

INITIAL STUDY

FOR THE

BEJARANO CANNABIS CULTIVATION

PROJECT

Prepared for:

City of Coachella
1515 Sixth Street
Coachella, California 92236

Prepared by:

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ENVIRONMENTAL CHECKLIST

1. Project Title: Bejarano Cannabis Cultivation Project
2. Lead Agency Name: City of Coachella
Address: 1515 Sixth Street, Coachella, CA 92236
3. Contact Person: Luis Lopez
Phone Number: (760) 398-3502
4. Project Location: The proposed project is located in the City of Coachella, Riverside County, at the approximate address the property is directly east of 48100 Harrison Street, Coachella, CA 92236. The project is located on the east side of Harrison Street just south of the southeast corner of Avenue 48 and Harrison Street. The geographic coordinates of the proposed project are 33.698979, - 116.181375 and the proposed project is located within the Indio, CA USGS Topo 7.5-minute topographic map, within Section 32 Township 5 South, Range 8 East. See Figures 1 and 2 for regional and site locations.
5. Project Sponsor: Bejarano, David Ardugo
E-Mail: davideargudo@gmail.com
Phone: (415) 640 4420
6. General Plan Designation: Heavy Industrial (IH)
7. Zoning: Wrecking Yard (M-W)
8. Project Description:

Project Description

The City of Coachella is located in the middle of Riverside County just northeast of the Salton Sea, which forms the border between Riverside and Imperial County. Bejarano proposes the development of a cannabis cultivation facility on a 10.01-acre site in the City of Coachella, Riverside County, California. The project site is comprised of Assessor Parcel Numbers 603-290-020 and 603-290-021. Bejarano, the Applicant, proposes two buildings inclusive of greenhouses and a dedicated Administration and Facility building designed to facilitate the cultivation and processing of medicinal marijuana. The City of Coachella Code Section 17.34.20 Permitted Uses, Article C7, states that Medical Cannabis cultivation and manufacturing is a Conditional Use in the IH District pursuant to Chapter 16.36. Therefore, the application for the cannabis cultivation facility requires the approval of a Conditional Use Permit (CUP) in the M-W (Wrecking Yard) zone, the zone within which the project is located. The applicant has submitted an application for approval of a CUP entitlement from the City.

At present, the site contains disturbed loose gravelly soil with trash and other debris lining the northern portion of the site along with remnants of broken down vehicles and storage areas, as well as active heavy machinery; there is a chain link fence at the front of the property facing Harrison Street. The previous use of the site was as a wrecking yard to store vehicles. According to the site plan (Figure 3), the project will construct 2 buildings total. The Headhouse building will be 2-stories, totaling 53,244 square feet (SF) in size, while the Cultivation Building will be 1-story totaling 172,461 SF in

size. The total building area will be 225,705 SF. The site coverage will be 199,083 SF given that the Headhouse Building is 2-stories. This equates to approximately 47% building coverage on the site.

Onsite parking will be provided on the outskirts of the two Buildings, which are located directly adjacent to one another near the center of the project site. The project will provide a total of 291 parking spaces, which is greater than the 256 parking spaces required by the City for the project as proposed. The parking provided includes 277 standard parking spaces, 7 handicapped parking spaces, and 7 loading spaces. The north side of the site will contain 69 parking spaces; the east side of the site will contain 25 parking spaces; the south side of the site will contain two rows of parking containing 152 parking spaces; and, the west side of the site will contain two rows of parking containing 45 parking spaces. The loading spaces are located at the eastern border of the site, while the majority of the handicapped parking spaces are located at the entrance of the Headhouse Building along the western border of the site.

The entirety of the site will be fenced with concrete blocks measuring 8 feet tall for security purposes. Access to the site will be through two 30-foot wide throughways at Harrison Avenue. A 37-foot land dedication will separate the site entrance from Harrison Street to enable sidewalk and future roadway improvements to be installed. All incoming and outgoing employee vehicles and other vehicular traffic associated with supply and materials deliveries, green and solid waste collection, and product shipping will enter and exit from these two entryways. For security purposes, just east and on either side of the Headhouse Building are security gates that will limit access to the Cultivation Building to authorized persons only. A security station for security personnel will be located just west of the south security fence.

Along the property boundary, the project will develop landscaping. The buffer between the Headhouse and Cultivation Buildings and the property line is at least 65 feet 8 inches from the two buildings at any point within the project site.

The Headhouse Building will contain offices and necessary operation facilities, which may include the following: Vault Security, Break Room, Dry Rooms, Show Room, Packaging, Soil Potting, Interior Loading, Janitors Closet, Storage Room, Men's and Women's Restrooms, an Elevator, an Equipment Area, Electric/Telephone Room, and a Transportation Corridor. Building 1 will be a two-story structure consisting of 26,622 SF for each floor. The Cultivation Building will include Flower, Vegetation, and Greenhouse Canopy areas that are designed to accommodate the various phases of cannabis cultivation and processing. Several trash enclosures will be located on the outskirts of the Cultivation Building: 2 will be located on the north side of the site, and 1 will be located on the south side of the site. Additionally, several transformers will be located on the outskirts of the Cultivation Building: 5 on the south side of the site, 1 at the northeast corner of the site. It is anticipated that the Cultivation Building will require 7 megawatts (MW) per year to operate as the structure will be retrofitted to utilize natural lighting—much as a typical greenhouse would.

Odors on site will be handled utilizing commercial odor controls with carbon filters, which utilize activated charcoal, carbon filters, and an extractor fan for flow of air.

The project includes a 52,131 SF retention basin that will collect runoff from the project site, which will be located directly on the eastern boundary of the site. The retention basin will be triangular to accommodate the site configuration, and will be surrounded on each side with additional landscaping.

Once in operation, it is anticipated that the Bejarano Cannabis Cultivation Project will employ a maximum of 100 persons.

Project Phasing

The proposed project will become operational in phases. As such, once the site is cleared, the Bejarano Cannabis Cultivation Facility will become operational as shown on the Interim Site Plan (Figure 4). Each of these components are temporary and easily removed or moved as the Future Headhouse and Cultivation Buildings are installed. Bejarano intends to install 6 containers that will be 8' x 40' in size towards the western border of the site adjacent to Harrison Avenue. In order to begin cultivation of cannabis as part of the Bejarano interim operations, Bejarano intends to install 24 hoop houses 24' x 100' in size. These hoop houses will effectively serve as temporary greenhouses that can be covered or uncovered. An example of what the hoop houses will look like is provided on Figures 5 and 6. The operations will be managed within two mobile office buildings at the center of the western border of the site.

Access to the site will be managed through an existing gate along Harrison Avenue and operation will occur within a portion of the site that is currently partially bound by a chain link fence. In the interim, a temporary fence will be installed to connect to the existing chain link fence to create a firm boundary around the interim operational area, which does not encompass the entirety of the site. A guard station will be located at the existing gated entrance, which will secure the site.

Construction Scenario

Due to the extent of entitlements required for a development of this type, it is anticipated that entitlements, construction documents, and permits would be obtained by the First Quarter of 2020. Construction of the proposed Cannabis Cultivation Facility is anticipated to take approximately 7 to 9 months, with an anticipated start date in the Second Quarter of 2022, which is anticipated to occur concurrently with the installation of a new Imperial Irrigation District (IID) transformer that will serve the project area. The project's anticipated completion date is the Second Quarter of 2023. Once the entitlements are acquired, and the site is cleared (by approximately the First Quarter of 2020), the Bejarano Cannabis Cultivation Facility will operate under the interim operational scenario outlined above. The interim operational scenario will terminate at or before the Cannabis Cultivation Facility has been constructed and is deemed operational. The project site contains disturbed loose gravelly soil; development of the site would require site preparation (i.e., grading and excavation), paving, and construction of buildings. The project is anticipated to require minimal cut and fill with any cut being reused to balance of the site through grading; which will minimize import/export material to an anticipated amount of $\pm 2,000$ CY. The retention pond will require excavation below ground surface of approximately 5 to 10 feet. Delivery of construction supplies and removal of any excavated materials, if necessary, will be accomplished using trucks during normal working hours, with a maximum of 50 round trips per day. Grading will be by traditional mechanized grading and compaction equipment. Equipment utilized will be traditional site development equipment of front end graders, vibratory compactors, petroleum powered fork lifts, and various hand tools traditional to commercial construction. The maximum number of construction employees required to complete the proposed development is about 50 persons.

9. Surrounding land uses and setting: (Briefly describe the project's surroundings)

The project site is located in a heavy industrial area. The area surrounding the project has one Cannabis Farm that is in the process of being developed at the southwest corner of 48th Avenue and Harrison Street. The land uses surrounding the project area as follows:

- North: IH Heavy Industrial/Open Space;

- West: IH Heavy Industrial, further west IL Light Industrial;
 - South: IH Heavy Industrial, further south IL Light Industrial; and
 - East: Open Space, further east CE Entertainment Commercial
10. Other agencies whose approval is required (e.g., permits, financing approval, or participation agreement):
- State Water Resource Control Board
 - South Coast Air Quality Management District
 - Colorado River Basin Regional Water Quality Control Board
 - County of Riverside Fire Department
11. Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? Four tribes have requested consultation under AB 52 from the City of Coachella. The Torres Martinez Desert Cahuilla Indians, Agua Caliente Band of Cahuilla Indians, Soboba Band of Luiseño Indians, Cabazon Band of Mission Indians, and Twenty-Nine Palms Band of Mission Indians.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

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

Prepared by

Date

Lead Agency (signature)

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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

I. AESTHETICS

SUBSTANTIATION

- a. *Less Than Significant Impact* – Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. A review of the project area determined that there are no scenic vistas located internally within the area proposed for the development of the Bejarano Project. The project site is located in an industrial, developed area with industrial uses to the north, south, and west, and the Whitewater River channel with vegetation adjacent to Highway 86 to the east. Therefore, the development of the Bejarano Cannabis Cultivation Facility is not expected to impact any important scenic vistas within the project area. A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. The Coachella Valley is located between several mountain ranges, the Little San Bernardino Mountains to the north and east, and the San Jacinto Mountains and Santa Rosa Mountains to the south and west. The City of Coachella General Plan generally states that the City desires to preserve scenic views of the mountains. However, views around the proposed project are limited because of existing man-made features and surrounding development, which consists of one- and two- story buildings. The development of the project would be consistent with the surrounding development and the height of the proposed structures will be no greater than 20-feet tall, with an 8-foot concrete block wall that will surround the property. This height is similar to surrounding development, and all buildings within the proposed development would be constructed to a height well within the 50-foot height limit designated under the Wrecking Yard (M-W) zone classification. Therefore, development of the proposed project has a less than significant potential to have a substantial adverse effect on a scenic vista.
- b. *No Impact* – The project site does not contain any scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway corridor. The project site has been previously bladed and contains remnants of broken down vehicles and storage areas, as well as active heavy machinery; the current use within the site is as a scrap metal recycling facility. The site contains some loose to slightly compacted dirt and non-native vegetation that is approximately at-grade. No trees, rock outcroppings, or scenic features existing on site. According to Caltrans, the proposed project is not located within a state scenic highway and the City of Coachella does not

identify any locally important scenic roadways. Therefore, the proposed project cannot affect any scenic resources within a state scenic highway corridor. Based on the site condition and immediate surroundings, the project site itself does not contain any significant scenic resources. Therefore, no damage to a scenic resource will occur and any impacts under this issue are considered less than significant.

- c. *Less Than Significant Impact* – The Coachella General Plan has designated the area for Industrial uses, and the zoning classification is Wrecking Yard; a use of this type is allowed within this designation and classification. Though the surrounding businesses consist mostly of auto wrecking yards and tree farms, the cannabis cultivation farm will be designed accordingly to fit the constraints of this land use designation. Additionally, recently two other Cannabis Cultivation projects were approved by the City along this corridor, one of which is currently in operation. It is anticipated that the proposed scale, architectural design and articulation of the development on the site will enhance the site and surrounding developed environment compared to the existing visual setting. Thus, by developing this site in accordance with City design guidelines and in accordance with the site development plans, the visual character of this site and its surroundings will be enhanced. Thus, the design elements incorporated in the project and the implementation of the City's design standards will ensure that the proposed project will not conflict with applicable zoning or other regulations governing scenic quality.

- d. *Less Than Significant Impact* – Implementation of the proposed project will create new sources of light during the operational phases of the project. Light and glare from interior and exterior building lighting, safety and security lighting, and vehicular traffic accessing the site will occur once the site is in operation. There are no lighting restrictions within the City of Coachella Municipal Code Section 17.34 that apply to the M-W Wrecking Yard Zone. Therefore, the project will be designed in accordance with the City of Coachella Municipal Code and will install light fixtures in such a way that minimal light would disturb surrounding properties, which do not include any light sensitive uses. No mitigation is required for this project to meet all light and glare control requirements imposed by the City. Thus, light and glare impacts are considered a less than significant impact.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
<p>II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

II. AGRICULTURE AND FORESTRY RESOURCES

SUBSTANTIATION

- a. *No Impact* – The project site is been previously bladed and the current use within the site is as a scrap metal recycling facility, and as such, contains remnants of broken down vehicles and storage areas, as well as active heavy machinery within the City of Coachella’s Heavy Industrial land use designation, and the Wrecking Yard zoning classification. Coachella has many agricultural operations throughout the City. According to the California Important Farmland Finder map (Figure II-1), the project is located within an Urban area, though there is agricultural land a few parcels south of the project. Construction and operation of the proposed Bejarano Project, which will ultimately function as a commercial crop cultivation facility, will be confined to the project site, and therefore will not convert farmland of any importance to non-agricultural use. No impacts are anticipated and no mitigation is required.

- b. *No Impact* – As stated under issue II(a) above, the proposed project site is not designated for agricultural use by the Coachella General Plan. The adjacent uses are not designated for agricultural uses, though a tree farm to the south is designated as Prime Farmland. The activities associated with the proposed project will be confined to the project site; therefore, no potential exists for a conflict between the proposed project and agricultural zoning or Williamson Act contracts within the project area. No mitigation is required.
- c. *No Impact* – The project site is not located within forest land, timberland or timberland zoned for Timberland Production. Therefore, the proposed project will not 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 impacts are anticipated and no mitigation is required.
- d. *No Impact* – The project site is not located within forest land and has no trees on the property; therefore, the project will not result in the loss of forest land or conversion of forest land to non-forest production use. No impacts are anticipated and no mitigation is required.
- e. *No Impact* – Implementation of the proposed project will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of valuable farmland to non-agricultural use or forest to non-forest uses. No forest resources or uses occur within the general vicinity of the proposed project site, and the agricultural uses to the south of the project site would not be impacted by the development or operation of the Bejarano Cannabis Cultivation Facility as the development of a project of this type is a form of agricultural use. Therefore, no adverse impacts to agricultural, forest or timberland resources will result from project implementation and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

III. AIR QUALITY

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the *Air Quality and GHG Impact Analysis, Bejarano Cannabis Cultivation Project, Coachella, California* prepared by Giroux and Associates dated February 4, 2020. This document is provided as Appendix 1 to this document.

