INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

HD BIOTECH CANNABIS WAREHOUSE CUP 16-03 AND MODIFICATION NO. 3 10042 RANCHO ROAD ADELANTO, CALIFORNIA APN 0459-681-03

LEAD AGENCY:

CITY OF ADELANTO
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION
11600 AIR EXPRESSWAY
ADELANTO, CALIFORNIA 92301

REPORT PREPARED BY:

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
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AUGUST 31, 2020

ADLT 024

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: HD Biotech Cannabis Warehouse; CUP 16-3 and Modification No. 3.

PROJECT APPLICANT: The Applicant for the proposed project is Michael Pontious, AIA Pontious Architecture. 17995 Hwy. S. 18, Suite 4 Apple Valley, California 92307.

PROJECT LOCATION: The proposed project site is located at 10042 Rancho Road, Adelanto, California, 92301. The corresponding Assessor Parcel Number (APN) is 045-968-103. The proposed project site is located near the intersection of Raccoon Avenue at Rancho Road in the southwestern portion of the City.

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

PROJECT: The City of Adelanto is reviewing an application submitted by HD Biotech Cannabis Warehouse to develop a portion of a larger 4.69-acre (204,754 square-foot) parcel within the southern area of the City of Adelanto. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the new building would be located consists of 204,754 square feet (4.7 acres). The project site is zoned as Manufacturing/Industrial (MI).

FINDINGS: The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any significant adverse unmitigable impacts. For this reason, the City of Adelanto determined that a *Mitigated Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may be made based on the analysis contained in the attached Initial Study:

- The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.

- The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The environmental analysis is provided in the attached Initial Study prepared for the proposed project. The project is also described in greater detail in the attached Initial Study.

Signature _____ Date _____

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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

This Initial Study analyzes the environmental impacts associated with the ongoing development of a portion of a larger 4.69-acre (204,754 square-foot) parcel located in the southern area of the City of Adelanto. The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI). The proposed project involves the construction of a new building to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building is located consists of 204,754 square feet (4.7 acres). [1]

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

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

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

[1] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

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

[3] Ibid. (CEQA Guidelines) §15050.

[4] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.5, Section 21067 and Section 21069.* 2000.

Adopt (NOIA) a Mitigated Negative Declaration will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.[5] Questions and/or comments should be submitted to the following contact person:

Mary Blais, Contract Planner
City of Adelanto, Planning Division
11600 Air Expressway
Adelanto, California 92301

1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.

- *Section 2 Project Description* provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.

- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and the subsequent operation of the proposed project.

- *Section 4 Conclusions* summarizes the findings of the analysis.

- *Section 5 References* identifies the sources used in the preparation of this Initial Study.

[5] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.6, Section 2109(b).* 2000.

SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

This Initial Study analyzes the environmental impacts associated with the ongoing development of a 4.69-acre (204,754 square-foot) parcel located in the southern portion of the City of Adelanto. The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI). The proposed project involves the construction of a new building within an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building would be located consists of 204,754 square feet (4.7 acres). [6]

2.2 PROJECT LOCATION

The City of Adelanto is located approximately 60 miles northeast of Downtown Los Angeles and 30 miles north of the City of San Bernardino. Adelanto is bounded on the north by unincorporated San Bernardino County; on the east by Victorville and unincorporated San Bernardino County; on the south by Hesperia and unincorporated San Bernardino County; and on the west by unincorporated San Bernardino County.[7] Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15), which extends in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395, which traverses the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), which traverses the southern portion of the City in an east to west orientation.[8] The location of Adelanto, in a regional context, is shown in Exhibit 2-1. A citywide map is provided in Exhibit 2-2.

The proposed project site is located at 10042 Rancho Road, Adelanto, California, 92301. The corresponding Assessor Parcel Number (APN) is 045-968-103. The proposed project site is located near the intersection of Raccoon Avenue at Rancho Road in the southwestern portion of the City. Rancho Road extends along the project site's south side. Raccoon is located approximately 150 feet to the east of the project site. A local vicinity map is provided in Exhibit 2-3.

2.3 ENVIRONMENTAL SETTING

The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI). Access to the project site is provided by secured driveway access with Rancho Road. The area where the new building will be

[6] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

[7] Blodgett Baylosis Environmental Planning. 2020.

[8] Google Earth. Website accessed August 22, 2020.

located is currently paved over, occupied by smaller storage buildings, or otherwise used for outdoor storage. Other land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* Various smaller industrial uses are located to the north of the project site. These parcels are zoned as *Manufacturing/Industrial (MI)*.[9]

- *East of the project site:* A SCE (no build) easement abuts the project site on the east side. Raccoon Road extends further east. Finally, the Adelanto ICE Processing Facility is located the east side of Raccoon Road. This area is zoned as *Manufacturing/Industrial (MI)*.[10]

- *South of the project site:* Rancho Road extends along the project site's south side. Vacant, undeveloped land is located further south on the south side of Rancho Road. This area is zoned as *Manufacturing/Industrial (MI)*.[11]

- *West of the project site:* Various smaller industrial uses abut the project site on the west side. These parcels are zoned as *Manufacturing/Industrial (MI)*.[12]

An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4. Photographs of the site and surrounding areas are provided in Exhibits 2-5 and 2-6.

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building would be constructed in the northern portion of the site, north of this existing building. Key elements of the proposed project are summarized below and on the following page.

- *Proposed New Building*. A new 26,775 square-foot cannabis cultivation distribution building would be constructed north of the existing 36,750 square foot building. The new building would have a length (east to west) of 425 feet and a width of (north to south) of 63 feet. The building would consist of a single level with a maximum height of 35 feet. The cultivation facility would feature an enclosed, controlled ventilation system for monitoring airflow and humidity throughout the facility.[13]

- *Access and Parking*. Access to the project site will be provided by an existing improved road that would be located along the site's south side (Rancho Road). The new building's parking demand

[9] Google Maps and City of Adelanto Zoning Map. Website accessed on April 31, 2020.

[10] Ibid.

[11] Ibid.

[12] Ibid.

[13] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

would be met by 23 standard parking spaces and 1 ADA-compliant parking stall. In addition, 1 loading space would be provided.[8]

- *On-Site Improvements*. Power (electrical), water, and sewer requirements would be met with connections to the existing utility lines located along Rancho Road. A 26-foot wide emergency/fire access road would surround the new building.[14]

- *Security*. On-site security will continue to be provided twenty-four hours a day, seven days a week by security guards. In addition, shielded security lighting that would conform with all municipal lighting regulations will be installed on the premises. In addition,

2.4.2 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

As indicated previously, the proposed development will involve the construction of a new single level 26,775 square-foot cannabis cultivation/distribution facility within the southern portion of the City of Adelanto. The new cultivation facility is projected to employ 10-20 persons per day. The hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.[15]

2.4.3 CONSTRUCTION CHARACTERISTICS

The construction for the current proposed project is estimated to begin on January 1st, 2021, and would take approximately five months to complete.[16] The key construction phases are outlined the paragraphs that follow.

- *Phase 1 Grading*. The project site would be graded and readied for the construction. The site would be graded to a depth of approximately 3 to 6 inches. This phase would require two weeks to complete.

- *Phase 2 Site Preparation*. During this phase, the building footings, utility lines, and other underground infrastructure would be installed. This phase would require two weeks to complete.

- *Phase 3 Building Construction*. The new building would be constructed during this phase. This phase will take approximately three months to complete.

- *Phase 4 Paving and Finishing*. This concluding phase would involve the paving and finishing. The completion of both phases will take approximately one month to complete.

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[8] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

[14] Ibid.

[15] Ibid.

[16] Ibid.

