s):** Rural
- D. **Land Use Designation(s):** Rural Residential (RR)
- E. **Overlay(s), if any:** Western Riverside Multiple Species Habitat Conservation Plan (WRMSHCP) Fee Area
- F. **Policy Area(s), if any:** None
- G. **Adjacent and Surrounding:**
 1. **General Plan Area Plan(s):** Riverside Extended Mountain Area Plan (REMAP)
 2. **Foundation Component(s):** Rural
 3. **Land Use Designation(s):** Rural Residential
 4. **Overlay(s), if any:** WRMSHCP Fee Area

5. Policy Area(s), if any: None

H. Adopted Specific Plan Information

1. Name and Number of Specific Plan, if any: N/A

2. Specific Plan Planning Area, and Policies, if any: N/A

I. Existing Zoning: A-1-10

J. Proposed Zoning, if any: N/A

K. Adjacent and Surrounding Zoning: The parcels surrounding the Project Site are zoned A-1-10.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

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

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made 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.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

- ☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
- ☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.
- ☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
- ☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following:(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or,(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Todd Carpenter

Signature

10/14/2026

Date

For: Todd Carpenter
Project Planner

Todd Carpenter

Printed Name

V. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction and implementation of the project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
1) Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

Source(s): Riverside County General Plan, Caltrans Scenic Highway Interactive Map, Submitted Project Materials

Findings of Fact:

- a) **No Impact.** The Project Site is within Riverside County General Plan's Riverside Extended Mountain Area Plan (REMAP). The Project Site is not located near any scenic highways or scenic viewpoints.¹ The nearest scenic highway is the CA – 74 Idyllwild National Forest Highway, located approximately 16 miles northeast of the Project Site. Due to topography and distance from the scenic highway to the site, the site would not be visible from the highway. No impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** The Project Site is currently developed with an existing residence. Due to the Project Site's uneven topography, the proposed operations would not be

¹ Riverside County General Plan: Riverside Extended Mountain Area Plan (REMAP), Figure 8 "Riverside Extended Mountain Area Plan Scenic Highways
(https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/areaplans/REMAP_120815m.pdf?ver=2017-10-11-101551-660)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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viewable from Benton Road. Although operations may be viewable from Wayman Way and San Ignacio Road, there are no views of scenic vistas accessible from these roads that the Proposed Project would interfere with. In addition, the eastern 5.33-acres of the Project Site would remain undeveloped. Furthermore, the proposed greenhouses, the tallest proposed structures, would be 26'-2" in height with a minimum setback of 43'-5" from property boundaries. Grading of the site would be designed to blend with undeveloped, natural contours of the property, and avoid an unvaried, unnatural, manufactured appearance. The Project Site is dominated by a mix of chaparral vegetation, sparse rock outcroppings, one single-family residential structure, and a well with storage tank. Although some of the rock outcropping near the frontage would be eliminated, a majority would be preserved in the eastern portion of the Project Site that would be left undeveloped. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The Project Site is in a non-urbanized area, and is surrounded by vacant land and scattered rural residential properties. There are no publicly accessed scenic trails near the Project Site that view the property. The residential dwellings to the north and south are the only properties that may have limited views of the Project Site. There are no regional trails that are in view of the Project Site. The nearest trail is located approximately 1.6 miles southeast of the Project Site.² Grading of the site would be designed to blend with undeveloped, natural contours of the property, and avoid an unvaried, unnatural, manufactured appearance. The proposed development would not significantly degrade the existing visual character of the Project Site and its surroundings. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

2) Mt. Palomar Observatory

- a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

☐	☐	☒	☐
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Source: Riverside County Ordinance. No. 655 (Regulating Light Pollution), Riverside County General Plan: REMAP Figure 5

Findings of Fact:

- a) **Less than Significant Impact.** Per Policy REMAP 8.1 of the County General Plan, the Proposed Project would be subject to lighting standards that are intended to limit light leakage and spillage that may interfere with the operations of the Mount Palomar Observatory. Mount Palomar Observatory, located in San Diego County, is approximately 15 miles south of the Project Site. Riverside County Ordinance No. 655 restricts the permitted use of certain light fixtures that emit undesirable light rays into the night sky and interfere with astronomical observation and research. This ordinance defines two impacted zones: Zone A is within a

² Riverside County General Plan, Riverside Extended Mountain Area Plan, Figure 7 "Riverside Extended Mountain Area Plan Trails and Bikeway System"

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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15-mile in radius of the Palomar Observatory and Zone B is within a 45-mile radius. The Project Site is located within Zone B.³

As required by the County,⁴ all cannabis cultivation lighting facilities shall be fully shielded, downward casting and not spill over onto structures, other properties, or the night sky. All mixed light cannabis cultivation operations shall be fully contained so that little to no light escapes. Light shall not escape at a level that is visible from neighboring properties between sunset and sunrise. The Applicant shall submit a Photometric Plan depicting the lumens to be produced on-site, ensuring that no light spillage is allowed at property lines. The Proposed Project would adhere to the applicable lighting standards established by Riverside County Ordinance 655, Shielding of Lighting Fixtures. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

3) Other Lighting Issues	☐	☐	☒	☐
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
b) Expose residential property to unacceptable light levels?	☐	☐	☒	☐

Source: Riverside County Ordinance. No. 655 (Regulating Light Pollution)

Findings of Fact:

- a, b) **Less than Significant Impact.** The Project Site is in a non-urbanized area⁵ and is surrounded by vacant land and scattered rural residential properties. The Proposed Project is subject to the lighting standards set forth by Riverside County Ordinance No. 655. The Project Applicant would be required to submit a Photometric Plan subject to approval by the County. As stated previously, all cannabis cultivation operations shall be fully shielded, downward casting and not spill over onto structures, other properties, or the night sky. All mixed light cannabis cultivation operations shall be fully contained so that little to no light escapes. Light shall not escape at a level that is visible from neighboring properties between sunset and sunrise. Compliance with County lighting standards would minimize light and glare exposure so that there would be no unacceptable light levels, and it would not affect day or nighttime views in the area. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

³ Riverside County General Plan: REMAP. Figure 5 "MT Palomar Night Time Lighting Policy Area."

⁴ DAC comments for Conditional Use Permit NO. 190046. February 16, 2022.

⁵ California Office of Planning and Research. Site Check. Accessed October 11, 2024.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE & FOREST RESOURCES Would the project:				
4) Agriculture	☐	☐	☒	☐
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 agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	☐	☐	☐	☒
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	☐	☐	☐	☒
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Source(s): California Department of Conservation, California Important Farmland Finder; Riverside County Parcel Report; Riverside County Information Technology (RCIT) GIS

Findings of Fact:

- a) **Less than Significant Impact.** The California Important Farmland Finder Interactive Map identifies the Project Site as "Other Land" and "Farmland of Local Importance."⁶ "Other Land" is defined as low density rural developments, brush, timber, wetland and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. The Proposed Project is an agricultural activity in the form of cannabis cultivation. Therefore, the Proposed Project would not convert farmland to a non-agricultural use. Less than significant impacts are identified or are anticipated, and no mitigation measures are required.
- b,d) **No impact.** The Project Site is not under a Williamson Act contract.⁷ The zoning classification for the Project Site is Light Agriculture (A-1-10). This zoning classification permits greenhouses, orchards, and herbs gathering in a commercial scale. The Proposed Project is an agricultural activity in the form of cannabis cultivation that would be consistent with the A-1-10 zoning. Therefore, the Proposed Project would not conflict within any agricultural zoning or agricultural uses. No impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** The Project Site is surrounded by agriculturally-zoned properties and the Proposed Project is an agricultural activity. Construction and operation of the Proposed Project would occur within property boundaries. The proposed area of disturbance would be limited to the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

⁶ California Department of Conservation. California Important Farmland Finder Interactive Map. <https://maps.conservation.ca.gov/DLRP/CIFF/> Accessed May 31, 2023.

⁷ Riverside County Parcel Report for the Project Site.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5) Forest	☐	☐	☐	☒
a) 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 Govt. Code section 51104(g))?	☐	☐	☐	☒
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure OS-3b "Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas"

Findings of Fact:

- a-c) **No impact.** There are no timber or forest lands on the Project Site or in the surrounding vicinity.⁸ Timberland production zones are defined as an area which has been zoned pursuant to Section 51112 or 51113 of the California Code and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). The Project Site and surrounding parcels are agriculturally-zoned. Therefore, the Proposed Project would not conflict with any existing zoning, cause any rezoning, or result in the loss or conversion of any forest land or timberland production zones. Furthermore, as there are no forest lands in the project vicinity, the Proposed Project would not involve any changes to the environment that could result in a conversion of forest land to a non-forest use. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AIR QUALITY Would the project:

6) Air Quality Impacts	☐	☐	☒	☐
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, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

⁸ Riverside County General Plan. Figure OS-3b "Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas"

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County General Plan; Riverside County Climate Action Plan (“CAP”); Air Quality Management Plan (AQMP); California Emissions Estimator Model (CalEEMod) version 2022.1.1.46.

Findings of Fact:

- a) **Less than Significant Impact.** The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal air quality standards. The SCAB is classified as an “extreme” nonattainment area for the 2015 Ozone National Ambient Air Quality Standards (NAAQS). The most recent AQMP (AQMP 2022) was developed to address the requirements for meeting this standard and was adopted by the SCAQMD on December 2, 2022. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2020 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories. Consistency with the AQMP 2022 for general development projects is determined by demonstrating compliance with local land use plans and/or employment projections.

A project is inconsistent with the AQMP if: (1) it does not conform with the local general plan; or (2) it uses a disproportionately large portion of the forecast growth increment. The AQMP contains air pollutant reduction strategies based on SCAG’s latest growth forecasts, and SCAG’s growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project Site is designated Rural Residential in the Riverside County General Plan and occurs within the Light Agriculture (A-1-10) Zoning district. The Proposed Project does not include a General Plan Amendment or Zone Change. The Proposed Project does not include housing and would not induce population growth. Therefore, approval of the Proposed Project would not conflict with the AQMP. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** Construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2022 prepared by the SCAQMD (see Appendix A). Since CalEEMod does not include a cannabis cultivation facility as a land use subtype, the land use “General Heavy Industry” was used to represent the Proposed Project. The criteria pollutants screened for include reactive organic gases (ROG), nitrous oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO₂), and particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, ROG and NOx, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Source Emissions

CalEEMod was used to estimate the on-site and off-site construction emissions. The emissions incorporate Rule 402 and 403 by default as required during construction. Construction activities associated with the Proposed Project would have the potential to generate air emissions and odor impacts. Construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: site grading (mass and fine grading), building construction, paving, and architectural coating. The grading phase of the Proposed Project is anticipated to include no import or export of materials. Impacts from construction

activities are anticipated to be short-term. Refer to Table 1, Summer Emissions and Table 2, Winter Emissions for construction emissions generated.

Table 1
Summer Construction Emissions
(Pounds per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2027 (max)	3.12	28.03	29.44	0.05	9.07	5.07
2028 (max)	8.48	9.02	13.37	0.02	0.47	0.30
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2022.1

Table 2
Winter Construction Emissions
(Pounds per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2027 (max)	1.06	9.50	13.30	0.02	0.45	0.34
2028 (max)	1.02	9.03	13.27	0.02	0.41	0.30
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2022.1

As shown in Table 1 and Table 2, none of the Proposed Project's construction emissions will exceed regional thresholds as modeled with implementation of Mitigation Measure AQ-1.

Compliance with SCAQMD Rules and Regulations

During construction and operation, the Proposed Project must comply with applicable rules and regulations. The following are rules the project may be required to comply with, either directly, or indirectly:

SCAQMD Rule 402

Prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 403

Governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM₁₀ component). Compliance with these rules would reduce impacts on nearby sensitive receptors. Rule 403 measures may include but are not limited to the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.)
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspension of all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Bumper strips or similar best management practices shall be provided where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replanting disturbed areas as soon as practical.
- During all construction activities, construction contractors shall sweep on-site and off-site streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

SCAQMD Rule 481

Applies to all spray painting and spray coating operations and equipment. The rule states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

1. The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
2. Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.

3. An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

SCAQMD Rule 1108

Governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule would regulate the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the project must comply with SCAQMD Rule 1108.

SCAQMD Rule 1113

Governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of the project must comply with SCAQMD Rule 1113.

SCAQMD Rule 1143

Governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

SCAQMD Rule 1186

Limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.

SCAQMD Rule 1303

Governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM₁₀ among other pollutants.

SCAQMD Rule 1401

New Source Review of Toxic Air Contaminants specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.

SCAQMD Rule 1403

Asbestos Emissions from Demolition/Renovation Activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

SCAQMD Rule 2202

On-Road Motor Vehicle Mitigation Options, is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. It applies to any employer who employs 250 or more

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average.

Compliance with Department of Cannabis Control Rules and Regulations

During construction and operation, the project must comply with applicable rules and regulations for cannabis cultivation activities. The following are rules that the project may be required to comply with, either directly, or indirectly:

CCR Title 4 Section 15011

The Project cultivation license application shall include the following, if deemed applicable:

- For indoor and mixed-light license types, identification of all power sources for cultivation activities, including but not limited to, illumination, heating, cooling and ventilation.

CCR Title 4 Section 16304(e):

The Project cultivation license shall comply with the following environmental protection measures:

- (1) Principles, guidelines, and requirements adopted pursuant to section 13149 of the Water Code and implemented by the State Water Resources Control Board, Regional Water Quality Control Boards, or California Department of Fish and Wildlife;
- (2) Any conditions of licensure included pursuant to section 26060.1(b)(1) of the Business and Professions Code;
- (3) Requirements of section 7050.5(b) of the Health and Safety Code if human remains are discovered during cultivation activities;
- (4) Requirements for generators pursuant to section 16306;
- (5) Requirements for pesticides pursuant to section 16307;

Compliance with these DCC cannabis cultivation regulations would minimize air quality operational impacts.