Background

Climate

The proposed project site is in the Coachella Valley Planning Area (CVPA) of the Salton Sea Air Basin (SSAB). The SSAB was part of the Southeast Desert Air Basin (SEDAB) until May, 1996 when the SSAB was created. The project site is in the hottest and driest parts of California. The climate is characterized by hot, dry summers and relatively mild winters. Rainfall is scant in all seasons, so differences between the seasons are characterized principally by differences in temperature. Average annual precipitation in the air basin ranges from 2 to 6 inches per year.

Seasonal temperature differences in the basin are large, confirming the absence of marine influences due to the blocking action of the mountains to the west. Average monthly maximum temperatures in the project vicinity range from 108°F in July to 57°F in January. The average monthly minima range from about 40°F in January to about 80°F in July.

During much of the year, California is covered by a moderately intense high-pressure system. In winter, the Pacific High retreats to the south, so that frontal systems from the North Pacific can move onto the California coast. On average, 20 to 30 frontal systems pass through California each winter. The first front usually arrives around the middle of October, and the average period of frontal activity is five to six months. Most of these systems are relatively weak by the time they reach the SSAB, however, and they become more diffuse as they move southeastward.

Air Quality Standards

Existing air quality is measured at established Southern California Air Quality Management District (SCAQMD) air quality monitoring stations. Monitored air quality is evaluated and in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an

adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table III-1. Because the State of California had established Ambient Air Quality Standards (AAQS) several years before the federal action and because of unique air quality problems introduced by the restrictive dispersion meteorology, there is considerable difference between state and national clean air standards. Those standards currently in effect in California are shown in Table III-1. Sources and health effects of various pollutants are shown in Table III-2.

**Table III-1
AMBIENT AIR QUALITY STANDARDS**

Pollutant	Average Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃) ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM ₁₀) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		–		
Fine Particulate Matter (PM _{2.5}) ⁹	24 Hour	–	–	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³	15.0 µg/m ³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	–	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		–	–	
Nitrogen Dioxide (NO ₂) ¹⁰	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	–	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹¹	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	–	Ultraviolet Flourescence; Spectrophotometry (Paraosaniline Method)
	3 Hour	–		–	0.5 ppm (1300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹¹	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas) ¹¹	–	
Lead ^{8,12,13}	30-Day Average	1.5 µg/m ³	Atomic Absorption	–	–	–
	Calendar Quarter	–		1.5 µg/m ³ (for certain areas) ¹²	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Avg	–		0.15 µg/m ³		
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No Federal Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

Footnotes

- 1 California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter – PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- 2 National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year, with a 24-hour average concentration above 150 µg/m³, is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.
- 3 Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- 4 Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- 5 National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- 6 National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- 7 Reference method as described by the EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the EPA.
- 8 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- 9 On December 14, 2012, the national PM2.5 primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- 10 To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- 11 On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- 12 The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- 13 The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- 14 In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

**Table III-2
HEALTH EFFECTS OF MAJOR CRITERIA POLLUTANTS**

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	<ul style="list-style-type: none"> • Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. • Natural events, such as decomposition of organic matter. 	<ul style="list-style-type: none"> • Reduced tolerance for exercise. • Impairment of mental function. • Impairment of fetal development. • Death at high levels of exposure. • Aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO ₂)	<ul style="list-style-type: none"> • Motor vehicle exhaust. • High temperature stationary combustion. • Atmospheric reactions. 	<ul style="list-style-type: none"> • Aggravation of respiratory illness. • Reduced visibility. • Reduced plant growth. • Formation of acid rain.
Ozone (O ₃)	<ul style="list-style-type: none"> • Atmospheric reaction of organic gases with nitrogen oxides in sunlight. 	<ul style="list-style-type: none"> • Aggravation of respiratory and cardiovascular diseases. • Irritation of eyes. • Impairment of cardiopulmonary function. • Plant leaf injury.
Lead (Pb)	<ul style="list-style-type: none"> • Contaminated soil. 	<ul style="list-style-type: none"> • Impairment of blood function and nerve construction. • Behavioral and hearing problems in children.
Fine Particulate Matter (PM-10)	<ul style="list-style-type: none"> • Stationary combustion of solid fuels. • Construction activities. • Industrial processes. • Atmospheric chemical reactions. 	<ul style="list-style-type: none"> • Reduced lung function. • Aggravation of the effects of gaseous pollutants. • Aggravation of respiratory and cardio respiratory diseases. • Increased cough and chest discomfort. • Soiling. • Reduced visibility.
Fine Particulate Matter (PM-2.5)	<ul style="list-style-type: none"> • Fuel combustion in motor vehicles, equipment, and industrial sources. • Residential and agricultural burning. • Industrial processes. • Also, formed from photochemical reactions of other pollutants, including NO_x, sulfur oxides, and organics. 	<ul style="list-style-type: none"> • Increases respiratory disease. • Lung damage. • Cancer and premature death. • Reduces visibility and results in surface soiling.
Sulfur Dioxide (SO ₂)	<ul style="list-style-type: none"> • Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes. 	<ul style="list-style-type: none"> • Aggravation of respiratory diseases (asthma, emphysema). • Reduced lung function. • Irritation of eyes. • Reduced visibility. • Plant injury. • Deterioration of metals, textiles, leather, finishes, coatings, etc.

Source: California Air Resources Board, 2002.

Baseline Air Quality

In the CVPA portion of the SSAB, air quality planning, enforcement and monitoring responsibilities are carried out by the South Coast Air Quality Management District (SCAQMD). Existing and probable future levels of air quality around the project area can be best inferred from ambient air quality measurements conducted by the SCAQMD at the Indio and Palm Springs air quality monitoring stations. In Indio, ozone and 10 microns or less in diameter, (respirable) particulates called PM-10, are monitored. These two pollutants are the main air pollution problems in the CVPA portion of the SSAB. Vehicular pollution levels such as carbon monoxide (CO) and nitrogen dioxide (NO₂) are monitored at Palm Springs. Levels of CO and NO₂ at the project site are likely lower than those monitored in Palm Springs. However, because CO and NO₂ levels in Palm Springs are well within acceptable limits, their use to characterize the project site introduces no complications. The last four years of published data from Indio and Palm Springs stations are summarized in Table III-3. The following conclusions can be drawn from these data:

- Photochemical smog (ozone) levels periodically exceed standards. The 1-hour state standard was violated less than one percent of all days in the last four years near Indio. The 8-hour state ozone standard has been exceeded an average of nine percent of all days per year in the same time period. The Federal eight-hour ozone standard is violated on around five percent of all days per year. Ozone levels are much lower than 10 to 20 years ago. Attainment of all clean air standards in the project vicinity is not likely to occur soon, but the severity and frequency of violations is expected to continue to slowly decline during the current decade.
- Carbon monoxide (CO) measurements near the project site have declined throughout the last decade, and 8-hour CO levels were at their lowest in 2017. Federal and state CO standards have not been exceeded in the last 10+ years. Despite continued basin-wide growth, maximum CO levels at the closest air monitoring station are less than 25 percent of their most stringent standards because of continued vehicular improvements.
- PM-10 levels as measured at Indio, have exceeded the state 24-hour standard on 14 percent of all measurement days in the last four years, but the national 24-hour particulate standard has not been exceeded during the same period. The state standard is considerably more restrictive.
- A fraction of PM-10 is comprised of ultra-small diameter particulates capable of being inhaled into deep lung tissue (PM-2.5). There have no violations of the 24-hour federal PM-2.5 standard in recent years. With dustier conditions along the I-10 Corridor, there may be occasional violations of PM-2.5 standards at the project site.

**Table III-3
AIR QUALITY MONITORING SUMMARY
(DAYS STANDARDS WERE EXCEEDED AND MAXIMUM OBSERVED CONCENTRATIONS 2015-2018)**

Pollutant/Standard	2015	2016	2017	2018
Ozone ^a				
1-Hour > 0.09 ppm (S)	0	2	8	4
8-Hour > 0.07 ppm (S)	12	27	44	49
8- Hour > 0.075 ppm (F)	4	12	27	28
Max. 1-Hour Conc. (ppm)	0.093	0.099	0.107	0.106
Max. 8-Hour Conc. (ppm)	0.085	0.089	0.093	0.091
Carbon Monoxide ^b				
1-hour > 20. ppm (S)	0	0	0	0
8- Hour > 9. ppm (S,F)	0	0	0	0
Max 8-hour Conc. (ppm)	0.7	1.5	0.5	1.1
Nitrogen Dioxide ^b				
1-Hour > 0.18 ppm (S)	0	0	0	0
Max 1-hour Conc. (ppm)	0.04	0.04	0.04	0.04
Respirable Particulates (PM-10) ^a				
24-hour > 50 µg/m ³ (S)	36/270	56/313	43/363	43/353
24-hour > 150 µg/m ³ (F)	0/270	0/313	0/363	0/363
Max. 24-Hr. Conc. (µg/m ³)	145.	137.	128.	146.
Ultra-Fine Particulates (PM-2.5) ^a				
24-Hour > 35 µg/m ³ (F)	0/94	0/115	0/110	0/122
Max. 24-Hr. Conc. (µg/m ³)	24.6	25.8	18.8	28.7

(S) = state standard, (F) = federal standard

^aData from Indio monitoring station.

^bData from Palm Springs air monitoring station.

Source: SCAQMD Air Monitoring Summaries.

Air Quality Planning

The U.S. EPA is responsible for setting and enforcing the NAAQS for O3, CO, NOx, SO2, PM10, PM2.5, and lead. The U.S. EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The U.S. EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of the CARB.

The Federal Clean Air Act (1977 Amendments) required that designated agencies in any area of the nation not meeting national clean air standards must prepare a plan demonstrating the steps that would bring the area into compliance with all national standards. The SCAB could not meet the deadlines for ozone, nitrogen dioxide, carbon monoxide, or PM-10. In the SCAB, the agencies designated by the governor to develop regional air quality plans are the SCAQMD and the Southern California Association of Governments (SCAG). The two agencies first adopted an Air Quality Management Plan (AQMP) in 1979 and revised it several times as earlier attainment forecasts were shown to be overly optimistic.

The 1990 Federal Clean Air Act Amendment (CAAA) required that all states with air-sheds with “serious” or worse ozone problems submit a revision to the State Implementation Plan (SIP). The most current regional attainment emissions forecast for ozone precursors (ROG and NOx) and for carbon monoxide (CO) and for particulate matter are shown in Table III-4. Substantial reductions in emissions of ROG, NOx and CO are forecast to continue throughout the next several decades. Unless new particulate control programs are implemented, PM-10 and PM-2.5 are forecast to slightly increase.

The Air Quality Management District (AQMD) adopted an updated clean air “blueprint” in August 2003. The 2003 AQMP was based upon the federal one-hour ozone standard which was revoked late in 2005 and replaced by an 8-hour federal standard. Because of the revocation of the hourly standard, a new air quality planning cycle was initiated. With re-designation of the air basin as non-attainment for the 8-hour ozone standard, a new attainment plan was developed. This plan shifted most of the one-hour ozone standard attainment strategies to the 8-hour standard. The attainment date was to “slip” from 2010 to 2021. The updated attainment plan also includes strategies for ultimately meeting the federal PM-2.5 standard.

Because projected attainment by 2021 required control technologies that did not exist yet, the SCAQMD requested a voluntary “bump-up” from a “severe non-attainment” area to an “extreme non-attainment” designation for ozone. The extreme designation was to allow a longer time period for these technologies to develop. If attainment cannot be demonstrated within the specified deadline without relying on “black-box” measures, EPA would have been required to impose sanctions on the region had the bump-up request not been approved. In April 2010, the EPA approved the change in the non-attainment designation from “severe-17” to “extreme.” This reclassification set a later attainment deadline (2024), but also required the air basin to adopt even more stringent emissions controls.

**Table III-4
SOUTH COAST AIR BASIN EMISSIONS FORECASTS (EMISSIONS IN TONS/DAY)**

Pollutant	2015^a	2020^b	2025^b	2030^b
NOx	357	289	266	257
VOC	400	393	393	391
PM-10	161	165	170	172
PM-2.5	67	68	70	71

^a2015 Base Year.

^bWith current emissions reduction programs and adopted growth forecasts.

Source: California Air Resources Board, 2013 Almanac of Air Quality

AQMPs are required to be updated every three years. The 2012 AQMP was adopted in early 2013. An updated AQMP was required for completion in 2016. The 2016 AQMP was adopted by the SCAQMD Board in March, 2017, and has been submitted the California Air Resources Board for forwarding to the EPA. The 2016 AQMP acknowledges that motor vehicle emissions have been effectively controlled and that reductions in NO_x, the continuing ozone problem pollutant, may need to come from major stationary sources (power plants, refineries, landfill flares, etc.). The current attainment deadlines for all federal non-attainment pollutants are now as follows:

8-hour ozone (70 ppb)	2032
Annual PM-2.5 (12 µg/m ³)	2025
8-hour ozone (75 ppb)	2024 (old standard)
1-hour ozone (120 ppb)	2023 (rescinded standard)
24-hour PM-2.5 (35 µg/m ³)	2019

The key challenge is that NO_x emission levels, as a critical ozone precursor pollutant, are forecast to continue to exceed the levels that would allow the above deadlines to be met. Unless additional stringent NO_x control measures are adopted and implemented, ozone attainment goals may not be met.

The proposed project does not directly relate to the AQMP in that there are no specific air quality programs or regulations governing cannabis projects. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The SCAQMD, however, while acknowledging that the AQMP is a growth-accommodating document, does not favor designating regional impacts as less-than-significant just because the proposed development is consistent with regional growth projections. Air quality impact significance for the proposed project has therefore been analyzed on a project-specific basis.

Significance Thresholds Used in This Document

Air quality impacts are considered “significant” if they cause clean air standards to be violated where they are currently met, or if they “substantially” contribute to an existing violation of standards. Any substantial emissions of air contaminants for which there is no safe exposure, or nuisance emissions such as dust or odors, would also be considered a significant impact.

Appendix G of the California CEQA Guidelines offers the following five tests of air quality impact significance. A project would have a potentially significant impact if it:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- c) Expose sensitive receptors to substantial pollutant concentrations?
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Primary Pollutants

Air quality impacts generally occur on two scales of motion. Near an individual source of emissions or a collection of sources such as a crowded intersection or parking lot, levels of those pollutants that are emitted in their already unhealthy form will be highest. Carbon monoxide (CO) is an example of such a pollutant. Primary pollutant impacts can generally be evaluated directly in comparison to appropriate clean air standards. Violations of these standards where they are currently met, or a measurable worsening of an existing or future violation, would be considered a significant impact. Many particulates, especially fugitive dust emissions, are also primary pollutants. Because of the non-attainment status of the South Coast Air Basin (SCAB) for PM-10, an aggressive dust control program is required to control fugitive dust during project construction.

