



## CITY OF CATHEDRAL CITY NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

Notice is hereby given that the City of Cathedral City, as Lead Agency, has completed an Initial Study for Conditional Use Permit No. 18-026 for a cannabis cultivation facility (Glass House Pharms, LLC). The project proposes to develop an approximately 300-acre site with a combination of open space areas, cannabis cultivation campus, and lots for future residential use located between Interstate 10 Freeway and Varner Road (APNs: 670-070-001 & 670-080-007). The project property is located within "Planning Area 4" in Cathedral City's North City Extended Specific Plan (NCESP).

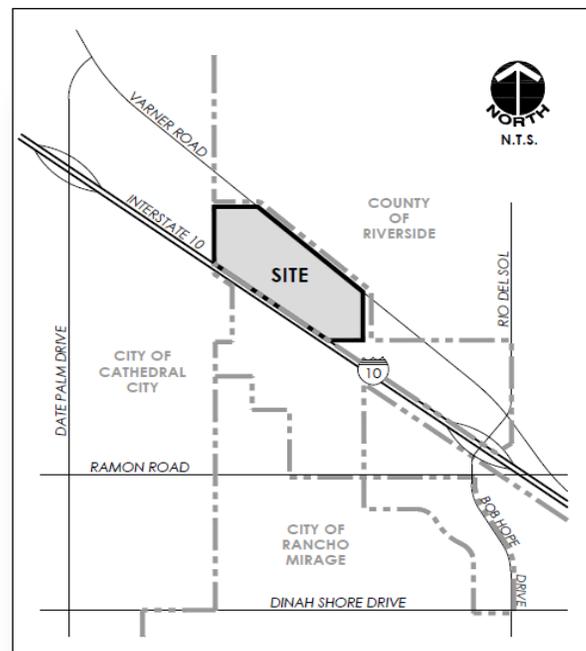
This Initial Study was completed in accordance with the California Environmental Quality Act (CEQA). This Initial Study was undertaken for the purpose of deciding whether the project may have a significant effect on the environment. On the basis of such Initial Study, City Staff has determined that the project will have a significant effect on the environment, but with the implementation of mitigation measures, impacts will be reduced to less than significant levels, and has, therefore, prepared a Draft Mitigated Negative Declaration. The Initial Study reflects the independent judgment of the City. The site is not known to be on the Hazardous Waste list compiled pursuant to Government Code Section 65962.5.

Copies of the application materials, Initial Study and Draft Mitigated Negative Declaration (IS/MND) are on file and available for public review with the Planning Department, City Hall, 68700 Avenida Lalo Guerrero, Cathedral City, CA 92234. City Hall is open Monday-Thursday (7:00 am – 6:00 pm). A copy of the IS/MND is also available at the Cathedral City Library located at 33520 Date Palm Drive, Cathedral City 92234. A digital copy of the IS/MND is available for public review on the City's website ([www.cathedralcity.gov](http://www.cathedralcity.gov)).

The public review period for this Initial Study and Draft Mitigated Negative Declaration will be from January 31, 2019 to February 19, 2019. Any person wishing to comment on this matter must submit such comments in writing during the review period. Comments of all Responsible Agencies are also requested. Please submit responses to:

Robert Rodriguez, Director of Planning  
City of Cathedral City  
68700 Avenida Lalo Guerrero  
Cathedral City, CA 92234  
email: [rrodriguez@cathedralcity.gov](mailto:rrodriguez@cathedralcity.gov)  
phone: 760-770-0344

The Planning Commission will consider the project and the Draft Mitigated Negative Declaration at a public hearing. This matter has been tentatively scheduled for the February 20, 2019 Planning Commission meeting. If the Planning Commission finds that the project will not have a significant effect on the environment, it will adopt the Mitigated Negative Declaration.





# CITY OF CATHEDRAL CITY

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Cathedral City, CA 92234  
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## ENVIRONMENTAL INITIAL STUDY

**Project Title:** Glass House Pharms

**City Project No:** **Conditional Use Permit No. 18-026**

**Lead Agency Name and Address:** City of Cathedral City  
68700 Avenida Lalo Guerrero  
Cathedral City, CA 92234  
Phone: (760) 770-0340 Fax: (760) 202-1460

**Project Location:** North of Interstate 10 Freeway, west of Date Palm Drive/east of Bob Hope Drive/Rio del Sol/south of Varner Road  
APNs: 670-070-001 & 670-080-007

**Applicant:** Glass House Pharms, LLC  
Attn: Bill Messenger  
270 Newport Center Drive, Suite 100  
Newport Beach, CA 92660

**General Plan Designation:**  
**Existing:** Mixed Use Neighborhood (MU-N) & Open Space (OS)  
**Proposed:** Mixed Use Neighborhood (MU-N) & Open Space (OS)

**Zoning Designation:**  
**Existing:** Mixed Use Neighborhood (MU-N) District & Open Space (OS)  
**Proposed:** Mixed Use Neighborhood (MU-N) District & Open Space (OS)

### Project Description:

Glass House Pharms, LLC, is proposing to develop an approximately 300-acre site with a combination of open space areas, cannabis cultivation campus, and residential lots located between Interstate 10 Freeway and Varner Road. The project property is located within "Planning Area 4" in Cathedral City's North City Extended Specific Plan (NCESP). Planning Areas 1, 2, 3, and 5 lie east of the project site. Planning Area 2, located east of Bob Hope Drive, is currently under construction by others; while Planning Areas 1, 3, and 5 are currently vacant.

Planning Area 4 is located at the western end of the specific plan area, with Varner Road on the north edge, and the City's North City Specific Plan area adjacent to the east. The project site and surrounding area are characterized by undisturbed, vacant sand fields with low-lying desert vegetation.

The project property is composed of two parcels that together create an irregularly shaped hexagon within the Planning Area 4's Mixed-Use Neighborhood (MU-N) and Open Space (OS) districts. The NCESP's MU-N District is primarily intended for mixed-use development containing residential and commercial uses.

City of Cathedral City passed Ordinance No. 805 in 2017 amending the NCESP to conditionally permit cannabis businesses within MU-N, the MU-U (Mixed-Use Urban), and I-1 (Light Industrial) districts. Additionally, the ordinance prohibits any cannabis structure in the MU-N district which also contains residential uses. The land uses to the west of the project includes Mixed Use Urban, Mixed Use Neighborhood, and Business Park in Cathedral City's North City Specific Plan. The southeast boundary of the project is met by Planning Area 5, which contains approximately 3.91 acres designated as open space. Vacant desert land, similar to that currently found on the project site, borders the northeast boundary of the project property. This vacant land is located in unincorporated Riverside County and is not part of the NCESP area.

The project will be completed in three phases, generally moving consecutively from east to west. The phasing will begin on the eastern property boundary with Phase I. Exhibit 4 contains the phasing plan provided by the applicant. The first phase includes the construction of a cannabis cultivation campus occupying approximately 72 acres (net area) of the project site. The residential component is proposed to include 64 single-family residential lots on approximately 68 acres located to the east of the cannabis cultivation campus and will be completed as part of Phase 2. A second regional retention basin, located west of the phase one retention basin, will also be completed during Phase 2. The third and final phase includes the construction of the western-most retention basin, along with the development of Valley Center Boulevard along the southern boundary of the project property.

#### Phase 1 – Cannabis Cultivation Campus

Phase 1 of the project includes construction of three, 500,000-square-foot greenhouse buildings, a 79,000-square-foot processing building, a 56,000-square-foot, two-story administration building, and a 500-square-foot security building. Retention basins, landscaped features, drive aisles, associated parking lots and off-site right-of-way improvements on Varner Road are also proposed for the project. Access to and from the cannabis cultivation campus will be from one main-entry point on Varner Road ("L" Street), and two emergency access points on "M" Street (which will be completed in Phase 2). Gated access and perimeter fencing are proposed for the cultivation component of the property to ensure the safety of the site. The security building/guardhouse will be located at the main entry off Varner Road to restrict entrance to employees and authorized individuals. The remaining two greenhouse buildings, and processing building will be located adjacent to the proposed Valley Center Boulevard and the Interstate 10 Freeway. One of the three greenhouse buildings will be located adjacent to Varner Road.

The approximately 56,000 square-foot administrative building will be constructed with steel frames, metal insulated panels (spandrels), aluminum storefront window/doors, concrete masonry units (utility core/stairs), cast stone veneers, and an elastomeric roof system. The administration building also proposes the use of green technology including solar panels, sun deflectors and canopies, triple glazing (insulated windows), and a reflective roof color.

The three greenhouse facilities will include the use of cogeneration (Cogen) technology. Cogen technology, also known as combined heat and power (CHP), uses the heat created to produce electricity in a more energy efficient cycle. CHP systems work by utilizing a natural gas generator (engine, turbine, or fuel cell) to produce electricity and then repurpose the leftover products to offset the facility's HVAC and CO2 needs.

Additionally, the project proposes a private water well and one 500,000-gallon agriculture storage tank to serve the site. The well water will be pumped into the storage tank to be used for all indoor irrigation. The wastewater discharge from the Reverse Osmosis system will be dispersed in a concrete lined orchard to filter this water through an organic system to then be used again in the irrigation of the cannabis cultivation. The Reverse Osmosis system is a filtration system to clean out all the minerals from the well water before entering the irrigation system.

Odor control at the project site will be controlled by Ecosorb 607 and Ecosorb CNB 100. These odor neutralizers are designed to control broad spectrum odors, and odors caused by odor causing chemical compounds found in cannabis including but not limited to the cannabinoids, terpenes, and sesquiterpenes groups. The products are non-toxic and non-hazardous by OSHA Hazard Communication Standard 29 CFR 1910.1200. According to

manufacturer standards, the products are stored in high density polyethylene (HDPE) containers and should be handled following manufacturer-specific instructions which the project will also be required to do by federal law.

Parking in the cultivation component of the site will be located throughout the project property. The cultivation component of the project is required to allot for the office/security parking, processing parking, and cultivation parking. The project proposes a parking ratio of 1 stall per 1,300 square feet, therefore, requiring at least 1,259 parking stalls. The project proposes 1,297 parking stalls throughout the cannabis cultivation center, with 23 stalls specifically for ADA parking. The Planning Commission may establish parking ratios for uses not specified in the Municipal Code provided pertinent information is given to support using a different ratio. The greenhouse is highly automated and does not require an excessive number of employees to operate.

The landscaped features throughout Phase 1, and retention basins located west and south of the cultivation and residential components will cover approximately 19.51 acres of the project site. Approximately 140 acres of open space and retention are proposed on the western portion of the site. Landscaping of the project will include desert and drought tolerant trees, shrubs, ground covers and accents, including Mesquite, Ironwood, Desert Willow, and Palo Verde, to name a few. Per the project's landscape design, the trees onsite will be located along the proposed parking lots and drive aisles to provide shade for vehicles and pedestrians.

#### Phase 2 – Residential Component

The residential component will be developed some time in the future and project details have not been developed at time. The analysis in the initial study is based on development of the residential component with 64 single-family homes on the 68.24-acre site. Vehicular access to the proposed residential component will be provided from “M” Street and “N” Street, both which are perpendicular to Varner Road and Valley Center Boulevard (Exhibit 4). The residential component will be located west of the cultivation component separated by open space/retention basin and “M” Street. An additional retention basin is proposed during this phase, west of Phase 1 retention basin and south of the Phase 1 open space area. The buildings on the project will be required to be consistent with the development standards set forth in the NCESP. The residential component will be required to comply with the applicable design standards and guidelines also contained in the NCESP.

#### Phase 3

The third and final phase includes the construction of the western-most regional retention basin.,

#### Project Streets

Valley Center Boulevard and roads “M” & “N” will be constructed in accordance with Phasing as approved by the City.

### **Document Purpose and Scope**

This Initial Study/Mitigated Negative Declaration tiers off the North City Extended Specific Plan (NCESP 12-0011) & North City Extended Specific Plan Environmental Impact Report (EIR), SCH #2013032068, which is available for review on the City's website. The NCESP EIR confirmed that all environmental impacts resulting from the implementation of the NCESP would be less than significant with the imposition of appropriate mitigation, with the exception of Air Quality impacts, which were identified as a significant and unavoidable impact, but a statement of overriding considerations was adopted. The NCESP EIR is incorporated into this document in its entirety by reference.