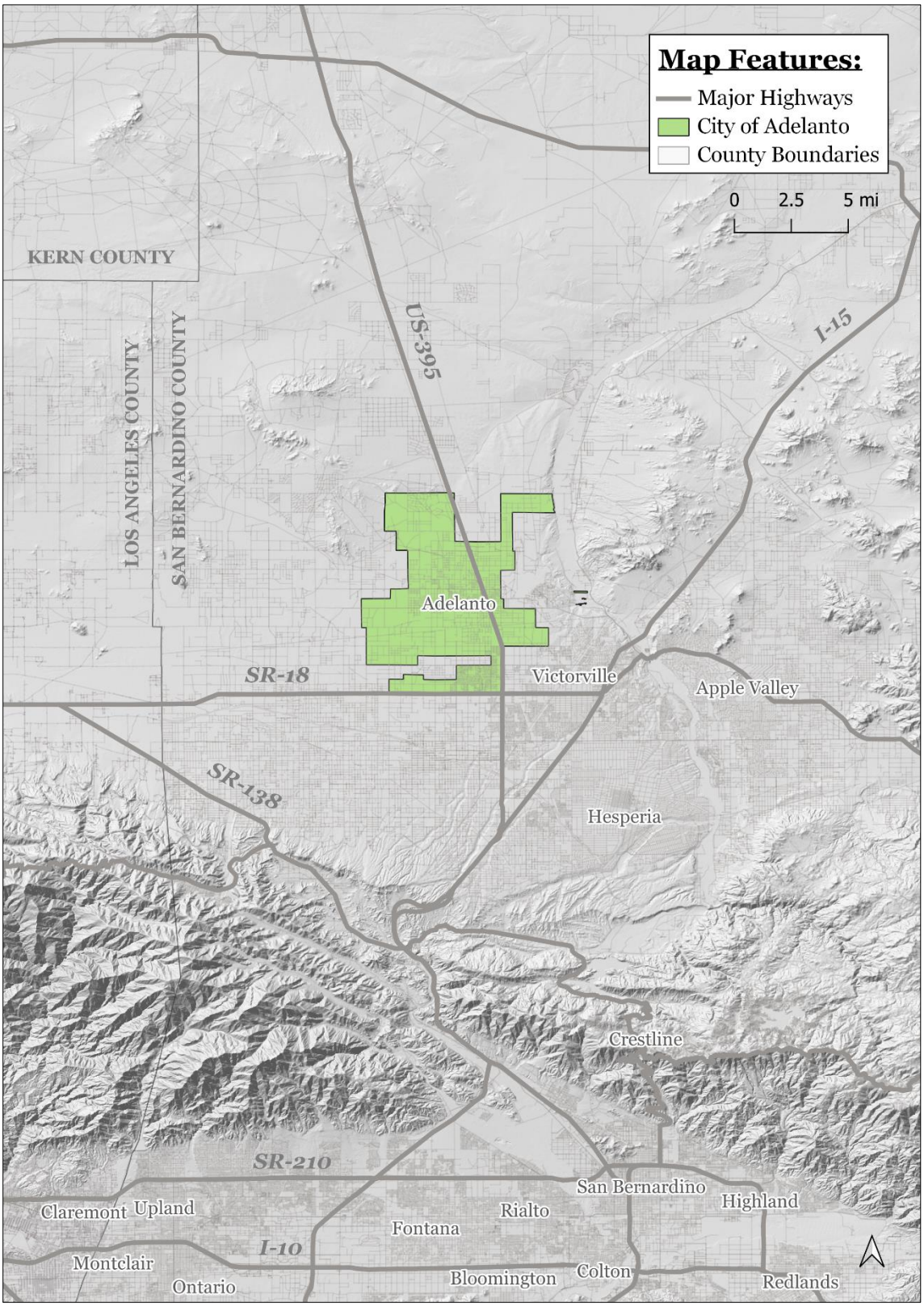

EXHIBIT 2-1
REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

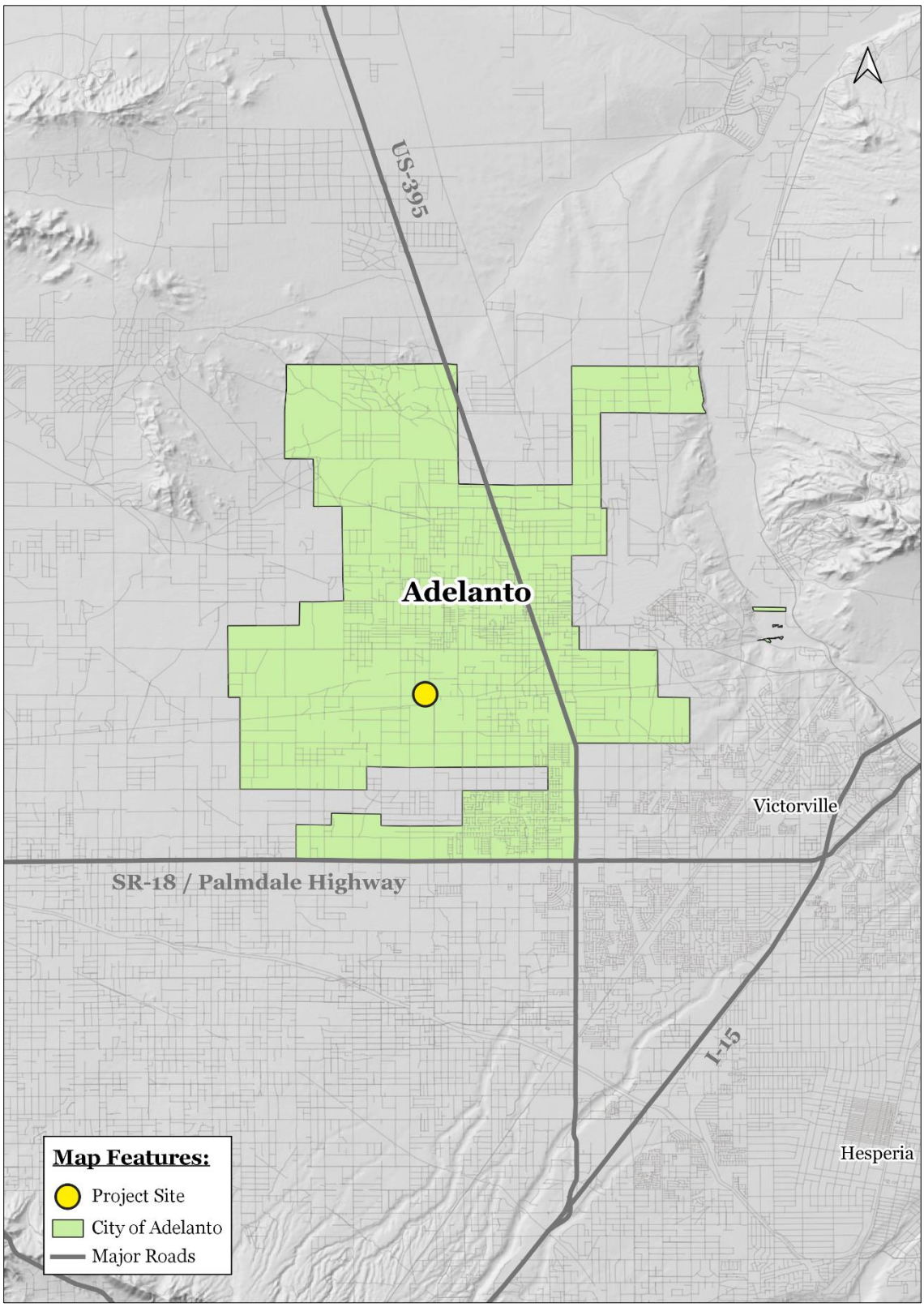

EXHIBIT 2-2
CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

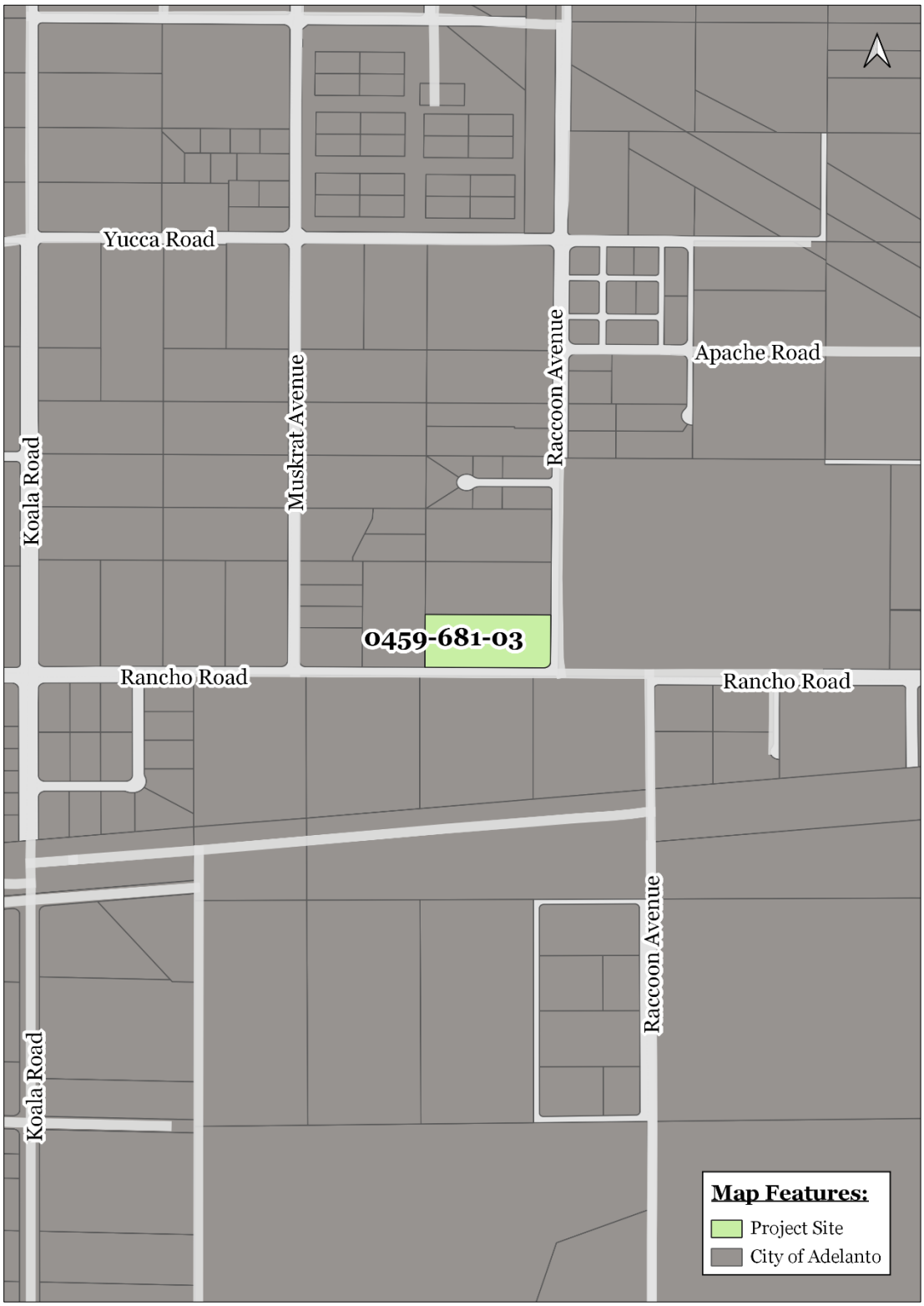

EXHIBIT 2-3
LOCAL MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

EXHIBIT 2-4
AERIAL IMAGE OF PROJECT SITE
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

View 1: View of the site looking west from Raccoon Avenue.