Secondary Pollutants

Many pollutants, however, require time to transform from a more benign form to a more unhealthful contaminant. Their impact occurs regionally far from the source. Their incremental regional impact is minute on an individual basis and cannot be quantified except through complex photochemical computer models. Analysis of significance of such emissions is based upon a specified amount of emissions (pounds, tons, etc.) even though there is no way to translate those emissions directly into a corresponding ambient air quality impact.

Because of the chemical complexity of primary versus secondary pollutants, the SCAQMD has designated significant emissions levels as surrogates for evaluating regional air quality impact significance independent of chemical transformation processes. Projects in the Coachella Valley portion of the SCAQMD with daily emissions that exceed any of the following emission thresholds are to be considered significant under CEQA guidelines.

**Table III-5
DAILY EMISSIONS THRESHOLDS**

Pollutant	Construction¹	Operations²
ROG	75	75
NOx	100	100
CO	550	550
PM-10	150	150
PM-2.5	55	55
SOx	150	150
Lead	3	3

¹ Construction thresholds apply to both the SCAB and the Coachella Valley (Salton Sea and Mojave Desert Air Basins).

² For Coachella Valley the mass daily emissions thresholds for operation are the same as the construction daily emissions thresholds.

Source: SCAQMD CEQA Air Quality Handbook, November, 1993 Rev.

Sensitive Uses

The land uses surrounding the project area as follows:

- North: IH Heavy Industrial/Open Space;
- West: IH Heavy Industrial, further west IL Light Industrial;
- South: IH Heavy Industrial, further south IL Light Industrial; and
- East: Open Space, further east CE Entertainment Commercial

The closest sensitive use (residential) is more than 2,000 feet to the west, on the opposite side of Highway 111.

Impact Analysis

- a. *Less Than Significant Impact* – Projects such as the proposed Bejarano Cannabis Cultivation Project do not directly relate to the AQMP in that there are no specific air quality programs or regulations governing general development. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The SCAQMD, however, while acknowledging that the AQMP is a growth-accommodating document, does not favor designating regional impacts as less than significant just because the proposed development is consistent with regional growth projections. Air quality impact significance for the proposed project has therefore been analyzed on a project-specific basis. The City requires compliance with the Municipal Code for project such as this, and the Applicant will to meet these standards. The Bejarano Cannabis Cultivation Project will be fully consistent with both the General Plan designation and Zone classification for the project site, because

Cannabis-related uses are consistent with the M-W (Wrecking Yard) zone. Thus, the proposed project is consistent with regional planning forecasts maintained by the Southern California Association of Governments (SCAG) regional plans. The SCAQMD, however, while acknowledging that the AQMP is a growth-accommodating document, does not favor designating regional impacts as less than significant only because of consistency with regional growth projections. Air quality impact significance for the proposed project has therefore been analyzed on a project-specific basis. As the analysis of project-related emissions provided below indicates, the proposed project will not cause or be exposed to significant air pollution, and is, therefore, consistent with the applicable air quality plan.

- b. *Less Than Significant Impact With Mitigation Incorporated* – Air pollution emissions associated with the proposed project would occur over both a short and long-term time period. Short-term emissions include fugitive dust from construction activities (i.e., site prep, demolition, grading, and exhaust emission) at the proposed project site. Long-term emissions generated by future operation of the proposed project primarily include energy consumption required to operate the Bejarano Cannabis Cultivation Facility and employee/visitor truck trips to the Bejarano Cannabis Cultivation Project.

Construction Emissions

The proposed project consists of the development of the Bejarano Cannabis Cultivation Facility within the City of Coachella. The proposed approximate 10-acre site is currently used as a wrecking yard and vehicular storage. This project will be developed with 2 buildings; a 53,244 sf Headhouse and 172,461 sf Cultivation Building. There will also be a 52,131 sf retention basin and a surface parking lot with 291 parking spaces. Construction is anticipated to take approximately 7-9 months with an anticipated start date in the second quarter of 2022. Mostly earthworks will balance onsite but a maximal 2,000 CY of export was modeled as a worst case. Estimated construction emissions were modeled using CalEEMod2016.3.2—developed by SCAQMD to provide a model by which to calculate both construction emissions and operational emissions from a variety of land use projects—to identify maximum daily emissions for each pollutant during project construction. Construction was modeled using default construction equipment and schedule for a project of this size as shown in Table III-6.

**Table III-6
CONSTRUCTION ACTIVITY EQUIPMENT FLEET**

Phase Name and Duration	Equipment
Demo (20 days)	3 Excavators
	1 Concrete Saw
	2 Dozers
Site Prep (10 days)	3 Dozers
	4 Loader/Backhoes
Grading (20 days)	1 Grader
	1 Excavator
	1 Dozer
	3 Loader/Backhoes
Construction (120 days)	1 Crane
	3 Loader/Backhoes
	1 Welder
	1 Generator Set
	3 Forklifts
Paving (20 days)	2 Pavers
	2 Paving Equipment
	2 Rollers

Utilizing this indicated equipment fleet and durations shown in Table III-6 the following worst-case daily construction emissions are calculated by CalEEMod and are listed in Table III-7.

Table III-7
CONSTRUCTION ACTIVITY EMISSIONS
MAXIMUM DAILY EMISSIONS (POUNDS/DAY)

Maximal Construction Emissions	ROG	NOx	CO	SO ₂	PM-10	PM-2.5
2022	68.2	33.2	22.3	0.0	20.2	11.6
SCAQMD Thresholds	75	100	550	150	150	55

Peak daily construction activity emissions are below their respective SCAQMD CEQA significance thresholds without the need for any additional mitigation. However, though construction activities are not anticipated to cause dust emissions to exceed SCAQMD CEQA thresholds, emissions minimization through enhanced dust control measures is recommended for use because of the non-attainment status of the air basin. As such, the following mitigation measure shall be implemented:

AIR-1 Fugitive Dust Control. The following measures shall be incorporated into Project plans and specifications for implementation:

- ***Apply soil stabilizers or moisten inactive areas.***
- ***Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 2-3 times/day).***
- ***Cover all stock piles with tarps at the end of each day or as needed.***
- ***Provide water spray during loading and unloading of earthen materials.***
- ***Minimize in-out traffic from construction zone.***
- ***Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard.***
- ***Sweep streets daily if visible soil material is carried out from the construction site.***

Similarly, ozone precursor emissions (ROG and NOx) are calculated to be below SCAQMD CEQA thresholds. However, because of the regional non-attainment for photochemical smog, the use of reasonably available control measures for diesel exhaust is recommended. Combustion emissions control options include:

AIR-2 Exhaust Emissions Control. The following measures shall be incorporated into Project plans and specifications for implementation:

- ***Utilize well-tuned off-road construction equipment.***
- ***Establish a preference for contractors using Tier 3 or better heavy equipment.***
- ***Enforce 5-minute idling limits for both on-road trucks and off-road equipment.***

With the above mitigation measures, any impacts related to construction emissions are considered less than significant. No further mitigation is required.

Operational Emissions

The project would be expected employ an estimated 100 employees. In addition, the cultivation building is predicted to consume 7,000,000 kWh/year and the emergency generator is expected to consume 1,000,000 kWh/year. Water use is estimated at 2,235,337 gallons/year.

Operational emissions were calculated using CalEEMod2016.3.2 for a build-out year of 2022 as a worst case. If the project does not come on-line until a later year, emissions would be slightly less because of improvements of vehicular and equipment technology. The operational impacts are shown in Table III-8.

**Table III-8
PROPOSED USES DAILY OPERATIONAL IMPACTS (2022)**

Source	Operational Emissions (lbs/day)					
	ROG	NOx	CO	SO ₂	PM-10	PM-2.5
Area	6.3	0.0	0.1	0.0	0.0	0.0
Energy	0.1	0.6	0.5	0.0	0.0	0.0
Mobile	0.4	3.0	5.0	0.0	1.7	0.5
Total	6.8	3.6	5.6	0.0	1.7	0.5
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Output in Appendix

As shown, operational emissions will not exceed applicable SCAQMD operational emissions CEQA thresholds of significance.

Conclusion

With the incorporation of mitigation measures **AIR-1** and **AIR-2**, the development of the Bejarano Cannabis Cultivation Project would have a less than significant potential to 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. *Less Than Significant Impact* – The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs were developed in response to Governing Board’s Environmental Justice Enhancement Initiative 1-4 and the LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD’s Mobile Source Committee in February 2005.

Use of an LST analysis for a project is optional. For the proposed project, the primary source of possible LST impact would be during construction. LSTs are applicable for a sensitive receptor where it is possible that an individual could remain for 24 hours such as a residence, hospital or convalescent facility.

LSTs are only applicable to the following criteria pollutants: oxides of nitrogen (NOx), carbon monoxide (CO), and particulate matter (PM-10 and PM-2.5). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

LST screening tables are available for 25, 50, 100, 200 and 500 meter source-receptor distances. For this project, the closest receptor is more than 2,000 feet from the site and therefore the 500-meter distance was used. The SCAQMD has issued guidance on applying CalEEMod to LSTs. LST pollutant screening level concentration data is currently published for 1, 2 and 5 acre sites for varying distances. Using guidance from the SCAQMD a site of 1.5 acres was used by interpolating between the 1- and 2-acre data.

The following thresholds and emissions in Table III-9 are therefore determined (pounds per day):

**Table III-9
LST AND PROJECT EMISSIONS (POUNDS/DAY)**

LST Coachella Valley	CO	NOx	PM-10	PM-2.5
LST Threshold	25,315	751	218	108
Max On-Site Emissions	22	33	20	12

CalEEMod Output in Appendix

LSTs were compared to the maximum daily construction activities. As seen in Table II-9, LST impacts are less than significant. As such, the proposed project would have a less than significant potential to expose sensitive receptors to substantial pollutant concentrations.

- d. *Less Than Significant Impact* – Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills or various heavy industrial uses. The project does not propose any such uses or activities that would result in potentially significant operational source odor impacts. However, cannabis growth can generate some odors that may be unpleasant to certain persons. The proposed project includes office and administration for the High Hampton operation, and operation of the various phases of cannabis cultivation and processing. Odors on site will be handled utilizing commercial odor controls with carbon filters, which utilize activated charcoal, carbon filters, and an extractor fan for flow of air. There are no sensitive receptors located within 1,000 feet of the proposed project, and the proposed project use is not of the type that would result in odor impacts to sensitive receptors during either construction or operation. Therefore, the potential for objectionable odors posing a health risk to humans on- or off-site is considered a less than significant impact.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES

SUBSTANTIATION: The following information is provided based on a study titled “Biological Resources Assessment for the Proposed 20 & 21 Cannabis Cultivation Project, Coachella, Riverside County, California” prepared by Jericho Systems, Inc. dated October 27, 2017 and provided as Appendix 2a; an updated report was prepared for this project due to the date in which the original Biological Resources Assessment (BRA) was prepared. The updated report is titled “Biological Resources Assessment 2020 Update Proposed 20 & 21 Cannabis Cultivation Project, Coachella, Riverside County” prepared by Jericho Systems, Inc. dated January 8, 2020. The following information is abstracted from Appendix 2a and 2b.

General Site Conditions

The existing site is surrounded by a chain link fence, except for the western boundary which is defined by a series of metal sheets, plywood, and other items to form a sort of wall that secures the western boundary. Access to the site was provided by the tenant through the doors/gate located along the western boundary of the site. The project site is characterized by disturbed loose gravelly soil with trash and other debris lining the northern portion of the site along with remnants of broken down vehicles and storage areas, as well as active heavy machinery. Dumped material lined the eastern boundary of the project area, and human habitation was evident in various locations.

Wildlife observed onsite included house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), domestic pigeon (*Columba livia domestica*), European starling (*Sturnus vulgaris*), and mourning dove (*Zenaidura macroura*).

Vegetation onsite consisted of ornamentals and ruderals that grew close to the fence line, where site compaction was at the lowest. Plants observed included Russian thistle (*Salsola tragus*), date palm (*Phoenix dactylifera*, from nearby farm), and silk tree (*Albizia julibrissin*).

Coachella Valley Multiple Species Habitat Conservation Plan

The project area is located within the area covered by the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). However, it is not located in an area designated for conservation, and implementation of the project will therefore not interfere with the goals of the CVMSHCP.

Burrowing owl

The field survey results for BUOW identified no evidence of BUOW individuals or sign including pellets, feathers or white wash in the project site, there were no burrows found onsite. Per the definition provided in the 2012 CDFG Staff Report on Burrowing Owl Mitigation, "Burrowing owl habitat generally includes, but is not limited to, short or sparse vegetation (at least at some time of year), presence of burrows, burrow surrogates or presence of fossorial mammal dens, well-drained soils, and abundant and available prey."

Therefore, the project site would not be considered suitable for BUOW for the following reasons:

- *No appropriately sized mammal burrows or burrow surrogates were observed within the project area during survey;*
- *No BUOW host burrowers were observed within the project area during survey; and*
- *No feathers, pellet castings, white-wash, or BUOW individuals were found.*

Coachella Valley Fringe-toed lizard (CVFL)

CVFL occupies a specific habitat consisting of accumulations of Aeolian sand. Deeper sand deposits with more topographic relief are preferred by the species over flatter sand sheets. Per the literature review, the nearest documented CVFL occurrence within the project vicinity is 0.61 mile south of the project site. However, this occurrence is a historical occurrence that has since been developed, and the occurrence location is also now separated from the project site by a palm tree farm.

The project site predominantly consists of compacted bare ground. There is no Aeolian sand dune habitat within the project site or immediate surrounding area. Soils on site are stabilized due to human use of the site, including compaction from vehicle use. Therefore, the site does not contain any habitat that would be considered suitable to support CVFL, and this species is not expected to occur within the project area.

In addition, no suitable habitat was found for any other sensitive species known to occur in the broader project vicinity. Therefore, implementation of this project would have no effect on BUOW, CVFL or other sensitive species. The follow up survey conducted on January 7, 2020 confirmed conditions on site have not changed.

Conclusion and Recommendation

No suitable habitat was identified for any other sensitive species known to occur in the broader project vicinity. Therefore, implementation of this project would have no effect on CVFL or other sensitive species, and no impact on BUOW with the implementation of the recommended mitigation. Thus, due to the presence of burrows that are of appropriate size for BUOW to colonize, a preconstruction survey no less than 30 days before commencement of the construction phase of the project is recommended to ensure that no BUOW have colonized the project area.