In December 2017, the City of Cathedral City amended the Zoning Code and the NCESP (12-001A) to allow cannabis businesses in the Mixed Use-Urban (MU-U), MU-N (Mixed Use– Neighborhood) and Light Industrial (I-1) zoning districts with a conditional use permit. The City found that in accordance with CEQA Guideline 15162,

no additional CEQA review was required for the Specific Plan Amendment as there was no substantial evidence in the record that the amendment would require “major revisions” to the EIR “due to the involvement of no significant effects”. The addition of cannabis businesses to the list of conditionally permitted uses in the I-1, MU-U, and MU-N districts will not create any new environmental impacts or substantially increase the severity of previously identified environmental impacts that would necessitate the preparation of a subsequent EIR. These uses were found to be consistent with the types of uses already allowed in these districts and analyzed in the NCESP EIR.

Because the proposed project is within the scope of the previously adopted NCESP EIR, and consistent with the requirements of CEQA Guidelines Section 15168(c) and Section 15162(a) and (c), this Initial Study has been prepared to examine the proposed project in the light of the NCESP EIR in order to determine if the proposed project would result in any new environmental impacts or substantially increase the severity of previously identified environmental impacts that would necessitate the preparation of a subsequent EIR or negative declaration.

The NCESP EIR identified Mitigation Measures that would be applicable to all subsequent developments in the following resource areas: Aesthetics, Air Quality, Biological Resources, Geology and Soils, Hydrology and Water Quality, Noise, and Transportation/Traffic.

All applicable mitigation measures contained in the NCESP EIR the Mitigation Monitoring and Reporting Program, will be applied to this project, if approved. The MMRP is attached as Appendix A. This Initial Study has found that project-specific mitigation will be required in the following areas: aesthetics, biological resources, air quality, cultural resources, geology and soils, hydrology and water quality, transportation/traffic, and tribal cultural resources necessitating the adoption of a subsequent mitigated negative declaration.

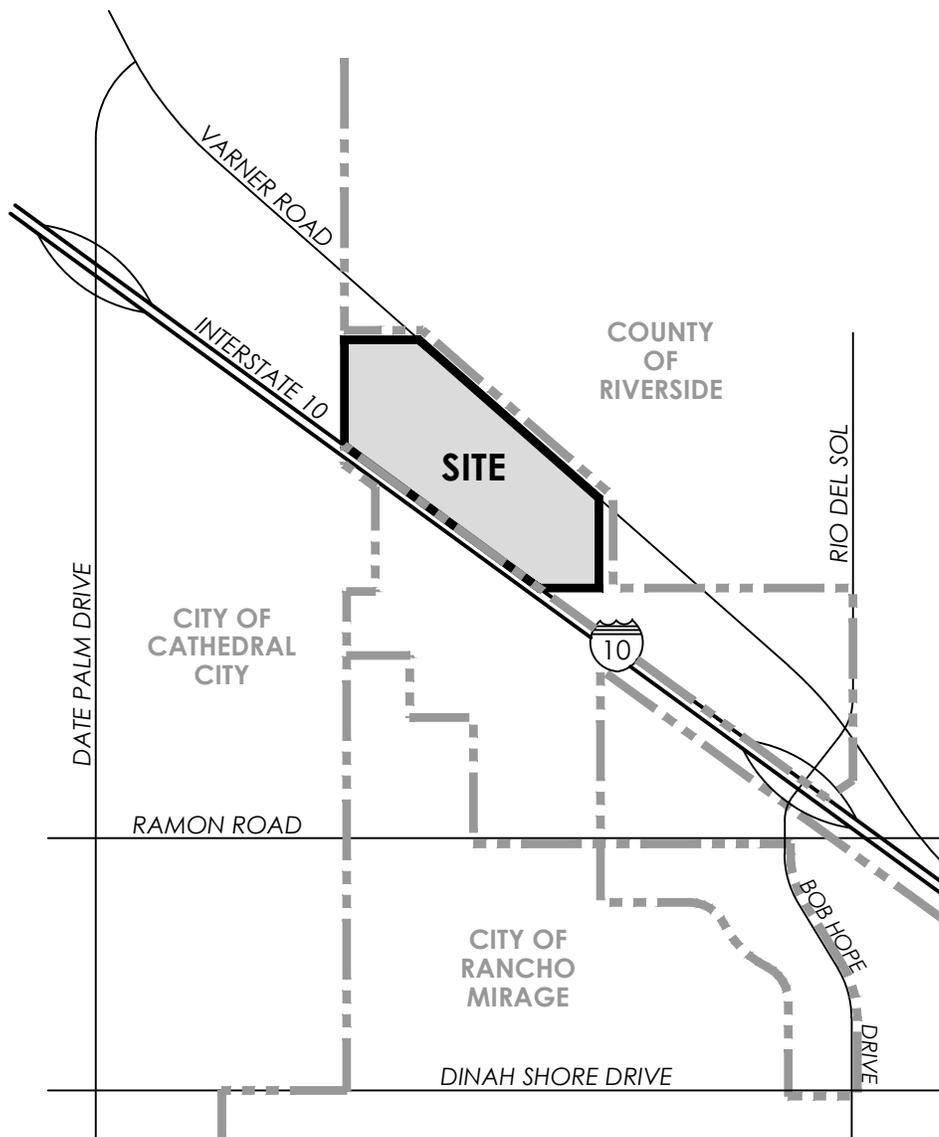
Finally, the Initial Study’s significance checklist identifies only those resources for which project-specific mitigation (beyond that already imposed through the NCESP EIR) are imposed as “less than significant with mitigation.” Impacts to all other resources are either “less than significant” or “no impact” with the imposition, as applicable, of the mitigation measures previously adopted and imposed by the City through the certified NCESP EIR and MMRP.

**Land Use and Setting:**

North: Varner Road and vacant land located in unincorporated Riverside County (zoned I-P/W-2 Riverside County)  
South: Interstate 10 Freeway (zoned W-2)  
Southeast: vacant land (OS District, NCESP)  
East: Vacant land/Unincorporated Riverside County, (zoned W-2, Riverside County)  
West: Vacant land (zoned MU-U/MU-N, NCSP)

**Other Public Agencies who’s Approval is Required (e.g., permits, financing approval, or participation agreement):**

- Coachella Valley Water District
- State Water Resource Control Board
- Regional Water Quality Control Board
- South Coast Air Quality Management District (SCAQMD)



**MSA CONSULTING, INC.**

> PLANNING > CIVIL ENGINEERING > LAND SURVEYING  
 34200 Bob Hope Drive, Rancho Mirage, CA 92270  
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**Vicinity Map**

**Glass House Pharms, LLC.**

*Initial Study*



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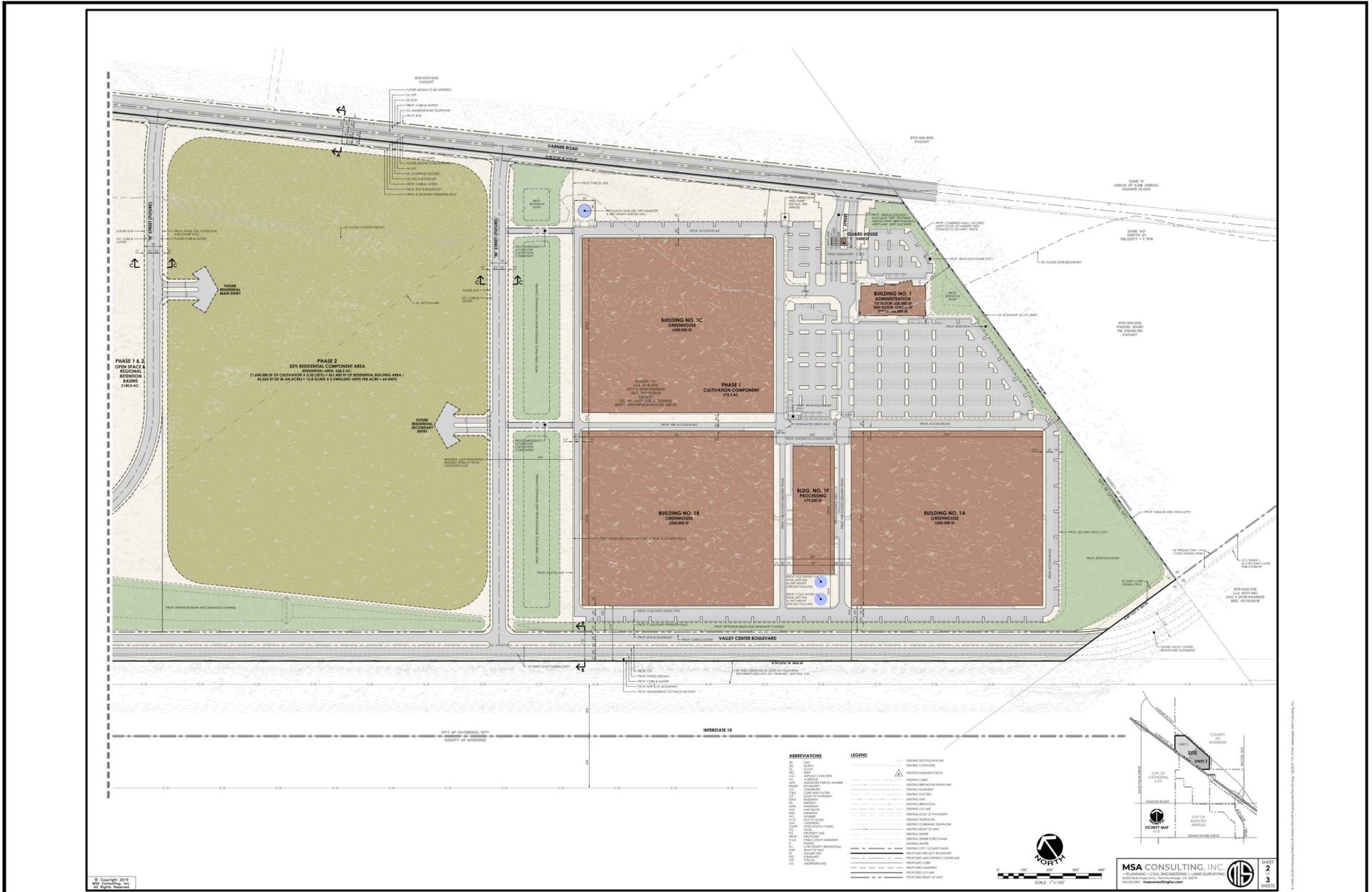


**Aerial Photograph**

**Glass House Pharms, LLC.**

*Initial Study*





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## Proposed Site Plan

**Glass House Pharms, LLC.**  
*Initial Study*

Sheet 2 of 3

**3B**





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## Phasing Plan

Glass House Pharms, LLC.  
 Initial Study

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

**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 checked="" type="checkbox"/>	Geology /Soils
<input checked="" type="checkbox"/>	Greenhouse Gas Emissions	<input 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 checked="" type="checkbox"/>	Transportation/Traffic	<input checked="" type="checkbox"/>	Tribal Cultural Resources	<input type="checkbox"/>	Utilities / Service Systems
<input checked="" type="checkbox"/>	Mandatory Findings of Significance				

**DETERMINATION:** (To be completed by the Lead Agency) On the basis of this initial evaluation:

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

_____ Signature City of Cathedral City	_____ Date
_____ Printed Name City of Cathedral City	_____ For

**Environmental Checklist and Discussion:**

The following checklist evaluates the proposed project’s potential adverse impacts. For those environmental topics for which a potential adverse impact may exist, a discussion of the existing site environment related to the topic is presented followed by an analysis of the project’s potential adverse impacts. When the project does not have any potential for adverse impacts for an environmental topic, the reasons why there are no potential adverse impacts are described.

1. AESTHETICS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<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"/>

Source: Cathedral City General Plan; Cathedral City Municipal Code; North City Extended Specific Plan, 2014; North City Extended Specific Plan Environmental Impact Report.

- a) **Less than Significant Impact.** The proposed project is located on approximately 300-gross-acres of vacant land in Cathedral City’s North City Extended Specific Plan (NCESP). The visual character of the project property is currently distinguished by vacant, desert land with low-lying vegetation, specifically Sonoran creosote bush scrub. The property is bounded on the north and south side by Varner Road and the I-10 freeway, respectively. Vacant desert land, similar to that found on the project property, also characterizes the properties to the north, east, and west of the project.

Since the project site is currently vacant, the mountains to the east and west are readily viewed from Varner Road and the I-10 Freeway. The General Plan policies recommend that scenic views of surrounding mountains be preserved. The NCESP analysis of impacts on scenic vistas contained in the aesthetics section were found to be less than significant for projects consistent with the height standards contained in the NCESP.