Operational Emissions

The operation of the Proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the project-generated vehicle trips and operational emissions from the on-going use of the Proposed Project. Operational emissions are categorized as energy (generation and distribution of energy to the end use), area (operational use of the project), and mobile (vehicle trips). Emissions from the back-up generators would be negligible as it would only be utilized during power outages. Ganddini Group, Inc. prepared a Transportation Screening Assessment for an earlier version of the Proposed Project with 19,360 square feet of building coverage, which was determined to generate 80 daily trips. Operational emissions were estimated using the CalEEMod version 2022 defaults values for General Heavy Industrial use generating up to 80 daily trips. The model is conservative as mobile emissions are based on a version of the Site Plan with more building coverage than what is currently proposed. Proposed Project emissions are listed in Table 3 and Table 4, which represent summer and winter operational emissions, respectively.

Table 3
Summer Operational Emissions Summary
(Pounds Per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	0.40	0.60	6.14	0.02	1.64	0.42
Area	0.50	0.01	0.69	0.00	0.00	0.00
Energy	0.01	0.18	0.15	0.00	0.01	0.01
Totals	0.91	0.79	6.98	0.02	1.66	0.44
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2022.1

Table 4
Winter Operational Emissions Summary
(Pounds Per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	0.38	0.65	4.95	0.02	1.64	0.42
Area	0.38	--	--	--	--	--
Energy	0.01	0.18	0.15	0.00	0.01	0.01
Totals	0.77	0.83	5.10	0.02	1.65	0.44
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2022.1

As shown, both summer and winter season operational emissions are below SCAQMD thresholds and no mitigation measures are required.

Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: None

Monitoring: None

- c) **Less than Significant Impact.** SCAQMD has developed a methodology to assess the localized impacts of emissions from a proposed project as outlined within the Final Localized Significance Threshold (LST) Methodology report; completed in June 2003 and revised in July 2008. The use of LSTs is voluntary to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. LSTs apply to projects that must undergo CEQA or the National Environmental Policy Act (NEPA) and are five acres or less. LST methodology is incorporated to present worst-case scenario off-site construction emissions. The LSTs were developed to analyze the significance of potential air quality impacts of proposed projects to sensitive receptors and provide screening tables for small projects (one, two, or five acres). Projects are evaluated based on geographic location and distance from the sensitive receptor (25, 50, 100, 200, or 500 meters from the site).

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, convalescent facility or anywhere that is possible for an

individual to remain for 24 hours. Additionally, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours, but are usually present for shorter periods of time, such as eight hours.

The proposed development would occur on a 9.85-acre⁹ Project Site, and therefore, the “five-acre” LST threshold was utilized. The nearest sensitive receptor to the Project Site is the residential structure approximately 170 feet¹⁰ (51 meters) south of the Project Site. LSTs are based on a 50-meter distance.

Table 5
Localized Significance Thresholds
(Pounds per Day)

Source	NO _x	CO	PM ₁₀	PM _{2.5}
Construction Emissions (Max. from Table 1 and Table 2)	28.03	29.44	9.07	5.07
Construction LST	416	2,714	40	10
Operational Emissions (Max. Total from Table 3 and Table 4)	0.83	6.98	1.66	0.44
Operational LST	416	2,174	10	3
Greater Than Threshold	No	No	No	No

Note: PM₁₀ and PM_{2.5} emissions are separated into construction and operational thresholds in accordance with the SCAQMD Mass Rate LST Look-up Tables.
Source: CalEEMod.2022.1 Summer & Winter Emissions; SCAQMD Final Localized Significance Threshold Methodology; SCAQMD Mass Rate Look-up Tables for five-acre site in Source Receptor Area No. 26, distance of 50 meters.

As shown in Table 5, the Proposed Project’s emissions are not anticipated to exceed the thresholds for LSTs. Therefore, the Proposed Project is not anticipated to expose sensitive receptors to substantial pollutant concentrations. No significant adverse impacts are identified or anticipated, and no additional mitigation measures are required.

- d) **Less than Significant Impact.** The cannabis cultivation activities shall be sited and operated in a manner that prevents nuisance odors from being detected off-site. The activities shall provide a sufficient odor absorbing ventilation and exhaust system so that odor generated inside the building that is distinctive to its operation is not detected outside of the operation’s facility. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

⁹ 4.52 acres proposed for development, 5.33 acres for conservation

¹⁰ As measured from the Project Site property line.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES Would the project:				
7) Wildlife & Vegetation	☐	☒	☐	☐
a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	☐	☒	☐	☐
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	☐	☒	☐	☐
c) 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. Wildlife Service?	☐	☒	☐	☐
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) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☐	☐	☒
f) 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?	☐	☐	☐	☒
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

Source(s): Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis, May 28, 2021, Searl Biological Services

Findings of Fact:

a-c) **Less than Significant with Mitigation Incorporated.** A Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis, dated May 28, 2021, was completed by Searl Biological Services (SBS) (see Appendix B), and is summarized herein.

Reserve Assembly Analysis

The Project Site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Conservation Area. It is located in the western portion of the REMAP Area Plan (RAP) within the northwestern portion of Subunit 2 – Wilson Valley/Sage (SU2). The Project Site is located in the northern portion of Cell Group R within Criteria Cell 6056 which was partially within the 35% targeted conservation area of the northern portion of Cell Group R. The Applicant will convey 5.33 acres as Additional Reserve Land (ARL) in the eastern portion of the property, which consisted primarily of coastal sage scrub. The Reserve Assembly Analysis indicates that Criteria Cell Group R has the land available to meet the target

conservation acreage with the development of the Proposed Project including the 5.33 acres for ARL. A solid fence (i.e., vinyl, wood, etc.) will be installed around the ARL.

Covered Roads

East Benton Road is designated as a "Mountain Arterial" Covered Road. A paper road, or proposed future alignment, was also depicted by the Regional Conservation Authority's (RCA) MSHCP Information Application designated as a "Collector" Covered Road. The Right-of-Way was likely old and abandoned given its alignment traveling through existing homes, including the Applicant's.

Covered Public Access Facilities

The Proposed Project does not entail the construction of, or improvements to, a Covered Public Access Facility.

Public Quasi-Public (PQP) Lands

The Proposed Project will not directly or indirectly impact PQP Lands. The nearest PQP Lands were located approximately 0.8-mile north of the Project Site.

Narrow Endemic Plant Species

The property and off-site Project areas were not located within a designated assessment area for Narrow Endemic Plant Species.

Additional Survey Needs and Procedures

The MSHCP covers 146 species of plants and animals of which 40 species have specific survey requirements. 34 of the 40 species have an associated survey area map that designates areas where surveys may be required if suitable habitat is present. The property and off-site Project areas were not located within a designated assessment area for Criteria Area Plant Species, Amphibians, Burrowing Owl, and Mammals. However, a portion of the Project Site is located in an Additional Survey Needs and Procedures Area for burrowing owl. As such, pre-construction surveys for burrowing owl are required (see Mitigation Measure BIO -1).

Information on Other Species

- Delhi Sands Flower Loving Fly: The property was not located in an area with Delhi sands.
- Species Not Adequately Conserved: No species listed in MSHCP Table 9-3 were detected on or near the Project Site.
- Regulatory-Status Species Not Covered Under The MSHCP: Paniculate tarplant is ranked by the CNPS as a 4.2, which is considered a "watch list" species with a limited or infrequent distribution throughout the broader area in California. In the County however, paniculate tarplant is a commonly encountered annual in coastal sage scrub, grassland, and ruderal lots. Paniculate tarplant was detected in the eastern portion of the Property, with the majority occurring within the area proposed for ARL (where no development is proposed).

Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant with Mitigation Incorporated.** MSHCP Section 6.1.4 provides recommendations and guidelines to minimize potential "edge effects" resulting from locating development projects in close proximity to the MSHCP Reserve Assembly or MSHCP conserved

resources. Measures, such as buffers and/or barriers, are typically put in place to control drainage, toxics, lighting, noise, and invasives.

The Applicant is proposing 5.33 acres of ARL on the eastern portion of the property. The development of the proposed detention basin in the northern portion comes within two feet of the Development/Conservation boundary provided by the County. The following 6.1.4 Guidelines will be implemented to minimize edge effects to the nearby conserved lands and habitats.

- **Drainage:** The Project will implement the applicable BMPs described below for **Mitigation Measure BIO-2**. Any runoff originating from the Project Site subsequent to project completion will be collected in the two proposed basins thus preventing any from entering the ARL area. This is detailed further in the Applicant's Water Quality Management Plan (WQMP) prepared by Ventura Engineering.
- **Toxics:** The Project shall implement the BMPs described below for **Mitigation Measure BIO-2**.
- **Lighting:** Any Proposed Project lighting installed near the Development/Conservation boundary shall be shielded or directed as to not shine directly into the proposed ARL area.
- **Noise:** The Proposed Project is not expected to produce any amount of noise that would be considered an impact to wildlife utilizing the proposed ARL area.
- **Invasives:** Any Proposed Project landscaping would avoid those listed in Table 6-2 of the MSHCP.
- **Barriers:** The Proposed Project is proposing a solid fence (i.e., vinyl or wood) between the area to be developed and the Conservation area. The fence shall also have signs attached periodically stating "Conservation Area Beyond This Point" or "Environmentally Sensitive Area," or utilize those the County/RCA utilize to demarcate conservation areas.
- **Grading/Land Development:** No grading or land development will extend into the proposed ARL area.

Nesting Birds

Birds and their nests are protected by the Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW) Codes. Since the Project Site supports suitable nesting bird habitat, Mitigation Measure BIO-3 shall be implemented to avoid significant impacts to nesting birds.

Therefore, no significant adverse impacts are anticipated with implementation of Mitigation Measures BIO-1 to BIO-3.

- e-f) **No Impact.** Section 6.1.2 Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools of the MSHCP requires all subject properties under the jurisdiction of the MSHCP that are proposing a land use change/applying for a discretionary permit to conduct a MSHCP Section 6.1.2 assessment. This includes a habitat assessment for Riparian/Riverine Areas, Vernal Pools, three fairy shrimp species; Riverside fairy shrimp (*Streptocephalus woottoni*) (RFS), vernal pool fairy shrimp (*Branchinecta lynchi*) (VPFS), and Santa Rosa Plateau fairy shrimp (*Linderiella santarosae*) (SRPFS), and three bird species: Least Bell's Vireo (*Vireo bellii pusillus*) (LBVI), Southwestern Willow Flycatcher (*Empidonax traillii extimus*) (SWFL), and Western Distinct Population Segment (DPS) 5 Yellow-billed Cuckoo (*Coccyzus americanus*) (YBCU).

Riparian/Riverine Areas

SBS conducted a review of Google Earth images dating back to September 29, 1996 and determined that the property has remained in the relatively same condition (i.e., vegetation, maintenance, etc.) over the past 25 years. No drainage or wetland areas were mapped on the Property by the National Wetland Inventory (NWI). LBVI has been documented within five miles of the property. Though no suitable habitat for LBVI was present on the Project Site, a total of four records (USFWS Carlsbad Fish and Wildlife Office: 2; California Natural Diversity Database: 2) from 1990, 1993, 2000, and 2008 were reported. The nearest documented record was in 2008 along Tualota Creek near Lake Skinner.

Two upland swales were present on the property: designated as Feature A and Feature A₁. Neither of these features contained evidence of concentrated flow, and based on that, do not appear to meet the criteria of a MSHCP Riparian/Riverine Area and are likely not jurisdictional. No Riparian/Riverine Area impacts will occur due to the lack of Riparian/Riverine Areas on the Project Site. The upland swales on the property will be included in the 5.33-acre ARL area. No Riparian/Riverine Area mitigation is required. The Proposed Project is consistent with the Riparian/Riverine Areas section of MSHCP Section 6.1.2.

Vernal Pools

No evidence of vernal pools was recorded on the Project Site or off-site Project area. No Vernal Pool impacts will occur due to the lack of Vernal Pools on the Project Site. No Vernal Pool mitigation is required. The Proposed Project is consistent with the Vernal Pool section of MSHCP Section 6.1.2.

Fairy Shrimp

No suitable habitat for fairy shrimp was detected on the Project Site and off-site Project area. No features were detected that would support fairy shrimp. No standing water or other sign of areas that pond water (i.e., mud cracks, tire ruts) were recorded. No Fairy Shrimp impacts will occur due to the lack of Fairy Shrimp habitat on the Project Site. No Fairy Shrimp mitigation is required. The Proposed Project is consistent with the Fairy Shrimp section of MSHCP Section 6.1.2.

Riparian Birds

No suitable habitat for LBVI, SWFL, or YBCU was present on the Property or off-site Project area. No impacts will occur to Riparian Birds due to the lack of Riparian Bird habitat on or near the Project Site. No Riparian Bird mitigation is required. The Proposed Project is consistent with MSHCP Section 6.1.2.

Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- g) **Less than Significant Impact.** There are no local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance other than the MSHCP as described above that would apply to the Proposed Project. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation:

Mitigation Measure BIO-1: A Pre-Construction Burrowing Owl Survey shall be conducted by a qualified biologist no more than 30-days prior to any ground disturbance activities. Surveys shall be completed following the recommendations and guidelines provided within the Burrowing Owl Survey Instructions for the Western Riverside MSHCP (RCA, 2006). Surveys should be conducted during weather that is conducive to observing owls outside their burrows and detecting burrowing owl signs. Surveys will not be accepted if they are conducted during rain, high winds (> 20 mph), dense fog, or temperatures over 90 °F. Surveys should be conducted in the morning one hour before sunrise to two hours after sunrise or in the early evening two hours before sunset to one hour after sunset. Count and map all burrowing owl sightings, occupied burrows, and burrows with owl sign. Record the location of all owls including numbers of pairs and juveniles and any behavior such as courtship and mating. Map the extent of all suitable habitat. It should be noted that owl signs may not be detectable if surveys are conducted within 5 days following rain.

Mitigation Measure BIO-2: The following BMPs, taken directly from the MSHCP, shall be implemented to the extent feasible and where applicable.

- A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.
- Water pollution and erosion control plans shall be developed and implemented in accordance with [Regional Water Quality Control Board] RWQCB requirements.
- The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
- The upstream and downstream limits of projects disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.
- Projects should be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern.
- Projects that cannot be conducted without placing equipment or personnel in sensitive habitats should be timed to avoid the breeding season of riparian identified in MSHCP Global Species Objective No. 7.
- When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing or other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments off-site. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.

- Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city, Fish and Wildlife Service [U.S. Fish and Wildlife Service], and California Department of Fish and Game [California Department of Fish and Wildlife], Regional Water Quality Control Board and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.
- Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.
- The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.
- The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.
- Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.
- To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).
- Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.
- The Permittee shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions including these BMPs.

Mitigation Measure BIO-3: Removal of vegetation or any other potential nesting bird habitat disturbances shall be conducted outside of the avian nesting season (February 1st through August 31st). If habitat must be cleared during the nesting season, a preconstruction nesting bird survey shall be conducted. The preconstruction nesting bird survey must be conducted by a biologist who holds a current Memorandum of Understanding (MOU) with the County of Riverside. If nesting activity is observed, appropriate avoidance measures shall be adopted to avoid any potential impacts to nesting birds. The nesting bird survey must be completed no more than 3 days prior to any ground disturbance. If ground disturbance does not begin within 3 days of the survey date a second survey must be conducted. Prior to issuance of a permit for rough grading or building (whichever comes first), the project's consulting biologist shall prepare and submit a report, documenting the results of the survey, to the Environmental Programs Division of Riverside County (EPD) for review.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Monitoring: None.

CULTURAL RESOURCES Would the project:				
8) Historic Resources				
a) Alter or destroy a historic site?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☒	☐

Source(s): Phase I Cultural Resources Survey Report, BFSA Environmental Services, December 15, 2023.

Findings of Fact:

a,b) **Less than Significant Impact.** A Phase I Cultural Resources Survey Report (see Appendix C), dated December 15, 2023, was prepared for the Proposed Project by BFSA Environmental Services, in compliance with CEQA and County of Riverside Cultural Resource Guidelines (Draft). The purpose of this investigation was to determine if any cultural resources would be affected by the Proposed Project. The study consisted of a records search of previously recorded archaeological sites on or near the property and the completion of an archaeological survey of the Project Site.

The archaeological records search results from the Eastern Information Center (EIC) at the University of California at Riverside (UCR) indicate 12 resources are located within a one-mile radius of the Project Site, none of which are recorded on the Project Site. The recorded resources include one historic schoolhouse complex with associated historic refuse, and one historic fire control station barracks and equipment garage. The records search results also indicate that 29 previous studies have been conducted within a one-mile radius of the Project Site, none of which include the Project Site.

The Project Site was vacant until 1990, when a single-family residence was constructed on the southwest corner of the Project Site. The aerial photographs indicate the western portion of the property was disked agriculturally from at least 1953. The USGS maps indicate that the property was vacant from as early as 1901. The Bureau of Land Management (BLM) General Land Office (GLO) search and National Register of Historic Places (NRHP) index did not reveal any additional information into the history of the property. The entire property was surveyed in 10-meter spaced transects. No cultural historical materials were identified throughout the property. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9) Archaeological Resources				
a) Alter or destroy an archaeological site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Source(s): Phase I Cultural Resources Survey Report, BFSa Environmental Services, October 24, 2023.

Findings of Fact:

- a, b) **Less Than Significant Impact With Mitigation Incorporated.** The Native American Heritage Commission (NAHC) was contacted for a Sacred Lands File (SLF) search, which was negative for the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance within one mile of the Proposed Project. In accordance with the recommendations of the NAHC, BFSa contacted all Native American consultants listed in the NAHC response letter at least two weeks prior to the initiation of the field survey. This request is not part of any AB 52 Native American consultation. One response was received from the Quechan Historic Preservation Officer, who deferred to other tribes in the area. BFSa directly contacted the Pechanga Band of Indians and the Soboba Band of Luiseño Indians and invited them to voluntarily participate in the survey of the property. Native American monitors Robert Cordova from the Pechanga Band of Indians and Jacob Rose from the Soboba Band of Luiseño Indians participated in the survey of the property.

During the survey, all visible soil was checked for cultural materials and all bedrock outcroppings were checked for signs of prehistoric use. No prehistoric cultural materials were identified throughout the property. One previously unrecorded prehistoric bedrock milling site (Temp-1) was identified on the property. Site Temp-1 was recorded according to the Office of Historic Preservation's manual, Instructions for Recording Historical Resources, using Department of Parks and Recreation forms. Site Temp-1 was identified approximately 25 meters north of the southern property boundary and approximately 125 meters east of East Benton Road. One bedrock milling feature (BMF A) containing a single milling slick was identified at the Site Temp-1. BMF A measures approximately five by five meters. No cultural materials were identified in association with the milling feature; however, ground visibility surrounding the milling feature was partially obscured due to higher density vegetation. Site Temp-1 is estimated to measure 25 square meters.

Although a prehistoric bedrock milling feature site (Temp-1) was identified during the archaeological survey, according to the development plan, Site Temp-1 is located outside the development area and will not be affected by grading. However, given the presence of Temp-1 along the boundary of the impact area, Mitigation Measure CR-1 shall be implemented to mitigate potential impacts to previously unidentified resources and any components of resources located within the development envelope.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation:

Mitigation Measure CR-1: Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant and address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

Mitigation Measure CR-2: If during ground disturbance activities, cultural resources are discovered, the following procedures shall be followed:

- a) All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the archaeologist, the tribal representative(s) and the Planning Director to discuss the significance of the find.
- b) At the meeting, the significance of the discoveries shall be discussed with the tribal representative(s) and the archaeologist. A decision shall be made, with the concurrence of the Planning Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.
- c) Grading or further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. Work shall be allowed to continue outside of the buffer area and monitoring will continue if needed.
- d) Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance.
- e) The applicant and the Project Archaeologist, with input from the Tribe(s) shall develop a Preservation Plan for the long term care and maintenance of the cultural resource(s). The plan shall indicate at minimum, the specific areas to be included in and excluded from longterm maintenance, prohibited activities, methods of preservation to be employed, the party responsible for the long term maintenance, appropriate protocols, monitoring and necessary emergency protocols.

Mitigation Measure CR-3: Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance with procedures stipulated in the Cultural Resources Management Plan.

- c) **Less Than Significant Impact.** No human remains were encountered during Lilburn Corporation's Site Visit that occurred on July 6, 2023. Nonetheless, the Proposed Project will be required to adhere to State Health and Safety Code Section 7050.5. In the event that human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin of the remains. Also, the Proposed Project would be required to adhere to DCC cannabis cultivation regulation CCR Title 4 Section 16304, which requires all licensees to immediately halt cultivation activities and implement section 7050.5 of the Health and Safety Code if human remains are discovered. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. As this is State Law and considered a standard Condition of Approval, no mitigation is required. Therefore, impacts are considered less than significant.

Mitigation: Mitigation Measures CR-1 to CR-3

Monitoring: Cultural Resources Monitoring Plan per Mitigation Measure CR-1

ENERGY Would the project:

10) Energy Impacts

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in potentially significant environmental impacts 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? | ☐ | ☐ | ☒ | ☐ |

Source(s): Riverside County Climate Action Plan (CAP); California Emissions Estimator Model (CalEEMod) version 2022.1.

Findings of Fact:

- a) **Less than Significant Impact.**

Electricity

County Ordinance No. 348 states "All cannabis cultivation operations shall include adequate measures to address the projected energy demand for cannabis cultivation at the lot. On-site renewable energy generation shall be required for all indoor cannabis cultivation operations. Renewable energy systems shall be designed to comply with the county's climate action plan and all state laws, mandates, and regulations regarding electrical power and solar, including the requirements of the California Energy Code. If there is a difference between the requirements

of the County's Climate Action Plan and any state law, mandate, or regulation, the Cannabis Cultivation operation shall comply with whichever requirement is greater."¹¹ The Proposed Project is estimated to consume 30,480 kilowatt-hours (kWh) maximum per day¹², or 11,125,200 kWh annually. The Proposed Project includes the installation of 91 solar arrays, each with a power output rating of 540 watts. The proposed solar arrays are expected to produce a total of 235¹³ kWh per day, or 86,000kWh annually, which would equate to approximately 0.77 percent of the Proposed Project's maximum demand. Remaining energy demands would be provided by Southern California Edison (SCE). The Proposed Project would include backup generators for use during power outages.

Currently, the existing Project Site uses electricity for the residential uses. Development of the Proposed Project would cause a permanent increase in demand for electricity when compared to existing conditions. The increased demand is expected to be sufficiently served by the on-site solar system and existing SCE electrical facilities. The Agricultural and Water Pump sector of the SCE planning area consumed 20,184 GWh in the year 2024.¹⁴ The Proposed Project would receive approximately 711,495 kWh annually from SCE. The increase in electricity demand from the project would represent 0.0035 percent of the 2024 SCE Agricultural and Water Pump consumption. Therefore, projected electrical demand would not significantly impact SCE's level of service.

The Proposed Project has been designed to comply with the 2022 Building Energy Efficiency Standards. The County would review and verify that the Proposed Project plans would be in compliance with the most current version of the Building and Energy Efficiency Standards. The Proposed Project would also be required to adhere to CALGreen, which establishes planning and design standards for sustainable developments, and energy efficiency. Adherence to these requirements would result in the Proposed Project being efficient in terms of energy consumption. The development of the Proposed Project is not anticipated to affect achievement of the 60 percent Renewable Portfolio Standard established in in the current SB 100. SCE and other electricity retailer's SB 100 goals include that end-user electricity use such as residential and commercial developments use would decrease from current emission estimates. The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and no mitigation measures are recommended.

Also refer to Compliance with Department of Cannabis Control Rules and Regulations in the Air Quality Analysis section of this Initial Study/Mitigated Negative Declaration.

Natural Gas

The Proposed Project would utilize propane gas. It would not rely on a natural gas provider. Title 24 is a collection of energy standards that address the energy efficiency of new (and altered) homes; the 2022 Building Energy Efficiency Standards will improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and

¹¹ Riverside County Ordinance No. 348.

¹² Estimate provided by the Applicant.

¹³ The area of the Project Site averages 6.0 to 6.5 peak sun hours daily and solar production can reach 1.75 kWh per watt.

¹⁴ California Energy Commission. Energy Reports <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0>. Accessed October 31, 2025711.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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nonresidential buildings. The Proposed Project would be built in accordance with the 2022 energy standards of Title 24; therefore, no significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation are anticipated and no mitigation measures are recommended. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

Fuel

During operations of the Proposed Project, the use of fuel would be generated by maintenance staff and product delivery/pick-up trips. The Proposed Project, which is estimated to generate up to 80 trips per day¹⁵, is not expected to result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. The fuel use related with vehicle trips produced by the Proposed Project would not be considered inefficient, wasteful, or unnecessary. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

- b) **Less than Significant Impact.** Construction of the Proposed Project would be temporary. Limitations on idling of vehicles and equipment, and requirements that equipment be properly maintained would minimize fuel use. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, paving, and building construction. The County's permissible hours for construction is 7:00 a.m. to 6:00 p.m. on non-holiday weekdays, including Saturdays. As on-site construction activities would be restricted between these hours, it is anticipated that the use of construction fuel would not be excessive.

The State's Title 24 energy efficiency standards are widely regarded as the most advanced energy efficiency standards. These standards help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Policy OS 16.1 of the County General Plan reinforces the implementation and enforcement of the California Code of Regulations (the "California Building Standards Code") particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. The Proposed Project would be required by State law to comply with the Title 24 energy efficiency standards and shall abide by the CAP. Furthermore, the Proposed Project would use a 4PM to 9PM load shift, thereby reducing its impact on the grid's most stressed period.

Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GEOLOGY AND SOILS Would the project directly or indirectly:

¹⁵ Based on the earlier version of the Site Plan with a smaller building footprint. 80 daily trips is therefore conservative.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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11) Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones

☐	☐	☒	☐
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a) Be subject to 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?

Source(s): Riverside County Information Technology (RCIT) Map My County GIS – Geographic Layers; California Department of Conservation – Earthquake Zones of Required Investigation; Preliminary Geotechnical Interpretive Report Proposed Commercial Cannabis Cultivation, Assessor's Parcel Number 915-330-040, Earth Strata Geotechnical Services, Inc., July 16, 2024

Findings of Fact:

- a) **Less than Significant Impact.** A Preliminary Geotechnical Interpretive Report, dated July 16, 2024, was prepared for the Proposed Project by Earth Strata Geotechnical Services, Inc. (see Appendix D). Earthquake risk is higher in the western portion of the County due to the presence of the San Andrea and San Jacinto faults, two of California's most active faults. In the Riverside Extended Mountain Planning Area, the San Jacinto fault is the most significant seismic hazard. The State Alquist-Priolo Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting as surface rupture is the most easily avoided seismic hazard. The A-P Act's purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.