Impact Analysis

- a. *Less Than Significant Impact* – Implementation of the project does not have a potential for a significant adverse effect, either directly or through habitat modifications, on 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 (CDFW) (*formerly Department of Fish and Game*) or U.S. Fish and Wildlife Service (USFWS). Though the proposed project is located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), the project site itself is not located within critical habitat for any species. Based on a biological field survey of the site, the Biological Resources Assessment (BRA) and BRA Update provided as Appendices 2a and 2b determined that because the site has been previously disturbed, and does not contain any suitable habitat for any Federal or State listed species. Furthermore, the Biological Resources Report concluded that the project site would not be considered suitable for burrowing owl. Therefore, the project would have a less than significant potential to either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- b. *Less Than Significant Impact* – Implementation of the proposed project will not have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. The project site itself consists of highly disturbed sandy ground, with scattered vegetation and evidence of dumping use, while the vegetation observed onsite includes Russian thistle (*Salsola tragus*), date palm (*Phoenix dactylifera*, from nearby farm), and silk tree (*Albizia julibrissin*). The site has been subject to historic human disturbance and ongoing human use. It is surrounded by open land to the east, and active commercial junkyards surround the project site to the north, south, and east. Based on the field survey conducted by Jericho Systems and the information contained in Appendices 2a and 2b, no significant impacts to riparian habitat or other sensitive communities are anticipated to occur as a result of implementation of the proposed project.
- c. *No Impact* – According to the data gathered by Jericho Systems in Appendices 2a and 2b, no federally protected wetlands occur within the project footprint. Therefore, implementation of the proposed project will have no potential to impact 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 mitigation is required.
- d. *Less Than Significant With Mitigation Incorporated* – Based on the field survey of the project site, the project will not substantially interfere with the movement of any native resident or migratory species or with established native or migratory wildlife corridors, or impede the use of native nursery sites. However, the State does protect all migratory and nesting native birds. No impacts to nesting or migratory birds have been identified in Appendices 2a or 2b, however, the project area may include locations that function as nesting locations for native birds. To prevent interfering with native bird nesting, the following mitigation measure shall be implemented.

BIO-1 *The State of California prohibits the “take” of active bird nests. To avoid an illegal take of active bird nests, any grubbing, brushing or tree removal should be conducted outside of the the State identified nesting season (Raptor nesting season is February 15 through July 31; and migratory bird nesting season is March 15 through September 1). Alternatively, the site shall be evaluated by a qualified biologist prior to the initiation of ground disturbance to determine the presence or absence of nesting birds. Active bird nests MUST be avoided during the nesting season. If an active nest is located in the project construction area it will be flagged and a 300-foot avoidance buffer placed around it. No activity shall occur within the 300-foot buffer until the young have fledged the nest.*

Thus, with implementation of the above measure, any effects on wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

- e. *No Impact* – Based on the field survey, the project footprint does not contain any biological resources, such as trees, that might be protected by local policies or ordinances. Past grading maintenance activities and human disturbance of the site have eliminated any trees or other biological resources that might be protected. With no potential for conflicts with local policies or ordinances, no mitigation is required.

- f. *Less Than Significant Impact* – Please refer to the discussion under response IV(a) above. The BRA provided as Appendices 2a and 2b concluded that the project, though located within the CVMSHCP, is not located in an area designated for conservation, and implementation of the project will therefore not interfere with the goals of the CVMSHCP. Therefore, the project does not have a significant potential to 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 further mitigation is necessary.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

V. CULTURAL RESOURCES

SUBSTANTIATION: A cultural resources report has been prepared to evaluate the potential for cultural resources to occur within the project area of potential effect entitled “Historical/Archaeological Resources Survey Report: David Argudo Coachella Cannabis Cultivation Farm, Assessor’s Parcel Nos. 603-290-20 and -21, City of Coachella, Riverside County, California” dated December 6, 2017, prepared by CRM TECH (Appendix 3a). The updated report is titled “Update to Historical/Archaeological Resources Survey Report Assessor’s Parcel Numbers 603-290-020 and 603-290-021 City of Coachella, Riverside County, California” prepared by CRM TECH, dated January 16, 2020. The following information is abstracted from Appendix 3a and 3b. It provides an overview and findings regarding the cultural resources found within the project area.

Background

The purpose of the Cultural Resources study is to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any “historical resources” or “tribal cultural resources,” as defined by CEQA, that may exist in or around the project area.

In order to identify such resources, CRM TECH conducted a historical/archaeological resources records search, pursued historical background research, contacted Native American representatives, and carried out an intensive-level field survey of the entire project area. Through the various avenues of research, this study did not encounter any “historical resources” or “tribal cultural resources” within or adjacent to the project area. On November 25, 2019, CRM TECH updated the results of the 2017 records search at the Eastern Information Center (EIC), University of California, Riverside. The findings indicate that no additional cultural resources studies have occurred in the immediate vicinity of the project area since 2017, nor have any cultural resources been identified within or adjacent to the project boundaries.

Therefore, the conclusion of the 2017 study that the proposed development project on the property will have No Impact on any “historical resources” (Tang et al. 2017:14) remains valid and appropriate today. As in 2017, no further cultural resources investigation is recommended for the project unless development plans undergo such changes as to include areas not covered by this study and the 2017 survey. However, if buried cultural materials are encountered during any earth-moving operations associated with the project, all work in that area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – CEQA establishes that “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment” (PRC §21084.1). “Substantial adverse change,” according to

PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

Per the above discussion and definition, no archaeological sites or isolates were recorded within the project boundaries; thus, none of them requires further consideration during this study. In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the project:

- No historical resources within or adjacent to the project area have any potential to be disturbed as they are not within the proposed area in which the facilities will be constructed and developed, and thus, the project as it is currently proposed will not cause a substantial adverse change to any known historical resources.
- No further cultural resources investigation is necessary for the proposed project unless construction plans undergo such changes as to include areas not covered by this study.

However, if buried cultural materials are discovered during any earth-moving operations associated with the project, the following mitigation measure shall be implemented:

CUL-1 Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the City's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

With the above mitigation incorporation, as well as the mitigation identified under Tribal Cultural Resources below, the potential for impacts to cultural resources will be reduced to a less than significant level. No additional mitigation is required.

- c. *Less Than Significant Impact* – As noted in the discussion above, no available information suggests that human remains may occur within the Area of Potential Effect (APE) and the potential for such an occurrence is considered very low. Human remains discovered during the project will need to be treated in accordance with the provisions of HSC §7050.5 and PRC §5097.98, which is mandatory. State law (Section 7050.5 of the Health and Safety Code) as well as local laws requires that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered adequate mitigation for potential impacts and no further mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VI. ENERGY: Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VI. ENERGY

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the *Air Quality and GHG Impact Analysis, Bejarano Cannabis Cultivation Project, Coachella, California* prepared by Giroux and Associates dated February 4, 2020. This document is provided as Appendix 1 to this document.

- a. *Less Than Significant With Mitigation Incorporated* –The proposed project consists of a cannabis cultivation facility. Both state and local jurisdictions require the use of renewable energy for all commercial cannabis activities, which will lower the energy demand of cannabis cultivation to a less than significant level.

Energy consumption encompasses many different activities. For example, construction can include the following activities: delivery of equipment and material to a site from some location (note it also requires energy to manufacture the equipment and material, such as harvesting, cutting and delivering wood from its source); employee trips to work, possibly offsite for lunch (or a visit by a catering truck), travel home, and occasionally leaving a site for an appointment or checking another job; use of equipment onsite (electric or fuel); and sometimes demolition and disposal of construction waste. The proposed project will employ approximately 100 employees on a typical work day, resulting in about 100 round trips per day, which is a modest number of trips requiring energy per day from employees. Energy consumption by equipment will be reduced through mitigation that requires shutdowns when equipment is not in use after five minutes and ensures that equipment is operated within proper operating parameters (tune-ups) to minimize emissions and fuel consumption. These requirements are consistent with State and regional rules and regulations. Under the construction scenario outlined above, the proposed project will not result in wasteful, inefficient, or unnecessary energy consumption during construction.

The project includes indoor cannabis cultivation which will involve artificial lighting which is anticipated to utilize wattage at a rate above twenty-five watts per square foot, temperature/ humidity/air flow control, carbon filters, and irrigation and water treatment equipment. Additionally, the project proposes to incorporate solar panels, LED lights, and zero emission or hybrid vehicles into their business plan, which will reduce energy consumption for the project. The Bejarano Cannabis Cultivation Project structures must be constructed in conformance with a variety of existing energy efficiency regulatory requirements or guidelines including:

- Compliance California Green Building Standards Code, AKA the CALGreen Code (Title 24, Part 11), which became effective on January 1, 2017. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of building through the use of building concepts encouraging sustainable construction practices.
- The provisions of the CALGreen code apply to the planning, design, operation, construction, use, and occupancy of every newly construction building.

- Compliance with California Energy Commission Building Energy Efficiency Standards would ensure that the building energy use associated with the proposed project would not be wasteful or unnecessary.
- Compliance with Indoor Water use consumption reduced through the maximum fixture water use rates.
- Compliance with diversion of construction and demolition materials from landfills.
- Compliance with AQMD Mandatory use of low-pollutant emitting finish materials.
- Compliance with AQMD Rules 431.1 and 431.2 to reduce the release of undesirable emissions.
- Compliance with diesel exhaust emissions from diesel vehicles and off-road diesel vehicle/equipment operations.
- Compliance with these regulatory requirements for operational energy use and construction energy use would not be wasteful or unnecessary use of energy.

Additionally, the State's regulations require indoor cannabis cultivation, beginning January 1, 2023, to ensure that electrical power used for commercial cannabis activity meets the average electricity greenhouse gas emissions intensity required by their local utility provider pursuant to the California Renewables Portfolio Standard Program, division 1, part 1, chapter 2.3, article 16 (commencing with section 399.11) of the Public Utilities Code.

Further, Imperial Irrigation District (IID), which is anticipated to provide electricity to the project area once a new transformer is installed to connect this area of the City to their service area, is presently in compliance with State renewable energy supply requirements and SCE will supply electricity to the project. According to IID's website¹, "Located in a region with abundant sunshine, enviable geothermal capacity, wind and other renewable potential, IID has met or exceeded all Renewable Portfolio Standard requirements to date, procuring renewable energy from diverse sources, including biomass, bio-waste, geothermal, hydroelectric, solar and wind." As such, renewable energy is abundant in the vicinity of the project.

Under the operational scenario for the proposed project, the proposed project will not result in wasteful, inefficient, or unnecessary energy consumption that could result in a significant adverse impact to energy issues based on compliance with the referenced laws, regulations and guidelines. Please refer to the operational impacts discussion under Air Quality, issue III(b). Operational emissions will be well below SCAQMD thresholds.

No mitigation beyond those identified under the Section III, Air Quality above are required.

- b. *Less Than Significant With Mitigation Incorporated* – Based on the analysis in the preceding discussion, the proposed project will not conflict with current State energy efficiency or electricity supply requirements or any local plans or programs for renewable energy or energy efficiency requirements. The City of Coachella has adopted State energy efficiency standards as part of its Municipal Code. No mitigation beyond those identified above are required.

¹ <https://www.iid.com/energy/about-iid-energy>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VII. GEOLOGY AND SOILS: Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VII. GEOLOGY AND SOILS

SUBSTANTIATION

a.(i) *Less Than Significant Impact* – The project site is located in the City of Coachella, which is located in an area with several active faults, including the San Andreas fault zone to the north and east, the Mecca Hills fault zone to the east, and the Indio Hills fault zone to the northeast as shown on the City of Coachella General Plan Faults and Historical (1800-2011) Seismicity Map (Figure VII-1). The California Geologic Survey Earthquake Zones of Required Investigation Indio Quadrangle map depicts the Alquist-Priolo fault zones in the City of Coachella area (Figure VII-2). According to Figure VII-2, the site is not located within an Alquist-Priolo fault zone, but is located approximately 2 miles from the nearest Alquist-Priolo fault zone. Based on the project site’s distance from the nearest fault zone, the risk for ground rupture at the site location is low; therefore, it is not likely that future

employees of Bejarano will be subject to seismic hazards from rupture of a known earthquake fault. Therefore, any impacts under this issue are considered less than significant; no mitigation is required.

- a.(ii) *Less Than Significant Impact* – As stated in the discussion above, several faults run through the City, and as with much of southern California, the proposed structures will be subject to strong seismic ground shaking impacts should any major earthquakes occur in the future, particularly due to the site's proximity to the San Andreas Fault Zone, which is classified as an Alquist-Priolo fault zone. Additionally, several active Fault Zones as defined by the City of Coachella, shown in Figure VII-1, travel through the City and surrounding area. As a result, and like all other development projects in the City and throughout the Southern California Region, the proposed project will be required to comply with all applicable seismic design standards contained in the 2016 California Building Code (CBC), including Section 1613 Earthquake Loads. Compliance with the CBC will ensure that structural integrity will be maintained in the event of an earthquake. Therefore, impacts associated with strong ground shaking will be less than significant without mitigation.
- a.(iii) *Less Than Significant With Mitigation Incorporated* – According to the City of Coachella General Plan Update 2035 EIR Liquefaction Risk map (Figure VII-3), the project is located within an area of high liquefaction susceptibility. Due to the dense condition of the deeper alluvial sediments, the soils beneath the site are generally not susceptible to liquefaction during seismic events. However, the following mitigation measure shall be implemented to minimize any potential liquefaction impacts at this site:

GEO-1 *Prior to initiating grading, the site developer shall provide a geotechnical evaluation of the potential liquefaction hazards at the site and, if a hazard exists at the proposed project location, the evaluation shall define design measures that will ensure the safety of any new structures in protecting human life in the event of a regional earthquake affecting the site. The developer shall implement any design measures required to protect human safety.*

Implementation of the above mitigation measure will reduce any potential impacts to a less than significant level and will ensure that human safety will be protected from any liquefaction hazards that may exist at the project site.

- a.(iv) *No Impact* – According to the City of Coachella General Plan Update 2035 EIR Landslide Risk map (Figure VII-4), the proposed project site is not located in an area with any known earthquake induced landslide hazards. Based on a site reconnaissance the project site is essentially flat. Therefore, the project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts under this issue are anticipated and no mitigation is required.
- b. *Less Than Significant With Mitigation Incorporated* – Due to the existing bladed and disturbed nature of the project site, and the type of project being proposed, a potential for soil erosion, loss of topsoil, and/or placing structures on unstable soils is generally considered less than significant. The project site is vacant with minimal non-native vegetation coverage. City grading standards, best management practices and the Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) are required to control the potential significant erosion hazards. The topography is generally flat with less than a 4-foot elevation change within the entirety of the site. It is anticipated that any required soil excavation will be reused on site with any excess cut or fill that may require removal from or transport to the site totaling no more than 2,000 cubic yards (CY). During project construction when soils are exposed, temporary soil erosion could occur, which could be exacerbated by rainfall. Project grading would be managed through the preparation and implementation of a SWPPP, and will be required to implement best management practices to achieve concurrent water quality controls after construction is completed and Bejarano is in operation. The following mitigation measures or equivalent BMPs shall be implemented to address these issues:

GEO-2 *Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering is not feasible, then measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup.*

GEO-3 *All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the Bejarano Cannabis Cultivation Facility is being constructed.*

With implementation of the above mitigation measures, implementation of the SWPPP and associated BMPs, any impacts under this issue are considered less than significant.