The project includes development of an approximately 72.32-acre cannabis cultivation campus, an approximately 68.24-acre residential component, and approximately 140 acres of open space and regional retention basins. The business park will be developed during the first phase of the project, along with the first retention basin, and the open space component. Per project design, the open space portion of the site intends to remain in its current and natural state. The residential component and the second regional basin, will be developed during Phase II of project implementation. The third phase will include the final regional basin. Project streets “M”, “ and N” Valley Center Boulevard. Will be constructed in phases as approved by the City. Valley Center Boulevard and a multi-use trail will lie on the southern boundary of the project property, parallel to the Interstate 10 Freeway.

The cannabis business park will include three greenhouse buildings (approximately 500,000 square feet each), one processing building (approximately 79,000 square feet), one, two-story administration building (approximately 56,000 square feet), and a security building/guardhouse (approximately 500 square feet). A conveyer belt system is proposed to connect the greenhouses with the processing building, to ensure the safe

handling of the cannabis product. Landscaped features, drive aisles, and associated parking lots are also proposed for construction of the cannabis cultivation campus.

The buildings on the project site will be consistent with the development standards and design standards guidelines in the NCESP and will not exceed height, FAR and lot coverage standards. Details regarding locations, height and massing of the buildings, building design, open space areas, etc. for the residential component are not known at this time. However, development of the residential portion will be required to comply with all development standards in the NCESP for single-family residential uses.

Based on the analysis contained in the NCESP EIR and the about discussion, the project will result in a less than significant impact on a scenic vista.

- b) **Less than Significant Impact.** The project property is vacant and undisturbed, bounded by Varner Road and Interstate 10 to the north and south, respectively. There are no natural landmarks, historic buildings, trees, or rock outcroppings in the vacant project property. The existing tamarisk trees on the southwest property boundary were planted and maintained along the freeway as a wind barrier.

A review of the California Scenic Highway Mapping System website operated by Caltrans revealed that the project is not located adjacent to or near any state or county, eligible or designated scenic highway. The purpose of the State Scenic Highway Program is to preserve and protect scenic State highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. State highways can be officially designated as Scenic Highways or be determined to be eligible for designation. The status of a state scenic highway changes from eligible to “officially designated” when a local jurisdiction adopts a scenic corridor protection program and the California Department of Transportation (Caltrans) approves the designation as a Scenic Highway. According to Figure C-9 in the Circulation Element of the Riverside County General Plan Update, the nearest State Designated Scenic Highway is Highway 74, located approximately 7.75 miles to the southeast of the project. Based on distance, the proposed site plan, architectural design, and landscaping design would not result in adverse impacts to scenic resources within a state scenic highway or other local transportation corridor. Less than significant impacts are expected.

Moreover, the Community Image and Urban Design Section of the Cathedral City General Plan does not designate the project near a scenic roadway, or intersection. The City considers the Interstate 10 Freeway to be a corridor that provides scenic views of the surrounding mountains for motorists, therefore development along this corridor shall attempt to have as little impact on the views as possible. City established building heights and setbacks will ensure that project development does not physically disturb or visually obstruct the existing scenic landscaping along the I-10 roadway. Based on the analysis, impacts from the project site on scenic resources are anticipated to be less than significant.

- c) **Less than Significant Impact.** The project site is currently vacant desert land in its natural state. The visual character of the project property is dominated by vacant, desert land, with low-lying vegetation. The site is relatively flat with gentle mounds of sand, and the properties north, east and west of the project are characterized by the same features. The proposed project would result in development of a vacant site with new buildings, greenhouses, paved roadways, and landscaping throughout the property and around its perimeter.

According to Chapter 7, Specific Plan Zoning Districts/Permitted Uses/Standards within the NCESP, the maximum building height allowed is 45 feet or three stories, whichever is less. The proposed buildings will be a maximum of 35 feet in height and will not exceed maximum permitted height.

Chapter 8 within the NCESP contains Design Standards and Guidelines for new development, in order to provide guidance to the quality and character of the individual projects, while maintaining consistency in building scale, proportion and pedestrian orientation. The project must adhere to any building and design standards required within the City’s General Plan, the NCESP, the Cathedral City Municipal Code, and any

associated amendments and ordinances for commercial buildings, residential buildings, and streetscape in order to avoid degrading the existing visual character of the site and its surroundings.

The landscaping design in the project interior, along its perimeter, and entry points will include a mixture of trees, palms, shrubs, and groundcover plantings to serve as an enhancement to the site design and streetscape. The landscaping will follow the North City Extended's desired theme of a Desert Oasis, utilizing native, and drought tolerant trees and shrubs. Landscaping along the Valley Center Boulevard and the multi-use trail will consist of trees to provide an attractive streetscape. The landscaping along this roadway will also create a barrier and protect the project from blowsand, as well as a noise and visual barrier from motorists on the Interstate 10 freeway. The buildings within the cannabis business park will not be visible from public streets due to intervening walls and tree screens.

As such, the placement, scale and design of the proposed development are expected to replace an unimproved private site with a business park environment and residential units adhering to the intended physical character of the MU-N land use designation. As a standard condition outlined within the NCESP EIR, the project property shall implement the following mitigation measures in order to reduce the potential impacts to aesthetics. These measures are listed within the NCESP EIR as:

**MM 3.1-1:** A landscape plan for infiltration Basin #1 (located on northeast of the project site) shall be submitted concurrently with the initial development plans implementing the NCESP that demonstrates the restoration of native vegetation at the top of any basins, exclusive to access roads.

**MM 3.1-2:** Landscape plans for infiltration Basins #2 (located south of Basin 1) and 3 (located north of the proposed Central Valley Business Park development in the NCESP) shall be submitted concurrently with adjoining development to demonstrate the "Desert Oasis" theme and they adequately shield views into the basins.

Project design, including architecture and landscape architecture, will require review and approval by the City's Architectural Review Committee and, thus, ensure that aesthetic considerations are addressed in the design. The proposed project is anticipated to enhance the visual character of the site and create an attractive, well planned project when viewed from surrounding properties and motorists. With the compliance of City standards, and Mitigation Measures 3.1-1 and 3.1-2 outlined within the NCESP EIR, less than significant impacts are anticipated to result from project implementation.

- d) **Less than Significant Impact.** The project property currently does not have any structural or lighting improvements and, therefore, does not constitute an existing source of glare or light. In the project surroundings, existing sources of daytime and nighttime light is mainly attributed to traffic on the Interstate 10 Freeway and Varner Road. Existing sources of fixed nighttime lighting can be attributed to the residential properties approximately 0.25 miles southwest of the project site. The individual home lighting typically consists of low-intensity, wall-mounted, downward-oriented fixtures in the patio, side, and front yards of homes.

According to the NCESP, the lighting at the property should provide illumination for the security and safety of on-site areas such as parking, loading, shipping and receiving, building entrances and pedestrian parkways. The Cathedral City Municipal Code Chapter 9.89 outdoor lighting standards require that lighting be hooded and directed downward to minimize light and direct glare impacts on neighboring properties and reduce impact upon dark skies. The project is required to adhere to the lighting standards and requirements contained in the City's Municipal Code, and the NCESP in order to minimize the project's impact light spillage.

The project site is proposed to be developed with a cannabis cultivation campus, residential units, and open space. Based on the above analysis, the development of the project would not create a new source of substantial light or glare that would adversely affect day or night time views in the area. Therefore, impacts related to light and glare are expected to be less than significant.

**NCESP Mitigation:**

**MM 3.1-1:** A landscape plan for infiltration Basin #1 shall be submitted concurrently with the initial development plans implementing the NCESP that demonstrates the restoration of native vegetation at the top of any basins, exclusive to access roads.

**MM 3.1-2:** Landscape plans for infiltration Basins #2 and 3 shall be submitted concurrently with adjoining development to demonstrate the “Desert Oasis” theme and they adequately shield views into the basins.

**Project Specific Mitigation:** None

<b>2. AGRICULTURE AND FORESTRY RESOURCES</b> -- 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. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<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, timberland, or timberland zoned Timberland Production?	<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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-e) **No Impact.** The proposed project is located north of Interstate 10, east of Date Palm Drive/Rio del Sol and south of Varner Road and is currently undeveloped desert land. The 300-acre project site is proposed to be developed with approximately seven buildings for a cannabis cultivation enterprise. Currently the land is vacant and part of the North City Extended Specific Plan. Additionally, the project is not located on lands zoned for agriculture and is not covered by a Williamson Act contract. There are no areas of forest land, timberland or timberland zoned Timberland Production.

According to the Williamson Act Program 2008 Status Report, no portion of land within a one-mile radius is recognized as being under a Williamson Act Contract. There are no other agricultural areas or related zoning policies with which the proposed project would conflict. The project will not impact or remove any portion of land from the County’s agricultural zoning or agricultural preserve.

The proposed project is located within the NCESP area that is designated MU-N (Mixed Use – Neighborhood) intended for mixed use and urban development. The project site and surrounding area have no agricultural component designated by the Farmland Mapping and Monitoring Program of the California Resources Agency.

Further, no forest land, timberland or Timberland Production areas are situated on or in the immediate surroundings of the site, largely because forest vegetation is uncharacteristic of the Coachella Valley’s desert floor environment. Therefore, the proposed project will have no impact on agricultural or forestry resources.

**Project Specific Mitigation:** None

3. 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Sources:** *Glass House Pharms Cultivation Facility Air Quality and Greenhouse Gas Impact Study, prepared by MD Acoustics, LLC, October 2018; Glass House Pharms Trip Generation Analysis, City of Cathedral City” Traffic Letter prepared by TJW Engineering, Inc. in January of 2019, Cathedral City Annexation and North City Extended Specific Plan Air Quality Impact Study, Endo Engineering, March 2013.*

**BACKGROUND**

The following background discussion is a summary of the regulatory setting that applies to air quality at various levels and in relation to the project based on the “Glass House Pharms Cultivation Facility Air Quality and Greenhouse Gas Impact Study” (Air Quality Impact Study), prepared by MD Acoustics, LLC in November of 2018 and updated in December of 2018. The air quality findings are also correlated to the “Glass House Pharms Trip Generation Analysis, City of Cathedral City” Traffic Letter prepared by TJW Engineering, Inc. in January of 2019 and the 2013 North City Extended Specific Plan Environmental Impact Report (NCESP EIR). That is because mobile sources generate emissions that must be consistent with Air Quality Impact Study factors and findings.

Air pollutants are regulated at the national, state, and air basin level; each agency has a different level of regulatory responsibility. The United States Environmental Protection Agency (EPA) regulates at the national level. The California Air Resources Board (ARB) regulates at the state level. The South Coast Air Quality Management District (SCAQMD) regulates at the air basin level.

The EPA is responsible for global, international, and interstate air pollution issues and policies. The EPA sets national vehicle and stationary source emission standards, oversees approval of all State Implementation Plans, provides research and guidance for air pollution programs, and sets National Air Quality Standards, also known as federal standards. There are six common air criteria pollutants which were identified from the provisions of the Clean Air Act of 1970. The federal standards were set to protect public health, including that of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants. Primary federal standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health.

A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain federal standards. The State Implementation Plan for the State of California is administered by the ARB, which has overall responsibility for statewide air quality maintenance and air pollution prevention. California's State Implementation Plan incorporates individual federal attainment plans for regional air districts—air district prepares their federal attainment plan, which sent to ARB to be approved and incorporated into the California State Implementation Plan. Federal attainment plans include the technical foundation for understanding air quality (e.g., emission inventories and air quality monitoring), control measures and strategies, and enforcement mechanisms.

The South Coast Air Quality Management District (SCAQMD) is the agency responsible for attaining state and federal clean air standards in the South Coast Air Basin and the Salton Sea Air Basin (SSAB), which includes the Coachella Valley and project site. SCAQMD is responsible for controlling emissions primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the basin and is responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the federal and/or California ambient air quality standards. The term nonattainment area is used to refer to an air basin where one or more ambient air quality standards are exceeded. Every three (3) years the SCAQMD prepares a new AQMP, updating the previous plan and having a 20-year horizon. On March 23, 2017 CARB approved the 2016 AQMP. The 2016 AQMP is a regional blueprint for achieving the federal air quality standards and healthful air.