The Project Site is not located in an Alquist-Priolo or Riverside County Earthquake Fault Zone. The likelihood of on-site rupture is considered low, due to the absence of known faults within the vicinity. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

12) Liquefaction Potential Zone

☐	☐	☒	☐
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a) Be subject to seismic-related ground failure, including liquefaction?

Source(s): Riverside County Information Technology (RCIT) Map My County GIS – Geographic Layers; California Department of Conservation – Earthquake Zones of Required Investigation

Findings of Fact:

- a) **Less than Significant Impact.** Liquefaction is a destructive secondary effect of strong seismic shaking and occurs when loose, unconsolidated, water-laden soils lose cohesion. The Project Site is not located in an area susceptible to liquefaction.¹⁶ Therefore, less than significant adverse impacts have been identified or are anticipated and no mitigation measures are required.

¹⁶ Riverside County Information Technology. Riverside County – Map my County GIS. Accessed June 5, 2023.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

13) Ground-shaking Zone

a) Be subject to strong seismic ground shaking?

☐
☐
☒
☐

Source(s): Riverside County Information Technology. Riverside County – Map my County GIS; Preliminary Geotechnical Interpretive Report Proposed Commercial Cannabis Cultivation, Assessor's Parcel Number 915-330-040, Earth Strata Geotechnical Services, Inc., July 16, 2024

Findings of Fact:

- a) **Less than Significant Impact.** Ground shaking can occur on the Project Site as a result of earthquakes associated with nearby and more distant faults. The San Jacinto Fault, with an approximate source to site distance of 16.80 kilometers, is the closest known active fault anticipated to produce the highest ground accelerations, with an anticipated maximum modal magnitude of 7.78.¹⁷ The Proposed Project would be required to comply with all applicable California Building Code (CBC) requirements and implement the recommendations listed in the Final Geotechnical Report to ensure that the Proposed Project does not pose a threat to the safety and welfare of the public. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

14) Landslide Risk

a) 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, collapse, or rockfall hazards?

☐
☐
☒
☐

Source(s): Riverside County General Plan: Riverside Extended Map Area Plan (REMAP), Figure 14 "Riverside Extended Mountain Area Plan Slope Instability"; Preliminary Geotechnical Interpretive Report Proposed Commercial Cannabis Cultivation, Assessor's Parcel Number 915-330-040, Earth Strata Geotechnical Services, Inc., July 16, 2024

¹⁷ Preliminary Geotechnical Interpretive Report Proposed Commercial Cannabis Cultivation, Assessor's Parcel Number 915-330-040, Earth Strata Geotechnical Services, Inc., July 16, 2024

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) **Less than Significant Impact.** The Project Site is not located in an area susceptible to seismically induced landslides¹⁸ and rockfalls.¹⁹ As stated previously, the Project Site is not located on a geologic unit susceptible to liquefaction. Therefore, the potential for seismically induced lateral ground spreading is considered low. Less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

15) Ground Subsidence

- a) 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 ground subsidence?

☐	☐	☒	☐
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Source(s): Riverside County Information Technology. Riverside County – Map my County GIS

Findings of Fact:

- a) **Less than Significant Impact.** Subsidence refers to the sinking or downward settling and compaction of soil and other surface material with little or no horizontal motion. The Project Site is not located in an area identified as susceptible to subsidence.²⁰ The Proposed Project is required to comply with the California Building Code, which would address any potential impacts to unstable soils. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

16) Other Geologic Hazards

- a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

☐	☐	☒	☐
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Source(s): USGS – California Volcano Observatory

Findings of Fact:

- a) **Less than Significant Impact.** Seiches are standing waves that reverberate on the surface of water in response to ground shaking and can damage buildings, roads and infrastructure

¹⁸ Preliminary Geotechnical Interpretive Report Proposed Commercial Cannabis Cultivation, Assessor's Parcel Number 915-330-040, Earth Strata Geotechnical Services, Inc., July 16, 2024

¹⁹ Riverside County General Plan: Riverside Extended Map Area Plan (REMAP), Figure 14 "Riverside Extended Mountain Area Plan Slope Instability"

²⁰ Riverside County Information Technology. Riverside County – Map my County GIS. Accessed June 5, 2023.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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surrounding the body of water. The Project Site is located approximately 5 miles east and 5 miles north of the nearest bodies of water, Lake Skinner and Diamond Valley Lake. No volcanoes occur on or near the Project Site.²¹ As stated in the geotechnical report, no oversteepened slopes exist on the site or are proposed. Impacts from mudflow are not anticipated. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

17) Slopes				
a) Change topography or ground surface relief features?	☐	☐	☒	☐
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	☐	☐	☒	☐
c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☐	☒

Source(s): Site Plan; Riverside County General Plan - REMAP

Findings of Fact:

- a, b) **Less Than Significant Impact.** The Project Site is located in an area with a slope range of 15-20%.²² The Project Site would be graded to construct the proposed structures. The construction of the agriculture building would not significantly alter the topography on-site, would not result in cut/fill slopes greater than 2:1, and would comply with the California Building Code. The project grades of the proposed driveways would connect to the existing grade of Benton Road. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** The Proposed Project would not connect to any sewer lines as the existing on-site septic system would be used for all operations. The grading of the Project Site would not affect or negate the existing subsurface sewage disposal system. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

²¹ USGS. California Volcano Observatory. Accessed June 5, 2023.

²² Riverside County General Plan: Riverside Extended Map Area Plan (REMAP), Figure 14 "Riverside Extended Mountain Area Plan Slope Instability"

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18) Soils				
a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐

Source(s): US Department of Agriculture: Web Soil Surveys; Preliminary Geotechnical Interpretive Report Proposed Commercial Cannabis Cultivation, Assessor's Parcel Number 915-330-040, Earth Strata Geotechnical Services, Inc., July 16, 2024

Findings of Fact:

- a) **Less than Significant Impact.** Site preparation and grading for the Proposed Project have the potential to loosen surface soils, consequently making soils susceptible to wind and/or water erosion. Moreover, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb more than one acre of soil; therefore, the Proposed Project would be subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit include: clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion during construction. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** Expansive soils, as defined in Section 1803.5.3 of the California Building Code (2019), have a plasticity index of 15 or greater, more than 10 percent of the soil particles pass a No. 200 sieve (75 um/micrometers), more than 10 percent of the soil particles less than 5 micrometers in size, and have an expansion index greater than 20. As stated in the Geotechnical Interpretive report, the on-site earth materials are primarily comprised of topsoil and bedrock. Residual topsoil, encountered in the upper 2 to 4 feet, blankets the site and underlying bedrock. These materials were noted to be generally dark yellowish brown, silty and clayey sand which were very porous, slightly moist to moist and in a loose state. Tonalite was encountered beneath the topsoil to the maximum depth explored of 6 feet. The Val Verde Tonalite was generally noted to be light gray to yellowish brown, dry to slightly moist, and was found to be in a moderately hard to very hard state. These soil types exhibit a very low expansion potential. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- c) **Less than Significant Impact.** The Proposed Project would not connect to any existing sewer lines. The existing 750-gallon septic system would be sufficient to handle the additional wastewater generated by 7 employees working five days per week, eight hours per day.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

19) Wind Erosion and Blows and from project either on or off site.

☐	☐	☒	☐
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a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?

Source(s):

Findings of Fact:

- a) **Less than Significant Impact.** As with any movement of soil, development of the Project Site would have the potential to loosen surface soils, thereby making soils susceptible to wind and/or water erosion. As previously discussed, the Proposed Project would be required to prepare a SWPPP and WQMP to ensure potential impacts from erosion are reduced to the extent feasible. The SWPPP and WQMP would address any issues related to potential erosion. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GREENHOUSE GAS EMISSIONS Would the project:

20) Greenhouse Gas Emissions

☐	☐	☒	☐
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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?

☐	☐	☒	☐
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Source(s): CalEEMod Output; Riverside County General Plan; Riverside County Climate Action Plan ("CAP")

Findings of Fact:

- a) **Less than Significant Impact.** The County of Riverside adopted the *Climate Action Plan* (CAP) in December of 2015 and updated it in November of 2019 and then September 2026. The 2015 CAP utilized a GHG emissions reduction target of a 15 percent decrease from 2008 levels by the year 2020 in order to meet the requirements of AB 32 and SB 375. Riverside County's 2022

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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GHG emissions totaled 3,985,857 metric tons (MT) of carbon dioxide equivalent (CO₂e).²³ The State has set goals for reducing GHG emissions by 2030 and 2045 through AB 32, EO B-30-15, AB1279, and AB 98. Stated most recently in the 2022 Scoping Plan, these goals include a Statewide emission reduction target of 40 percent below 1990 levels by 2030 (which translates to the County achieving a 49 percent reduction below 2008 baseline levels), and a reduction target of 85 percent below 1990 levels of anthropogenic emissions by 2045 (87 percent below 2008 baseline levels). One of the overarching goals of CAP is to provide an implementation plan to implement the stated reduction measures of the CAP.

Appendix D of the Riverside County CAP Update also states that projects that do not exceed the CAP's screening threshold of 3,000 MTCO₂e per year are considered to have less than significant GHG emissions and are in compliance with the County's CAP Update. Therefore, to determine whether the project's GHG emissions are significant, the following GHG impacts analysis prepared for the Proposed Project uses the SCAQMD draft local agency tier 3 threshold and County of Riverside CAP screening threshold of 3,000 MTCO₂e per year for all land use types.

Projects that exceed emissions of 3,000 MTCO₂e per year are also required to use Screening Tables. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the County's CAP Update. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions. Those projects that do not garner 100 points using the Screening Tables will need to provide additional analysis to determine the significance of GHG emissions.

Emissions associated with the construction and operation of the Proposed Project were estimated using CalEEMod version 2022. The model includes 19,360 square feet of light industrial use generating up to 80 daily trips and with the assumption that the entire facility would be powered by the electrical grid. The model is based on an older version of the Site Plan with more building coverage and that would have generated more trips than currently proposed. As such, greenhouse gas emissions estimated for the Proposed Project are considered conservative.

The Proposed Project is estimated to consume 30,480 kilowatt-hours (kWh) maximum per day, or 11,125,200 kWh annually. The Proposed Project includes the installation of 91 solar arrays, each with a power output rating of 540 watts. The proposed solar arrays are expected to produce a total of 235 kWh per day, or 86,000 kWh annually, which would equate to approximately 0.77 percent of the Proposed Project's maximum demand.

Table 6 shows that the total for the Proposed Project's construction emissions amortized over 30 years would be approximately 10.24 MTCO₂e.

²³ Riverside County 2026 Climate Action Plan Update, Table 3-6, p. 39

Table 6
Greenhouse Gas Construction Emissions
(Metric Tons per Year)

Year	CO ₂	CH ₄	N ₂ O	R
2027	160.69	0.00	0.00	0.01
2028	145.06	0.00	0.00	0.01
Total MTCO₂e	307.26			
Construction Amortized (30 Years)	10.24			

Source: CalEEMod.2022.1

Table 7
Greenhouse Gas Operational Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O	R
Mobile	287.72	0.01	0.01	0.38
Area	0.32	0.00	0.00	--
Energy	72.78	0.01	0.00	--
Water	83.39	1.39	0.03	--
Waste	20.36	2.03	0.00	--
Refrigeration	--	--	--	0.68
Construction Amortized (30 Years)	10.24			
Total MTCO₂e	572.51			
County of Riverside screening threshold	3,000			
Significant	No			

Source: CalEEMod.2022.1 Annual Emissions.

As shown in Table 7, the Proposed Project operations would generate approximately 572.51 MTCO₂e annually. According to the thresholds of significance, a cumulative global climate change impact would not occur. GHG emissions created from the operations of the Proposed Project would not exceed the County screening threshold of 3,000 MTCO₂e. As stated previously, the Proposed Project would use a 4PM to 9PM load shift, thereby reducing its impact on the grid's most stressed period. SCE uses natural gas-fired plants to meet high electricity demand during peak hours. This load shift would further reduce the Proposed Project's greenhouse gas emissions. Therefore, operation of the Proposed Project would not create a significant cumulative impact to global climate change.

Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

- b) **Less than Significant Impact.** As referenced above, the County of Riverside CAP Update (updated in September 2026) contains guidance on Riverside County's GHG Inventory reduction goals, thresholds, policies, guidelines, and implementation programs. In particular, the CAP elaborates on the General Plan goals and policies relative to the GHG emissions and provides a specific implementation tool to guide future decisions of the County of Riverside.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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To keep the CAP in line with the State's reduction goals, the following targets are set for Riverside County. In the year 2030, the County would need to reduce emissions by 211,910 MTCO₂e annually below the Adjusted Business-As-Usual (ABAU) scenario to meet the State-aligned target. In the year 2045, the County would need to reduce emissions by 2,564,723 MTCO₂e annually below the ABAU scenario to meet the State-aligned target.²⁴ Furthermore, the goals and supporting measures within the County's CAP Update are proposed to reflect and ensure compliance with changes in the local and State policies and regulations such as SB 32 and California's 2017 Climate Change Scoping Plan. Therefore, compliance with the County's CAP in turn reflects consistency with the goals of the CARB Scoping Plan, Assembly Bill (AB) 32 and Senate Bill (SB) 32.

According to the County's CAP Update, projects that do not exceed emissions of 3,000 MTCO₂e per year are also required to include the following efficiency measures:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and
- Water conservation measures that match the California Green Building Code in effect as of January 2017.

Also, refer to Compliance with Department of Cannabis Control Rules and Regulations in the Air Quality Analysis section of this Initial Study/Mitigated Negative Declaration.