- c. *Less Than Significant With Mitigation Incorporated* – Refer to the discussion under VII(a) above. As discussed under issue VI(a) above, liquefaction is a concern at the site, and is a concern throughout the portions of the City of Coachella. With the implementation of mitigation measure **GEO-1** above, prior to any construction, a geotechnical study will be prepared and any design measure identified to increase seismic safety will be implemented. This will ensure that the soils that underlie the site will be stable. Though subsidence can occur throughout the City of Coachella, the proposed project site has been previously rough graded, which minimizes the potential for subsidence to occur at the project site, furthermore the Geotechnical Investigation will identify any mitigation to address soil constraints. Therefore, with mitigation, implementation of the proposed project will have a less than significant potential to 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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse.
- d. *Less Than Significant With Mitigation Incorporation* – The site is currently vacant and the surface of the site has been bladed in the past, with non-native vegetation throughout the project site. According to the United States Department of Agriculture Web Soil Survey, the project Area of Potential Effect (APE) is underlain by Fluvents (Fluvents are the more or less freely drained Entisols that formed in recent water-deposited sediments on flood plains, fans, and deltas along rivers and small streams²), Gilman fine sandy loam, wet, 0-2 percent slopes, and Indio very fine sandy loam, wet (Appendix 4). These soil classes are, according to the USDA Soil Series website^{3,4}, well drained, have slow runoff, and moderate permeability. As previously stated, liquefaction is a concern on the site; however, with the implementation of mitigation measure **GEO-1** above, any impacts from implementing the proposed project on this site will be mitigated through the implementation of design measures designed to protect human safety. Also, the site has been previously disturbed, which indicates that the soils were stable enough for previous uses. Therefore, with implementation of mitigation measure **GEO-1**, the development of the proposed project will not create a substantial risk to life or property by being placed on expansive soils. No further mitigation is required.
- e. *No Impact* - This project will be connected to the regional wastewater collection system and it will not utilize any subsurface septic tank-leach system. Therefore, no impact to underlying soil from wastewater disposal can occur and no mitigation is required.
- f. *Less Than Significant With Mitigation Incorporated* – The potential for discovering paleontological resources during development of the project is considered not likely based on the data gathered within the Cultural Resources Report provided as Appendix 3. No unique geologic features are known or suspected to occur on or beneath the sites. However, because these resources are located beneath the surface and can only be discovered as a result of ground disturbance activities, the following measure shall be implemented:

² https://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/class/maps/?cid=nrcs142p2_053597

³ https://soilseries.sc.egov.usda.gov/OSD_Docs/G/GILMAN.html

⁴ https://soilseries.sc.egov.usda.gov/OSD_Docs/I/INDIO.html

GEO-4 *Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.*

With incorporation of this contingency mitigation, the potential for impact to paleontological resources will be reduced to a less than significant level. No additional mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VIII. GREENHOUSE GAS EMISSIONS: Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VIII. GREENHOUSE GAS EMISSIONS

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the *Air Quality and GHG Impact Analysis, Bejarano Cannabis Cultivation Project, Coachella, California* prepared by Giroux and Associates dated February 4, 2020. This document is provided as Appendix 1 to this document.

a&b. *Less Than Significant Impact –*

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. Many scientists believe that the climate shift taking place since the industrial revolution (1900) is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of greenhouse gases in the earth’s atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. Many scientists believe that this increased rate of climate change is the result of greenhouse gases resulting from human activity and industrialization over the past 200 years.

An individual project like the project evaluated in this GHGA cannot generate enough greenhouse gas emissions to effect a discernible change in global climate. However, the project may participate in the potential for GCC by its incremental contribution of greenhouse gasses combined with the cumulative increase of all other sources of greenhouse gases, which when taken together constitute potential influences on GCC.

Significance Thresholds

In response to the requirements of SB97, the State Resources Agency developed guidelines for the treatment of GHG emissions under CEQA. These new guidelines became state laws as part of Title 14 of the California Code of Regulations in March 2010. The CEQA Appendix G guidelines were modified to include GHG as a required analysis element. A project would have a potentially significant impact if it:

- Generates greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Section 15064.4 of the Code specifies how significance of GHG emissions is to be evaluated. The process is broken down into quantification of project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if impacts are found to be potentially significant. At each of these steps, the new GHG guidelines afford the lead agency with substantial flexibility.

Emissions identification may be quantitative, qualitative or based on performance standards. CEQA guidelines allow the lead agency to “select the model or methodology it considers most appropriate.” The

most common practice for transportation/combustion GHG emissions quantification is to use a computer model such as CalEEMod, as was used in the ensuing analysis.

The significance of those emissions then must be evaluated; the selection of a threshold of significance must take into consideration what level of GHG emissions would be cumulatively considerable. The guidelines are clear that they do not support a zero net emissions threshold. If the lead agency does not have enough expertise in evaluating GHG impacts, it may rely on thresholds adopted by an agency with greater expertise.

On December 5, 2008 the SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 Metric Tons (MT) CO₂ equivalent/year. Because this project is considered industrial, the 10,000 MT threshold was used for this project.

Project Related GHG Emissions Generated

Construction Activity GHG Emissions

The project is assumed to require less than one year for construction. During project construction, the CalEEMod2016.3.2 computer model predicts that the construction activities will generate the annual CO₂e emissions identified in Table VIII-1.

**Table VIII-1
CONSTRUCTION EMISSIONS (METRIC TONS CO₂e)**

	CO₂e
Year 2022	12.8
Amortized	7.0
Significance Threshold	10,000

*CalEEMod Output provided in appendix

SCAQMD GHG emissions policy from construction activities is to amortize emissions over a 30-year lifetime. The amortized level is also provided. GHG impacts from construction are considered individually less than significant.

Operational GHG Emissions

The input assumptions for operational GHG emissions calculations, and the GHG conversion from consumption to annual regional CO₂e emissions are summarized in the CalEEMod2016.3.2 output files found in the appendix of the Air Quality Impact Assessment.

As discussed above, under Section III, Air Quality, the project would be expected employ 100 employees and therefore generate 200 trips per day. In addition, the cultivation building is predicted to require 7,000,000 kWh/year and the emergency generator is expected to consume 1,000,000 kWh/year. Water use is estimated at 2,235,337 gallons/year.

The total operational and annualized construction emissions for the proposed project are identified in Table VIII-2. The project GHG emissions are considered less-than-significant.

**Table VIII-2
Operational Emissions (Metric Tons CO₂e)**

Consumption Source	MT CO₂e
Area Sources	0.0
Energy Utilization	5,146.2
Mobile Source	349.8
Solid Waste Generation	114.7
Water Consumption	19.9
Construction	12.8
Total	5,643.4
Guideline Threshold	10,000

Therefore, both construction and operation related emissions are below SCAQMD GHG emissions thresholds. Impacts under these issues are considered less than significant. No mitigation is required.

Consistency with GHG Plans, Programs and Policies

In the City of Coachella's Climate Action Plan (2014), the City proposes to set an efficiency-based greenhouse gas reduction target of 15% below 2010 (per service population) emissions by 2020 and an emissions reduction target of 49% (per service population) emissions by 2035.

The recent Coachella General Plan Update addresses GHG emissions as well. The General Plan Update discusses the significance criteria proposed but not adopted by the South Coast Air Quality Management District to evaluate air quality impacts. Since the project results in GHG emissions below the recommended SCAQMD 10,000 metric ton threshold, for industrial use the project would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IX. HAZARDS AND HAZARDOUS MATERIALS

SUBSTANTIATION

a&b. *Less Than Significant Impact With Mitigation Incorporated* – The project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or may 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. During construction, there is a potential for accidental release of petroleum products in sufficient quantity to pose a significant hazard to people and the environment. The following mitigation measure will be incorporated into the Storm Water Pollution Prevention Plan (SWPPP) prepared for the project and implementation of this measure can reduce this potential hazard to a less than significant level.

HAZ-1 *All spills or leakage of petroleum products during construction activities will be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately licensed*

disposal or treatment facility. This measure will be incorporated into the SWPPP prepared for the Project development.

The proposed project consists of an industrial agricultural use that may include the use of cleaners, fertilizers, solvents, and pesticides for routine cleaning and cultivation of medical marijuana. None of these materials would be used in sufficient quantities to pose a threat to the environment or cause a foreseeable release of hazardous materials into the environment. The handling of hazardous these materials would comply with all Federal, State, and local laws. Thus, with implementation of the above mitigation measure, the project would not create a significant hazard to the public or the environment either through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts are considered less than significant with implementation of standards best management practices (BMPs) and mitigation incorporated and no further mitigation is required.

- c. *No Impact* – The project site is located greater than one-quarter mile from any public school. The nearest public school—Cesar Chavez Elementary School, located at 49601 Avenida De Oro, Coachella, CA 92236—is more than one mile southwest of the project site. Based on this information, implementation of the project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No adverse impacts are anticipated. No additional mitigation is required.
- d. *No Impact* – The project site has been previously bladed and is vacant containing non-native vegetation throughout. The project will not be located on a site that is included on a list of hazardous materials sites that are currently under remediation. According to the California State Water Board's GeoTracker website (consistent with Government Code Section 65962.5), which provides information regarding Leaking Underground Storage Tanks (LUST), there are no active LUST sites located within the project site, though there is one open, but inactive, LUST cleanup site—previously a Quail Oil gas station—located just beyond the 2,500-foot radius around the project site, located west of Old California 86 (refer to Figures IX-1 through IX-3). A second, closed LUST Cleanup site is located just outside of the 2,500-foot radius around the project site. Neither of these sites has no potential to create a hazard that would affect the operations of the proposed project. Therefore, the proposed construction and operation of the site as the Bejarano Cannabis Cultivation Facility will not create a significant hazard to the population or to the environment from their implementation. No impacts are anticipated. No mitigation is required.
- e. *No Impact* – The closest airport is the Jacqueline Cochran Regional Airport located approximately 6 miles south of the project site at 56-850 Higgins Drive, Thermal, CA 92274. According to the Riverside County Airport Land Use Commission Compatibility Map for Jacqueline Cochran Regional Airport (Figure IX-4), the proposed project is located outside of the airport influence boundary. No private airstrips are located in the vicinity of the project. Therefore, given that the project is not located within an airport influence zone, construction and operation of the project at this location would not result in a safety hazard for people residing or working in the project area as a result of proximity to a public airport or private airstrip. No impacts are anticipated and no mitigation is required.
- f. *Less Than Significant Impact* – The proposed project will occur entirely within the boundaries of the project site, which is located on Harrison Street just south of Avenue 48. These roadways are not located adjacent to any major arterial roadway, such as Highway 86 or Interstate 10 to the north/northeast. The City of Coachella does not identify any evacuation routes within the City. Access to the site will be provided through two entryways facing Harrison Street. The proposed onsite parking and circulation plans will be reviewed by the local Fire Department and Police Department to ensure that the project's ingress/egress are adequate for accommodating emergency vehicles. Finally, a construction traffic plan will be required to be submitted to the Fire Department prior to development in order to provide adequate emergency access during construction of the proposed project. Therefore, there is no potential for the development of the project to physically interfere with any adopted emergency response plans, or evacuation plans. No impacts are anticipated and no mitigation is required.

- g. *Less Than Significant Impact* – According to the City of Coachella General Plan 2035, the area east of the Coachella Canal is mapped as having moderate fuel rank and as such may be susceptible to wildfires. The proposed project is located on the west side of the Coachella Canal/Whitewater River Channel, and is in an industrial area with very little fuel load in the surrounding area that could be susceptible to wildfires. Therefore, because the proposed project is located outside of the area identified as a high fire hazard zone within the City's General Plan, the proposed project has a less than significant potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. HYDROLOGY AND WATER QUALITY: Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation onsite or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?; or,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

X. HYDROLOGY AND WATER QUALITY

SUBSTANTIATION

- a. *Less Than Significant With Mitigation Incorporated* – The proposed project is located within a developed area within the Whitewater River watershed, which is within the Coachella Valley Planning Area of the Colorado River Basin Regional Water Quality Control Board (RWQCB). The Coachella Water Authority (CWA) is responsible for the water supply to the City, though it pays a replenishment charge to Coachella Valley Water District (CVWD). CWA’s existing water system consists of different pressure zones, groundwater wells, storage reservoirs, booster pumping stations, and distribution facilities. CWA has one principal source of water supply, local groundwater pumped from CWA owned and operated wells. CWA is required to meet potable water quality requirements of the Division of Drinking Water, State Water Resources Control Board (SWRCB).

For a developed area, the only three sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal wastewater, stormwater runoff, and potential discharges of pollutants, such as accidental spills. Municipal wastewater is delivered to the

Coachella Sanitation District, which meets the waste discharge requirements imposed by the RWQCB. Wastewater will be transported and processed at the wastewater treatment plant (WTP) located to the south on Avenue 54. To address stormwater and accidental spills within this environment, any new project must ensure that site development implements a Storm Water Pollution Prevention Plan (SWPPP) and a National Pollutant Discharge Elimination System (NPDES) permit to control potential sources of water pollution that could violate any standards or discharge requirements during construction and a Water Quality Management Plan (WQMP) to ensure that project-related after development surface runoff meets discharge requirements over the short- and long-term. The WQMP would specify stormwater runoff permit Best Management Practices (BMPs) requirements for capturing, retaining, and treating on site stormwater once the Bejarano Cannabis Cultivation Facility has been developed. Because the project site consists of pervious surfaces, the project has identified onsite drainage that will generally be directed to the onsite retention pond that will be developed as part of the project. Additionally, the Coachella Sanitation District will impose conditions of approval that would require compliance with its regulations and standards related to the release of fertilizers or pesticides which may be released by the Bejarano Cannabis Cultivation Facility in its cultivation practices. The SWPPP would specify the BMPs that the project would be required to implement during construction activities to ensure that all potential water pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. With implementation of these mandatory Plans and their BMPs, as well as mitigation measure **HAZ-1** above, the development of the Bejarano Cannabis Cultivation Facility will not cause a violation of any water quality standards or waste discharge requirements.