The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the Plan is not approved or if the NAAQS are not met on time. As with every AQMP, a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures is updated with the latest data and methods. The most significant air quality challenge in the Basin is to reduce nitrogen oxide (NOx) emissions sufficiently to meet the upcoming ozone standard deadlines. The primary goal of this Air Quality Management Plan is to meet clean air standards and protect public health, including ensuring benefits to environmental justice and disadvantaged communities. Now that the plan has been approved by CARB, it has been forwarded to the U.S. Environmental Protection Agency for its review. If approved by EPA, the plan becomes federally enforceable.

The 2012 AQMP built upon the approaches taken in the 2007 AQMP for the attainment of federal PM and ozone standards, and highlights the significant amount of reductions needed and the need to engage in interagency coordinated planning of mobile sources to meet all of the federal criteria pollutant standards. Compared with the 2007 AQMP, the 2012 AQMP utilized revised emissions inventory projections that use 2008 as the base year. On-road emissions are calculated using CARB EMFAC2011 emission factors and the transportation activity data provided by SCAG from their 2012 Regional Transportation Plan (2012 RTP). Off-road emissions were updated using CARB's 2011 In-Use Off-Road Fleet Inventory Model. Since the 2007 AQMP was finalized new area source categories such as liquid propane gas (LPG) transmission losses, storage tank and pipeline cleaning and degassing, and architectural colorants, were created and included in the emissions inventories. The 2012 AQMP also includes analysis of several additional sources of GHG emissions such as landfills and could also assist in reaching the GHG target goals in the AB32 Scoping Plan.

On June 21, 2002, the SCAQMD adopted the 2002 Coachella Valley PM10 State Implementation Plan (CVSIP). The 2002 CVSIP, which included a request for extension of the PM10 deadline and met all applicable federal Clean Air Act requirements, including a Most Stringent Measures analysis, control measures, and attainment demonstration. U.S. EPA approved the 2002 CVSIP on April 18, 2003. At the time of adoption, the AQMD committed to revising with the 2002 CVSIP with the latest approved mobile source emissions estimates, planning assumptions and fugitive dust source emission estimates, when they became available.

The 2003 CVSIP updates those elements of the 2002 CVSIP; the control strategies and control measure commitments have not been revised and remain the same as in the 2002 CVSIP. The 2003 CVSIP contains updated

emissions inventories, emission budgets, and attainment modeling. It requests that U.S. EPA replace the approved transportation conformity budgets in the 2002 CVSIP with those in the 2003 CVSIP. On September 27, 2007 CARB approved the South Coast Air Basin and the Coachella Valley 2007 Air Quality Management Plan for Attaining the Federal 8-hour Ozone and PM<sub>2.5</sub> Standards. The plan projected attainment for the 8-hour Ozone standard by 2024 and the PM<sub>2.5</sub> standard by 2015.

The AQMP for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal standards. Some of the rules and regulations that apply to this Project include, but are not limited to, the following:

SCAQMD Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 403 governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable suppression techniques are indicated below and include but are not limited to the following:

SCAQMD Rule 403.1 are supplemental to Rule 403 requirements and shall apply only to fugitive dust sources in the Coachella Valley.

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

- a) **Less than Significant Impact.** The project is located within the City of Cathedral City and is within the Salton Sea Air Basin (SSAB). The central portion of Riverside County belongs in the SSAB, along with Imperial County. The SSAB portion of Riverside County is separated from the South Coast Air Basin (SCAB) region by the San Jacinto Mountains and from the Mojave Desert Air Basin to the east by the Little San Bernardino Mountains. During the summer, the SSAB is generally influenced by a Pacific Subtropical High Cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The SSAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist and unstable air masses from the south. The SSAB averages between three and seven inches of precipitation per year.

The Coachella Valley is a geographically and meteorologically unique area wholly contained within the Salton Sea Air Basin. The region is currently impacted by significant air pollution levels caused by the transport of pollutants from coastal air basins to the west, primarily ozone, and locally generated PM<sub>10</sub>. The mountains surrounding the region isolate the Valley from coastal influences and create a hot and dry low lying desert (see Table 3). As the desert heats up it draws cooler coastal air through the narrow San Gorgonio Pass, generating strong and sustained winds that cross the fluvial (water caused) and aeolian (wind) erosion zones in the Valley. These strong winds suspend and transport large quantities of sand and dust, reducing visibility, damaging property, and constituting a significant health threat.

The following air quality analysis relies on the findings of the *Glass House Pharms Cultivation Facility Air Quality and Greenhouse Gas Impact Study* (Air Quality Impact Study), prepared by MD Acoustics, LLC in November of 2018. This air quality and greenhouse gas (GHG) analysis was prepared to evaluate whether the estimated criteria pollutants and GHG emissions generated from the project would cause a significant impact to the air resources in the project area. The Air Quality Impact Study was conducted within the context of the California Environmental Quality Act (CEQA) and the project assessment was consistent with the methodology and emission factors established by South Coast Air Quality Management District (SCAQMD), California Air Resource Board (CARB), and the United States Environmental Protection Agency (US EPA).

The project has been evaluated for consistency with the local air quality management plans, which links local planning and individual projects to the regional plans developed to meet the ambient air quality standards. The assessment takes into consideration whether the project forms part of the expected conditions identified in local plans (General Plan Land Use and Zoning) and whether the project adheres to the City's air quality goals, policies, and local development assumptions factored into the regional 2016 Air Quality Management Plan.

The project involves the development of a cannabis cultivation campus, open space and residential development within Planning Area 4 of Cathedral City's NCESP. The project is proposed to be developed in three phases.

The first phase of development involves a cannabis cultivation campus with three greenhouse buildings of approximately 500,000 square feet, 79,000 square feet of processing (constructed within one building), 56,000 square feet of administrative space, 500 square feet of security building and a total of 1,297 parking stalls on approximately 75 acres. Phase 2 consists of 64 residential units and remainder open space on approximately 66 acres. Planning Area 4 also includes approximately 140 acres that will remain open space. The site design will establish a minimum separation of 250 between the proposed cultivation facilities and the proposed residential land use area. For purposes of the air quality assessment, the Air Quality Impact Study assumed that the project would be built in one complete phase, thus representing a worst-case scenario.

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed project with the AQMP.

The purpose of this discussion is to determine consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- 1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- 2) Whether the project will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

Both criteria are evaluated by the Air Quality Impact Study as follows:

#### Criterion 1 - Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in this Air Quality Impact Study, with incorporation of SCAQMD Rules 403 and 403.1, which are standard requirements, the short-term construction emissions will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. Long-term operations will also not result in significant impacts based on the SCAQMD regional and local thresholds of significance.

#### Criterion 2 – Potential Exceedance of Assumptions in the AQMP

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2016-2040 Regional Transportation/Sustainable Communities Strategy, prepared by SCAG, 2016, includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the North City Extended Specific Plan defines the assumptions that are represented in the AQMP.

Furthermore, MD Acoustics, LLC compared the project air quality analysis to the previous air quality analysis done by Endo Engineering in 2013 as the *Cathedral City Annexation & North City Extended Specific Plan Air Quality Impact Study*. The prior report included the entire NCESP area and an analysis of project-related impacts found to have a potential to exceed the SCAQMD significance thresholds during both construction activities and long-term operation. The emissions calculations of that study were based on approximately 595,000 SF of industrial uses, 3,200 residential dwellings, 200,000 SF of commercial/retail floor space, including a gasoline service station with a convenience store, 120,000 SF of restaurant floor space, 190,000 SF of office/services floor space, 400 hotel rooms, and 240.44 acres of open space.

The air quality analysis in the NCESP EIR determined that no feasible mitigation measures were available at the time to substantially reduce the project-related operational emissions or the significant impact associated with the inconsistency of the project with the applicable 2007 AQMP. Those impacts were considered significant and unavoidable and a Statement of Overriding Considerations was adopted by the City for cumulative impacts on air quality associated with development of the entire specific plan area. However, the current project unmitigated emissions would not result in an increase in impacts or new impacts associated with those analyzed in the NCESP EIR.

The project-related Air Quality Impact Study focused on the proposed improvements and associated impacts in Planning Area 4 and found that the specific development proposal would result in less than significant impacts for both short-term construction and long-term operational impacts.

The project site is classified as a Mixed Use Neighborhood (MU-N) and Open Space (OS) in the NCESP. This designation allows for a variety of housing types and densities as well as the establishment of cannabis businesses. As the proposed project involves the development of the project site with residential uses and cannabis cultivation facilities, the project would be consistent with the allowable land uses within the NCESP.

Therefore, it is not anticipated that the project would exceed the AQMP assumptions for the project site, and the project is found to be consistent with the AQMP for the second criterion. Therefore, a less than significant impact will occur.

- b) **Less than Significant Impact with Mitigation.** An impact is potentially significant if concentration of emissions exceed the State or Federal Ambient Air Quality Standards. Based on Table 2-4 of the Final 2016 AQMP, the two primary pollutants of concern in the Coachella Valley including the City of Cathedral City are ozone (O3) and particulate matter (PM10 and PM2.5). The project site is located within the Salton Sea Air Basin (SSAB), which has been designated by the California Air Resources Board as a nonattainment area for ozone (8-hour standard) and PM10. Violations of the air quality standards for ozone are impacted by pollutant transport from the South Coast Air Basin.

Ozone (O3) is formed when byproducts of combustion react in the presence of ultraviolet sunlight. This process occurs in the atmosphere where oxides of nitrogen (NO<sub>x</sub>) combine with reactive organic gases (ROG), such as hydrocarbons, in the presence of sunlight. Ozone is a pungent, colorless, toxic gas, and a common component of photochemical smog. Although also produced within the Coachella Valley, most ozone pollutants affecting the Valley are transported by coastal air mass from the Los Angeles and Riverside/San Bernardino air basins, thereby contributing to occasionally high local ozone concentrations. The SSAB is in nonattainment for ozone.

Particulate Matter (PM10 and PM2.5) consists of fine suspended particles of ten microns or smaller in diameter, and are the byproducts of road dust, sand, diesel soot, windstorms, and the abrasion of tires and brakes. The elderly, children and adults with pre-existing respiratory or cardiovascular disease are most susceptible to the effects of PM10 and PM2.5.

To assist lead agencies in determining the significance of air quality impacts, SCAQMD has established suggested short-term construction-related and long-term operational impact significance thresholds for direct and indirect impacts on air quality. Significance thresholds are recommended therein for both local and regional air quality impacts associated with short-term project construction and long-term operations. Table III-1 displays the established construction and operational daily significance thresholds, which are recommended for use by lead agencies in considering potential impacts on air quality. Project effects would be considered significant if the emissions exceed these thresholds. Project effects would also be considered potentially significant if emissions affected sensitive receptors such as schools or nursing homes, or if the project conflicted with the regional AQMP and/or local air quality plans.

**Table III-1  
SCAQMD’s Air Quality Significance Thresholds (Pounds/Day)**

Emission Source	CO	VOC	NO <sub>x</sub>	SO <sub>x</sub>	PM10	PM2.5
Construction or Operation	550	75	100	150	150	55

Source: Air Quality Analysis Guidance Handbook, Chapter 5.  
Prepared by the South Coast Air Quality Management District. [www.aqmd.gov/ceqa/hndbk.html](http://www.aqmd.gov/ceqa/hndbk.html)

The project-specific Air Quality Impact Study used the latest version of CalEEMod to estimate the onsite and offsite construction emissions. The emissions incorporate SCAQMD Rule 403 and Rule 403.1, which pertain to required fugitive dust control measures during construction activities and are therefore not considered mitigation measures. Per Rule 403.1, any operator applying for a grading permit, or a building permit for an activity with a disturbed surface area of more than 5,000 square feet, shall not initiate any earth-moving operations unless a Fugitive Dust Control Plan has been prepared pursuant to the provisions of the Coachella Valley Fugitive Dust Control Handbook and approved by the City. This requirement applies to the project. The construction emissions for the project would not exceed the SCAQMD’s daily emission thresholds at the regional level as demonstrated in Table III-2 and therefore would be considered less than significant.