As shown above, the proposed project is anticipated to generate 572.51 MTCO₂e per year and would not exceed the County's screening threshold. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HAZARDS AND HAZARDOUS MATERIALS Would the project:

21) Hazards and Hazardous Materials

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) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	☐	☐	☒	☐
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	☐	☐	☐	☒

²⁴ Riverside County 2026 Climate Action Plan Update, Table 3-6, p. 39

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Source(s): Department of Toxic Substances Control *EnviroStor*

Along with compliance with the relevant regulations presented throughout this analysis section, the project would be required to adhere to the following DCC cannabis cultivation regulations:

CCR Title 4 Section 15011:

Each cultivation license application shall include the following, if applicable:

- Evidence that the applicant has conducted a hazardous materials record search of the EnviroStor database for the proposed premises. If hazardous sites were encountered, the applicant shall provide documentation of protocols implemented to protect employee health and safety.

CCR Title 4 Section 16310:

(a) The cultivation plan for each Specialty Cottage, Specialty, Small, and Medium licenses shall include all of the following:

(3) A pest management plan which shall include, but not be limited to, the following:

(A) Product name and active ingredient(s) of all pesticides to be applied to cannabis during any stage of plant growth;

(B) Integrated pest management protocols, including chemical, biological, and cultural methods the applicant anticipates using to control or prevent the introduction of pests on the cultivation site

CCR Title 4 Section 15011:

For all cultivator license types except processor, a signed attestation that states the commercial cannabis business shall contact the appropriate County Agricultural Commissioner regarding requirements for legal use of pesticides on cannabis prior to using any of the active ingredients or products included in the pest management plan and shall comply with all pesticide laws.

Findings of Fact:

- a, b) **Less than Significant Impact.** Components of the Proposed Project that may involve the potential impacts from hazardous materials include the on-site use of materials required for construction of the 15,864 square-feet of building coverage, paved access, water storage tanks, and the transportation of materials required for construction. Construction of the Proposed Project would require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. Hazardous materials commonly found in cannabis-related activity include fertilizers, soil amendments (such as nitrogen, phosphorus and

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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potassium), herbicides, fungicides, pesticides and insecticides. Prior to issuance of a Building and Safety permit, handling of any hazardous materials/wastes will be reviewed by Hazardous Materials Management Branch (HMMB) to ensure compliance with applicable California Health and Safety codes, County of Riverside Ordinances and other applicable federal, State, and local regulations.

Development of the Proposed Project would disturb approximately 4.52 acres, and therefore would be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. Requirements of the permit would include development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include Best Management Practices (BMPs) to control and abate pollutants during construction. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The Project Site is developed with a single-family residence and does not contain any emergency facilities. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County. A 30-foot-wide access driveway is proposed along Benton Road at the west corner of the site. Access provided via Benton Road would be maintained for ingress/egress at all times. In addition, the facility will require a business emergency plan for the storage of hazardous materials at or greater than 55 gallons, or if any acutely hazardous materials or extremely hazardous substances are handled or stored on the premises. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- d) **No Impact.** Cottonwood School is the nearest school to the Project Site and is located approximately 6 miles south of the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** According to the Hazardous Waste and Substances site list as compiled pursuant to Government Code Section 65962.5, reported by the Department of Toxic Substances Control through the EnviroStor database,²⁵ there is no existing toxic or hazardous material recognized as an environmental concern at the Project Site. A Phase I Environmental Site Assessment (ESA) was prepared for the Project Site by Lilburn Corporation in February 2024 (see Appendix E). The Phase I ESA did not identify any Recognized Environmental Conditions (RECs) associated with storage, treatment, disposal, or releases of hazardous substances or petroleum products associated with the site or any adjacent properties. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

²⁵ California Department of Toxic Substances Control. Envirostor Database Accessed June 5, 2023.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
22) Airports				
a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☒	☐
b) Require review by the Airport Land Use Commission?	☐	☐	☒	☐
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐

Source(s): Site Plan

Findings of Fact:

a-d) **Less than Significant Impact.** The purpose of airport master plans is to assess the demand for airport facilities and to guide the development necessary to meet those demands. Since the Project Site is not on-airport property, there is no inconsistency. The Project Site is not located within any Airport Land Use Commission's influence areas.²⁶ Therefore, the Airport Land Use Commission will not be required to review the Proposed Project. The Project Site is located approximately 8.7 miles east of the boundaries of the French Valley Airport influence area, resulting in no safety hazards for anyone residing or working in the area of the Project Site.²⁷ The Proposed Project includes 15,864 square-feet of building coverage that includes grow rooms, storage, and logistics area. The tallest proposed structure would be 22 feet high. These proposed structures and uses would not result in any hazards to aircraft flights. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

HYDROLOGY AND WATER QUALITY Would the project:

23) Water Quality Impacts				
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	☐	☐	☒	☐

²⁶ Riverside County Information Technology. Riverside County – Map my County GIS. Accessed June 7, 2023.

²⁷ Riverside County Information Technology. Riverside County – Map my County GIS. Accessed June 7, 2023.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a stream or river or through the addition of impervious surfaces?				
d) Result in substantial erosion or siltation on-site or off-site?	☐	☐	☒	☐
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	☐	☐	☒	☐
f) 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?	☐	☐	☒	☐
g) Impede or redirect flood flows?	☐	☐	☒	☐
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	☐	☐	☒	☐
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source(s): DBS Engineering, Drainage Study for Parcel 1 of PM 8957 38455 E. Benton Road, Riverside County, CA 92544 Commercial Agricultural Facility, September 19, 2025; Eastern Municipal Water District UWMP; Riverside County General Plan Safety Element

Along with compliance with the relevant regulations presented throughout this analysis section, the project would be required to adhere to the following DCC cannabis cultivation regulations:

CCR Section 16311. Supplemental Water Source Information: The cultivation license application shall include the following, if deemed applicable:

If the water source is a groundwater well, provide the following:

- (1) The groundwater well's geographic location coordinates, in either latitude and longitude or the California Coordinate System; and
- (2) A copy of the well completion report filed with the Department of Water Resources pursuant to section 13751 of the Water Code. If no well completion report is available, the applicant shall provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well completion report. If no well completion report is available, the State Water Resources Control Board may request additional information about the well.

Findings of Fact:

- a) **Less than Significant Impact.** The Proposed Project would develop 4.52 acres of land and therefore would be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a

Stormwater Pollution Prevention Plan (SWPPP). The purpose of an SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction. Therefore, the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

The NPDES also requires a Water Quality Management Plan (WQMP). A Preliminary WQMP (see Appendix F), dated March 15, 2021, was prepared for the Proposed Project by Ventura Engineering Inland, Inc. The WQMP includes mandatory compliance of Best Management Practices (BMPs) as well as compliance with NPDES Permit requirements. BMPs include, but not limited to, minimizing impervious area, incorporation bioinfiltration basins, dispersing runoff to adjacent pervious areas or small collection areas, and keeping the runoff from sediment producing pervious area hydrologically separate from developed areas that require treatment. Review and approval of the WQMP and all BMPs by the County would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** Potable water will be provided by an existing well on-site. All domestic water use demand in the vicinity of the Project Site is provided by wells owned and maintained by property owners. The Proposed Project includes water storage (4 proposed water tanks each with capacity of 5,000 gallons for fire suppression and an existing 5,000-gallon water tank for the existing residence). The existing domestic use is estimated at 169 gallons per day (gpd).²⁸ The increase in demand with the proposed cannabis cultivation facility would be an additional 2,029 gpd. The proposed facility would utilize the water harvested from HVAC and dehumidifier condensate, which is estimated to be approximately 1,826 gpd. Therefore, the net increase in water demand would be 203 gpd. Water would be pumped and stored in the on-site water tanks. The existing on-site water well would yield approximately 10,080 gpd, thereby exceeding the Proposed Project's estimated total demand. This demand would not decrease groundwater supplies in the vicinity as there is no underlying groundwater basin – only fractured bed rock. There are no groundwater recharge facilities in the vicinity and therefore the Proposed Project would not interfere with any groundwater recharge. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- c) **Less than Significant Impact.** A Hydrology Report, dated September 19, 2025, was prepared for the Proposed Project by DSB Engineering (see Appendix G). Under existing conditions, the drainage pattern of Parcel 1 flows south at an average slope of 7%. The Proposed Project would include multiple drainage facilities to convey the runoff across the proposed improvements and out towards its natural drainage course. The proposed facilities include storm pipes, a catch basin inlet, and a riprap energy dissipator. On-site runoff would first drain to a proposed bioretention basin for first flush treatment, then drain to a detention basin.

²⁸ Based on 3.06 person per household (<https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf>) and 55 gallons per person per day (<https://www.emwd.org/water-use-efficiency-requirements>)

Therefore, the Proposed Project would not 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. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant Impact.** During development of the Project Site, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb approximately 4.52 acres and therefore is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial erosion or siltation on- or off-site. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- e, f) **Less than Significant Impact.** Under existing conditions, the drainage pattern of Parcel 1 flows south at an average slope of 7%. The 100-year peak flow rate is 22.15 cubic-feet per second (cfs). Without any drainage facilities, the 100-year peak flow rate is 23.70 cfs. The proposed drainage facilities include storm pipes, a catch basin inlet, and a riprap energy dissipator. The proposed drainage structures are adequately sized to convey the on-site flow. On-site runoff would first drain to a proposed bioretention basin, which contains a volume of 29,176 cubic-feet (CF), for first flush treatment, then drain to a detention basin. As concluded in the Hydrology report, the proposed bioretention basin is sized to mitigate peak flows to existing conditions.
- Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- g) **Less than Significant Impact.** The proposed project will not cause additional locations of stormwater discharge to occur as the ultimate discharge locations remain the same. As stated previously, there would be no increase in peak flow rate. Therefore, the Proposed Project would not impede or redirect flood flows. Less than significant impacts are identified or anticipated, and no mitigation measures are required.
- h) **Less than Significant Impact.** Seiches are standing waves generated in enclosed bodies of water in response to ground shaking. The Project Site is located approximately 5 miles east and 5 miles north of the nearest bodies of water, Lake Skinner and Diamond Valley Lake. The Project Site is neither located within a 100-year nor a 500-year FEMA flood zone area.²⁹ Tsunamis are large waves generated in open bodies of water by fault displacement of major ground movement. The Project Site is not located in a tsunami hazard area.³⁰ Therefore, the Proposed Project is not anticipated to risk release of pollutants due to project inundation. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

²⁹ County of Riverside. General Plan: REMAP -Figure 10: Riverside Extended Mountain Area Plan Special Flood Hazard Areas Map

³⁰ California Department of Conservation. California Tsunami Maps. Accessed June 21, 2023.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- i) **Less than Significant Impact.** The Proposed Project would disturb approximately 4.52 acres of land and is therefore subject to the NPDES permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's CGP include removal of vegetation, grading excavating, or any other activity that causes the disturbance of at least one acre. The CGP requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. Implementation of a SWPPP is for the purpose of protecting surface water quality during construction activities.

The preliminary WQMP prepared for the Proposed Project is intended to comply with the requirements of the County of Riverside Ordinance No. 457, which includes the requirement for the preparation and implementation of a Project-Specific WQMP. The WQMP includes Best Management Practices for the long-term protection of groundwater and surface waters. The Project Applicant shall be responsible for the implementation and funding of the WQMP which will be approved by the County of Riverside.

California's Sustainable Groundwater Management Act (SGMA) requires local Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or to develop Alternatives to GSPs. GSPs provide a roadmap for how groundwater basins will reach long-term sustainability. Priority Basins and GSPs are available on the Department of Water Resources' (DWR). The Project Site is south of the San Jacinto Groundwater Basin and east of the Temecula Valley Groundwater Basin. It does not overlie any groundwater basins³¹ defined by either the State or regional water agencies. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

LAND USE/PLANNING Would the project:

24) Land Use

a) 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?

☐	☐	☒	☐
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b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

☐	☐	☐	☒
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Source(s): Riverside County Information Technology GIS *Map My County*

³¹ Groundwater Sustainability Agencies. GSA Map viewer

<https://sgma.water.ca.gov/webgis/index.jsp?appid=gasmaster&rz=true>. Accessed January 16, 2024.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) **Less than Significant Impact.** The Project Site is located within the Rural Residential (RR) General Plan designation. This land use designation allows one single-family residence per five acres, as well as limited animal-keeping and agricultural activities. Limited recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses, and governmental uses are allowed within this designation. Neighborhood-serving small-scale commercial uses that are compatible with the surrounding uses are allowed. The zoning classification for the Project Site is Light Agriculture (A-1-10). This zoning classification permits greenhouses, orchards, and herbs gathering in a commercial scale. The Proposed Project is a cannabis cultivation facility that would be consistent with the A-1-10 zoning. Less than significant impacts are identified or are anticipated, and no mitigation measures are required.
- b) **No Impact.** The Project Site is currently developed with a single-family residence. The Proposed Project would construct a cannabis cultivation facility on the same site, but would not demolish or displace the existing residence. Construction activities would take place within the Project Site. Therefore, the development of the Proposed Project would not disrupt or divide an established community as none exist in the vicinity. No impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

MINERAL RESOURCES Would the project:

25) Mineral Resources

a) Result in the loss of availability of a known mineral resource that would be of value to the region or 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?	☐	☐	☒	☐
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	☐	☐	☐	☒

Source(s): Riverside County General Plan (Chapter 5: Open Space Figure OS-6) "Mineral Resources Zone," Riverside County General Plan Extended Mountain Area Plan, Table 1 "Land Use Designations Summary,"

Findings of Fact:

- a, b) **Less than Significant Impact.** The State Mining and Geology Board (SMGB) has also established Mineral Resources Zones (MRZ) to designate lands that contain mineral deposits. The Project Site occurs in an area designated by the County for Rural Residential. It does not occur within an Open Space Mineral Resources (OS-MR) land use designation, which includes mineral extraction and processing facilities and areas held in reserve for future mineral extraction and processing. The Riverside County General Plan identifies the Project area as

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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“Unstudied (No MRZ designation issued).”³² The Project Site is located in an area with scattered residential uses that would not be compatible with mineral resource extraction. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **No Impact.** There are no existing or abandoned mines or quarries on the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in:

26) Airport Noise

a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) 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?