View 2: View of the site looking north along Raccoon Avenue.

EXHIBIT 2-5
PHOTOGRAPHS OF THE PROJECT SITE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

View 3: View of the site looking west along Rancho Road. Site is in the right.

View 4: View of the site looking east along Rancho Road. Site is in the left.

EXHIBIT 2-6
PHOTOGRAPHS OF THE PROJECT SITE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

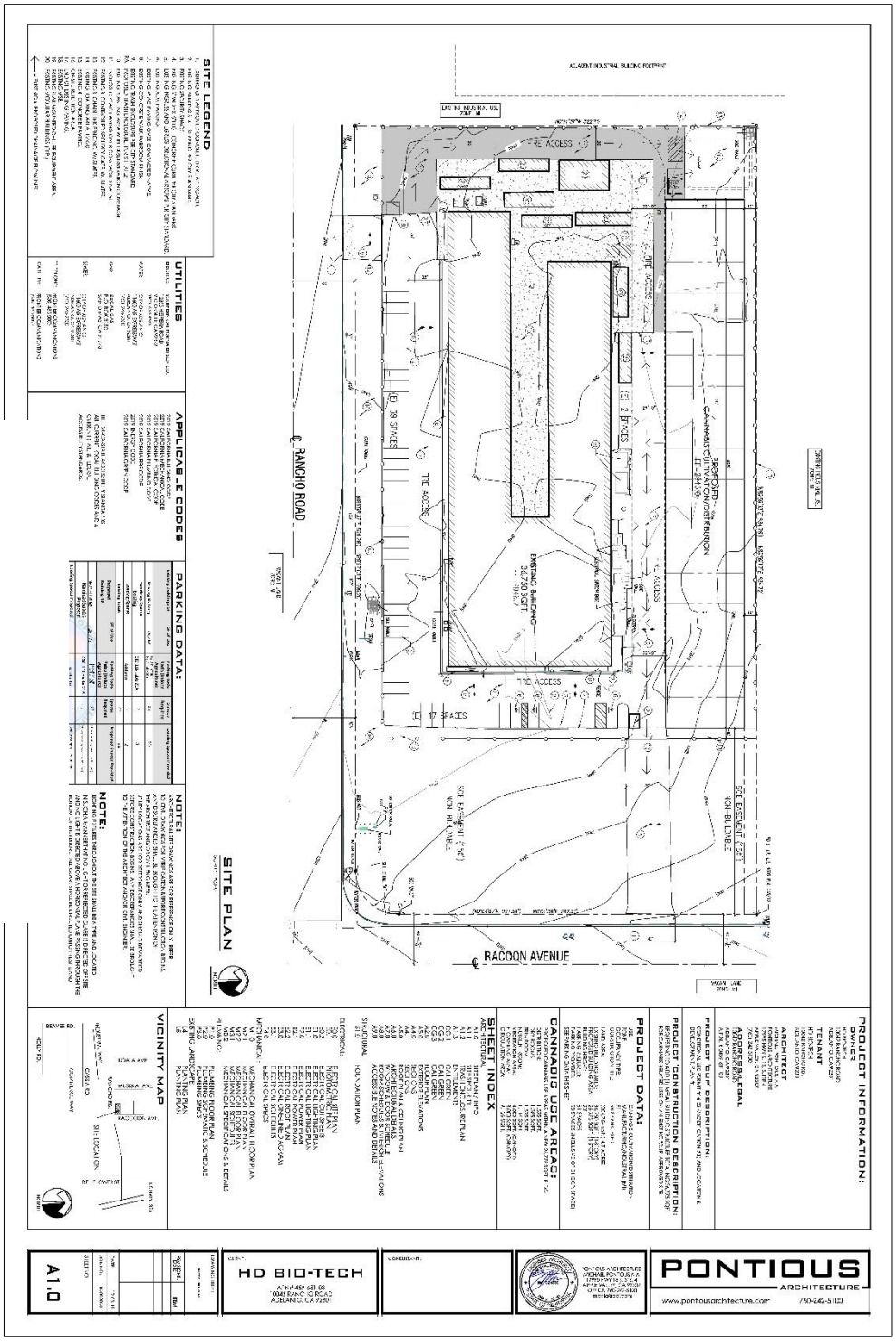

EXHIBIT 2-7
SITE PLAN OF PROJECT SITE
SOURCE: AIA PONTIOUS ARCHITECTURE

2.5 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Adelanto) that calls for an exercise of judgment in deciding whether to approve a project. The following discretionary approvals are required:

- Approval of an amendment to a Conditional Use Permit (CUP 16-3); and
- A Mitigated Negative Declaration (MND).

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SECTION 3 ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

Aesthetics (Section 3.1);
Agricultural &Forestry Resources (Section 3.2);
Air Quality (Section 3.3);
Biological Resources (Section 3.4);
Cultural Resources (Section 3.5);
Energy (Section 3.6)
Geology & Soils (Section 3.7);
Greenhouse Gas Emissions; (Section 3.8);
Hazards & Hazardous Materials (Section 3.9);
Hydrology & Water Quality (Section 3.10);
Land Use & Planning (Section 3.11);
Mineral Resources (Section 3.12);
Noise (Section 3.13);
Population & Housing (Section 3.14).
Public Services (Section 3.15);
Recreation (Section 3.16);
Transportation (Section 3.17);
Tribal Cultural Resources (Section 3.18);
Utilities (Section 3.19);
Wildfire (Section 3.20); and,
Mandatory Findings of Significance (Section 3.21).

The environmental analysis included in this section reflects the Initial Study Checklist format used by the City of Adelanto in its environmental review process (refer to Section 1.3 herein). Under each issue area, an analysis of impacts is provided in the form of questions followed by corresponding detailed responses. For the evaluation of potential impacts, questions are stated and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

- *No Impact*. The proposed project *will not* have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The proposed project *may have* the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Adelanto or other responsible agencies consider to be significant.

- *Less Than Significant Impact with Mitigation*. The proposed project *may have* the potential to generate impacts that will have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures.

- *Potentially Significant Impact*. The proposed project may result in environmental impacts that are significant.

This Initial Study will assist the City of Adelanto in making a determination as to whether there is a potential for significant adverse impacts on the environment associated with the implementation of the proposed project.

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect on a scenic vista?				✕
B. Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✕
C. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✕
D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✕

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect on a scenic vista? ● No Impact*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building would be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building would be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[17] The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. In addition, local views are already dominated by regional Southern California Edison (SCE) transmissions towers and transmission lines. Views from the mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. As a result, no impacts will occur.

B. *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ● No Impact.*

According to the California Department of Transportation, none of the streets located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.[18] There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the

[17] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

[18] California Department of Transportation. *Official Designated Scenic Highways*. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The City of Adelanto 2035 Sustainable Plan identifies prominent view sheds within the City. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.[19] The site would not qualify as undeveloped desert land since the site is currently developed and does not contain any sensitive habitats. Lastly, the project site does not contain any buildings listed in the State or National registrar. As a result, no impacts will occur.

C. *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ● No Impact*

There are no protected views in the vicinity of the project site and the City does not contain any scenic vistas. In addition, the City does not have any zoning regulations or other regulations governing scenic quality other that the development standards for which the new building will conform to. As a result, no impacts will occur.

D. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ● No Impact*

The proposed project would not expose any sensitive receptors to daytime or nighttime light trespass, since there are no light-sensitive land uses located adjacent to the property. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.15.050(E)(5) – Lighting of the City of Adelanto Municipal Code. As a result, no light-related impacts are anticipated.

MITIGATION MEASURES

The analysis of aesthetics indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

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

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?				✖
B. Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✖
C. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✖
D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✖
E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses? ● No Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building would be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[20] According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. As a result, no impacts will occur.[11]

B. *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract? ● No Impact.*

[20] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

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

The project site is currently zoned as Manufacturing Industrial (MI). The property is developed and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.[21] As a result, no impacts on existing Williamson Act Contracts will result from the proposed project's implementation.

C. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ● No Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building would be located in the northern portion of the site and will consist of 26,775 square feet of floor area. There are no forest lands or timber lands located within or adjacent to the site. Furthermore, the site's existing zoning designation does not contemplate forest land or timber land uses. As a result, no impacts will occur.