**Table III-2  
Short Term Air Pollutant Emissions  
Associated With Construction of the Proposed Project (Unmitigated) (Pounds/Day)**

Phase	Pollutant Emissions					
	ROG/VO C	NOx	CO	SO2	PM1 0	PM2. 5
Maximum Daily Emissions Resulting from On-Site Preparation, Grading, Building Construction, Paving, and Architectural Coating	14.30	75.03	80.54	0.28	16.04	5.44
SCAQMD Threshold	75	100	550	150	150	55
<b>Threshold Exceeded</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Table III-3  
Localized Construction Emissions (Pounds/Day)**

Phase	On-Site Pollutant Emissions			
	NOx	CO	PM1 0	PM2. 5
Maximum Daily Emissions Resulting from On-Site Preparation, Grading, Building Construction, Paving, and Architectural Coating	129.01	88.41	16.75	11.1
SCAQMD Threshold for 500 meters (1,640 feet)	875	31,115	248	128
<b>Threshold Exceeded</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

The Air Quality Impact Study also included a localized construction analysis, as shown in Table III-3. The local air quality emissions from construction were analyzed using the SCAQMD’s Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in Localized Significance Threshold Methodology, prepared by SCAQMD, revised July 2008. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. The emission thresholds were based on the Coachella Valley source receptor area (SRA 30) and a disturbance of 5 acres per day at a distance of 500 meters (1,640 feet). The closest receptors are located over 1,800 feet (548 meters) from the project site; therefore, the 500-meter threshold was used. The Air Quality Impact Study found that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would occur from construction of the proposed project.

The Air Quality Impact Study used CalEEMod to analyze potential impacts related to long-term project operations. The operating emissions were based on year 2025, which is the anticipated opening year for the project. The summer and winter emissions created by the proposed project’s long-term operations were calculated and the highest emissions from either summer or winter are summarized. Table III-4 provides the project’s unmitigated operational emissions, demonstrating that the project will not exceed the SCAQMD daily emissions thresholds and therefore the regional operational emissions are considered to be less than significant.

The SCAQMD recommends that a local CO hot spot analysis be conducted if an intersection meets at least one of the following criteria: 1) the intersection is at level of service (LOS) D or worse and where the project increases the volume to capacity ratio by 2 percent, or 2) the project would result in a decrease at an intersection

from C to D. Micro- scale air quality emissions have traditionally been analyzed in environmental documents where the air basin was a non-attainment area for CO. However, the SCAQMD has demonstrated in the CO attainment re designation request to EPA that there are no “hot spots” anywhere in the air basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in Riverside County. If the worst-case intersections in the air basin have no “hot spot” potential, any local impacts will be below thresholds.

According to the traffic analysis, the project would generate a maximum of 2,315 trips per day. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) states that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic at project buildout would be well below 100,000 vehicles and below the necessary volume to even get close to causing a violation of the CO standard. Therefore, no CO “hot spot” modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

**Table III-4  
Long Term Operational Air Pollutant  
Emissions Associated With Development of the  
Project (Unmitigated) (Pounds/Day)**

Operational Activities –	ROG/VOC	NOx	CO	SO2	PM10	PM2.5
Area Source	36.90	1.02	5.98	0.01	0.18	0.11
Energy Source	0.29	2.63	2.01	0.02	0.20	0.20
Mobile Source	3.12	19.52	32.21	0.15	12.18	3.31
Total Maximum Daily Emissions	40.32	23.17	40.20	0.18	12.56	3.62
SCAQMD Regional Threshold	75	100	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

The Air Quality Analysis concluded that the project operational-sourced emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. Project operational-source emissions would not result in or cause a significant localized air quality impact. Additionally, project-related traffic will not cause or result in CO concentrations exceeding applicable state and/or federal standards (CO “hotspots”). Project operational-source emissions would therefore not adversely affect sensitive receptors within the vicinity of the project.

**Mitigation Measures Identified in the NCESP:**

**MM 3.3-1:** The architectural coatings used within the project should give priority to a combination of low-VOC (< 50 grams of VOC per liter), zero-VOC, and super-compliant (< 10 grams of VOC per liter) with an average of 35 grams or less of VOC per liter to reduce the projected emissions below 75 pounds per day.

**MM 3.3-2:** Low emission building materials such as pre-primed and sanded wood molding and trim products and pre-primed wallboard shall be given priority for construction materials.

**MM 3.3-3:** Construction activities should be prioritized to occur first on the upwind portion of the project site to reduce the potential for blowsand and fugitive dust impacts in the downwind areas.

**MM 3.3-4:** Tier 3 and Tier 4 grading equipment shall be used to avoid exceeding the SCAQMD threshold for short-term construction NO<sub>x</sub> emissions.

### **Project-Specific Mitigation Measures and Standard Conditions**

**Construction Measure:** As a standard condition, the project applicant will adhere to SCAQMD Rules 403 and 403.1, which involve the preparation and implementation of a Fugitive Dust Control Plan for construction.

- c) **Less than Significant Impact.** The Riverside County portion of the Salton Sea Air Basin is designated by the U.S. Environmental Protection Agency (EPA) as a “Severe-15” ozone nonattainment area for the 1997 8-hour federal ozone standard (0.080 ppm) and the more stringent 2008 standard (0.075 ppm). Violations of the ambient air quality standards for ozone in the Coachella Valley are primarily due to pollutant transport from the neighboring South Coast Air Basin (SCAB) that includes the western portion of Riverside County. Ozone is formed on sunny days from ozone precursors in the lower atmosphere that are emitted upwind of the Coachella Valley, in the coastal and central Los Angeles County areas of the SCAB. Pollutant transport through the Banning Pass, from the SCAB to the Salton Sea Air Basin, is the primary cause of the high ozone concentrations experienced in the Coachella Valley in the late afternoon and early evening. The attainment date for the 1997 8-hour ozone standard is June 15, 2019.

Ozone is a pungent, colorless toxic gas produced in the troposphere by the photochemical process. Photochemical oxidant is created by complex atmospheric reactions involving NO<sub>x</sub> and reactive organic gases (ROG) in the presence of ultraviolet energy from sunlight. In the Coachella Valley, motor vehicles are the major source of the two ozone precursors, reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>). Ozone is formed through chemical reactions of ROG, NO<sub>x</sub>, and oxygen in the presence of sunlight. The reactions that form ozone begin at sunrise and require sunlight to proceed. Peak ozone concentrations in the SCAB tend to occur near the source of precursors in the afternoon hours during the summer and early fall, when the solar radiation exposure of the air mass is the greatest. Ozone and ozone precursors are then transported downwind (from Central Los Angeles, through Riverside and Rubidoux, Banning, and then through the San Gorgonio Pass, into the Coachella Valley) as the photochemical reactions continue to occur. In the Coachella Valley, peak ozone concentrations occur in the late afternoon and early evening hours. The attainment date for the 2008 8-hour ozone standard is July 20, 2027. The 2016 AQMP is addressing the Clean Air Act planning requirements for ozone in the South Coast Air Basin (SCAB) and the Coachella Valley portion of the SSAB.

As demonstrated in tables III-2, III-3, and III-4 in this section, project-related short-term construction and long-term operational emissions are not expected to exceed the daily thresholds of significance established by SCAQMD for ozone precursors, such as NO<sub>x</sub> and ROG/VOC. By complying with the adopted thresholds, the proposed development is also complying with the overall attainment strategies reflected in the 2016 AQMP.

Furthermore, the Coachella Valley is currently designated as a serious nonattainment area for PM<sub>10</sub> (particulate matter with an aerodynamic diameter of 10 microns or less). In the Coachella Valley, there are two primary sources of PM<sub>10</sub>: natural sources consisting of sea salts, volcanic ash, and pollens, and man-made or anthropogenic sources. Man-made sources originate from direct emissions, such as industrial facilities, fugitive dust sources (e.g., construction sites) and paved and unpaved road dust. The U.S. EPA-approved 2002 Coachella Valley PM<sub>10</sub> State Implementation Plan (2002 CVSIP) includes an attainment strategy for meeting the PM<sub>10</sub> standards. Some of the existing measures include the requirement of detailed dust control plans from builders that specify the use of more aggressive and frequent watering, soil stabilization, wind screens, and

phased development to minimize fugitive dust. Appropriate air quality measures to prevent fugitive dust are required by the City's Fugitive Dust Control policies, which are consistent with SCAQMD Rules 403 and 403.1 that apply to the Coachella Valley strategy for reducing fugitive dust emissions.

Relative to the PM10 emissions threshold, construction associated with the interim and permanent Project facilities will be required to adhere to the City's Fugitive Dust and Erosion Control policies and ordinance to minimize potential temporary construction related emissions. An approved Fugitive Dust (PM10) Control Plan will be required prior to issuance of a grading permit. Implementation of the Fugitive Dust Control Plan is required to occur under the supervision of an individual with training on Dust Control in the Coachella Valley (Rule 403 and 403.1). The plan will include methods to prevent sediment track-out onto public roads, prevent visible dust emissions from exceeding a 20-percent opacity, and prevent visible dust emissions from extending more than 100 feet (vertically or horizontally from the origin of a source) or crossing any property line. The most widely used measures include proper construction phasing, proper maintenance/cleaning of construction equipment, soil stabilization, installation of track-out prevention devices, and wind fencing. The permanent site condition will not have unpaved or non-stabilized ground surfaces that could emit fugitive dust during the life of the project.

Since Project-related emissions would be consistent with the Air Quality Management Plan, the Coachella Valley PM10 SIP, and all SCAQMD Air Quality Significance Thresholds, long-term operational air quality impacts associated with the Project should not be considered cumulatively considerable. Less than significant impacts are anticipated.

- d) **Less than Significant Impact with Mitigation.** For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to include residences, hospitals, and convalescent facilities where an individual could remain at the location for 24 hours. SCAQMD also considers land uses such schools, child care centers, athletic facilities, and playgrounds to be sensitive receptors. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours, but are present for shorter periods of time, such as eight hours. The closest existing sensitive receptors (to the site area) are residential uses located south of Interstate 10, on the northern side of Paloma Del Norte, west of Da Vall Drive, at a distance of over 1,800 feet from project's southwestern boundary. The Air Quality Impact Study determined that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would occur from construction of the proposed project.

### TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As such, if a proposed project would not exacerbate pre-existing hazards (e.g., TAC health risks) then an analysis of those hazards and the proposed project's effect on increasing those hazards is not required. The project is a mixed-use project and will not be a source of toxic air contaminants. The existing conditions on the project site only include vacant land that does not contain any operational land uses that emit toxic air contaminants.

### Construction-Related Toxic Air Contaminants

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments, February 2015 to provide a description of the algorithms, recommended exposure variates, cancer and noncancer health values, and the air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987.

Given the relatively limited number of heavy-duty construction equipment, the construction schedule, and the distance of the closest sensitive to the site, the proposed project would not result in a long-term substantial source of toxic air containment emissions and corresponding individual cancer risk. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project. Therefore, no significant short-term toxic air containment impacts would occur during construction of the project.

### CO Hot Spot Emissions

According to the traffic analysis, the project would generate a maximum of 2,315 trips per day. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic at project buildout would be well below 100,000 vehicles and below the necessary volume to even get close to causing a violation of the CO standard. Therefore, no CO “hot spot” modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

### Diesel Emissions Health Risk Assessment

The proposed project could expose future residential uses to TACs from diesel truck emissions from the I-10 Freeway. The Air Quality Impact Study included a Qualitative Diesel Emissions Health Risk Assessment for Phase 2 of the project, where residential uses are proposed on approximately 12.8 acres of the 68-acre phase. The primary entry to this portion of the project would occur from Varner Road. The qualitative assessment assumed a worst-case scenario in which residential uses would be potentially located within 500 feet of Interstate 10. However, the project site design is expected to situate residential uses closer to Varner Road, where the main entry is proposed, therefore establishing the greatest separation between residential uses and the freeway, a distance that will exceed 500 feet. As such, project implementation is expected to meet the CARB Handbook recommendations at reducing freeway diesel particulate matter (DPM) exposure. The summary of the Health Risk Assessment is provided below.

In April 2005, the California Air Resources Board published the Air Quality and Land Use Handbook: A Community Health Perspective (CARB Handbook). The document reported that air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways. These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Measurements of traffic-related pollutants showed concentrations within 300 meters (approximately 1,000 feet) downwind of freeways were higher than regional values.

The CARB Handbook provides an advisory recommendation to avoid locating new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. The California Department of Transportation traffic counts show 2016 AADT numbers of 101,000 (ahead AADT) at the segment of Date Palm Drive with a total of 20,296 of those vehicles being trucks. The ARB also recommend against siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. There are no major service/maintenance rail yards within vicinity of the project site; however, there is a rail line that runs southwest of the project site, southwest of the I-10 freeway. As the rail line is at least 1,000 feet from the project boundary, impacts rail-related emissions are anticipated to be negligible.