- b. *Less Than Significant Impact* – Implementation of the proposed project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin. The project will be supplied water by the CWA, which utilizes groundwater to supply its customers, though it pays water replenishment charges to CVWD. The City of Coachella does not currently have water demand factors, though CVWD has developed demand factors that are applicable to the proposed project, outlined in their Urban Water Management Plan (2015)⁵. Industrial land uses such as the proposed project site are estimated to generate an average of 1.43-acre feet per acre per year; therefore, the anticipated demand of the 10.01-acre project site is 14.31 acre feet per year (AFY). The project will include cannabis growth within a 172,461 SF structure, of which an estimated 75% of the building area will be utilized for plant growth. This amounts to about 2.97 acres of growing area. According to a recent publication of Marijuana Venture, an article titled “Cannabis Cultivators’ Report on Water Usage,”⁶ which describes cannabis water use from the perspective of the grower, one-eighth of an acre would use 24,000 gallons of water per season (about eight months or 240 days). As such, it is estimated that the proposed project would require about 855,360 gallons of water per year or 2,343 gallons of water per day, or about 2.63 acre feet of water per year (AFY) ($2.97 \div 0.125 = 23.76 \times 24,000 = 570,240 \times 1.5$ to equal one year = 855,360). Another method in which to determine the water use for cannabis cultivation is to utilize the average estimated water use per square foot for cannabis cultivation projects in the Coachella Valley. Utilizing calculations from similar projects, it is anticipated that the project would require 35.05 gallons per 1,000 square feet of greenhouse/cultivation area. This equates to approximately 6,122.37 gallons per day (GPD), or 6.86 AFY. Therefore, utilizing either the lower water demand estimation—2.63 AFY—or the higher water demand estimation for cannabis cultivation—6.86 AFY—the proposed project is anticipated to require less water to operate than the 14.31 AFY estimated for industrial land uses. As such, the proposed project is expected to have a demand for water that is well within that which is anticipated for industrial land uses. The City of Coachella has a Water Conservation Program that new development such as the Bejarano Cannabis Cultivation Facility must comply with, which includes installation of water efficient irrigation systems. Furthermore, the proposed project will install a 52,131 SF retention pond to store surface water runoff from the site, which will recharge to the groundwater basin. Examples of these water conservation methods include water conserving plumbing fixtures, drought tolerant landscaping, and drip irrigation

⁵ <https://www.cvwd.org/Archive/ViewFile/Item/331>

⁶ <https://www.marijuanaventure.com/report-on-water-usage/>

systems. Therefore, no significant adverse impacts to groundwater resources are forecast to occur from implementing the proposed project. No mitigation is required.

- c.(i) *Less Than Significant Impact* – The proposed project is not anticipated to significantly change the volume of flows downstream of the project site, and would not be anticipated to change the amount of surface water in any water body in an amount that could initiate a new cycle of erosion or sedimentation downstream of the project site. The onsite drainage will capture the incremental increase in runoff from the project site associated with project development. Runoff will be detained on the project site within the proposed 52,131 SF retention pond located at the eastern end of the project site. This system has been designed to intercept the peak 100-year flow rate from the project site. The downstream drainage system will not be altered and given the control of future surface runoff from the project site, the potential for downstream erosion or sedimentation will be controlled to a less than significant impact level.
- c.(ii) *Less Than Significant Impact* – The proposed project will alter the existing drainage courses or patterns onsite but will maintain the existing offsite downstream drainage system through control of future discharges from the site, which would prevent flooding onsite or offsite from occurring. The onsite drainage will capture the incremental increase in runoff from the project site associated with project development, which will decrease the amount of pervious area within the site. Runoff will be detained on the project site within the proposed 52,131 SF retention pond located at the eastern end of the project site. This system will be designed to capture the peak 100-year flow runoff from the project site or otherwise be detained on site and discharged in conformance with Riverside County requirements. Thus, the implementation of onsite drainage improvements and applicable requirements will ensure that stormwater runoff will not substantially increase the rate or volume of runoff in a manner that would result in flooding on- or off-site. Impacts under this issue are considered less than significant with no mitigation required.
- c.(iii) *Less Than Significant With Mitigation Incorporated* – As indicated above, the project will not substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater capacity, or provide substantial additional sources of polluted water, particularly because the site plan includes a 52,131 SF retention pond located at the eastern end of the project site, and other water quality control measures that will collect on-site runoff. The project will require the implementation of a SWPPP and WQMP, and implementation of mitigation measure **HAZ-1**, which will ensure that discharge of polluted material does not occur or is remediated in the event of an accidental spill. However, in most cases onsite surface flows will be collected and conveyed to 52,131 SF retention pond, or otherwise controlled through other water quality control measures. At present, the site is mostly pervious and runoff is either retained on site or is directed into adjacent public rights-of-way; thus, with the development of the site as proposed and through development of the planned drainage systems, runoff from the site would be managed more efficiently than that which exists at present. Thus, the implementation of onsite drainage improvements and applicable requirements will ensure that that drainage and stormwater will not create or contribute runoff that would exceed the capacity of existing or planned offsite stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts under this issue are considered less than significant with implementation of mitigation.
- c.(iv) *Less Than Significant Impact* – The proposed project site is located adjacent to the Coachella Stormwater Channel/Whitewater River, which is subject to overflow during periods of inclement weather. The channel is located within a 100-year flood zone; however, the proposed project is located in Zone X according to the City of Coachella General Plan Flood Hazard map (Figure X-1). Zone X corresponds to areas of 500-year flood, areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 100-year floods. The project site is in an area of reduced flood impact due to the presence of a levee limiting flows during potential flood events, as shown on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06065C2260H (Figure X-2). Furthermore, development of this site is not anticipated to redirect or impede flood flow within the project site, particularly given that surface flows on site will be directed to the onsite drainage features which will

be capable of intercepting the peak 100-year flow rate from the project site or otherwise be detained on site and discharged in conformance with Riverside County requirements. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

- d. *Less Than Significant Impact* – As stated above, the proposed project is located adjacent to the Coachella Stormwater Channel/Whitewater River, which is subject to overflow during periods of inclement weather. According to the City of Coachella General Plan EIR, the Whitewater River levee is designed to hold double the amount of water that would flow in a 100-year flood. The levee and channelized portions of the Whitewater River are managed by the City of Coachella Engineering Department. Potential risks and planned responses associated with failures of these systems are addressed in the City's Local Hazard Mitigation Plan. The proposed project is located over 100 miles from the Pacific Ocean, therefore, there is no potential for tsunami to occur within the project area. According to the City of Coachella General Plan EIR, the proposed project and the entirety of the City are outside of the area that could be affected by seiche that could occur at the Salton Sea, which is over 10 miles away. It is anticipated that through compliance with the City's Municipal Code and implementation of the onsite drainage system, inundation hazards within the City would be reduced to a level of less than significant. Therefore, the potential to expose people or structures to a significant risk of pollutants due to inundation would be minimal. No mitigation is required.
- e. *Less Than Significant With Mitigation Incorporated* – The Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The proposed project is located within the Coachella Valley Groundwater Basin, in the Indio Subbasin, which has been designated by the California Department of Water Resources Groundwater Sustainability Agency Formation Notification System⁷, as medium priority under the SGMA. CWA is a Groundwater Sustainability Agency (GSA), which enables it to manage a portion of the Indio/Whitewater Subbasin, which is both adjudicated and designated as medium priority under the SGMA. According to the Indio Subbasin Annual Report for 2017/2018⁸, the GSAs that manage the Indio Subbasin have been working to implement the goals and programs of the 2010 Coachella Valley Water Management Plan (CVWMP) Update. WY 2016-2017 saw the highest volume of water recharged in a 12-month period. The City of Coachella, where the project is located, has experienced water level gains during the period. The GSAs have until Jan. 1, 2020 to have an approved Groundwater Sustainability Plan (GSP) because the Indio Subbasin is in overdraft (Bulletin 118 [2018]); as such, the Indio Subbasin does not currently have an approved GSP. In a phone conversation with Ms. Berlinda Blackburn of CWA on November 20, 2019, Ms. Blackburn indicated that CWA does not pose any conservation measures beyond those identified by the State⁹, which are mandatory. Compliance with the State water conservation measures is enforced through CWA visits to operations, such as the proposed Bejarano Cannabis Cultivation Facility. Additionally, Ms. Blackburn indicated that, in her experience, cannabis cultivation operations in Coachella have generally exceeded the State water conservations measures, and she indicated that CWA deems these conservations measures sufficient to meet the future SGMA objectives. Furthermore, though controlling water quality during construction and operations through implementation of both short (SWPPP) and long (WQMP) term best management practices at the site, the potential for conflict or obstruction of the Regional Board's water quality control plan or with the Indio Subbasin sustainable groundwater management plan is considered less than significant.

⁷ <https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#boundaries>

⁸ <https://sgma.water.ca.gov/portal/alternative/print/23>

⁹ https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XI. LAND USE AND PLANNING: Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XI. LAND USE AND PLANNING

SUBSTANTIATION

- a. *No Impact* – The project site consists of two parcels of land, which are zoned for Wrecking Yard, and designated Heavy Industrial. The surrounding uses include Heavy Industrial and Open Space to the north, Open Space to the east, Heavy Industrial to the south, and Heavy Industrial to the west. The project site is currently used for scrap metal recycling; the site has been previously bladed and contains remnants of broken down vehicles and storage areas, as well as active heavy machinery, with non-native vegetation throughout the site. The addition of Bejarano at this location would be consistent with both the uses surrounding the project and the surrounding land use designations and zoning classifications, particularly given the two previously approved cannabis cultivation operations located within this corridor. Consequently, the development of the project site with the proposed use will not divide any established community in any manner. Therefore, no adverse impacts under this issue are anticipated and no mitigation is necessary.

- b. *No Impact* – The project site is designated for Heavy Industrial and zoned for Wrecking Yard within the City of Coachella. Consistent with the provisions of Coachella’s Ordinance 1083, the cultivation of medical marijuana requires the approval of a Conditional Use Permit (CUP) in the M-W (Wrecking Yard) zone. With approval of the CUP application on this property, the proposed project will be fully consistent with both the General Plan designation and Zone classification for the project site as shown on Figure XI-1 and XI-2 which depict the City of Coachella General Plan Land Use Map and the City of Coachella Zoning Map. Therefore, the implementation of this project at this site will be consistent with surrounding land uses, and current use of the site. Based on this information, implementation of the Bejarano Cannabis Cultivation Project would not conflict with any applicable any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impacts are anticipated under this issue and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XII. MINERAL RESOURCES: Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XII. MINERAL RESOURCES

SUBSTANTIATION:

a&b. *No Impact* – The proposed site for the Bejarano Cannabis Cultivation Facility is in a highly disturbed industrial area that previously contained an auto wrecking yard. The site is surrounded by development to the north, south, and west; the Whitewater River and open space are located to the east of the project site. According to the Map prepared for the City of Coachella General Plan EIR depicting Mineral Resources (Figure XII-1), the proposed project is located in Mineral Resource Zone-1, which indicates an area where available geological information indicates that little likelihood exists for the presence of significant mineral resources. The project is designated for Heavy Industrial uses, and is not designated for mineral resource-related land uses. Therefore, the development of the project will not cause any loss of mineral resource values to the region or residents of the state, nor would it result in the loss of any locally important mineral resources identified in the City of Coachella General Plan. No impacts would occur under this issue. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIII. NOISE: Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIII. NOISE

SUBSTANTIATION

Background

Noise is generally described as unwanted sound. Bejarano will be developed as a cannabis cultivation farm that will consist of the following: 1 administration and facilities building, 1 building containing flower, vegetation, and greenhouse areas, parking, security, and a 52,131 SF retention pond. The site is in a heavily industrial area with Heavy Industrial land uses to the south, north, and west, and Open Space (the Coachella Stormwater Channel/Whitewater River) to the east. The project site is located in an area with intermittent heavy background noise from traffic along nearby highways and from surrounding industrial uses, including several auto-wrecking yards.

The unit of sound pressure ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over one million times within the range of human hearing. A logarithmic loudness scale, similar to the Richter scale for earthquake magnitude, is therefore used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all sound frequencies within the entire spectrum. Noise levels at maximum human sensitivity from around 500 to 2,000 cycles per second are factored more heavily into sound descriptions in a process called "A-weighting," written as "dBA."

Leq is a time-averaged sound level; a single-number value that expresses the time-varying sound level for the specified period as though it were a constant sound level with the same total sound energy as the time-varying level. Its unit is the decibel (dB). The most common averaging period for Leq is hourly.

Because community receptors are more sensitive to unwanted noise intrusion during more sensitive evening and nighttime hours, state law requires that an artificial dBA increment be added to quiet time noise levels. The State of California has established guidelines for acceptable community noise levels that are based on the Community Noise Equivalent Level (CNEL) rating scale (a 24-hour integrated noise measurement scale). The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. The State Guidelines, Land Use Compatibility for Community Noise Exposure, single-family homes are "normally acceptable" in exterior noise environments up to 60 dB CNEL and "conditionally acceptable" up to 70 dB CNEL based on this scale. Multiple family residential uses are "normally acceptable" up to 65 dB CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable"

up to 70 dB CNEL, as are office buildings and business, commercial and professional uses with some structural noise attenuation.

Impact Analysis

- a. *Less Than Significant With Mitigation Incorporated* – The proposed project is located in a highly industrial area of development. The proposed project is located between Highway 111—about 2,000 feet to the west, and State Route 86—about 1,000 feet to the east. The nearest residences are located to the east of the project site approximately one-half mile to the west of the project on the opposite side of Highway 111. Background noise is anticipated to be at or lower than the City of Coachella Municipal Code noise standard for Industrial uses (75 dBA). The proposed project site currently serves as a scrap metal recycling facility, and as such currently generates some noise typical of heavy industrial uses.

Short Term Noise

Short-term construction noise impacts associated with the proposed project will occur in phases as the project site is developed. The earth-moving sources are the noisiest type of equipment typically ranging from 82 to 85 dB at 50 feet from the source. Construction equipment generates noise that ranges between approximately 75 and 90 dBA at a distance of 50 feet. Refer to Table XIII-1, which shows construction equipment noise levels at 25, 50 and 100 feet from the noise source. Section 7.04.070 of the Coachella Municipal Code (CMC) specifically exempts noise sources associated with construction, erection, demolition, alteration, repair, addition to or improvement of any building, structure, road or improvement to realty, provided that such activities take place during daytime hours, as follows: October 1st through April 30th: Monday – Friday: 6:00 AM to 5:30 PM, May 1st through September 30th Monday – Friday: 5:00 AM to 7:00 PM, all year Saturday: 8:00 AM to 5:00 PM, all year Sunday: 8:00 AM to 5:00 PM, all year Holidays: 8:00 AM to 5:00 PM. The proposed project would be constructed in compliance with the City's Noise Performance Standards, and therefore construction of the project would be less than significant. However, to minimize the noise generated on the site to the extent feasible, the following mitigation measures shall be implemented:

- NOI-1** *All construction vehicles and fixed or mobile equipment shall be equipped with properly operating and maintained mufflers.*
- NOI-2** *All employees that will be exposed to noise levels greater than 75 dB over an 8-hour period shall be provided with adequate hearing protection devices to ensure no hearing damage will result from construction activities.*
- NOI-3** *No exterior construction activities shall occur during the hours of 5:30 PM through 6 AM, Monday through Friday between October 1st and April 30th, and 7 PM and 5 AM Monday through Friday between May 1st and September 30th; all year between the hours of 5 PM and 8 AM on Saturdays, Sundays, and holidays, unless a declared emergency exists.*
- NOI-4** *Equipment not in use for five minutes shall be shut off.*
- NOI-5** *Equipment shall be maintained and operated such that loads are secured from rattling or banging.*
- NOI-6** *Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment.*
- NOI-7** *The City will require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.*

Table XII-1
NOISE LEVELS OF CONSTRUCTION EQUIPMENT AT 25, 50 AND 100 FEET (in dBA Leq) FROM THE SOURCE

Equipment	Noise Levels at 25 feet	Noise Levels at 50 feet	Noise Levels at 100 feet
Earthmoving			
Front Loader	85	79	73
Backhoes	86	80	74
Dozers	86	80	74
Tractors	86	80	74
Scrapers	91	85	79
Trucks	91	85	79
Material Handling			
Concrete Mixer	91	85	79
Concrete Pump	88	82	76
Crane	89	83	77
Derrick	94	88	82
Stationary Sources			
Pumps	82	79	70
Generator	84	78	72
Compressors	87	81	75
Other			
Saws	84	78	72
Vibrators	82	76	70

Source: U.S. Environmental Protection Agency "Noise"

Long-Term Noise

Noise generated as a result of the project would attenuate to a less than significant level, or an inaudible level by the time it reaches the residences one half mile to the east. The primary source of noise generated as a result of the operation of the Bejarano Cannabis Cultivation Facility will be vehicular traffic entering, exiting and accessing the site, maintenance equipment that may be required as needed, heating, ventilation and air conditioning units. The City of Coachella does not identify exterior noise standards for industrial land uses, but the Coachella Land Use/Noise Compatibility Matrix (Figure XIII-1) defines noise levels up to 75 CNEL within commercial/industrial development areas to be normally acceptable. The project is not anticipated to operate at a level greater than 75 CNEL. Furthermore, the project site is within an industrial land use area, in which noise levels are generally higher than within other land use. Noise attenuates at a rate of approximately 6 to 7 decibels per doubling of distance, and much like construction noise, equipment required to operate the Bejarano will generate some noise, anticipated to range from approximately 75 dBA to 85 dBA at 50 feet from the source. Given the distance from the nearest residence to the project site—about 2,500 feet to the west—the noise environment at the nearest residence will be well within the levels deemed acceptable by the City. With no sensitive receptors nearby, the proposed project should not expose of persons to or generation of noise levels in excess of established standards. Thus, based on the existing noise environment within this industrial corridor, and through the implementation of the mitigation measures identified above, neither operation or construction of the proposed project would violate noise standards outlined in the City of Coachella Development Code. Impacts under this issue are considered less than significant with mitigation incorporated.