D. *Would the project result in the loss of forest land or conversion of forest land to a non-forest use? ● No Impact.*

No forest lands are located within the project site. The proposed use will be restricted to the site and will not affect any land under the jurisdiction of the BLM. As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation.

E. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use? ● No Impact.*

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use because the project site is currently developed. As a result, no farmland conversion impacts will occur with the implementation of the proposed project.

MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

[21] California Department of Conservation. *State of California Williamson Act Contract Land.* ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf.

3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				✖
B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?			✖	
C. Would the project expose sensitive receptors to substantial pollutant concentrations?				✖
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		✖		

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The City is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The District covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and on the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.[22] The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).

- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).

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

- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).

- *Sulfur Dioxide* (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).

- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM_{10} and 65 pounds per day of $PM_{2.5}$.

- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of "smog." The daily threshold is 137 pounds per day of ROG.

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Adelanto is projected to add a total of 38,900 new residents and 3,900 new employees through the year 2040.[23] The proposed project will not introduce new residents and is anticipated to employ between 10 to 20 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project's construction emissions would be below the thresholds of significance established by the MDAQMD (the project's daily construction emissions are summarized in Table 3-1). In addition, the proposed project's long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). As a result, no conformity impacts will occur.

B. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ● Less than Significant Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[24] According to the SCAQMD, any project is significant if it triggers or exceeds the SCAQMD

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

[24] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0.* December 3, 2019.

daily emissions threshold identified previously and noted at the bottom of Tables 3-1 and 3-2. In general, a project will have the potential for a significant air quality impact if any of the following are met:

- Generates total emissions (direct and indirect) that exceeds the SCAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3-1 and 3-2);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City's Zoning and General Plan); and,
- Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1 (the proposed project will not expose sensitive receptors to substantial pollutant concentrations nor is the site located near any sensitive receptors).

The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2). For air quality modeling purposes, a five-month period of construction for all five phases was assumed. As shown in Table 3-1, daily construction emissions will not exceed the SCAQMD significance thresholds. The short-term construction emissions will be limited to those emissions generated during project construction.

Table 3-1
Estimated Daily Construction Emissions

Construction Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Site Preparation (on-site)	0.64	7.82	4.02	--	0.31	0.27
Site Preparation (off-site)	0.02	0.01	0.16	--	0.04	0.01
Total Site Preparation	**0.66**	**7.83**	**4.18**	**--**	**0.35**	**0.28**
Grading (on-site)	0.80	7.25	7.57	0.01	0.70	0.55
Grading (off-site)	0.05	0.02	0.33	--	0.08	0.02
Total Grading	**0.85**	**7.27**	**7.90**	**0.01**	**0.78**	**0.57**
Building Construction (on-site)	0.78	7.98	7.26	0.01	0.45	0.41
Building Construction (off-site)	0.07	0.40	0.44	--	0.11	0.03
Total Building Construction	**0.85**	**8.38**	**7.70**	**0.01**	**0.56**	**0.44**
Paving (on-site)	0.72	6.72	7.09	0.01	0.35	0.33
Paving (off-site)	0.08	0.04	0.59	--	0.14	0.04
Total Paving	**0.80**	**6.76**	**7.68**	**0.01**	**0.49**	**0.37**
Architectural Coating (on-site)	56.61	1.53	1.81	--	0.09	0.09
Architectural Coating (off-site)	--	--	0.06	--	0.01	--
Total Architectural Coating	**56.61**	**1.53**	**1.87**	**--**	**0.10**	**0.09**
Maximum Daily Emissions	**57.43**	**1.52**	**1.81**	**0.02**	**1.14**	**0.86**
Daily Thresholds	**75**	**55**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2016.3.2.

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. The analysis of long-term operational impacts summarized in Table 3-2 also used the CalEEMod V.2016.3.2 computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the SCAQMD daily emissions thresholds.

Table 3-2
Estimated Operational Emissions in lbs/day

Emission Source	ROG	NOx	CO	SO2	PM10	PM2.5
Area-wide (lbs/day)	0.74	--	--	0.00	--	--
Energy (lbs/day)	--	0.01	0.01	--	--	--
Mobile (lbs/day)	0.10	0.78	1.04	--	0.28	0.07
Total (lbs/day)	**0.84**	**0.79**	**1.05**	**0.00**	**0.28**	**0.07**
Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2016.3.2.

The analysis presented in Tables 3-1 and 3-2 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3-1 and 3-2, the impacts are considered to be less than significant. In addition, the SCAQMD Rule Book contains numerous regulations governing various activities undertaken within the District. Among these regulations is Rule 403.2 – Fugitive Dust Control for the South Coast Planning Area, which was adopted in 1996 for the purpose of controlling fugitive dust. Adherence to Rule 403.2 regulations is required for all projects undertaken within the District. Future construction truck drivers must also adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel powered vehicles to less than five minutes.[3] Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant.

C. *Would the project expose sensitive receptors to substantial pollutant concentrations? ● No Impact.*

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project (50,000 or more vehicles per day) within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and, a gasoline dispensing facility within 300 feet. The nearest sensitive receptor is Adelanto Elementary School, which is located 2.28 miles to the northeast of the project site. As a result, no impacts will occur.

D. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? ● Less than Significant Impact with Mitigation.*

Cannabis cultivation directly impacts air quality in two (2) predominant operations; plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by the generation of strong odors. The majority of the odors of cannabis come from a class of

chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants and vary widely between plants.[25] Cannabis produces over 140 different terpenes and these chemicals are found in varying concentrations in different cannabis varieties. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis' psychoactivity, has no odor whatsoever. The type and potency of cannabis odors range widely from variety to variety, as do receptors' opinions regarding whether the odor is pleasant or objectionable.[16] The natural growth of the cannabis plants, and other processes at cultivation facilities, emit terpenes. Terpenes, known for their strong odor, are volatile organic compounds (VOCs). At facilities such as that being considered, the evaporation of solvents, and other processes in the production cycle also result in VOC emissions. The project Applicant will employ certain technologies that will be beneficial in controlling odors including the following:

- *Carbon Filters*. Also known as carbon scrubbers, carbon filters are historically one of the best methods for odor control. This type of filter uses pellets of charcoal to trap the terpenes. Carbon filters are simple to install, effective, and reliable. Carbon filters will be installed at key locations in the facility and will be monitored and replaced by staff on a regular basis.

- *Air Filters*. Standard air filters, also referred to as air purifiers, are typically made of densely woven fiber screens. These filters trap particles as air circulates through the filter, which can either be a stand-alone unit or incorporated into a ventilation system depending on the exact specifications.

- *Negative Ion Generators*. The machines will use a negative charge to attract positively charged particles in the air. This equipment will be installed in areas that do not interfere with the production activities but instead can proactively treat the air in order to meet regulations.

- *Air-tight Seals*. The proposed facility will utilize air-tight seals throughout the facility. Predominately used in the exhaust system, these air tight seals will be used in order to keep the exhaust system efficient and effective.

- *Negative Air Pressure*. The Applicant will make use of negative air pressure in order to retain odor for treatment. This will help to serve as a safeguard of odor escaping into the ambient air until it can be treated using the techniques above. GSC Holding Group, LLC. will seal the facility, except for the intake and exhaust, which creates suction when exhaust fans are turned off. The proper use of both negative air and negative ion generators will efficiently expunge odor before leaving the facilities.

- *Staff Training*. The facility's employees will be trained regarding compliance with the industry's best standards and facility regulations in order to achieve successful odor control. Employees will be trained in the use of odor control methods as well as any new techniques and technologies that may be added in the future.

[16]Cannabis Environmental Best Management Practices Draft Section for Review: Air Quality August 9, 2018.

The project Applicant will also be required to prepare an Odor Management Plan pursuant to San Bernardino County Department of Public Health construction guidelines. The following mitigation measures will be required to control odors and to ensure that the indoor air is safe for the workers:

- The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and the San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.

- Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

The above mitigation will reduce the potential impacts to levels that are less than significant.

MITIGATION MEASURES

The analysis of air quality impacts indicated that the projected emissions would be below the SCAQMD's thresholds of significance. However, the following mitigation would be required to address potential odor impacts:

Mitigation Measure No. 1 (Air Quality Impacts). The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.

Mitigation Measure No. 2 (Air Quality Impacts). Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
C. Would the project have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✖
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✖
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✖
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● No Impact.*

A. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[26] The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building would be constructed in the northern portion of the site, north of this existing building. The site's utility as a habitat is constrained by the presence of an adjacent roadway and the development that is present on-site and in the surrounding areas. As a result, no impacts are anticipated.

[26] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

B. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● No Impact.*

According to the United States Fish and Wildlife Service and the results of the site visits, there are no wetland or migratory bird nesting areas located within the project site.[27] The site in its entirety is developed. In addition, there is no riparian habitat located on-site or in the surrounding areas.[18] No offsite wetland or migratory bird nesting areas will be affected by the proposed development since all new development will be confined to the project site. As a result, no impacts are anticipated.

C. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ● No Impact.*

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.[19] The site in its entirety is developed and disturbed. As a result, no impacts are anticipated.

D. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? ● No Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[28] The site's utility as a habitat and a migration corridor is constrained by the presence of an adjacent roadway and the development that is present on-site and in the surrounding areas. As a result, no impacts are anticipated.

E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ● No Impact*

Joshua Trees are protected under Chapter 17.57 – Biotic Resources of the City of Adelanto's Municipal Code. In addition, the City of Adelanto enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the City to assure the Joshua tree is not a "specimen" class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert communities. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are

[18] United States Fish and Wildlife Service. *National Wetlands Inventory*. https://www.fws.gov/Wetlands/data/Mapper.html

[19] RCA Associates, Inc. *Protected Plant Preservation Plan*. Report dated January 28, 2019.

[28] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006). There are no Joshua Trees located within the site and, as a result, no impacts would occur.

F. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ● No Impact.*

The proposed project's implementation would not be in conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans. As a result, no impacts are anticipated.

MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impacts on biological resources. As a result, no mitigation is required.

3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				✖
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?				✖
C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines? ● No Impact.*

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

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;

- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;

- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;

- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;

- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;

- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;

- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,

- A property achieving significance within the past 50 years if it is of exceptional importance.[29]

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A search of the National Register of Historic Places and the list of California Historical Resources was conducted and it was determined that no historic resources were listed within the City of Adelanto.[30]

The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[31] The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[22] The project site is developed though the existing structures and buildings do not have any historical or cultural significance. Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

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

[30] U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. http://focus.nps.gov/nrhp. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed December 6, 2019.

[31] California Department of Parks and Recreation. *California Historical Resources*. Website http:// ohp.parks.ca.gov/ ListedResources. Website accessed on December 20, 2019.

B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines? ● No Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[32] The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. Therefore, no significant impacts related to archaeological or historical resources is anticipated and no further investigations are recommended for the proposed project.

C. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries? ● Less than Significant Impact.*

There are no dedicated cemeteries located in the vicinity of the project site.[33] The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

> "A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures."

Additionally, Section 5097.98 of the Public Resources Code states:

> "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

[32] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

Adherence to the aforementioned standard condition will ensure potential impacts remain at levels that are less than significant.

MITIGATION MEASURES

The analysis of potential cultural resources impacts indicated that the project site's previous disturbance would limit the potential for cultural resources or human remains to be discovered within the project site. As a result, no mitigation is required.

3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✖	
B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? ● Less than Significant Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[34] The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building.

The growing (cultivation) of cannabis is an agricultural production process where the environmental conditions, temperature, and humidity are tightly controlled to optimize the quality of the cannabis plants and to reduce crop loss. The quality and amount of light provided is the primary variable affecting crop yield and quality once air temperature and humidity needs are met. Dehumidification is generally achieved mechanically by sub-cooling the air to remove water and then reheating the air to the desired supply air temperature through traditional dehumidification units or by absorbing moisture in the air through a desiccant dehumidifier. The indoor air conditioning will also involve electrical consumption.

For indoor grow operations (as opposed to greenhouse operations), LED lighting fixtures are being successfully applied to vegetative rooms, saving up to 50% of the lighting energy compared to the standard practice. For flower rooms, double ended, high-pressure sodium (HPS) fixtures save 20-25% compared to the standard HPS fixtures. While less common, some growers are successfully applying LED fixtures or LED/HPS hybrid designs for up to 30-40% energy savings in flower rooms. For cooling and dehumidification, smaller grow operations are saving energy by using split ductless air conditioning units in place of standard rooftop units. Medium and large-sized grow operations are using chilled water systems to accomplish both cooling and dehumidification, with energy savings of up to 40% compared to the standard practice. By implementing all these best practices, a medium-size or larger indoor grow operation

[34] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

can achieve up to 30-35% energy savings compared to a standard indoor grow.[23] The total energy costs for indoor cannabis grow operations typically varies between 20-50% of total operating costs. By comparison, for a typical medium-size or larger brewery, energy use accounts for about 6-12% of total operating costs. The proposed project's electric power service would be provided by the Southern California Edison Company (SCE) which operates and maintains two transmission substations within the City of Adelanto and its sphere-of-influence. Major utility lines extend along both Rancho Road and Raccoon Avenue. An SCE vault is located in the project site's northwest corner.

Indoor cannabis cultivation facilities consume up to ~150 kilowatt-hours of electricity per year per square foot, which is about 10 times as much as a typical office building in the Southwest. Assuming this rate of consumption, the proposed project would consume approximately 10,000 kWh of electricity on a daily basis. The project Applicant will be required to closely work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. As a result, the impact will be less than significant.

B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ● Less Than Significant Impact.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned commercial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. As a result, the potential impacts will be less than significant.

MITIGATION MEASURES

The analysis determined that the proposed project will not result in significant impacts related to energy and mitigation measures are not required.

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

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or, landslides?			✖	
B. Would the project result in substantial soil erosion or the loss of topsoil?			✖	
C. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✖	
D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property?			✖	
E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✖
F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or, landslides? ● Less than Significant Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).[35] The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building.

[35] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Adelanto is not on the list.[36] The closest fault to the project site is the Helendale Fault, which is located approximately 18 miles east of the City.[37]

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is located in a moderate liquefaction zone.[38] According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. As a result, the potential impacts in regards to liquefaction and landslides are less than significant.

B. *Would the project result in substantial soil erosion or the loss of topsoil? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Cajon, Helendale and Bryman soils associations which consist of very deep and well drained soils. Slopes range from 0 to 15 percent.[39] The future uses within this existing building will involve the cultivation of medicinal cannabis. The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building.

The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge

[36] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010*. http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx.

[37] California Department of Conservation. *The Helendale Fault*. http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/FER/262/FER_262_Report_20160610.pdf.

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

[39] UC Davis. *SoilWeb*. Website accessed May 2, 2020.

Elimination System (NPDES) stormwater permitting program. Since the site is less than one acre, the later applies to the proposed project.

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

C. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? ● Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.[28] The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. As a result, the potential impacts are will be less than significant.

D. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Cajon, Helendale and Bryman soils associations.[40] According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.[30] The applicant is required to adhere to all requirements detailed by the USDA, resulting in potential impacts which will be less than significant.

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

[40] UC Davis. *SoilWeb*. Website accessed May 2, 2020.

[30] United States Department of Agriculture. Natural Resources Conservation Service. Website accessed July 2, 2020. https://www.nrcs.usda.gov/wps/PA_NRCSConsumption/download?cid=nrcseprd1295676&ext=pdf#:~:text=Small%20commercial%20buildings%20are%20structures,frost%20penetration%2C%20whichever%20is%20deeper.

E. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? ● No Impact.*

The proposed project will connect to the City's sanitary sewer system. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

F. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ● No Impact*

The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The closest fossil vertebrate locality is LACM 7786, between Adelanto and the former George Air Force Base. This locality produced a fossil specimen of meadow vole, *Microtus*. The next closest vertebrate fossil locality from these deposits is LACM 1224, west of Spring Valley Lake, which produced a specimen of fossil camel, *Camelops*. Additionally, on the western side of the Mojave River below the bluffs, an otherwise unrecorded specimen of mammoth was collected in 1961 from older Quaternary Alluvium deposits. Since no significant new excavation or grading will occur, no impacts are anticipated.

MITIGATION MEASURES

The analysis determined that the proposed project will not result in significant impacts related to paleontological resources and no mitigation measures are required.

3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✖	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ● Less than Significant Impact.*

The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Carbon dioxide equivalent, or CO2E, is a term that is used for describing different greenhouses gases in a common and collective unit. The SCAQMD established the 10,000 MTCO2 threshold for industrial land uses. As indicated in Table 3-4, the operational CO2E is 472 pounds per day which is well below the threshold.

Table 3-4
Greenhouse Gas Emissions Inventory

Source	GHG Emissions (metric tons/year)			
	CO2	CH4	N2O	CO2E
Long-Term – Area Emissions	--	--	--	--
Long-Term - Energy Emissions	17.51	--	--	17.62
Long-Term - Mobile Emissions	454.75	0.03	--	455.24
Long-Term - Total Emissions	471.98	0.03	--	472.87
Total Construction Emissions	2,495.93	0.67	0.00	2,512.83
Significance Threshold				**100,000 MTCO2E**

Furthermore, as mentioned in Section 3.17, Transportation, the projected vehicle trips to and from the site will not be significant given the proposed use. All vehicle, equipment and machinery sales transactions will be completed through an online auction-style website. Very few customers will visit the project site since the new business will be closed to the general public. As a result, the potential impacts are considered to be less than significant.

B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? ● Less than Significant Impact.*

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was completed and finalized in March of 2014. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. It is important to note that the California Department of Transportation as well as the Counties of Los Angeles and San Bernardino are engaged in an effort to construct a multi-modal transportation corridor consisting of public transit, a new freeway, and bicycle lanes known as the High Desert Corridor (HDC). The aforementioned regional program will reduce potential GHG emissions related to excessive VMTs to levels that are less than significant.

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.[41] The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.

MITIGATION MEASURES

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

[41] Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.* http://gov.ca.gov/news. May 2, 2020.

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✖	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✖	
C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✖
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✖
E. Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✖
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✖
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ● Less than Significant Impact.*

The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. Once operational, the potentially hazardous materials that are often associated with the new development that involves the cultivation of cannabis are outlined below.