Most other studies have assessed exposure based on proximity factors such as distance to freeways or traffic density. These studies linking traffic emissions with health impacts build on a wealth of data on the adverse health effects of ambient air pollution. The data on the effects of proximity to traffic-related emissions provides additional information that can be used in land use siting and regulatory actions by air agencies. The key observation in these studies is that proximity increases both exposure and the potential for adverse health effects. Other effects associated with traffic emissions include premature death in elderly individuals with heart disease. In these and other proximity studies, the distance from the roadway and truck traffic densities were key factors affecting the strength of the association with adverse health effects. In the above health studies, the association of traffic related emissions with adverse health effects was seen within 1,000 feet and was strongest within 300 feet. This demonstrates that the adverse effects diminished with distance.

In April 2017, the CARB published a Technical Advisory entitled Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. This advisory is a technical supplement to CARB's Air Quality and Land Use Handbook: A Community Health Perspective discussed above. Since its publication, research has demonstrated the public health, climate, financial, and other benefits of compact, infill development along transportation corridors. Moreover, new research has demonstrated promising strategies to help decrease pollution exposure near their sources. These strategies are the focus of the Technical Advisory. The CARB intends the Technical Advisory to provide planners and other stakeholders involved in land use planning and decision-making with information on scientifically based strategies to reduce exposure to traffic emissions near high-volume roadways in order to protect public health and promote equity and environmental justice.

The SCAQMD MATES-IV study shows that the project area has an estimated existing, ambient cancer risk of 474.37 in one million from toxic air emissions. In comparison, the average ambient cancer risk for South Coast Air Basin portion of Riverside County is 223 in one million. Many communities in California exist near high volume roadways. This is both because freeways and other busy traffic corridors have been built adjacent to and through existing neighborhoods in California, and because new developments have been built near existing roadways. Near-roadway development is a result of a variety of factors, including economic growth, demand for built environment uses, and the scarcity of developable land in some areas.

The CARB Technical Advisory demonstrates that planners, developers, and local governments can pursue infill development while simultaneously reducing exposure to traffic-related pollution by implementing the identified strategies and in other statewide guidance and policies that promote sustainable communities. The State Planning Priorities emphasize infill development, since this pattern of development can help attain goals to promote equity, strengthen the economy, protect the environment, and promote public health and safety. Strategies to reduce exposure include practices and technologies that reduce traffic emissions, increase dispersion of traffic pollution, or remove pollution from the air. Recent research documents the effectiveness of a variety of strategies.

There currently is no SCAQMD TAC threshold for "existing" cancer risk to sensitive receptors. The SCAQMD TAC threshold of 10 in one million is defined as the "maximum incremental cancer risk." As the project does not involve the construction of sources that would significantly contribute to "incremental cancer risk," the application of the 10 in one million threshold is not well applied in this case. Other air quality districts have refined methodology and thresholds for evaluation of the health risks posed by heavily traveled roadways and freeways to adjacent receptors. For example, the San Luis Obispo Air Pollution Control District had a requirement that new land use projects that would place sensitive receptors (e.g., residential units) in close proximity to existing toxics sources (e.g., freeway) should not exceed the CEQA health risk threshold of 89 in-a-million.

The MDS Health Risk Assessment identified a potential exterior cancer risks if residential uses are placed near freeway DPM sources. Since the exact location of the proposed 64 single-family units on the residential component of the project site have not been established at this time, implementation of mitigation measure MM 3-6 will assist in reduces impacts from diesel emissions from the I-10 Freeway. As a conservative approach and

consistent with the Health Risk Assessment, Mitigation Measure MM 3-7 identifies minimum efficiency reporting value (MERV) 13 filters to remove a substantial amount of particulates, including DPM. MERV 13 filters have a particle size removal efficiency rating of greater than 90 percent for particulates 3 microns to 10 microns in size and a rating of >75 percent for particles 0.30 to 1.0 micron in size. A MERV 13 filter creates more resistance to airflow because the filter media becomes denser as efficiency increases. The MERV filters do not remove gaseous pollutants. As MERV 13 filters would remove a substantial amount of particulates, including DPM, indoor (interior) exposure to DPM (of particles greater than 0.3 microns) and consequently cancer risk would be reduced by at least 75 percent, to less than the 10 in one million SCAQMD MICR threshold. With implementation of mitigation, the project will result in a less than significant impact related to toxic air contaminants.

**Mitigation Measures:**

**MM AQ-1:** All residential units to be constructed on the project site shall be setback a minimum of 1,000 feet from the edge of the travel lanes of the I-10 Freeway. A minimum 500-foot-wide open space buffer shall be located along the southern boundary of the residential component area.

**MM AQ-2:** All residential units shall install high efficiency Minimum Efficiency Reporting Value (MERV) filters of MERV 13 or better as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2, in the intake of ventilation systems. Heating, air conditioning and ventilation (HVAC) systems shall be installed with a fan unit power designed to force air through the MERV 13 filter. To ensure long-term maintenance and replacement of the MERV 13 filters, the following shall occur: i) The developer shall provide notification to all affected future residents of the project of the potential health risk from the adjacent freeway uses for all affected Glass House Pharms Cultivation Facility Air Quality and Greenhouse Gas Impact Study City of Cathedral City, CA Introduction 5 portions of the site, ii) The property owner shall inform residents of increased risk of exposure to diesel particulates from the freeway uses when windows and doors are open and when outside.

- e) **Less than Significant Impact.** Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed project.

The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. Potential sources of operational odors generated by the proposed project would include plant blossom odors and disposal of miscellaneous commercial refuse. The City's Municipal Code Chapters 5.88.065 requires all medical marijuana cultivation activities are to be conducted in a secure manner and shall not be visible from a public street. In addition, CCMC Code Section 9.108.080.A.1 requires all cannabis businesses to be equipped with an odor-absorbing and ventilation system so that odor generated by the cannabis business is not detectable outside the business. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances. Potential operation-source odor impacts are therefore considered to be less than significant.

**Project Specific Mitigation:** MM AQ-1 & MM AQ-2

4. BIOLOGICAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: James E. Cornett Ecological Consultants, *Biological Assessment and Impact Analysis of the Proposed Glass House Pharms Cannabis Cultivation Campus*, Sept. 20, 2018.

**BACKGROUND**

Migratory Bird Treaty Act (MBTA)

The Federal Migratory Bird Act (MBTA) of 1918 makes it illegal to take, possess, import, export, transport, sell, purchase, barter or offer for sale and migratory bird, or the nests, or eggs of such bird except under the terms of a valid Federal permit. Most birds are considered migratory under the MBTA. Disturbances that cause nest abandonment and/or loss of reproductive effort or loss of habitat upon which these birds depend would be in violation of the MBTA.

Coachella Valley Multiple Species Habitat Conservation Plan

Cathedral City is a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), which is a regional conservation plan comprising close to 1.14 million acres. The CVMSHCP currently includes a number of permittees taking part in the plan including nine cities, Riverside County, CVAG and various water and public land agencies. Within the CVMSHCP, there are multiple individual designated conservation areas where development is limited. All new development within the CVMSHCP boundaries is required to pay a habitat acquisition fee to mitigate for any impacts to and loss of habitat for species covered under the CVMSHCP.

- a) **Less than Significant with Mitigation.** In September 2018, James W. Cornett Ecological Consultants conducted a project- specific Biological Assessment and Environmental Impact Analysis. The biological survey and analysis were designed to determine whether the proposed development would result in impacts on the biological resources of the approximately 300-acre project site and immediate vicinity. Field surveys were completed between August 27, 2018 through September 16, 2018.

Survey methodology included literature, records, collections, website, or staff review to determine resources that are known to exist within the general area and to determine the possible occurrence of sensitive species. The University of California at Riverside Herbarium, the Boyd Deep Canyon Desert Research Center, the Coachella Valley Association of Governments, and the California Department of Fish and Game Natural

Diversity Database were reviewed and consulted for specific information regarding the occurrence of sensitive species.

Per the biological report, the federally threatened Coachella Valley fringe-toed-lizard (CVFTL) and the state-sensitive Palm Springs ground squirrel were observed within the Project site boundaries. However, these species are a covered species under the CVMSHCP.

The site was also found to be suitable habitat for the federally endangered Coachella Valley milkvetch, state-sensitive flat-tailed horned lizard, Palm Springs pocket mouse, Coachella Valley Jerusalem cricket and the Coachella Valley giant sand-treader cricket. However, none of these species were found on the project site. All of these species are covered under the CVMSHCP. Mitigation for impacts to these species related to loss of habitat is accomplished through payment of a habitat mitigation fee to the Coachella Valley Association of Governments (CVAG).

Burrowing owls were observed on the project site or near the vicinity. However, no active burrows were found. Despite the apparent absence of resident owls, the entire site contains prime foraging habitat for the owls and the species can take up residence at any time. Therefore, pursuant to the Migratory Bird Treaty Act, a clearance survey 30-days prior to site disturbance is required. No migratory birds were observed on the project site and no nests or nesting activity was observed during the field survey.

Therefore, less than significant impacts are expected to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS with the following mitigation:

**Mitigation Measures:**

**MM BR-1:** Not more than 30 days before land disturbance or issuance of a grading permit by the City, the applicant/project proponent shall have a biological survey conducted at the project site to determine presence/absence of the species. If no active burrows are found during the clearance survey, the applicant shall present evidence to the City before issuance of a grading permit.

Results of the survey may determine whether focused surveys must be conducted. If the site survey determines the presence of burrowing owl, mitigation in accordance with the CDFW shall be implemented as follows:

- If burrowing owls are identified as being resident on-site outside the breeding season (February 1 through August 31) they may be relocated to other sites by a permitted biologist (permitted by CDFW), as allowed in the CDFW Staff Report on Burrowing Owl Mitigation (March 2012).
- If an active burrow is found during the breeding season, the burrow shall be treated as a nest site and temporary fencing shall be installed at a distance from the active burrow, to be determined by the biologist, to prevent disturbance during grading or construction. Installation and removal of the fencing shall be done with a biological monitor present.

**MM BR-2:** A qualified biological monitor with the authority to halt or redirect grading, shall be present during all earth moving activities and when construction vehicles are present and operating on the project site.

- b) **No Impact.** The biological survey performed on the project site did not find any on-site naturally occurring springs, permanent aquatic habitats, drainages, or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or the USFWS. No blue-line stream corridors or desert washes were found within the project boundaries. Because of the absence of significant wash or riparian vegetation, and the absence of other sensitive natural communities, no impacts are expected.

- c) **No Impact.** Per the project-specific biological report, the site does not contain, nor is adjacent to, federally protected wetlands, marshes or other drainage features. No blue-line stream corridors (streams or dry washes) are shown on U.S. Geological Survey maps for the project site nor are there botanical indicators of such corridors. As a result, implementation of the project would not result in the direct removal, filling or other hydrological interruption to any of these resources. The proposed on-site storm drain improvements shall include facilities to prevent the direct discharge and hydro-modification impacts of runoff to any adjacent land. A Project Specific Water Quality Management Plan (WQMP) is expected to be prepared to ensure that the project does not contribute pollutants of concern in any project storm runoff. No impacts to federally protected wetlands are expected.
- d) **No Impact.** Per the project-specific biological report, no migratory wildlife corridors or native wildlife nursery sites were found on the project or adjacent properties. The site is vacant and undeveloped land with I-10 forming the site's southern boundary. There are several informal and unpaved roads traversing the project site. Off-road vehicle tracks are present across the entire site. The project biologist regularly conducted various methods of sand sifting and smoothing of surfaces to yield tracks and determine if wildlife corridors existed on or through the site. Tracks of coyote and black tailed jackrabbits were found at least once. However, no wildlife corridors were detected through observation or sign. No impacts to movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or wildlife nursery sites are expected.
- e, f) **No Impact.** The proposed project would not conflict with any provisions of the CVMSHCP. As discussed in above, the proposed project will be required to pay the CVMSHCP mitigation fee to mitigate loss of habitat for covered species before beginning construction. There are no other local, regional, or state habitat conservation plans currently in place other than the CVMSHCP that are applicable to the proposed project. Therefore, the project will not conflict with any local policies and ordinances and no impacts are expected.

**Project Specific Mitigation: MM BR-1 & MM BR-2**

<b>5. CULTURAL RESOURCES</b> -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §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) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: *Phase I Historical/Archaeological Resources Survey: Glass House Pharms Project*, CRM Tech, 10/4/18 and 11/21/18

## BACKGROUND

A Phase I cultural resources survey was prepared by CRM Tech that included the 300-acre project site along with an adjacent portion of Varner Road. The survey was conducted in October and November 2018. The cultural resources assessment included an historical/archaeological records search, historical background research, consultation with Native American representatives, and an intensive-level field survey of the entire project area.