☐
☐
☒
☐

b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐
☐
☒
☐

Source(s): Riverside County Information Technology. Riverside County – Map my County GIS

Findings of Fact:

- a, b) **Less than Significant Impact.** The Project Site is located approximately 10 miles east of the nearest airport, French Valley Airport. Therefore, people residing or working in the Project Site would not be exposed to excessive noise levels. Additionally, the Project Site is not within an Airport Influence Area.³³ Therefore, the Proposed Project will not be required to go through Airport Land Use Commission review. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

³² County of Riverside. General Plan: Multipurpose Open Space Element -Figure OS-6: Mineral Resource Zones.

³³ Riverside County Information Technology. Riverside County – Map my County GIS. Accessed June 7, 2023.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
27) Noise Effects by the Project				
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, noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Source(s): Transportation Screening Assessment

Findings of Fact:

- a) **Less than Significant Impact.** Construction noise would be temporary, intermittent and short-term, and would not present any long-term impacts. The Proposed Project is the development and operation of a cannabis cultivation facility. It would permanently increase the ambient noise levels in the project vicinity due to the vehicle trips to be added to the vicinity and the back-up generators during power outages. Construction activities would be limited to the hours and days allowed in Chapter 9.52: "Noise regulations" of the Riverside County Municipal Code.

Noise-generating activities on-site during operations would include delivery trucks entering and exiting the site. Exhaust fans would be installed for use only during emergency situations. The nearest residence is approximately 500 feet south of the Building 3. Noise levels are expected to remain below the County's exterior daytime noise threshold of 65 dBA and the County's nighttime exterior noise threshold of 45 dBA at the nearest residence. Vehicles entering and exiting the site are anticipated to be maximum 80 trips per day.³⁴ Back-up generators would be located adjacent to the proposed buildings. Although the noise generated would be substantial, it would be temporary, occurring only during emergencies. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** Construction activities can produce vibration that may be felt by adjacent uses. Although the primary sources of vibration during construction would be from bulldozers and vibratory rollers, other vibratory equipment could be used during installation of pavement. Construction of the Proposed Project would be temporary and would not present any long-term impacts. The Proposed Project includes a CUP to allow for the operation of a cannabis cultivation facility. Vibration may be generated by the backup generators. However, it would be temporary and short-term. Furthermore, provided that the nearest residential structure is approximately 180 feet east of the Project Site property line, vibration would not be perceptible to the nearest receptor. Operation of the Proposed Project would not generate substantial groundborne vibration. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

³⁴ 80 daily trips was determined for a Marijuana Cultivation and Processing facility with 19,360 SF of building coverage. The current Proposed Project would have a smaller building footprint and therefore, project trips would not exceed 80 daily trips.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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PALEONTOLOGICAL RESOURCES:

28) Paleontological Resources

- a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?

☐	☐	☒	☐
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Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity;"
Findings of Fact:

- a) **Less than Significant.** The Project Site is located in an area mapped as having low potential for paleontological resources.³⁵ This category encompasses lands for which previous field surveys and documentation demonstrates a low potential for containing significant paleontological resources. Additionally, as stated in the Geotechnical Interpretive report, the on-site earth materials are primarily comprised of topsoil and bedrock. Residual topsoil, encountered in the upper 2 to 4 feet, blankets the site and underlying bedrock. These materials were noted to be generally dark yellowish brown, silty and clayey sand which were very porous, slightly moist to moist and in a loose state. Tonalite was encountered beneath the topsoil to the maximum depth explored of 6 feet. The Val Verde Tonalite was generally noted to be light gray to yellowish brown, dry to slightly moist, and was found to be in a moderately hard to very hard state. As such, the Proposed Project is not anticipated to require any direct mitigation for paleontological resources. Less than significant impacts would occur and no mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

POPULATION AND HOUSING Would the project:

29) Housing

- a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

☐	☐	☐	☒
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- b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?

☐	☐	☒	☐
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- c) 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)?

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Source(s): Site Plan

Findings of Fact:

- a) **No Impact.** The Project Site is currently developed with an existing single family residential structure and supporting accessory structures. The development of the Proposed Project would not displace existing people or housing. The existing residents would remain at the site and the additional workers would travel to the site five days per week. The construction of replacement

³⁵ County of Riverside. General Plan – Multipurpose Open Space Element. Figure OS-8.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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housing elsewhere would not be necessary. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** The Proposed Project is estimated to require 7 employees. The employees that would fill these roles are anticipated to reside within commuting distance and would not generate needs for any housing. In addition, should the Proposed Project require employees to relocate to the area for work, there is sufficient vacant housing available within the general area. Because of the low employment demand, demand for housing would be nominal. Thus, the Proposed Project would not create a demand for substantial additional housing, including housing affordable to households' earning 80 percent or less of the County's median income. Less than significant impacts are identified or anticipated, and no mitigation measures are required.
- c) **Less than Significant Impact.** The Proposed Project site will not result in a demand for additional housing or infrastructure. No new utility lines or roads would be constructed, nor would existing infrastructure need to be extended thereby inducing additional population growth. The 7 employees will commute from the local area. There will not be a need for additional housing and businesses, or an extension of road and other infrastructure. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 following public services:

30) Fire Services

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Source(s): Riverside County Information Technology. Riverside County – Map my County GIS, Riverside County Fire Department *Strategic Plan*

Findings of Fact:

Less than Significant Impact. Due to the natural occurring climate, the County of Riverside has a high-risk factor for wildfires. The Project Site occurs within a “very high” fire hazard classification.³⁶ The Riverside County Fire Department provides fire and emergency services to the unincorporated communities of Riverside County. Pursuant to the Riverside County Fire Department Strategic Plan 2009-2029, the department consists of 93 fire stations within the County. The nearest fire station to the Project Site is station No. 28 (Sage Fire Station). It is located approximately 2.5 miles north of the Project Site at 35655 Sage Rd, Hemet, CA 92544. Deferred submittals shall be required for Carbon Dioxide Gas Enrichments systems and Plant Processing/Extractions systems. The Project Applicant is required to pay development impact fees to account for potential impacts of the Proposed Project under Ordinance No. 659. The Proposed Project is expected to include fire safety and suppression measures, such as

³⁶ Riverside County Information Technology. Riverside County – Map my County GIS. Accessed June 26, 2023.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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appropriate building materials, fire sprinklers, and paved fire access. A preliminary Hazardous Vegetation and Fuel Management Plan shall be provided to and approved by Riverside County Fire Department prior to parcel map recordation. A final plan shall be provided prior to grading permit clearance. This project will ensure hazardous materials are in compliance with federal, state, and local regulations, including California Fire Code (CFR), California H&SC, and California Fire Code as amended through local ordinances. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

31) Sheriff Services

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Source(s): Riverside County General Plan

Findings of Fact:

Less than Significant Impact. The Riverside County Sheriff's Department will provide law enforcement and first responders services to the Project Site. The closest Riverside County Sheriff station is located approximately 10 miles west of the Project Site at 30755-A Auld Road, Murrieta. The Proposed Project would require "No Loitering" signs from the sheriff's department to deter unwanted guests. The proposed uses are consistent with the Project Site's zoning of Light Agriculture (A-1-10). There shall be no signage on the building, except the address and "no loitering" sign, as it will not be used for commercial retail purposes and has no need for visitors. Further, the absence of signage is in keeping with the requirements of State law while at the same time minimizing the presence of an attractive nuisance. Lack of signage will help limit attention and thus, the threat of crime. The development impact fees paid by the Project Applicant would be allocated to finance an increased demand for police protection services. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32) Schools

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Source(s): Riverside County General Plan Riverside Extended Map Area Plan

Findings of Fact:

Less than Significant Impact. The Project Site is located within the Hemet Unified School District. Cottonwood School is the nearest school to the Project Site and is located approximately 6 miles south of the Project Site. The Project Applicant will be required to pay applicable development fees in support of public school facilities. This fee will be sufficient in mitigating impacts of the Proposed Project on the school district. Moreover, the increase in employment demand from the Proposed Project will be fulfilled by the local population. The Proposed Project is not anticipated to result in an increase in population growth within the area, thereby not

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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increasing the number of students in that area. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

33) Libraries

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Source(s): Riverside County General Plan Riverside Extended Map Area Plan

Findings of Fact:

Less than Significant Impact. The Riverside County Library System serves residents of the County. The nearest library to the Project Site is French Valley Library, located approximately 10 miles west of the Project Site. The Proposed Project is not anticipated to have a significant impact on libraries services as no residential development is proposed and no significant increase in population would result. The demand for 7 full-time employees for the Proposed Project is expected to be met by residents of the local community. The collection of developer impact fees at the time of building permit issuance would ensure potential impacts to library services are reduced to a less than significant level. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34) Health Services

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Source(s): Riverside County General Plan Safety Element; Temecula Valley Hospital website

Findings of Fact:

Less than Significant Impact. Health Services will be provided by several facilities within the region. The nearest hospital to the Project Site is Temecula Valley Hospital (TVH), located approximately 11 miles southwest of the Project Site. The TVH plans to expand its facilities to include construction of a new 120-bed freestanding facility for behavioral health services, addition of a new medical office building, a new four-story tower with 82 patient beds with expanded ICU and stroke services, an increase in the number of emergency treatment bays from 21 to 30, and additional training space for the growing Graduate Medical Education Residency Program.³⁷ The Proposed Project does not include new residential uses or result in any significant population increase that would generate additional demand for health services. The demand for 7 full-time employees for the Proposed Project is expected to be met by the local community. No new/upgraded healthcare facilities would be necessary with implementation of the Proposed Project. Moreover, any potential impacts of the Proposed Project would be mitigated by payment of development impacts fees. Therefore, less than

³⁷ <https://www.swhtemeculavalley.com/about/expansion-2023>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

RECREATION Would the project:

35) Parks and Recreation

a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☐	☒

Source(s): County Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications), County Ord. No. 659 (Establishing Development Impact Fees), County of Riverside. General Plan – Multipurpose Open Space Element

Findings of Fact:

- a) **No Impact.** The Proposed Project is the construction and operation of a cannabis cultivation facility. No significant population growth is anticipated from implementation of the Proposed Project. It does not include recreational facilities, nor does it require the construction or expansion of recreational facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b) **No impact.** The demand for 7 full-time employees for the Proposed Project is expected to be met by residents of the local community. The closest recreation area to the Project Site is Lake Skinner Recreation Area, located approximately 5 miles northwest of the Project Site. Given the distance to this recreational facility, project employees are not anticipated to visit during their break hours. Therefore, the Proposed Project would not increase the use of existing neighborhood or regional parks or other recreational facilities. It would not result in significant population growth and would not require the construction or expansion of recreational facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** The Project Site is not located within a recreation and park district.³⁸ The Proposed Project is not located in a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees).³⁹ The implementation of the Proposed

³⁸ County of Riverside. General Plan – Multipurpose Open Space Element. Figure OS-3a “Forestry Resources Western Riverside County Parks, Forests, and Recreational Areas.”

³⁹ Riverside County Office of Economic Development. Office of Economic Development – Service Areas. <https://www.arcgis.com/apps/dashboards/2bb180b117bc4754aec6228fae43b989>. Accessed May 2025.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project is not anticipated to lead to substantial population growth and significant deterioration of Lake Skinner Recreation Area or other recreational facilities in the vicinity. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

36) Recreational Trails

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a) Include the construction or expansion of a trail system?

Source(s): Riverside County General Riverside Extended Mountain Area Plan Figure: 7 (Trails and Bikeway System)

Findings of Fact:

- a) **No Impact.** There are no publicly accessed scenic trails or regional trails near the Project Site. The nearest trail is located approximately 1.6 miles southeast of the Project Site.⁴⁰ The Proposed Project is the construction and operation of a cannabis cultivation facility. No construction or the expansion of a trail system is proposed. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:

37) Transportation

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a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

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c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

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d) Cause an effect upon, or a need for new or altered maintenance of roads?

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e) Cause an effect upon circulation during the project's construction?

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f) Result in inadequate emergency access or access to nearby uses?

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Source(s): Riverside County General Plan: REMAP; RCIT Map My County; Transportation Screening Assessment

⁴⁰ Riverside County General Plan, Riverside Extended Mountain Area Plan, Figure 7 "Riverside Extended Mountain Area Plan Trails and Bikeway System"

Findings of Fact:

- a) **Less than Significant Impact.** The purpose of the circulation system within REMAP is to provide for the movement of people and commodities efficiently, economically, and safely while not inducing growth beyond the intent of the General Plan or disrupting the unique environments within this planning area. A Transportation Screening Assessment technical memorandum, dated November 28, 2023, was prepared for the Proposed Project by Ganddini Group, Inc. (Appendix H). The model is based on an older version of the Site Plan with a cannabis cultivation and processing facility having 19,360 SF of building coverage. As summarized in the memorandum, the a 19,360-SF facility is forecast to generate approximately 80 daily trips, including 13 trips during the AM peak hour and 12 trips during the PM peak hour. As the Proposed Project includes 15,864 SF of building coverage, it is anticipated to generate no more than 80 daily trips. The Proposed Project would be consistent with the following REMAP applicable policies:

REMAP 9.4: Preserve natural resources, including scenic values, and avoid the unnecessary destruction of trees and flora in all future plans for development or improvement of circulation and transportation facilities.