- *Mold.* Marijuana production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold. Previous studies of illegal indoor cultivation operations have reported elevated levels of airborne mold spores, especially

during activities such as plant removal by law enforcement personnel. Physiological effects include allergic reactions, hypersensitivity, and anaphylaxis to marijuana.

- *Skin Sensitivity*. Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes. As with most sensitizers, initial exposure results in a normal response, but over time, repeated exposures can lead to progressively strong and abnormal responses.

- *Carbon dioxide (CO2)*. CO2 is used in the marijuana industry to increase plant growth and to produce concentrates. In addition to the liquid gas form, solid carbon dioxide or dry ice can be used for extraction processes. Compressed gases can present a physical hazard and has additional safety regulations that must be adhered to.

- *Carbon monoxide (CO)*. CO is a colorless, odorless, toxic gas which interferes with the oxygen-carrying capacity of blood. At elevated concentrations, CO can overcome persons without warning. Sources of carbon monoxide exposure include furnaces, hot water heaters, portable generators/generators in buildings; concrete cutting saws, compressors; forklifts, power trowels, floor buffers, space heaters, welding, and gasoline powered pumps.

- *Indoor Air Quality*. Workers may encounter ozone as a product of the chemical reaction of nitrogen oxides and volatile organic compounds (e.g., terpenes emitted from the marijuana plant) present inside a cultivation facility. Terpenes and nitric oxides are associated with eye, skin, and mucous irritation. Ozone generators may also be found in facilities for odor control. Ozone can cause decreased lung function and/or exacerbate pre-existing health effects, especially in workers with asthma or other respiratory complications.

- *Pesticides*. Cannabis cultivation facilities may have insecticides and fungicides used within the facility. Some pesticides, including pyrethrins and neem oil are non-persistent and have low volatility (neem oil is an organic pest repellent derived from the neem tree). However, these pesticides have been associated with dermal and respiratory toxicity for the workers who apply them. Depending on the pesticide, requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.

- *Nutrients and Corrosive Chemicals*. Cannabis Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of Riverside Fire Department prior to the issuance of the Occupancy Permit. As a result, less than significant impacts will occur.

B. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ● Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As indicated in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Environstor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project's construction phase is remote and the impacts will be less than significant.

C. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ● No Impact.*

There are no schools located within one-quarter of a mile from the project site. The nearest school is Adelanto Elementary School, which is located 2.3 miles northeast of the project site. As a result, the proposed project will not create a hazard to any local school and no impacts are anticipated.

D. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ● No Impact.*

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.[32] Therefore, no impacts will occur.

E. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ● No Impact.*

The project site is not located within an airport land use plan and is not located within two miles of a public airport or public use airport.[42] The nearest airport to the City is the Southern California Logistics Airport is located approximately 3.4 miles northeast of the project site.[43] The project will not introduce a structure that will interfere with the approach and take off of airplanes utilizing any regional airports. As a result, no impacts related to this issue will occur

[32] CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).* *http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm*.

[42] Toll-Free Airline. *Los Angeles County Public and Private Airports, California.* http://www.tollfreeairline.com/california/losangeles.htm.

[43] Google Earth. Website accessed May 2, 2020.

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

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

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

The project site and the adjacent properties are developed. The project site is not located within a "very high fire hazard severity zone."[33] As a result, no impacts will result.

MITIGATION MEASURES

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

[33] CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County*. http://frap.fire.ca.gov/webdata/maps/san_bernardino_sw/

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✖	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✖	
C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows?			✖	
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				✖
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? ● Less than Significant Impact.*

The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. The project Applicant will be required to adhere to Chapter 17.93 - Erosion and Sediment Control, of the municipal code regulates erosion and sediment control. These regulations outlined in Section 17.93.050 – Soil Erosion and Sediment Control Plan. The project Applicant will also be required to conform to Section 17.93.060 – Runoff Control of the City's Municipal Code. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. As a result, the construction impacts will be less than significant.

B. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ● Less than Significant Impact.*

No new direct construction related impacts to groundwater supplies, or groundwater recharge activities would occur as part of the proposed project's implementation. Water used to control fugitive dust will be

transported to the site via truck. No direct ground water extraction will occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. As a result, there would be no direct groundwater withdrawals associated with the proposed project's implementation. As a result, the impacts are considered to be less than significant.

C. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows? ● Less than Significant Impact.*

The proposed project's location will be restricted to the developed property and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site is presently undeveloped though there are no stream channels or natural drainages that occupy the property. The site would be designed so the proposed hardscape surfaces (the building and paved areas) will percolate into the landscape parkway areas. As a result, the potential impacts will be less than significant.

D. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? ● No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Adelanto, the proposed project site is located in Zone X.[34] Thus, properties located in Zone X are not located within a 100-year flood plain. The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 65 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.[44] As a result, the potential impacts will be less than significant. As a result, no impacts are anticipated.

E. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ● No Impact.*

The proposed project is required to be in compliance with Chapter 17.93 the City of Adelanto Municipal Code. Chapter 17.93 of the City of Adelanto Municipal Code is responsible for implementing the NPDES and MS4 stormwater runoff requirements. In addition, the project's operation will not interfere with any groundwater management or recharge plan because there are no active groundwater management recharge activities on-site or in the vicinity. As a result, no impacts are anticipated.

MITIGATION MEASURES

As indicated previously, hydrological characteristics will not substantially change as a result of the proposed project. As a result, no mitigation is required.

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[34] Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2020.

[44] Google Earth. Website accessed May 2, 2020.

3.11 LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				✖
B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide an established community? ● No Impact.*

The City of Adelanto is reviewing an application submitted by HD Biotech Cannabis Warehouse to develop a 4.69-acre (204,754 square-foot) parcel within the southern portion of the City of Adelanto. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The project site is zoned as Manufacturing/Industrial (MI). The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. The property currently has a General Plan and Zoning land use designation of Manufacturing Industrial (MI).

Access to the project site is provided by secured driveway access with Rancho Road. The area where the new building will be located is currently paved over, occupied by smaller storage buildings, or otherwise used for outdoor storage. Other land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* Various smaller industrial uses are located to the north of the project site. These parcels are zoned as *Manufacturing/Industrial (MI)*.[45]

- *East of the project site:* A SCE (no build) easement abuts the project site on the east side. Raccoon Road extends further east. Finally, the Adelanto ICE Processing Facility is located the east side of Raccoon Road. This area is zoned as *Manufacturing/Industrial (MI)*.[46]

[45] Google Maps and City of Adelanto Zoning Map. Website accessed on August 21, 2020.

[46] Ibid.

- *South of the project site:* Rancho Road extends along the project site's south side. Vacant, undeveloped land is located further south on the south side of Rancho Road. This area is zoned as *Manufacturing/Industrial (MI).*[47]

- *West of the project site:* Various smaller industrial uses abut the project site on the west side. These parcels are zoned as *Manufacturing/Industrial (MI).*[48]

This issue is specifically concerned with the expansion of an inconsistent land use into an established neighborhood. The proposed project will be confined within the project site's boundaries. The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood and no impacts will occur.

B. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ● No Impact.*

The City of Adelanto permits and regulates Medicinal and Adult Use Cannabis activities in designated zones. Cannabis activity is permitted with a Conditional Use Permit (CUP) in the following zones: Light Manufacturing (LM), Light Manufacturing Cannabis Only (LMCO), Manufacturing Industrial (MI), and Airport Development District (ADD). Because the proposed project site is located within a Manufacturing Industrial zoning designation in the southern portion of the City, a CUP) is required. As a result, no impacts will occur.

MITIGATION MEASURES

The analysis determined that no impacts on land use and planning would result upon the implementation of the proposed project. As a result, no mitigation measures are required.

[47] Google Maps and City of Adelanto Zoning Map. Website accessed on August 21, 2020.

[48] Ibid.

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✖
B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[36] The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.

- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.

- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and

[36] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*. *https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14*.

Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[49] The project site is located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.[50] As indicated previously, the site develop and there are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur.

B. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ● No Impact.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

MITIGATION MEASURES

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

[49] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*. *https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14*

[50] California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed April 11, 2019.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✖	
B. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?			✖	
C. For a project located within the vicinity of a private airstrip or- an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ● Less than Significant Impact.*

The City of Adelanto is reviewing an application submitted by HD Biotech Cannabis Warehouse to develop a 4.69-acre (204,754 square-foot) parcel within the southern portion of the City of Adelanto. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.[38] Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. All of the cultivation and manufacture of cannabis products will occur indoors. In addition, the operation of the facility will not expose surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. Finally, there are no noise sensitive land uses located in the vicinity of the site. As a result, the proposed project will not expose sensitive receptors to excessive noise levels and the potential impacts are considered to be less than significant. As a result, the impacts will be less than significant.

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

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

Once in operation, the proposed project will not significantly raise groundborne noise levels. Slight increases in groundborne noise levels could occur during the construction phase. The limited duration of construction activities and the City's construction-related noise control requirements will reduce the potential impacts to levels that are less than significant. Furthermore, there are no sensitive receptors or noise sensitive land uses located near the project site As a result, the impacts will be less than significant.

C. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? ● No Impact.*

The project site is not located within an airport land use plan and is not located within two miles of a public airport or public use airport. The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. As a result, no impacts will occur.