### Records Search

Eastern Information Center (EIC) records search resulted in discovery of three previous surveys completed in 1977, 2004 and 2005 that included portions of the project area. However, the project site as a whole was not found to have been surveyed systematically for cultural resources. Moreover, all three previous surveys are now well over 10 years and outdated for compliance purposes.

EIC records include a previously recorded site of historical origin within the northeastern edge of the project area. The site represents various segments of Varner Road that have been recorded into the California Historical Resources Inventory since 1998 including the segment within the project boundaries.

Outside the project area but within a one-mile radius, EIC records show more than 30 other previous studies on various tracts of land and linear features, including most of the adjacent properties. Collectively these studies cover nearly 60 percent of the land within the scope of this records search, resulting in ten historical archaeological sites and four isolates. One of the sites and two of the isolates were of prehistoric Native American origin, consisting of scatter of ceramic sherds and two isolated sherds. The other sites and two isolates dated to the prehistoric period and included an adobe building, scattered refuse items, a rock cairn, and various linear infrastructure features. Other than the Varner Road, no of the other sites or isolates were found in the immediate vicinity of the project area. Therefore, none of them required further consideration in the study.

### a) **Less than Significant Impact with Mitigation.**

#### Historical Background

The project area was found to be relatively low in sensitivity for cultural resources from the historic period. No evidence of any settlement or land development was found throughout the 1850s – 1950s era. Originally built in 1915 as State Route 26, what is now Varner Road was later designated concurrently as part of U.S. Routes 60, 70, and 99, important arteries in the 1926 national highway system. As late as 1941, U.S. Route 60/70/99 was the only manmade feature in the immediate project vicinity. In the 1950s, the highway was realigned to the course of present-day I-10, on the opposite side of the project area. The original alignment became a local road that was named after former Riverside County Supervisor Homer S. Varner in 1956, upon his death in office.

During past studies, two small segments of Varner Road that retain historic integrity were determined to be eligible for listing in the National Register of Historic Places and/or the California Register of Historical Resources, while other segments that have been altered in modern times were found not to be eligible. The two segments considered eligible are located near the Varner Road intersections of Rio del Sol Road and Palm

Drive, approximately one mile to the southeast and five miles to the north west of the project area respectively. The segment of Varner Road adjacent to the northeastern project boundary should be presumed to be potentially significant historical resource.

CEQA Guidelines state that historical resources are those cultural resources that are eligible or determined to be eligible for listing in the California Register of Historical Resources (CRHR), listed in a local register of historical resources, or determined to be historically significant by a lead agency. A historical resource must be significant at the local, state or national level under one or more of the following four criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation (Criterion 4).

The segment of Varner Road on the northeastern edge of the project site was previously recorded in the California Historical Resources Inventory as part of Site 33-008408. Site 33-008408 consists of various segment of Varner Road, formerly part of Route 60/70/99 in the national highway system. The significance of the segment of Varner Road that forms the northern boundary of the project site was analyzed in the cultural resources survey to determine whether it met any of the listing criteria. The segment was found to meet Criterion 4, because it remains, as stated in the cultural resources report, “as one of the few segments of, the original Ocean-to-Ocean Highway in California that has not been absorbed into the present-day I-10, Varner Road is closely associated with the early- and mid-20<sup>th</sup> century development of the American automobile culture, a pattern of events that has left a lasting legacy in national, state and local history.”

This segment of Varner Road lies within the project boundary and the proposed project would alter its existing condition and appearance with the construction of off-site improvements (curb & gutter, median, landscape, etc.) and project access points and an addition of public right-of-way and required median. These alterations constitute a significant impact to the historical significance of the subject Varner Road segment. CEQA section 15064.5 states that a project that may “cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” This section further states that, “Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” As such, the project would result in a substantial adverse change in the historical significance of Varner Road.

The cultural resources report concludes that the preservation of the segment of Varner Road along the northern property line is not feasible “given its status as a working component of the transportation infrastructure in an area of upcoming growth”. Therefore, the mitigation in the form of documenting the current history and current condition of the road was recommended to be implemented to reduce the impact on an important historical resource to less than significant.

#### Other Historical Resources

During the field survey, two isolate historic period artifacts were found on the ground surface in the project area and recorded. Both isolates consist of refuse items dating to the early to mid-20th century. Such isolates lack contextual integrity and archaeological data potential and therefore, not considered potential historical

resources. No other artifacts of prehistoric or historical origin were encountered within the project area during the field survey. Some scattered remains are present on the site that were once part of a densely planted windbreak along the I-10 Freeway. Although the windbreak, which once extended continuously for more than two miles, presumably dated to the realignment of U. S. Route 60/70/99 in the 1940s-1950s or the construction of I-10 in the 1950s-1960s contained heavy tamarisk growth, the surviving trees no longer present a viable image of the original formation, and do not exhibit any elements of the original design. As a result of the alterations in 2011-2012, the remnants of the windbreak do not retain any historic integrity to be considered potential historical resources and per the project-specific cultural report, require no further study.

Therefore, the proposed project is not expected to cause substantial adverse change in the significance of a historical resource with implementation of mitigation measure CUL-1.

**Mitigation Measure:**

**MM CUL-1:** Before start of site disturbance for the project, a comprehensive documentation program shall be completed on the segment of Varner Road within the project boundaries between the eastern boundary of the project site and the western boundary of the project site, including photographic recordation, scaled mapping, and detailed description of the current configuration and appearance of the road as well as further research and compilation of its historical background. The results of these procedures should be curated at appropriate local cultural resources information repositories for easy public access, including the City of Cathedral City Planning Department and the Eastern Information Center at the University of California, Riverside. The project applicant shall present evidence of the completion of the documentation of Varner Road to the City before issuance of any building permit for the project.

- b) **Less than Significant Impact with Mitigation.** Archaeological resources are typically defined as the material remains of past human life and behaviors. Over time this material evidence becomes buried, fragmented or scattered or otherwise hidden from view. Archaeological resources may include both prehistoric remains and remains dating to the historic period, defined by CEQA as remains 45 years old or older. An archaeological resource is one that meets that meets the criteria for listing on the CRHR (See above discussion for details.) If an archaeological site does not meet the criteria for listing in the CRHR, then the site is to be treated in accordance with Public Resources Code Section 21083.2, which refers to unique archaeological resources.

As previously discussed, CRM Tech conducted a Phase I site-specific survey that included archaeological resources. The assessment included a records search, Native American scoping, historical background research and an intensive-level field survey.

EIC records show ten historical archaeological sites and four isolates. One of the sites and two of the isolates were of prehistoric Native American origin, consisting of scatter of ceramic sherds and two isolated sherds. The other sites and two isolates, dated to the prehistoric period, included an adobe building, scattered refuse items, a rock cairn, and various linear infrastructure features. During the field survey, two isolates of historic period artifacts were found on the ground surface in the project area and recorded during the field survey. Both isolates consist of refuse items dating to the early to mid-20th century. Such isolates lack contextual integrity and archaeological data potential and therefore, are not considered potential historical resources. No other artifacts of prehistoric or historical origin were encountered within the project area during the field survey.

Native American Heritage Commission (NAHC) scared lands record search was conducted for the project but did not identify any Native American cultural resources within the project area. NACHC recommended that local Native American Groups be contacted for further information. CRM Tech sent written requests for comments to 11 Tribal individuals. At the time of writing, five Tribal representatives contacted, responded in writing. Three of the Tribes stated that their tribe has no information on any Native American cultural resources in the project area and encouraged further consultation with other Native American groups in the region and

Native American Monitoring. The Morongo Band of Mission Indian identified the site as part of their Traditional Use Area and requested Tribal monitoring by a Morongo representative. Therefore, less than significant impacts are expected to archaeological resources with implementation of mitigation.

**Mitigation Measures:**

**MM CUL-2:** The project applicant shall ensure the presence of an approved Native American Cultural Resource Monitor during any ground disturbing activities (including archaeological testing and surveys) for the proposed project.

**MM CUL-3:** Should buried historical/archaeological deposits be encountered during ground-disturbing activities for the project, all destructive construction shall be halted and the monitor and/or project proponent shall notify a qualified archaeologist (meeting the Secretary of the Interior's Historic Preservation Professional Qualifications Standards) to evaluate the find. If the archaeologist determines that the resource may be significant, the archaeologist shall notify the project proponent and the City and, if necessary, prepare a mitigation/treatment plan for the resource. The archaeologist shall consult with the appropriate Native American representative in determining the appropriate treatment for the resource if the resource is prehistoric or Native American in nature.

**MM CUL-4:** The archaeologist shall prepare a final report to be reviewed and accepted by the City. The report shall include a description of the resource(s) unearthed, if any, treatment of the resource(s), and evaluation of the resource with respect to the CRHR and National Register of Historic Places criteria for designation. The archaeologist shall provide copies of any studies or reports to the Eastern Information Center for the State of California located the University of Riverside, the City, and the Agua Caliente Tribal Historic Preservation Office (THPO) for permanent inclusion in the Agua Caliente Cultural Register.

- c) **Less than Significant Impact.** Paleontological resources are fossilized remains of plants, animals and associated deposits. The lakebed of Holocene Lake Cahuilla has produced many paleontological resources generally containing freshwater mollusks of Holocene age. Per the Riverside County Land Information System, the property is recognized as having low potential for Paleontological Sensitivity. Areas recognized for having low potential have a reduced likelihood for containing significant non-renewable paleontological resources, including vertebrate or significant vertebrate fossils. According to the NCESP EIR, the discovery of paleontological resources is virtually unknown in the western Coachella Valley due to the geography of the area. Due to location, deep sediment and sand deposits are the norm for the area. Further the EIR states that the potential for uncovering unknown paleontological resources increase with depth of excavation. Typical low-rise development would not include deep excavation. The EIR included the following standard condition to reduce any impact to less than significant:

**SC 3.5.3:** A qualified paleontologist shall monitor all grading that includes initial cutting to a depth of 10 feet below existing ground surface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays, and to remove samples of sediments, which are likely to contain the remains of small fossil invertebrates and vertebrates, If any paleontological resources are identified during these activities, the following activities shall occur:

- All recovered specimens shall be prepared to a point of identification and permanent preservation, including washing sediments to recover small invertebrates and vertebrates.
- Specimens shall be identified and curated into an established, accredited, professional museum repository with permanent retrievable storage.
- The paleontologist shall have a written repository agreement in hand prior to the initiation of mitigation activities.
- At the end of the monitoring period, the paleontological monitor shall submit a letter report to the Director of Planning detailing the duration and results of the monitoring. A report of findings

shall be prepared by the paleontologist. The report shall be submitted prior to the issuance of the Certificate of Occupancy.

No site specific paleontological resources were discovered during the field survey. Therefore, less than significant impacts to resources are expected.

- d) **Less than Significant Impact.** The project site is not located on, or in close proximity to a known cemetery. Therefore, the construction of the project is not expected to disturb human remains. However, in the event previously unknown human remains are uncovered on the project site during grading or construction, State law requires that the Riverside County Coroner be contacted and the find assessed pursuant to Section 7050.5 of the California Health and Safety Code and CEQA Guidelines §15064.5. Therefore, there will be no further excavation or disturbance of the site, or any nearby area until the County Coroner has examined the remains. If the coroner determines that the remains are not recent and may be Native American, in accordance with Public Resource Code 5097.94, the coroner will notify the Native American Heritage Commission (NAHC) within 24 hours of the find. With compliance with State law pertaining to uncover of human remains, the project will result in a less than significant impact.

**Project Specific Mitigation:** MM CUL-1, MM CUL-2, MM CUL-3 & MM CUL-4

6. GEOLOGY AND SOILS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Expose people or structures to 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

**Sources:** Alquist-Priolo Earthquake Fault Zoning Act, 2017; “Geotechnical Report,” prepared by RJR Engineering, June 2013; Cathedral City General Plan, July 2002; Geotechnical Investigation, Sladden Engineering 2005; Rule 403 Dust Control Information, South Coast Air Quality Management District, 2018; Soils Update Letter, Sladden Engineering, 2018; Riverside County General Plan December 2016; USDA Riverside County Soils Data, 2014.