Consistent: The Proposed Project does not require any alterations to existing roads nor does it require construction of any new roads.

REMAP 9.7: Consider emergency access and circulation, paying special attention to seasonal traffic, in fire hazard areas.

Consistent: The Project Site is located within a very high fire hazard severity zone. An on-site fire access route is proposed that would extend to within 150 feet of all exterior walls. Access to the site is via a 30-foot-wide driveway along Benton Road. The Proposed Project is anticipated to generate 80 trips per week.

REMAP 10.2: Implement Figure 7, Trails and Bikeway System, as discussed in the Non-motorized Transportation section of the General Plan Circulation Element.

Consistent: The Project Site is not adjacent to any bike paths. There are no publicly accessed trails near the Project Site. The nearest trail is located approximately 1.6 miles southeast of the Project Site.⁴¹ Therefore, the Proposed Project is not anticipated to interfere with the County General Plan Trails and Bikeway System..

REMAP 11.3: Enforce at least a 150-foot setback from the centerline of the scenic highway for new development, where such a setback requirement would not prohibit the use of a parcel.

Consistent: The Project Site is not located near any scenic highways or scenic viewpoints.

Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** California Senate Bill 743 (SB 743) directs the State Office of Planning and Research (OPR) to amend the California Environmental Quality Act (CEQA) Guidelines for evaluating transportation impacts to provide alternatives to Level of Service that

⁴¹ Riverside County General Plan, Riverside Extended Mountain Area Plan, Figure 7 "Riverside Extended Mountain Area Plan Trails and Bikeway System"

“promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. Agencies may currently opt-in to applying the updated CEQA guidelines for VMT analysis and implementation is required State-wide by July 1, 2020. The County of Riverside adopted VMT Guidelines and thresholds of significance in December 2020.

The County TA Guidelines were developed based on guidance from the Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California, December 2018) [“OPR Technical Advisory”]. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. The OPR Technical Advisory provides technical considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT. The County TA Guidelines identify screening criteria for certain types of projects that typically reduce VMT and may be presumed to result in a less than significant VMT impact. To qualify for VMT screening, the project need only satisfy one of the following screening criteria:

- Small Projects (generate less greenhouse gas emissions or daily vehicle trips than threshold criteria)
- Projects near High Quality Transit
- Local Servicing Retail
- Affordable Housing
- Local Essential Service
- Map Based Screening
- Redevelopment Projects

Ganddini Group, Inc. conducted a VMT Screening for the Proposed Project (see Appendix H). The Proposed Project is forecast to generate approximately 80 daily trips, including 13 trips during the AM peak hour and 12 trips during the PM peak hour. It is forecast to generate less than 110 daily trips; therefore, the Proposed Project satisfies the County-established small project screening criteria and may be presumed to result in a less than significant VMT impact. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** Access to the site is via a driveway along Benton Road at the west corner of the Project Site. The Project Site is not adjacent to a curved road or a dangerous intersection. The Proposed Project is the development of a cannabis cultivation facility. The Proposed Project would not create substantial hazards due to a site design feature or incompatible use. Discretionary actions by the County of Riverside includes approval of the project design. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- d) **Less than Significant Impact.** Benton Road is county-maintained and classified as a Mountain Arterial (110 ft ROW) Highway.⁴² The Proposed Project would utilize Benton Road, a paved road. The Proposed Project does not include road improvements. With approximately 80 daily trips occurring on paved roads, the Proposed Project would not result in a need for new or altered maintenance of roads. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- e,f) **Less than Significant Impact.** Fire apparatus access roads shall have an unobstructed width of no less than 24 feet, as approved by the Office of the Fire Marshal. Access to the site is via a 24-foot-wide driveway along Benton Road at the west corner of the site. During construction and long-term operation, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County of Riverside. Therefore, the Proposed Project would not result in inadequate emergency access or cause an effect upon circulation during the project's construction. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

38) Bike Trails

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- a) Include the construction or expansion of a bike system or bike lanes?

Source(s): Riverside County General Plan: Riverside Extended Map Area Plan (Figure: 7) "Trails and Bikeway System"

Findings of Fact:

Less than Significant Impact. The County's Bikeway System is part of the circulation system. The Project Site is not near or adjacent to any bike paths.⁴³ The Proposed Project does not include the construction or expansion of a bike system or bike lanes. It is not anticipated to result in a change in the County's bikeway system. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

⁴² RCIT. Map My County GIS Map. Accessed July 13, 2023.

⁴³ Riverside County General Plan, Riverside Extended Mountain Area Plan, Figure 7 "Riverside Extended Mountain Area Plan Trails and Bikeway System"

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or 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:

39) Tribal Cultural Resources

a) 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)?

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

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Source(s): Phase I Cultural Resources Survey, AB52 Consultation

Findings of Fact:

a, b) **Less than Significant with Mitigation Incorporated.** BFSA requested a review of the SLF by the NAHC on June 7, 2023 to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the Project Site. The NAHC SLF search did not indicate the presence of sacred sites or locations of religious or ceremonial importance within the search radius. In accordance with the recommendations of the NAHC, BFSA contacted all Native American consultants listed in the NAHC response letter at least two weeks prior to the initiation of the field survey. This request is not part of any Assembly Bill (AB) 52 Native American consultation. One response was received from the Quechan Historic Preservation Officer, who deferred to other tribes in the area. BFSA directly contacted the Pechanga Band of Indians and the Soboba Band of Luiseño Indians and invited them to voluntarily participate in the survey of the property.

The results of the archaeological records search indicate 12 cultural resources are located within one mile of the Project Site, none of which are located within the Project Site. The recorded resources include seven prehistoric bedrock milling feature sites, two prehistoric bedrock milling feature sites with associated artifact scatters, one prehistoric lithic artifact scatter, one historic schoolhouse complex with associated historic refuse, and one historic fire control station barracks and equipment garage. The records search results also indicate that 29 previous studies have been conducted within a one-mile radius of the project, none of which include the Project Site.

During the survey, one prehistoric bedrock milling site, Temp-1, was identified within the Project Site. According to EIC data, Temp-1 has not been previously recorded. Given the presence of Temp-1 along the boundary of the impact area, Mitigation Measure CR-1, as identified previously, shall be implemented.

Changes in the California Environmental Quality Act, effective July 2015, require that the County address a new category of cultural resources – tribal cultural resources – not previously included within the law’s purview. Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. Also relevant is the category termed “traditional cultural property” (TCP) which is typically associated with cultural resource management performed under federal auspices. According to Guidelines for Evaluating and Documenting Traditional Cultural Properties (Parker and King 1998), “traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices. A TCP can be defined, generally, as one that is eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a TCP by extension a TCR, provided the cultural landscape meets the criteria and that the landscape is geographically defined in terms of the size and scope. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all requesting tribes on March 28, 2022. There was no response from the Santa Rosa Band of Cahuilla Indians, Colorado River Indian Tribes (CRIT), Cahuilla Band of Indians, Soboba Band of Luiseño Indians, Pala Band of Mission Indians, or the Ramona Band of Cahuilla Indians.

Fort Yuma Quechan Indians

The Quechan Historic Preservation Officer responded in an email dated March 28, 2022. The email declined consultation and deferred to closer tribes.

Agua Caliente Band of Cahuilla Indians

The Agua Caliente Band of Cahuilla Indians responded in an emailed letter dated April 18, 2022. The letter stated that the project is within the Traditional Use Area of the band, and they requested the following: *Formal government to government consultation under California Assembly Bill No. 52 (AB-52). *A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area. *Copies of any cultural resource documentation (report and site records) generated in connection with this project. *A copy of the records search with associated survey reports and site records from the information center”. Project documents were provided to the tribe on November 14, 2023, and November 30, 2023. On July 31, 2023, a meeting was held in which this project was discussed. No Tribal Cultural Resources were identified by the tribe. Consultation was concluded on November 30, 2023.

Rincon Band of Luiseño Indians

The Rincon Band of Luiseño Indians responded in an emailed letter dated April 29, 2022. The letter stated, “The location identified within project documents is situated within the Territory of the Luiseño people. At this time, we have no additional information to provide and do not request consultation. We recommend that you directly contact the Luiseño and Cahuilla Tribes that are located closer to the project area and may have pertinent information”.

Pechanga Band of Indians

The Pechanga Band of Indians responded in an email dated April 20, 2022. The email state, "The Pechanga Tribe asserts that the Undertaking is a part of 'Atáaxum (Luiseño) territory, and therefore the Tribe's aboriginal territory as evidenced by the existence of cultural features associated with religious practice and an extensive artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Luiseño Indians because of the Tribe's cultural ties to this area as well as our extensive history with the County and other projects within the area". Project documents were provided to the tribe on October 17, 2022, November 14, 2023, and November 30, 2023. The Pechanga tribe failed to engage in consultation, and it was concluded on December 04, 2023.

In summary, the consulting tribes expressed concern regarding the possibility that previously unidentified Tribal Cultural Resources may be found during the grading process and recommended that a tribal monitor be present during ground disturbing activities. This would ensure that if any resources are identified, they will be handled in a professional and culturally appropriate manner. With the inclusion of the following mitigation measures, impacts to Tribal Cultural Resources would be less than significant.

Mitigation Measure TCR-01: ECS Sheet- reburial area

Prior to issuance of grading permits: the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area that will be used, if needed, for reburial of any artifacts that have been identified during grading and cannot be avoided. This area will be protected and not disturbed in the future. This is confidential information, and the exact nature of this area will not be called out on the grading plans.

Mitigation Measure TCR-02: Native American Monitor

Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the consulting tribe(s) for the appropriate number of Native American Monitor(s).

In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, an adequate number of Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

Activities will be documented in Tribal Monitoring Notes which will be required to be submitted to the County Archaeologist prior to grading final inspection.

The developer/permit applicant shall submit a fully executed copy of the agreement(s) to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation Measure TCR-03: Artifact Disposition
Prior to Grading Permit Final Inspection

In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources, (with the exception of sacred the items, burial goods, and Human Remains) and Provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through the following methods.

Pre-contact resources-A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s). This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloguing, analysis and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in the Phase IV Report. The details of any disposition of artifacts shall be documented in the Phase IV report.

Mitigation Measure TCR-04: Human Remains

If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. There will be no photography of human remains or associated resources.

Mitigation Measure TCR-05: Unanticipated Resources

The developer/permit holder or any successor in interest shall comply with the following for the life of this permit:

If during ground disturbance activities, unanticipated cultural resources* and/or Tribal Cultural Resources** are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource/Tribal Cultural Resources shall be halted and the Project archaeologist shall contact the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist***, the Native American tribal representative, and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, avoidance, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources.

** A Tribal Cultural Resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, or listed in a local register of historic resources; or resources that the lead agency determines, in its discretion, are tribal cultural resources.

*** If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

Mitigation: Mitigation Measures TCR-01 to TCR-05

Monitoring: Monitoring per Mitigation Measure TCR-02

UTILITIES AND SERVICE SYSTEMS Would the project:

40) Water

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

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b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

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Source(s):

Findings of Fact:

- a) **Less Than Significant Impact.** Potable water will be provided by an existing well on-site. No public water system exists in the area and all domestic water needs in the vicinity are met by individual wells owned and maintained by property owners. Self-retaining retention basins would be installed to collect and treat stormwater runoff. The proposed on-site septic system is sufficient to meet the Proposed Project's increase in demand for wastewater treatment. The construction of these on-site systems is not anticipated to cause significant environmental effects, as demonstrated in other sections of this Initial Study. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** The Proposed Project includes water storage (4 proposed water tanks each with capacity of 5,000 gallons for fire suppression). The existing domestic use is

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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estimated at 169 gallons per day (gpd).⁴⁴ The increase in demand with the proposed cannabis cultivation facility would be approximately 1,700 gpd. The demand for well water would therefore be 1,869 gpd. Water would be pumped and stored in the on-site water tanks. The existing on-site water well would yield approximately 10,080 gpd; thereby meeting/exceeding the Proposed Project's estimated total demand. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

41) Sewer

a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

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b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

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Source(s):

Findings of Fact:

a,b) **Less than Significant Impact.** Sewage disposal will be provided by the existing 750-gallon septic system on-site. The Proposed Project would require only 7 employees. The total aggregate domestic waste flows generated by the Proposed Project are anticipated to be sufficiently served by the existing and additional sewage disposal system. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

42) Solid Waste

a) 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?

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b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?

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⁴⁴ Based on 3.06 person per household (<https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf>) and 55 gallons per person per day (<https://www.emwd.org/water-use-efficiency-requirements>)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County Department of Waste Resources, CalRecycle Estimated Solid Waste Generation Rate, Advisory Notification Document

Findings of Fact:

a,b) **Less than Significant Impact.** The County of Riverside Department of Waste Resources operates five landfills and administers several transfer station leases. The department has a contract agreement for waste disposal with Waste Management of the Inland Empire (Waste Management Inc.), a local waste disposal company. Most refuse in the region is disposed of at the El Sobrante Landfill, which is a privately owned landfill that is open to the public. It is located 10910 Dawson Canyon Road, Corona, CA 92883, approximately 34 miles northwest of the Project Site.