MITIGATION MEASURES

The analysis of potential noise impacts indicated that no significant adverse impacts would result from the proposed project's construction and operation. As a result, no mitigation measures are required.

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✖
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

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

- *New development in an area presently undeveloped and economic factors which may influence development*. The site is currently developed and occupied. All land use surrounding the property has been previously designated as Manufacturing Industrial (MI) zoning by the City of Adelanto.
- *Extension of roadways and other transportation facilities*. Future roadway and infrastructure connections will serve the proposed project site only. The existing roadway that serves the project site are fully improved.
- *Extension of infrastructure and other improvements*. The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only. At present, there are water or sewer utility lines within the immediate area of the project site. The project's potential utility impacts are analyzed in Section 3.19.
- *Major off-site public projects (treatment plants, etc.)*. The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants. The project's potential utility impacts are further analyzed in Section 3.19.
- *The removal of housing requiring replacement housing elsewhere*. The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services*. The project will result in a limited increase in employment which can be accommodated by the local labor market. The cultivation facility is projected to employ 10-20 persons. The hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.

- *Short-term growth-inducing impacts related to the project's construction*. The project will result in temporary employment during the construction phase.

The proposed project will utilize existing roadways and infrastructure. The existing roads and utility lines will serve the project site only and will not extend into undeveloped areas. The proposed project will not result in any unplanned growth. Therefore, no impacts will result.

B. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ● No Impact.*

The project site is vacant and unoccupied. This property and surrounding areas have a General Plan and zoning designations of Manufacturing/Industrial (M/I). No housing units will be permitted and none will be displaced as a result of the proposed project's implementation. Therefore, no impacts will result.

MITIGATION MEASURES

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

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for: fire protection; police protection; schools; parks; or other public facilities?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in* fire protection; police protection; schools; parks; or other public facilities? ● *Less than Significant Impact.*

The City of Adelanto is reviewing an application submitted by HD Biotech Cannabis Warehouse to further develop a 4.69-acre (204,754 square-foot) parcel within the southern portion of the City of Adelanto. The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The project site is zoned as Manufacturing/Industrial (MI).

Fire Department

The City of Adelanto contracts fire protection services with the San Bernardino County Fire Department from two fire stations located within the City limits. The Fire Department currently reviews all new development plans. The proposed project will be required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires). The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all pertinent Fire Code Standards including the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by City and County Fire officials to ensure adequate fire service and safety as a result of project implementation. As a result, the potential impacts to fire protection services will be less than significant.

Law Enforcement

Law enforcement services within the City are provided by the San Bernardino County Sheriff's Department which serves the community from one police station. The proposed project will not be open or be accessible to the general public. On-site security will include security personnel, gates, cameras, and detailed background checks of employees. The facility will be closed to the public at all times. Non-employees will only be allowed to enter the facility with a permitted escort. The proposed facility will also be required to comply with the County and City security requirements. As a result, the potential impacts to law enforcement services will be less than significant.

Schools

Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. As a result, the impacts on school-related services will be less than significant.

Recreational Services

The proposed project will not result in any local increase in residential development (directly or indirectly) which could potentially impact the local recreational facilities. As a result, less than significant impacts on parks will result from the proposed project's implementation.

Governmental Services

The proposed project will not create direct local population growth which could potentially create demand for other governmental service. As a result, less than significant impacts will result from the proposed project's implementation.

MITIGATION MEASURES

The analysis of public service impacts indicated that no significant adverse impacts are anticipated and no mitigation is required with the implementation of the proposed project.

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✖
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ● No Impact.*

The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The project site is zoned as Manufacturing/Industrial (MI). Due to the industrial nature of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. In addition, no public park is located within one mile of the project site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. As a result, no impacts are anticipated.

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

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site and, as a result, no impacts will occur.

MITIGATION MEASURES

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

3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✖	
B. Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?				✖
C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✖	
D. Would the project result in inadequate emergency access?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ● Less than Significant Impact.*

The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The project site is zoned as Manufacturing/Industrial (MI). Access to the project site will be provided by an existing improved road that would be located along the site's south side (Rancho Road). The new building's parking demand would be met by 23 standard parking spaces and 1 ADA-compliant parking stall. In addition, 1 loading space would be provided.[8] The key operational assumptions used in determining potential daily traffic generation are summarized below:

- The proposed project will operate the cannabis cultivation facility from 8:00 AM to 5:00 PM, Monday through Friday. A total of between 10 and 20 full-time staff will be on-site.

- The facility will be closed to the public at all times. Non-employees such as vendors, delivery persons, and maintenance personnel, will only be allowed to enter the facility with a permitted escort.

- The existing full-time security guards will continue to be stationed at the facility 24 fours a day, seven days a week.

The total trip generation assumed 20 trip ends (10 round trips) per day for the employees and 4 trip ends (2 round trips) per day for the vendors. A maximum of 24 new trip ends per day are anticipated for the proposed project. As a result, the impacts will be less than significant.

[8] Pontious Architecture. *HD-Bio Tech [Site Plan] Sheet A1.0*. December 3, 2019.

B. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? ● No Impact.*

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. As previously mentioned in Subsection A, the proposed project will not create a significant amount of traffic in the surrounding area. As a result, the proposed project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impacts will occur.

C. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ● Less than Significant Impact.*

Access to the project site will be provided by The project site is zoned as Manufacturing/Industrial (MI). Access to the project site will be provided by an existing improved road that would be located along the site's south side (Rancho Road). The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. As a result, the potential impacts will be less than significant.

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

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

MITIGATION MEASURES

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

3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k)?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? ● Less than Significant Impact.*

The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. In addition, 24 parking spaces and 1 loading space will be provided. The total site area in which the building addition is located consists of 204,754 square feet (4.7 acres). The project site is zoned as Manufacturing/Industrial (MI). The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The new 26,775 square foot building will be constructed in the northern portion of the site, north of this existing building. A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

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

- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant.

MITIGATION MEASURES

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant. As a result, no mitigation is required.

3.19 UTILITIES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✖	
B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✖	
C. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✖	
D. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✖	
E. Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?				✖
F. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? • Less than Significant Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The project site is currently developed and the existing utility connections and facilities can adequately handle the proposed project and no expansion of these services is required (refer to the following subsections). As a result, the potential impacts are will be less than significant.

B. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? ● Less than Significant Impact.*

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario.[51] There are existing water and sewer lines located in Rancho Road.[52] Therefore, the project's implementation will not require the relocation or construction of any water facilities or connections. The indoor agricultural areas will utilize an automated irrigation system. The medicinal cannabis will be cultivated, harvested, dried, packaged, stored, and distributed from this facility. In addition, the project will be equipped with water efficient fixtures and hydroponics. As a result, the impacts are will be less than significant.

C. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ● Less than Significant Impact.*

The City operates a 1.5-million-gallons-per-day activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program. The City is currently constructing a 2.5-million-gallons-per-day upgrade that will increase wastewater treatment capabilities to 4.0 million gallons per day and produce treated water that can be used for lawn/public parks irrigation, construction and dust control and other beneficial uses. The project's implementation will not require the relocation or construction of any water facilities or connections. As a result, the impacts are expected to be less than significant.

D. *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ● Less than Significant Impact.*

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

E. *Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals? ● No Impact.*

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[51] City of Adelanto. *2015 Urban Water Management Plan*. Report dated June 22, 2016.

[52] City of Adelanto. City of Adelanto Existing Sewer and Water. https://www.ci.adelanto.ca.us/DocumentCenter/View/614/Sewer-and-Water-Map.

The proposed project, like all other development in San Bernardino County and the City of Adelanto, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

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

The proposed project, like all other development in Adelanto and San Bernardino County, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

MITIGATION MEASURES

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.20 WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				✖
B. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✖
C. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✖
D. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

The proposed project involves the construction of a new addition to an existing cannabis facility located at 10042 Rancho Road. The existing facility is operated by HD Bio-Tech. The new building will be located in the northern portion of the site and will consist of 26,775 square feet of floor area. The new building will be used for cannabis cultivation and distribution. The proposed project site is located on a larger 4.69-acre (204,754 square-foot) parcel that is currently occupied by a 36,750 square foot building used by HD Bio-Tech. The project site is located in the midst of an urbanized area. Improved surface streets serve the project site and the surrounding area. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts will occur.

B. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ● No Impact.*

The project site is located in the midst of an urbanized area. The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 20 miles north and northwest of the San Gabriel and San Bernardino Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, no impacts will occur.

C. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ● No Impact.*

The project site is not located in an area that is classified as a high fire risk severity, and therefore will not require the installation of specialized infrastructure such *as fire roads, fuel breaks, or emergency water sources*. As a result, no impacts will occur.

D. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ● No Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes and no impacts will occur.

MITIGATION MEASURES

The analysis of wildfires impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				✖
B. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✖
C. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✖

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

A. The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.

B. The proposed project *will not* have impacts that are individually limited, but cumulatively considerable. The proposed project is relatively small and the attendant environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.

C. The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.

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SECTION 4 CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Adelanto can make the following additional findings: a mitigation monitoring and reporting program will not be required.