- b. *Less Than Significant Impact* – Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noises. Sources of groundborne vibrations include natural phenomena (e.g. earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g. explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second), and discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration. Vibration impacts related to human development are generally associated with activities such as train operations, construction, and heavy truck movements.

The Federal Transit Authority (FTA) Noise and Vibration Assessment¹⁰ states that in contrast to airborne noise, ground-borne vibration is not a common environmental problem. Although the motion of the ground may be noticeable to people outside structures, without the effects associated with the shaking of a structure, the motion does not provoke the same adverse human reaction to people outside. Within structures, the effects of ground-borne vibration include noticeable movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. The FTA Assessment further states that it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. However, some common sources of vibration are trains, trucks on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment. The FTA guidelines identify a level of 80 VdB for sensitive land uses. This threshold provides a basis for determining the relative significance of potential project related vibration impacts.

Due to the large size of the project site, and the lack of any sensitive receptors within a reasonable distance of the project site, the proposed project will not expose people to generation of excessive groundborne vibration or groundborne noise levels. During construction, certain construction activities have some potential to create vibration, but due to the size of the site and lack of sensitive receptors, any impacts are considered less than significant. Furthermore, the City of Coachella Municipal Code Section 7.04.070 places restrictions on hours of construction, which are outlined above. The proposed project would comply with the construction hours established by the City's Municipal Code. Additionally, because the rubber tires and suspension systems of heavy trucks and other on-road vehicles provide vibration isolation and reduced noise, it is unusual for on-road vehicles to cause noticeable groundborne noise or vibration impact. Most problems with on-road vehicle-related noise and vibration can be directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. Smoothing a bump or filling a pothole will usually solve the problem. The proposed project would be constructed with smooth new pavement throughout the project and would not result in significant groundborne noise or vibration impacts from vehicular traffic. Thus, any impacts under this issue are considered less than significant and no mitigation is required.

- c. *No Impact* – The closest airport is the Jacqueline Cochran Regional Airport located approximately 6 miles south of the project site at 56-850 Higgins Drive, Thermal, CA 92274. According to the Riverside County Airport Land Use Commission Compatibility Map: Noise Compatibility Contours Jacqueline Cochran Regional Airport (Figure XIII-1), the proposed project is located outside of the airport noise contours. No private airstrips are located in the vicinity of the project. Therefore, given that the project is not located within the airport noise contours, construction and operation of the project at this location would not expose people residing or working in the project area to excessive noise levels in a safety hazard for people residing or working in the project area as a result of proximity to a public airport or private airstrip. No impacts are anticipated and no mitigation is required.

¹⁰ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the project:				
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIV. POPULATION AND HOUSING

SUBSTANTIATION

- a. *Less Than Significant Impact* – The proposed project will employ about 100 persons. It is unknown whether the new employees will be drawn from the general area or will be new residents to the project area. Relative to the total number residents of Coachella, approximately 45,635 persons in 2018 according to the Southern California Association of Governments (SCAG) 2019 Local Profile for the City of Coachella¹¹, an increase of about 100 employees as new residents represents a minor increase in the area population. According to the City of Coachella General Plan EIR, by 2020, an estimated 70,200 persons will reside in Coachella, with the population growing to 128,700 persons by 2035. As such, given the current population, the City of Coachella has planned for significant population growth to occur, and as such project related population growth is not anticipated to be beyond that which has been planned by the City. Thus, based on the type of project, and the small increment of potential indirect population growth the project may generate, the population generation associated with project implementation will not induce substantial population growth that exceeds either local or regional projections.
- b. *No Impact* – No occupied residences are located on the project site; therefore, implementation of the proposed project will not displace substantial numbers of existing housing or persons, necessitating the construction of replacement housing elsewhere. No impacts will occur; therefore, no mitigation is required.

¹¹ <https://www.scag.ca.gov/Documents/Coachella.pdf>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XV. PUBLIC SERVICES

SUBSTANTIATION

- a. *Less Than Significant Impact* – The City of Coachella contracts with Riverside County Fire Department for local fire protection services. The nearest fire station is Station 79 located at 1377 Sixth Street, approximately 2.5 miles southeast of the project site. Development of the project will marginally increase demand for fire and emergency services within the City. Based on the location of the nearest fire station, the project site is clearly within a distance (approximately 2.5 miles) where any future calls can be responded to within 5 minutes, which is the City’s target response time. Emergency access to the project site will be provided by the site entrance on Harrison Street. The Fire Department will review the site plan to ensure that it meets applicable fire standards and regulations. The proposed project will incrementally add to the existing demand for fire protection services. Cumulative impacts are mitigated through the payment of the Development Impact Fee (DIF), which contains a fire facilities component. There is no identified near term need to expand facilities in a manner that could have adverse impacts on the environment. Any impacts are considered less than significant and no mitigation is required.
- b. *Less Than Significant Impact* – The City of Coachella Police Department operates a substation from the Riverside County Sheriff’s Department. Local headquarters for the Police area located at 82-625 Airport Boulevard, approximately 4 miles southeast of the proposed project site. The nearest police station is the Indio Police Department, which is located at 46800 Jackson Street in the City of Indio. This Department operates out of a single facility with response times of about three minutes for emergency calls. At the time that the City of Coachella General Plan EIR was compiled (2012), the Department had 36 sworn officers and two non-sworn personnel for a total of 38 positions. The proposed project will result in a marginal increase in demand for police services. Access to the site for Police protection services will be provided at the entrance to the project site on Harrison Street. The proposed project will incrementally add to the existing demand for police protection services. These incremental impacts are mitigated through the payment of the DIF, which contains a Law Enforcement component. Therefore, with payment of DIF, impacts to police protection services are considered less than significant.
- c. *Less Than Significant Impact* – The proposed project is an industrial farming development that is not forecast to generate any new direct demand for the area schools. The proposed project may place additional demand on school facilities, but such demand would be indirect and speculative. The

Coachella Valley Unified School District (CVUSD) requires commercial industrial developments such as the Bejarano Cannabis Cultivation Facility to pay a Level II Fee to support development of future facilities due to development within the City. The development impact fee mitigation program of the CVUSD adequately provides for mitigating the impacts of the proposed project in accordance with current state law. No other mitigation is identified or needed. Since this is a mandatory requirement, no additional mitigation measures are required to reduce school impacts of the proposed project to a less than significant level.

- d. *Less Than Significant Impact* – The proposed project will not directly add to the existing demand on local recreational facilities. According to the City’s General Plan EIR, as developments are built and constructed, developers would be subject to all provisions of the Coachella Quimby Ordinance 868 fees to set aside land or pay in-lieu fees to provide park and recreation facilities. However, at present, the City only requires residential development to pay Quimby Fees. Therefore, with no existing or planned park facilities located within the project site, and no required payment of fees, the proposed project would have a less than significant impact to parks and recreation facilities.
- e. *Less Than Significant Impact* – Other public facilities include library and general municipal services. Since the project will not directly induce substantial population growth, it is not forecast that the use of such facilities will substantially increase as a result of the proposed project. Section 4.45.050(B) of the City of Coachella Municipal Code requires developer fees for library facilities to be used for the land acquisition and construction costs of a public library facility as part of the Riverside County Library System. Therefore, the project will be required to contribute developer fees to library services and these fees are considered sufficient to offset any impacts to other public facilities as a result of implementing the project. Thus, any impacts under this issue are considered less than significant, and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XVI. RECREATION

SUBSTANTIATION

- a. *Less Than Significant Impact* – The Coachella Valley Recreation and Park District (CVRPD) provides park and recreational services for the City. The nearest park to the proposed project is Bagdouma Park located at 84-620 Bagdad Avenue, which is approximately 3 miles east of the project site. Bagdouma Park is a 34.3-acre community park that contains the following amenities: 7 baseball/softball fields, 3 soccer/football fields, several basketball courts, gym, swimming pool, pavilion, playground, picnic tables, benches, and blenchers. As stated under issue XV(d), the City of Coachella does not require commercial/industrial projects to pay Quimby Act fees dedicated to development of City parks. Additionally, the proposed project will be developed on land that is designated by the City’s General Plan for Heavy Industrial use, and is not listed in any planning documents as desirable land for future park development. Therefore, the proposed project would have a less than significant potential to physically deteriorate park or recreational facilities through increased use. No mitigation is required.

- b. *No Impact* – The proposed project consists of developing Bejarano Cannabis Cultivation within the City of Coachella. The project will develop a cannabis cultivation farm, and will not include any recreational facilities, nor will it require the construction of new recreational facilities or expansion of new recreational facilities because the proposed project is not anticipated to substantially induce any population growth. The site currently contains a scrap metal recycling facility, with no existing recreational facilities on or near the project site, and the project site is in an area of the City that is designated for Heavy Industrial use. As a result, no recreational facilities—existing or new—are required to serve the project, thus any impacts under this issue are considered less than significant. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVII. TRANSPORTATION: Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVII. TRANSPORTATION

SUBSTANTIATION

- a. *Less Than Significant Impact* – Implementation of the proposed Bejarano Cannabis Cultivation Project will not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located off of Harrison Street just south of Avenue 48. According to the City of Coachella General Plan, Harrison Street extends north-south and is specified in the Circulation Element as an enhanced major arterial from Grapefruit Boulevard (Highway 111) south to Avenue 52, then as a major arterial south to Airport Boulevard. Grapefruit Boulevard is located south of the project site’s location on Harrison Street; this section of roadway is not heavily traveled due to the industrial nature of this corridor. The General Plan identifies existing traffic on Harrison Street north of Avenue 50 as being capable of handling 21,900 trips per day, and operates at a Level of Service (LOS) of 0.61 C or better at present. The 2035 roadway segment LOS, as forecast in the General Plan, at Harrison Street north of Avenue 50 would be capable of handling 56,000 trips per day operating at an LOS C or better, though the forecasted volume for 2035 is 26,600 trips, which is well below the forecasted capacity identified in the General Plan.

The proposed project is anticipated to employ a maximum of 100 persons, which would generate an average daily trip rate of 2 trips per day, which would result in 200 trip ends per week day should the project employ a maximum of 200 persons. It is anticipated that, in the future when Bejarano is set up to receive visitors and customers that the site would receive an average of approximately 100 customers per day—no more than 50 of these trips are anticipated occur during peak AM or PM hours. Deliveries related to operations of the proposed project are anticipated to have a potential to occur on a daily basis, with an estimated average of 5 round trips per day. Based on this information, the proposed project would contribute about 405 trips per day, the volume to capacity ratio would increase from 0.61 to 0.62, which would still allow this segment of roadway to operate at an LOS C or better, which is better than the City’s standard of a minimum LOS D or better. Furthermore, the City of Coachella General Plan EIR states that it will implement a DIF program to establish a plan and funding mechanism that provides for the implementation of all of the roadway improvements identified in the Mobility Element, and thus, the proposed project will pay any applicable fees to improve the roadways that experience greater use as a result of the project. Additionally, the City of Coachella Development Services Department typically imposes traffic mitigation measures as part of the conditions of approval put forth to the Planning Commission. These measures generally address site circulation, site access, circulation in the surrounding area, etc., and are deemed sufficient to minimize potential project related traffic impacts.

Implementation of the proposed project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, bicycle and pedestrian facilities. The proposed project is located within an industrial area, with limited connection to alternative forms of transportation. There are no bike lanes adjacent to the project site, and the General Plan does not identify any planned bicycle facilities within this corridor. Bus services are provided by SunLine Transit Agency throughout the City of Coachella, with the nearest bus stop located north west of the project site at Grapevine Boulevard and Avenue 48 approximately one half mile from the project site. The City of Coachella General Plan does not identify heavy industrial and agricultural areas as the type in which alternative modes of transportation are necessary. Therefore, no significant adverse impacts to these alternative modes of transportation will occur and overall bus and bicycle access should be enhanced by the proposed intersection improvements. Therefore, with minimal impacts to the circulation system, the proposed project has a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. No mitigation is required.