El Sobrante Landfill has a maximum daily throughput of 16,054 tons/day.⁴⁵ The Proposed Project would generate 0.18 tons per day (based on 0.0024 tons per square-foot per year and assuming 250 working days per year).⁴⁶ The estimated project-generated waste represents approximately 0.0011 percent of the total permitted waste received daily at the El Sobrante Landfill. The Proposed Project would include space allocated for project-generated trash and recyclable materials, and include signage indicating the location of each bin in the proposed trash enclosure. Cannabis vegetation waste would be disposed of in a separate locked bin within the enclosure. It would be removed by a certified hauler for cannabis waste.

The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with AB 939. AB 939 established an integrated waste management hierarchy to guide the Board and local agencies on source reduction, recycling and composting, and environmentally safe transformation and land disposal. AB 1826 requires businesses to arrange for organic waste recycling. AB 341 requires businesses that generate four or more cubic yards of waste per week to divert commercial solid waste from disposal. The Proposed Project would include bins for trash, recyclable materials, and organics and have an adequate signate indicating the location of each bin in the trash enclosure. In addition, the Project Applicant would be required to submit a Waste Recycling Plan that details the measures/methods that will be taken to recycle, reuse, and reduce the amounts of materials, and the targeted recycling or reduction rate. During construction, at least one bin shall be allocated for recycling of construction and demolition materials.

Moreover, the Project Applicant must identify programs or plans that address commercial and organics recycling in compliance with State legislation/regulation by completing a Mandatory Commercial Recycling and Organics Recycling Compliance form. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

⁴⁵ CalRecycle. SWIS Facility/Site Activity Details: El Sobrante Landfill.
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402>

⁴⁶ County of Riverside. Draft EIR for the General Plan. Table 4.17-N

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
43) Utilities				
Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?				
a) Electricity?	☐	☐	☐	☒
b) Natural gas?	☐	☐	☐	☒
c) Communications systems?	☐	☐	☐	☒
d) Street lighting?	☐	☐	☐	☒
e) Maintenance of public facilities, including roads?	☐	☐	☒	☐
f) Other governmental services?	☐	☐	☐	☒

Source(s): Site Plan; California Energy Commission: Electricity Utilities Service Area Map, Southern California Edison, Southern California Gas Company, Department of Cannabis Control

The Proposed Project would be required to adhere to the following DCC cannabis cultivation regulations relevant to utilities:

CCR Title 4 Section 15011:

The application for a cultivation license shall include the following, if deemed applicable:

- For indoor and mixed-light license types, identification of all power sources for cultivation activities, including but not limited to, illumination, heating, cooling, and ventilation;

Compliance with the DCC cannabis cultivation regulations above would help minimize project implementation impacts regarding utilities.

Findings of Fact:

- No Impact.** The proposed solar arrays are expected to produce a total of 86,000 kWh annually. In addition, a portion of the Proposed Project energy demand would continue to be provided by an existing service connection with Southern California Edison (SCE). There are existing electric lines along the property frontage that the proposed structures would connect to. The Proposed Project would not require the expansion or construction of new electrical facilities. Prior to issuance of a grading permit, the Applicant shall obtain a Will Serve letter from SCE. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- No Impact.** The Proposed Project would utilize propane gas from storage tanks located on-site. The storage tanks would be refilled by a propane service provider as needed. It would not require a connection to natural gas facilities. It would not result in the construction of new natural gas facilities or expansion of existing facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- No Impact.** The Proposed Project would be serviced by Spectrum. The Proposed Project will continue to use existing telecommunication infrastructure and will not require the expansion or construction of new communications systems facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- d) **No Impact.** Lights are proposed within project boundaries in a rural area. The Proposed Project will not require the construction of additional streetlights. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- e) **Less than Significant Impact.** Any potential impacts to public facilities will be mitigated by the Project Applicant's payment of development impacts fees. The County of Riverside Transportation Department is responsible for the repair and maintenance of approximately 2,200 miles of roads located within the unincorporated areas of Riverside County. The Proposed Project would utilize Benton Road, a paved road. With 80 anticipated daily trips, the Proposed Project would not result in a need for new or altered maintenance of roads. Less than significant impacts are identified or anticipated, and no mitigation measures are required.
- f) **No Impact.** The Proposed Project is not anticipated to require additional services aside from those already mentioned. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:

44) Wildfire Impacts

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?	☐	☐	☒	☐
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Source(s): RCIT Map my County, Riverside County General Plan Safety Element Figure S-7, Figure S-11 "Wildfire Susceptibility"; Ventura Engineering, Hydrology Report, July 30, 2024

Findings of Fact:

- a) **Less than Significant Impact.** The Project Site is located in a State Responsibility Area (SRA) in lands classified as very high hazard severity zone.⁴⁷ The Project Site does not contain any emergency facilities.⁴⁸ The nearest emergency facility is located approximately 3.4 miles west of the Project Site. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County. The Proposed Project would provide the minimum required parking spaces and therefore, project vehicles are not anticipated to park off-site and interfere with the use of evacuation routes. The Proposed Project would be designed according to existing regulations, which include provisions for emergency access on the site and defensible space in the event of wildfire. As part of the standard development procedures, development plans are submitted to the County for review and approval to ensure adequate emergency access is provided. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- b, c) **Less than Significant Impact.** The Project Site is located in a State Responsibility Area (SRA) in lands classified as very high hazard severity zone.⁴⁹ The Proposed Project will be required to meet minimum fire safety standards such as, but not limited to, clearing brush in fuel modification zones that would reduce wildfire risks. The fuel modification zones would be established pursuant to the Riverside County and California Fire Codes. The Office of the Fire Marshal will review building plans and ensure that fire and life safety conditions are met. The Proposed Project does not include the installation of new roads, power lines or other utilities that would exacerbate wildfire risk for the area. A preliminary Hazardous Vegetation and Fuel Management Plan shall be provided to and approved by Riverside County Fire Department prior to parcel map recordation. A final plan shall be provided prior to grading permit clearance. This project will ensure hazardous materials are in compliance with federal, state, and local regulations, including CFR, California H&SC, and California Fire Code as amended through local ordinances. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant Impact.** The Project Site is neither located within a 100-year nor a 500-year FEMA flood zone area.⁵⁰ The Project Site is not located in an area susceptible to seismically induced landslides and rockfalls.⁵¹ As stated previously, the Proposed Project's surface runoff would be conveyed to a bioretention basin then to a detention basin designed to mitigate the 10-year storm flow. These self-retaining areas will heavily decrease peak discharges and velocities of runoff from the property as such facilities temporarily store storm runoff in order to reduce or eliminate flooding or other adverse effects downstream. Less than significant impacts are identified or anticipated, and no mitigation measures are required.
- e) **Less than Significant Impact.** The Project Site is located in a State Responsibility Area (SRA) in lands classified as very high hazard severity zone.⁵² The Proposed Project would be designed

⁴⁷ RCIT. Map My County GIS Map. Accessed July 14, 2023.

⁴⁸ Riverside County General Plan, Safety Element, Figure S-7 "Fire Hazard Severity Zones (West County)"

⁴⁹ RCIT. Map My County GIS Map. Accessed July 14, 2023.

⁵⁰ Riverside County. General Plan: REMAP -Figure 10: Riverside Extended Mountain Area Plan Special Flood Hazard Areas Map

⁵¹ Riverside County General Plan: Riverside Extended Map Area Plan (REMAP), Figure 14 "Riverside Extended Mountain Area Plan Slope Instability"

⁵² RCIT. Map My County GIS Map. Accessed July 14, 2023.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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according to existing regulations, which include provisions for emergency access on the site and defensible space in the event of wildfire. The proposed buildings nearest to the property line (Buildings 2 and 3 on Site Plan) would be 47'-10.5" from the western property line. The proposed buildings on-site would have a building separation of at least 15 feet. The proposed setbacks and building separation would minimize the spread of wildfire, where it to occur. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:

45) 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?	☐	☒	☐	☐
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Source(s): MSHCP Consistency Analysis, Phase I Cultural Resources report

Findings of Fact:

Less Than Significant with Mitigation Incorporated. The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis provides the results of the required MSHCP assessments in order to determine if the Proposed Project was consistent with the goals and objectives of the MSHCP. The Project Site was not located within an MSHCP-designated assessment area for covered species. The Proposed Project required a MSHCP Section 6.1.2 Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools assessment, and compliance with MSHCP Section 6.1.4 Guidelines Pertaining to the Urban/Wildlands Interface. The Project Site is located in the western portion of the REMAP Area Plan within the northwestern portion of Subunit 2 – Wilson Valley/Sage (SU2). It is in the northern portion of Cell Group R within Criteria Cell 6056 which was partially within the 35% targeted conservation area of the northern portion of Cell Group R. The Applicant will convey 5.33 acres as Additional Reserve Land (ARL) in the eastern portion of the property, which consisted primarily of coastal sage scrub. The Reserve Assembly Analysis indicates that Criteria Cell Group R has the land available to meet the target conservation acreage with the development of the Proposed Project including the 5.33 acres for ARL. No MSHCP Section 6.1.2 resources were present on the property. Two upland swales; designated as Feature A and Feature A₁, were present on the Project Site but did not contain evidence of concentrated flow (i.e., incised channel, ordinary high-water mark, definitive bed and bank, debris, bent vegetation, etc.). With the contribution of 5.33 acres of ARL, the Proposed Project is consistent with the goals and objectives of the MSHCP.

The purpose of the Phase I Cultural Resources investigation was to determine if any cultural resources would be affected by the Proposed Project. The archaeological records search results

from the Eastern Information Center (EIC) at the University of California at Riverside (UCR) indicate 12 resources are located within a one-mile radius of the Project Site, none of which are recorded in the Project Site, and 29 previous studies have been conducted within a one-mile radius of the Project Site, none of which include the Project Site. In addition, the Native American Heritage Commission (NAHC) was contacted for a Sacred Lands File (SLF) search, which was negative for the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance within one mile of the Project Site. In accordance with the recommendations of the NAHC, BFSA contacted all Native American consultants listed in the NAHC response letter at least two weeks prior to the initiation of the field survey.

The topography of the Project Site is generally flat with a gentle slope upward to the southeast. The western portion of the project is developed with a modern single-family residence and has been agriculturally disked since the 1950s. The eastern portion of the property is undeveloped and contains concentrations of bedrock outcroppings. During the survey, one prehistoric bedrock milling site, Temp-1, was identified within the subject property. According to EIC data, Temp-1 has not been previously recorded. Therefore, BFSA recorded the site according to the Office of Historic Preservation's (OHP) manual, Instructions for Recording Historical Resources, using Department of Parks and Recreation (DPR) forms. Since Temp-1 was identified along the boundary of the impact area, Mitigation Measure CR-1 shall be implemented to avoid any significant impacts.

For AB52 consultation, the consulting tribes expressed concern regarding the possibility that previously unidentified Tribal Cultural Resources may be found during the grading process and recommended that a tribal monitor be present during ground disturbing activities. This would ensure that if any resources are identified, they will be handled in a professional and culturally appropriate manner. With the inclusion of Mitigation Measures TCR-01 to TCR-05, impacts to Tribal Cultural Resources would be less than significant.

46) Have impacts which 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, other current projects and probable future projects)?

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Source(s): CalEEMod Output

Findings of Fact:

Less Than Significant Impact. Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Air Quality

Development of the Proposed Project will be conditioned to comply with current SCAQMD rules and regulations to minimize impacts to air quality. With implementation of Mitigation Measure AQ-1 to reduce the level of local construction-related PM_{2.5} emissions, the Proposed Project would not exceed SCAQMD air quality thresholds. Operational impacts resulting from either the existing General Plan zoning designations or the Proposed Project would not exceed SCAQMD thresholds. Consequently, the Proposed Project would not result in a conflict or obstruction to the implementation of the AQMP. Therefore, cumulative impacts are anticipated to be less than significant.

Greenhouse Gas

Greenhouse gas (GHG) emissions are cumulative in nature, in that, no one single project can measurably contribute to climate change and its affects (global average change in temperature, rising sea levels etc.). The direct or indirect GHG impacts are therefore not evaluated on a local level, but whether or not the GHG emissions resulting from the project are cumulative; that is, they add considerably to an increase in GHGs as compared to the existing environmental setting based on: 1) an established significance threshold(s); or 2) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The project's total net operational GHG emissions do not exceed the County's Climate Action Plan (CAP) threshold of 3,000 MTCO₂e per year. Therefore, the Proposed Project is consistent with CAP and its incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable. Less than significant impacts are identified or anticipated, and no additional mitigation measures are required.

47) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

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Source(s): Geotechnical Report

Findings of Fact:

Less Than Significant Impact. The incorporation of the REMAP design measures and Riverside County policies, standards, guidelines, and proposed mitigation measures as provided in this Initial Study would ensure that the Proposed Project would have no substantial adverse effects on human beings, either directly or indirectly on an individual or cumulative basis. As stated above, the Project Site is not susceptible to geologic hazards. Therefore, implementation of Proposed Project is not anticipated to pose any foreseeable danger to human beings. Less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. EARLIER ANALYSES

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

Earlier Analyses Used, if any:

- Riverside County, *County of Riverside General Plan*. Adopted December 8, 2015.
- Riverside County, *County of Riverside General Plan Draft Environmental Impact Report*. Adopted December 8, 2015.

Location Where Earlier Analyses, if used, are available for review:

Location: County of Riverside Planning Department
4800 Lemon Street, 12th Floor
Riverside, CA 92505

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Lilburn Corporation. Phase I Environmental Site Assessment. February 2024.

Lilburn Corporation. CalEEMod Outputs Sun Grown Farms Detailed Report. October 8, 2026.

Searl Biological Services. Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis. May 28, 2021.

Searl Biological Services. Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis. May 28, 2021.

Ventura Engineering Inland, Inc. County Project Specific Water Quality Management Plan. March 15, 2021.