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SECTION 5 REFERENCES

5.1 PREPARERS

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(626) 336-0033

Marc Blodgett, Project Principal
Jessica Golden, Project Manager
Alice Ye, Administrative Assistant

5.2 REFERENCES

Bugliarello, et. al., *The Impact of Noise Pollution,* Chapter 127, 1976.

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

California Department of Fish and Wildlife, *Natural Diversity Database*.

California Department of Parks and Recreation, *California Historical Landmarks*.

California Division of Mines and Geology, *Seismic Hazards Mapping Program,* 2012.

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Google Earth.

Adelanto, City of, *Municipal Code,* Chapter 17.70, Signs.

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United States Department of Agriculture. *Web Soil Survey*.

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APPENDIX A – AIR QUALITY WORKSHEETS

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3.4 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358
Total	**0.7750**	**7.9850**	**7.2637**	**0.0114**		**0.4475**	**0.4475**		**0.4117**	**0.4117**		**1,103.2158**	**1,103.2158**	**0.3568**		**1,112.1358**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0116	0.3750	0.0807	1.1900e-003	0.0271	5.9000e-004	0.0277	7.8100e-003	5.7000e-004	8.3800e-003		124.2206	124.2206	0.0100		124.4710
Worker	0.0502	0.0304	0.3632	8.9000e-004	0.0904	5.5000e-004	0.0909	0.0240	5.1000e-004	0.0245		88.4401	88.4401	2.8500e-003		88.5112
Total	**0.0618**	**0.4054**	**0.4439**	**2.0800e-003**	**0.1175**	**1.1400e-003**	**0.1186**	**0.0318**	**1.0800e-003**	**0.0329**		**212.6607**	**212.6607**	**0.0129**		**212.9822**

3.4 Building Construction - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358
Total	**0.7750**	**7.9850**	**7.2637**	**0.0114**		**0.4475**	**0.4475**		**0.4117**	**0.4117**	**0.0000**	**1,103.2158**	**1,103.2158**	**0.3568**		**1,112.1358**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0116	0.3750	0.0807	1.1900e-003	0.0271	5.9000e-004	0.0277	7.8100e-003	5.7000e-004	8.3800e-003		124.2206	124.2206	0.0100		124.4710
Worker	0.0502	0.0304	0.3632	8.9000e-004	0.0904	5.5000e-004	0.0909	0.0240	5.1000e-004	0.0245		88.4401	88.4401	2.8500e-003		88.5112
Total	**0.0618**	**0.4054**	**0.4439**	**2.0800e-003**	**0.1175**	**1.1400e-003**	**0.1186**	**0.0318**	**1.0800e-003**	**0.0329**		**212.6607**	**212.6607**	**0.0129**		**212.9822**

3.5 Paving - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7214	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286		1,035.3425	1,035.3425	0.3016		1,042.8818
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.7214**	**6.7178**	**7.0899**	**0.0113**		**0.3534**	**0.3534**		**0.3286**	**0.3286**		**1,035.3425**	**1,035.3425**	**0.3016**		**1,042.8818**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0822	0.0498	0.5944	1.4500e-003	0.1479	9.0000e-004	0.1488	0.0392	8.3000e-004	0.0401		144.7201	144.7201	4.6600e-003		144.8365
Total	**0.0822**	**0.0498**	**0.5944**	**1.4500e-003**	**0.1479**	**9.0000e-004**	**0.1488**	**0.0392**	**8.3000e-004**	**0.0401**		**144.7201**	**144.7201**	**4.6600e-003**		**144.8365**

3.5 Paving - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7214	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286	0.0000	1,035.3425	1,035.3425	0.3016		1,042.8818
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.7214**	**6.7178**	**7.0899**	**0.0113**		**0.3534**	**0.3534**		**0.3286**	**0.3286**	**0.0000**	**1,035.3425**	**1,035.3425**	**0.3016**		**1,042.8818**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0822	0.0498	0.5944	1.4500e-003	0.1479	9.0000e-004	0.1488	0.0392	8.3000e-004	0.0401		144.7201	144.7201	4.6600e-003		144.8365
Total	**0.0822**	**0.0498**	**0.5944**	**1.4500e-003**	**0.1479**	**9.0000e-004**	**0.1488**	**0.0392**	**8.3000e-004**	**0.0401**		**144.7201**	**144.7201**	**4.6600e-003**		**144.8365**

3.6 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	56.3995					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	**56.6184**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**		**281.4481**	**281.4481**	**0.0193**		**281.9309**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	9.1300e-003	5.5300e-003	0.0660	1.6000e-004	0.0164	1.0000e-004	0.0165	4.3600e-003	9.0000e-005	4.4500e-003		16.0800	16.0800	5.2000e-004		16.0930
Total	**9.1300e-003**	**5.5300e-003**	**0.0660**	**1.6000e-004**	**0.0164**	**1.0000e-004**	**0.0165**	**4.3600e-003**	**9.0000e-005**	**4.4500e-003**		**16.0800**	**16.0800**	**5.2000e-004**		**16.0930**

3.6 Architectural Coating - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	56.3995					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309
Total	**56.6184**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**	**0.0000**	**281.4481**	**281.4481**	**0.0193**		**281.9309**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	9.1300e-003	5.5300e-003	0.0660	1.6000e-004	0.0164	1.0000e-004	0.0165	4.3600e-003	9.0000e-005	4.4500e-003		16.0800	16.0800	5.2000e-004		16.0930
Total	**9.1300e-003**	**5.5300e-003**	**0.0660**	**1.6000e-004**	**0.0164**	**1.0000e-004**	**0.0165**	**4.3600e-003**	**9.0000e-005**	**4.4500e-003**		**16.0800**	**16.0800**	**5.2000e-004**		**16.0930**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.1065	0.7816	1.0491	4.4400e-003	0.2808	2.5500e-003	0.2833	0.0751	2.3900e-003	0.0775		454.4593	454.4593	0.0314		455.2441
Unmitigated	0.1065	0.7816	1.0491	4.4400e-003	0.2808	2.5500e-003	0.2833	0.0751	2.3900e-003	0.0775		454.4593	454.4593	0.0314		455.2441

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Unrefrigerated Warehouse-No Rail	44.97	44.97	44.97	131,301	131,301
Total	44.97	44.97	44.97	131,301	131,301

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Unrefrigerated Warehouse-No	9.50	7.30	7.30	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Unrefrigerated Warehouse-No Rail	0.542047	0.035396	0.174897	0.107230	0.017469	0.005327	0.008901	0.094756	0.001421	0.002157	0.008671	0.000709	0.001020

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Install High Efficiency Lighting

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	1.6100e-003	0.0146	0.0123	9.0000e-005		1.1100e-003	1.1100e-003		1.1100e-003	1.1100e-003		17.5159	17.5159	3.4000e-004	3.2000e-004	17.6200
NaturalGas Unmitigated	1.6100e-003	0.0146	0.0123	9.0000e-005		1.1100e-003	1.1100e-003		1.1100e-003	1.1100e-003		17.5159	17.5159	3.4000e-004	3.2000e-004	17.6200

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unrefrigerated Warehouse-No Rail	148.885	1.6100e-003	0.0146	0.0123	9.0000e-005		1.1100e-003	1.1100e-003		1.1100e-003	1.1100e-003		17.5159	17.5159	3.4000e-004	3.2000e-004	17.6200
Total		**1.6100e-003**	**0.0146**	**0.0123**	**9.0000e-005**		**1.1100e-003**	**1.1100e-003**		**1.1100e-003**	**1.1100e-003**		**17.5159**	**17.5159**	**3.4000e-004**	**3.2000e-004**	**17.6200**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unrefrigerated Warehouse-No Rail	0.148885	1.6100e-003	0.0146	0.0123	9.0000e-005		1.1100e-003	1.1100e-003		1.1100e-003	1.1100e-003		17.5159	17.5159	3.4000e-004	3.2000e-004	17.6200
Total		**1.6100e-003**	**0.0146**	**0.0123**	**9.0000e-005**		**1.1100e-003**	**1.1100e-003**		**1.1100e-003**	**1.1100e-003**		**17.5159**	**17.5159**	**3.4000e-004**	**3.2000e-004**	**17.6200**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

No Hearths Installed

Use Low VOC Cleaning Supplies

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.7003	2.0000e-005	2.7400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		5.8600e-003	5.8600e-003	2.0000e-005		6.2500e-003
Unmitigated	0.7431	2.0000e-005	2.7400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		5.8600e-003	5.8600e-003	2.0000e-005		6.2500e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1700					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5729					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.5000e-004	2.0000e-005	2.7400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		5.8600e-003	5.8600e-003	2.0000e-005		6.2500e-003
Total	**0.7431**	**2.0000e-005**	**2.7400e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**		**5.8600e-003**	**5.8600e-003**	**2.0000e-005**		**6.2500e-003**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1700					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5301					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.5000e-004	2.0000e-005	2.7400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		5.8600e-003	5.8600e-003	2.0000e-005		6.2500e-003
Total	**0.7003**	**2.0000e-005**	**2.7400e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**		**5.8600e-003**	**5.8600e-003**	**2.0000e-005**		**6.2500e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet
Install Low Flow Kitchen Faucet
Install Low Flow Toilet
Install Low Flow Shower
Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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