- b. *Less Than Significant Impact* – The proposed project would develop a Cannabis Cultivation Facility within the City of Coachella. The City has not yet developed a threshold for vehicle miles travelled. The proposed project is not located in close proximity to many alternative modes of transportation, such as bike lanes, sidewalks, and transit because the project is located in an industrial corridor. However, the proposed project will install sidewalk that will contribute to the creation of pedestrian circulation in the project area. The type of project proposed is anticipated to continue to attract a local clientele (within the City of Coachella), many of which would not travel a great distance to visit the Bejarano Facility; furthermore, it is anticipated that the majority of the persons working at the proposed facility will be residents of the City of Coachella or surrounding cities. As such, it is not anticipated that employees or visitors will travel great distances to specifically visit this project. Given that the proposed project is anticipated to serve the local community, the number of vehicle miles traveled per trip generated by the project is anticipated to be minimal. The greatest distance in which vehicles would travel to the site would occur as a result of employees and customers that may visit from out of town as either visitors or locals from the surrounding cities, but these trips would be minimal compared to the number of trips per day made to the site by locals on a regular basis. Therefore, the proposed Bejarano Cannabis Cultivation Project is not anticipated to result in significant impact related to vehicle miles travelled, and thus would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts under this issue are considered less than significant.
- c&d. *Less Than Significant Impact* – The proposed project will occur entirely within the project site boundaries. However, construction activities will include curb improvements as well as installation of a driveway and gated entryway to provide access to the site. Large trucks delivering equipment or removing small quantities of excavated dirt or debris can enter the site without major conflicts with the flow of traffic on the roadways used to access the site. Primary access to the site will be provided by two new entrances on Harrison Street, which intersects Avenue 48 north of the project site. Access to the site must comply with all City design standards, and would be reviewed by the City to ensure that inadequate design features or incompatible uses do not occur. Both entrances to the site provide access to the public to a small portion of the site, while a gated side entrance allows for restricted access to the remainder of the site. Additionally, the proposed project would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. Emergency response and evacuation procedures would be coordinated with the City, as well as the police and fire departments, resulting in less than significant impacts; no mitigation measures are required.

It will not be necessary for the contractor to implement a traffic management plan, including flag-persons or other features to control the interaction of the truck traffic and the flow of traffic on these roadways. This is because the roadway has ample room for truck traffic, with minimal traffic conflicts as Harrison Street does not have a heavy flow of traffic. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, 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 the California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVIII. TRIBAL CULTURAL RESOURCES

SUBSTANTIATION

A Tribal Resource is defined in the 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 purpose of this paragraph, the lead agency shall consider the significance of the resources to a California 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 resource if it conforms with the criteria of subdivision (a).

a&b. *Less Than Significant With Mitigation Incorporated* – The project site is located within the City of Coachella, which has been contacted pursuant to Public Resources Code section 21080.3.1 by the following California Native American tribes traditionally and cultural affiliated with the City of Coachella: Torres Martinez Desert Cahuilla Indians, Agua Caliente Band of Cahuilla Indians, Soboba Band of Luiseño Indians, Cabazon Band of Mission Indians, and Twenty-Nine Palms Band of Mission Indians. The City contacted these tribes to initiate the AB-52 process on November 26, 2019 to notify the tribes of the proposed project through mailed letters. As stated under the Cultural Resources

section above, the project site consists of a rough graded vacant lot with scattered vegetation covering the site. There is a potential to unearth tribal cultural resources of importance during the earth moving activities, which include excavation of the water retention basins that will be located on site. During the 30-day consultation period that concluded in early January 2020, none of the five tribes responded. As such, AB-52 concluded with no tribal input, and as such, with the implementation of the mitigation measure **CUL-1**, the project has a less than significant potential to cause a substantial change in the significance of tribal cultural resources, 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 the California Native American tribe and that is either **a)** Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or **b)** A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. No further mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XIX. UTILITIES AND SERVICE SYSTEMS

SUBSTANTIATION

a. Water

Less Than Significant Impact – The project will be supplied water by the CWA, which utilizes groundwater to supply its customers, though it pays water replenishment charges to CVWD. The proposed project will utilize existing connections within the adjacent roadway to support the Bejarano Cannabis Cultivation Activities. The project will operate under the guidelines outlined in the UWMP and within CWAs capacity, as discussed under issue X, Hydrology above, and below under issue XIX(b). The estimated water demand is anticipated to be below average for Industrial land uses. The anticipated demand of water supply within CWA's retail service area is anticipated to be greater than the demand for water in the future, which indicates that CWA has available capacity to serve the proposed project. Therefore, development of the Bejarano Cannabis Cultivation Facility would not result in a significant environmental effect related to the relocation or construction of new or expanded water facilities. Impacts are less than significant.

Wastewater

Less Than Significant Impact – The proposed project will develop a Cannabis Cultivation Facility within the City of Coachella. All wastewater generated by the project, once developed, will be delivered to the Coachella Sanitation District (CSD). The proposed project will utilize existing sewer connections within the adjacent roadway to support the Bejarano Cannabis Cultivation Activities. This increase in wastewater generated within the City is nominal compared to the 4.9 million gallon per day (MGD) capacity of the CSD wastewater treatment plant (WTP). The WTP treats approximately 2.9 MGD of wastewater at present, which leaves approximately 2 MGD of capacity remaining. At this time and for the foreseeable future, CSD maintains ample capacity to treat the wastewater delivered

from its member agencies. As such, given the nominal amount of additional wastewater generated by the employees and visitors of the future Cannabis Cultivation Facility as a result of the proposed project, it is not anticipated that CSD would need to expand their existing facilities beyond that which is already planned to accommodate the wastewater generated by the proposed project. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded wastewater facilities. Impacts are less than significant.

Stormwater

Less Than Significant Impact – Please refer to the discussion under Section X, Hydrology and Water Quality, of this Initial Study. The project design incorporates onsite drainage, which will capture the incremental increase in runoff from the project site associated with project development. Runoff will be detained on the project site within the proposed 52,131 SF retention pond located at the eastern end of the project site. This system has been designed to intercept the peak 100-year flow rate from the project site. The downstream drainage system will not be altered and given the control of future surface runoff from the project site; therefore, surface water will be adequately managed on site and as such, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

Electric Power

Less Than Significant Impact – IID will serve the proposed project. IID intends to install a new transformer to service this part of the City, as connection to the grid is currently not available at this site. The proposed project will be constructed concurrent with the installation of the new transformer, and as such, power will be provided to the project site. The installation of the transformer will result in impacts to the environment in the form of noise, air quality and GHG emissions, etc.; however, none of these impacts is anticipated to be significant. The provision of electricity at the project site, as such, is anticipated to be less than significant even though extension of IID's facilities is required to serve this area. Impacts are less than significant.

Natural Gas

Less Than Significant Impact – Natural gas will be supplied by Southern California Gas. The site will connect to the existing natural gas line in Harrison Street. This effort to connect the site to natural gas is not anticipated to result in significant impacts, as evidenced by the discussions in preceding sections. Therefore, development of the Bejarano Cannabis Cultivation Facility would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. Impacts are less than significant.

Telecommunications

Less Than Significant Impact – Development of the Bejarano Cannabis Cultivation Facility would require installation of telecommunication services, including wireless internet service and phone service. This can be accomplished through connection to existing services that are available to the developer at the project site. Therefore, development of the Bejarano Cannabis Cultivation Facility would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunications facilities. Impacts are less than significant.

- b. *Less Than Significant With Mitigation Incorporated* – The Coachella Water Authority (CWA) is responsible for the water supply for the City, though it pays a replenishment charge to Coachella Valley Water District (CVWD). CWA's existing water system consists of different pressure zones, groundwater wells, storage reservoirs, booster pumping stations, and distribution facilities. CWA has one principal source of water supply, local groundwater pumped from CWA owned and operated wells. CWA is required to meet water quality requirements of the RWQCB. The City of Coachella does not currently have water demand factors, though CVWD has developed demand factors that are applicable to the proposed project, outlined in their Urban Water Management Plan (2015). Industrial land uses such as the proposed project site are estimated to generate an average of 1.43-acre feet per acre per year; therefore, the anticipated demand of the 10.01-acre project site would be 14.31 acre feet per year (AFY); however, as discussed under issue X, Hydrology above, because the

project will be a cannabis cultivation facility, the actual estimated water demand for cannabis is between 2.63 AFY and 6.86 AFY. As a result, the proposed project is anticipated to require less water to operate than the 14.31 AFY estimated for Industrial land uses. Through the payment of water standby charges, hookup and connection fees, the impact of implementing the proposed project on water systems are forecast to be less than significant. The CWA 2015 UWMP documents the water availability for this project as an Industrial land use, and assesses the water availability for the whole of the CWA service area, considering the water shortage contingency plan and demand management measures. Based on these substantiating data, provision of domestic water supply can be accomplished without causing significant impacts on the existing water system or existing entitlements. However, the following mitigation measure shall be implemented to reduce consumption of potable water by the project site:

UTL-1 If recycled water becomes available at the project site, Bejarano shall connect to this system and utilize recycled water for landscape irrigation, and any other feasible uses of recycled water on the project site.

With implementation of the above mitigation measures, any impacts under the above issues are considered less than significant.

- c. *Less Than Significant Impact* – The CSD WTP has a capacity of 4.9 MGD. The WTP treats approximately 2.9 MGD of wastewater at present, which leaves approximately 2 MGD of capacity remaining. Based on the City of Coachella 2015 Sewer System Master Plan¹², Heavy Industrial land uses are estimated to have a wastewater flow rate of 800 gallons per day per acre. Therefore, the 10.01-acre site is anticipated to generate 8,008 gallons of wastewater per day per acre. Based on this information, the proposed project is expected to require 0.16% of the WTP's 4.9 MGD capacity, which is miniscule when compared to the 2 MGD of capacity remaining during daily operations. The Coachella WTP implements all requirements of the RWQCB, State Water Resource Control Board and City of Coachella 2015 Sewer System Master Plan that protect water quality and monitor wastewater discharge. Thus, the proposed project will consume some capacity of the existing Water Reclamation Facility, but the proposed project would not 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&e. *Less Than Significant Impact* – The proposed project will generate demand for solid waste service system capacity and has a potential to contribute to potentially significant cumulative demand impacts on the solid waste system. Solid waste generation rates outlined in the City of Coachella General Plan EIR state that industrial uses such as that which this project proposes can produce 0.0108 tons per square foot per year (tons/sf/year). According to the site plan, the building area totals 225,705 SF, which would equate to approximately 2,437.6 tons of solid waste per year, or after an assumed 50% diversion to be recycled per the state's solid waste diversion requirements under AB 939, the project solid waste generation will be about 1,218.8 tons per year. With the City's mandatory source reduction and recycling program, the proposed project is not forecast to cause a significant adverse impact to the waste disposal system.

The City of Coachella General Plan identifies landfills that serve the planning area. The Lamb Canyon Sanitary Landfill and Badlands Landfill serve the project area. The Lamb Canyon Sanitary Landfill has a maximum permitted daily capacity of 5,500 tons per day, with a permitted capacity of 38,935,653 cubic yards (CY), with 19,242,950 CY of capacity remaining. The Badlands landfill has a maximum permitted daily capacity of 4,800 tons per day, with a permitted capacity of 34,400,000 CY, with 15,748,799 CY of capacity remaining. According to Jurisdiction Landfill Tonnage Reports from Riverside County Waste Management Department, 2,037,163 total tons of solid waste was hauled to County landfills in 2015. Therefore, the proposed project would consist of 0.053% of solid waste generation within the County of Riverside. The City of Coachella contracts with Burrtec Waste and Recycling Services to provide regular trash, recycling, and green waste pickup. It is not anticipated

¹² <https://www.coachella.org/Home/ShowDocument?id=5678>

that the project will generate a significant amount of construction waste, as the project aims to use any excavated material on site, with a neutral amount of cut and fill. However, should the proposed project need to remove any excess soils, the soil removal will be accomplished using trucks during normal working hours, with a maximum of 50 round trips per day. Furthermore, any hazardous materials collected on the project site during either construction of the project will be transported and disposed of by a permitted and licensed hazardous materials service provider in accordance with existing regulations. Therefore, the project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. The project is expected to comply with all regulations related to solid waste under federal, state, and local statutes and be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs. No further mitigation is necessary.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XX. WILDFIRE

SUBSTANTIATION

a-d. *No Impact* – According to the City of Coachella General Plan 2035, the area east of the Coachella Canal is mapped as having moderate fuel rank and as such may be susceptible to wildfires. The proposed project is located on the west side of the Coachella Canal/Whitewater River Channel, and is in an industrial area with very little fuel load in the surrounding area that could be susceptible to wildfires. The proposed project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone, therefore the proposed project can have no impacts to any wildfire issues. According to the CAL FIRE Fire Hazard Severity Zones in State Responsibility Areas (SRA) Map of Riverside County, the proposed project is not located within a very high fire hazard severity zone in an SRA (Figure XX-1). Furthermore, according to the CAL FIRE Fire Hazard Severity Zones in Local Responsibility Areas (LRA) Map of Riverside County, the proposed project is not located within a very high fire hazard severity zone in an LRA (Figure XX-2). Therefore, no impacts under these issues are anticipated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

SUBSTANTIATION

The analysis in this Initial Study and the findings reached indicate that the proposed project can be implemented without causing any new project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control potential environmental impacts of the proposed project to a less than significant impact level. The following findings are based on the detailed analysis of the Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

- a. *Less Than Significant With Mitigation Incorporated* – The project has no potential to cause a significant impact any biological or cultural resources. The project has been identified as having minimal potential to degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. Based on the historic disturbance of the project area, and its current condition, the potential for impacting biological resources is low; however, mitigation has been identified in order to protect nesting birds. The cultural resources evaluation concluded that the project footprint does not contain any known important cultural resources, but to ensure that any accidentally exposed subsurface cultural resources are properly handled, contingency mitigation measures will be implemented. With incorporation of project mitigation measure all biology and cultural resource impacts will be reduced to a less than significant level.
- b. *Less Than Significant With Mitigation Incorporated* – The project has 9 potential impacts that are individually limited, but may be cumulatively considerable. These are: Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Tribal Cultural Resources, and Utilities and Service Systems. The project is not considered growth-inducing, as defined by *State CEQA Guidelines*. These issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure

that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and thus, less than significant impacts.

- c. *Less Than Significant With Mitigation Incorporated* – The project will achieve long-term community goals through the provision of growth in tax dollars generated within the City. The short-term impacts associated with the project, which are mainly construction-related impacts, are less than significant with mitigation, and the proposed project is compatible with long-term environmental protection. The issues of Air Quality, Geology and Soils, and Hazards and Hazardous Materials, and Noise require the implementation of mitigation measures to reduce human impacts to a less than significant level. All other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed project have been determined to be less than significant.

Conclusion

This document evaluated all CEQA issues contained in the current Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Aesthetics, Agricultural and Forestry Resources, Greenhouse Gas Emissions, Land Use and Planning, Mineral Resources, Population/Housing, Public Services, Recreation, and Transportation and Traffic. The issues of Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Tribal Cultural Resources, and Utilities and Service Systems require the implementation of mitigation measures to reduce project specific and cumulative impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact level.

Based on the findings in this Initial Study, the City of Coachella proposes to adopt a Mitigated Negative Declaration (MND) for the Bejarano Cannabis Cultivation Project. A Notice of Intent to Adopt a Mitigation Negative Declaration (NOI) will be issued for this project by the City. The Initial Study and NOI will be circulated for 20 days of public comment. At the end of the 20-day review period, a final MND package will be prepared and it will be reviewed by the City for possible adoption at both future Planning Commission and City Council meetings, the dates for which has yet to be determined. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting dates in accordance with the requirements in Section 21092.5 of CEQA (statute).

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Revised 2019

Authority: Public Resources Code sections 21083 and 21083.09

Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

REFERENCES