**BACKGROUND**

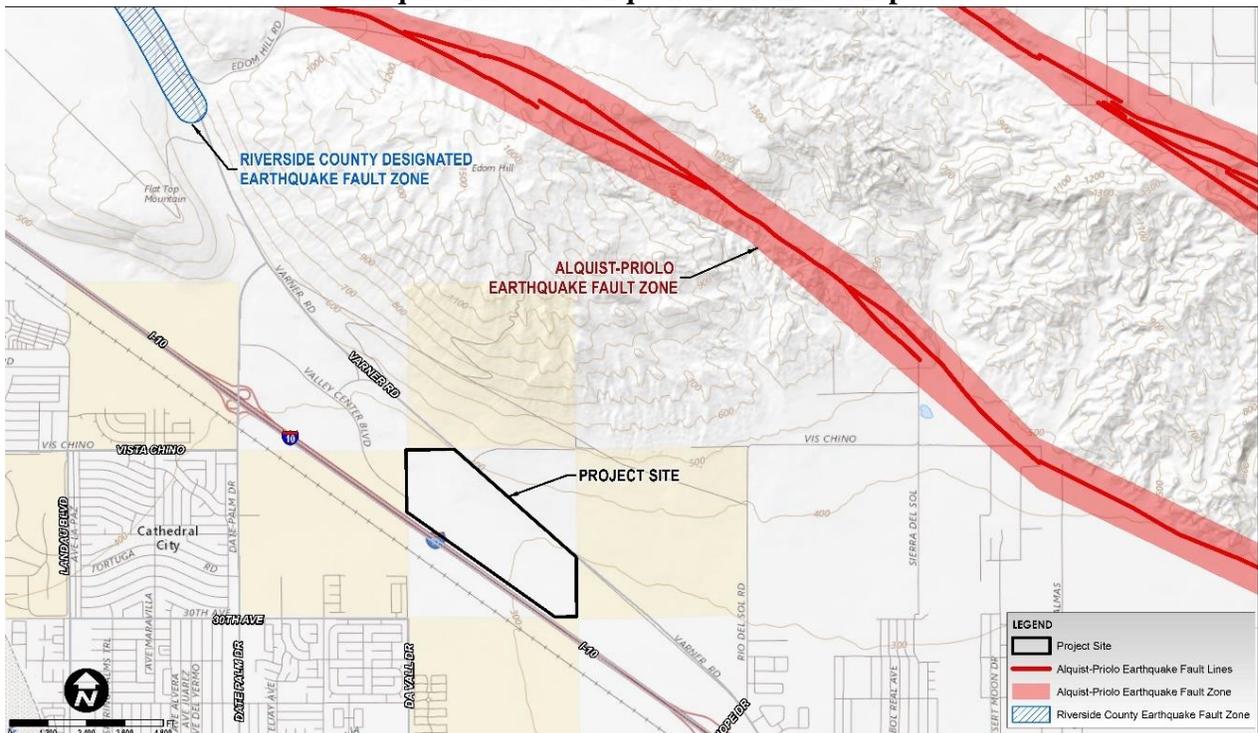
The discussion in this section is based on prior geotechnical reports, Alquist-Priolo Earthquake Fault Zone maps, the Cathedral City General Plan and Riverside County General Plan and USDA Riverside County Soils Data, 2014. Three separate geotechnical reports were prepared that involved the project area. In 2005, Sladden Engineering prepared a geotechnical investigation for a project involving a commercial/industrial development proposed for the Glasshouse Pharms project site. Although the project was never built, the information contained in the report remains mostly relevant to the current project. A second geotechnical investigation was prepared by RJR Engineering in 2013 to analyze impacts from development proposed for the NCESP area. The third geotechnical report was prepared by Sladden Engineering in 2018 as an update to the 2005 geotechnical investigation.

The South Coast Air Basin, in which the project is located, lies within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). For the purpose of reducing the amount of fugitive dust created as a result of human activities, such as land development, SCAQMD established Rule 403 and supplemental Rule 403.1. Fugitive dust is a particulate matter that is suspended in the air by direct or indirect human activities. Therefore, Rule 403 requires the implementation of best management practices (BMPs) during operations capable of generating fugitive dust. Rule 403.1 is a supplemental rule to Rule 403 and is applicable to man-made sources of fugitive dust specifically in the Coachella Valley. Since the project is greater than 10 acres, the site will have to submit the relevant and corresponding applications and forms to SCAQMD, as required by the District.

- a) **i. Less than Significant Impact.** The Coachella Valley is crisscrossed by multiple fault lines that traverse the region, most notably the San Andreas Fault. Although the fault lines created the various mountain ranges and a low valley floor that characterize the Coachella Valley, it also increases the potential risks of earthquakes and seismic hazards. Coachella Valley is considered one of the most seismically active regions in California. The San Andreas Fault system is the closest fault zone to the project site and capable of producing earthquakes with a magnitude of 8.0.

The Alquist-Priolo Earthquake Fault Zone Act was established after the 6.6 magnitude San Fernando Earthquake in 1971. The Alquist-Priolo Fault Zone Act intends to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. Alquist-Priolo Earthquake Fault Zoning Maps are issued by the State Geologist. The project site is not located within an Alquist-Priolo Fault Zone, nor are there active faults located on-site. According to the State Geologist issued map, the nearest fault zone is approximately one to two miles northeast of the project site. GIS files obtained from the California Department of Conservation and the County of Riverside have been used to create a graphic representation of the project in relation to the Alquist-Priolo Earthquake Fault Zone, as displayed in Exhibit VI-1, below.

**Exhibit VI-1:  
Alquist-Priolo Earthquake Fault Zone Map**



RJR Engineering’s 2013 Geotechnical Report analyzed Planning Areas 1 through 5 in the NCESP, which consists of approximately 590 acres of vacant land in the northern part of Cathedral City. The proposed project occupies approximately 300 acres on the west side of the NCESP that is designated as Planning Area 4. According to the RJR Geotechnical Report, surface rupture usually occurs along traces of known or potentially active faults, although, many historic events have occurred on faults not previously known to be active. Ground rupture caused by movement along a fault could likely result in catastrophic structural damage to buildings constructed along fault traces. RJR Engineering used various test methods (described in detail in their 2013 Geotechnical Report) to analyze the potential of seismic hazards occurring in the project area. RJR Engineering concluded that the risk of fault rupture at and around the site is low.

Based on the findings of the Alquist-Priolo Earthquake Fault Zone Map, and the Geotechnical Report prepared by RJR Engineering, impacts associated with fault rupture on the project site are expected to be less than significant.

- ii. **Less than Significant Impact.** The entire Coachella Valley is susceptible to seismic ground shaking due to the various fault lines that define the area. According to the Geotechnical Report, provided by RJR Engineering,

the energy released during an earthquake spreads from its rupture surface in the form of seismic waves and intense ground motion from the seismic waves can cause significant damage to structures. The intensity of the ground motion is mainly attributed to the distance of the fault rupture and the type of materials underlying the site and the motion of fault displacement.

According to the NCESP EIR, the primary geologic hazard is severe ground shaking from earthquakes originating on nearby faults. A major earthquake above magnitude 7 originating on the local segment of the San Andreas Fault zone would be the critical seismic event that may affect the site within the design life of the NCESP area. Engineered design and earthquake resistant construction increase safety and allow development of seismic areas.

RJR Engineering's 2013 Geotechnical Report states that the NCESP area has experienced shaking from a number of seismic events over the last 150 years. The report determined that the number or frequency of large magnitude earthquakes that may occur during the life of the project cannot be predicted reliably, however, it is probable that the project site will experience at least one major earthquake during the next 50 years, which is typical of the majority of the Coachella Valley. Sladden Engineering's January 31, 2005 Geotechnical Investigation stated that the project is subject to seismic shaking due to its proximity to active faults. According to the Soil Update Letter Site Class D may be used to estimate design seismic loading for the proposed structures, in accordance with Section 1613 of the 2016 California Building Code (CBC). The project is governed by the most recent version of the CBC seismic design standards for Site Class D, which was determined based on the types of soils present at the site, and their engineering properties as defined in Section 1613.3.2 in the CBC.

With the probability of the project site and surrounding area being subjected to seismic shaking, the NCESP EIR provides a Standard Condition (SC) for developments proposed in the Extended North City. The SC is recommended in order to ensure the project's safety if subjected to strong seismic shaking. The SC is listed as follows (the numbering of the SC is consistent with the NCESP EIR for reference purposes):

**SC 3.6-1:** All structural design shall adhere to the structural recommendations within the site specific Geotechnical Reports for each portion of the project. Minimum seismic design should comply with the California Building Code using the seismic coefficients given in the Geotechnical Report.

All plans will be reviewed and approved by the City to ensure compliance with construction standards. Project compliance with the recommendations provided in the Geotechnical Report, Geotechnical Investigation, and NCESP EIR SC 3.6-1 are designed to reduce impacts related to strong ground shaking to less than significant levels. In addition, the project will be required to comply with all recommendation contained in the 2005 Geotechnical Investigation and the August 16, 2018 Sladden Engineering Soils Update Letter. Mitigation measure MM 3.6-1 in the NCESP EIR that requires the project proponent to adhere to the recommendations contained within the site-specific Geotechnical Feasibility and Infiltration Report, provided by Sladden Engineering on September 12, 2018. throughout grading and construction activities. Based on the above analysis and consistency with the NCESP EIR's SC 3.6-1 and MM 3.6-1, the project will result in a less than significant impact related to strong seismic ground shaking.

- iii. **Less than Significant Impact.** Liquefaction is the total or substantial loss of shear strength of loose, sandy, saturated sediments in the presence of ground accelerations greater than 0.2g, or approximately a 5-magnitude earthquake. A vital contributing factor for liquefaction is the presence of groundwater within 50 feet below the ground surface. During an earthquake, the pressure of the groundwater saturates the soil and causes it to lose strength and act like a liquid. Liquefaction can result in lateral spread, flow failure, ground oscillation and loss of bearing strength, as well as structural distress and/or failure. However, according the City's General Plan, the deep groundwater in Cathedral City, lying approximately 150 to 200 feet below the ground's surface, liquefaction in most areas in the City is considered low. Regions with a moderate to high susceptibility to

liquefaction include areas close to the fault lines, and areas near the Santa Rosa Mountains, which have historically shallow groundwater, neither of which are present on the project site.

The Geotechnical Report, provided by RJR Engineering, analyzed the likelihood of liquefaction occurring at and around the project site. The report concluded that the sediments found at the site are prone to liquefaction, however the depth of groundwater is over 100 feet below the surface. Therefore, the possibility of liquefaction adversely affecting the project site is low.

Seismic-induced settlement occurs when cohesionless materials (sands) densify as a result of ground shaking. A strong earthquake could cause settlement of medium-dense sands, even without the rise of groundwater. RJR Engineer's seismic settlement analysis of the project area in the Geotechnical Report, predicted settlements on the order of 1 inch, with a design differential value on the order of 0.67 inches. According to RJR Engineering, the settlements are on the border of acceptable for most developments, and would be considered a Class II risk, and recommended remedial measures, listed below:

1. Removal of the upper soils, and replacement with engineered fill (possibly in combination with geosynthetic fabric) to provide a uniform, homogenous fill blanket that will provide arching over the underlying soils that may be prone to settlement from dynamic loading;
2. Place larger structures that cannot tolerate the settlements on a pile supported foundation. The piles can be driven (which densify the surrounding soil) or cast-in-place to suitable depths. Both system provide benefits and can be implemented;
3. Place the structures on post-tensioned slabs or structural slabs that can resist the 1 inch of settlement and 0.67 inches of settlement;
4. Perform in-situ soil densification to increase the relative density of the underlying soil in the building pad areas and reduce the potential for seismic settlement.

The NCESP EIR also provides Standard Conditions (SC) and Mitigation Measures (MM) for the Planning Areas within the Extended North City in order to ensure that the geotechnical impacts related to liquefaction and ground settlement caused earthquakes would be less than significant. The project is required to adhere to the SC and MM provided in the NCESP EIR, which are as follows:

**SC 3.6-4:** Additional site specific geotechnical investigations may be necessary based on-site specific design proposals. Local variation in soil conditions may warrant adjustments such as increasing depth recompaction and over-excavation. A representative of the soils consultant shall observe site clearing and the bottoms of excavations before placing fill.

**SC 3.6-5:** At the start of site grading for all portions of the project, existing vegetation, trees, large roots, pavements, foundations, non-engineered fill, construction debris, abandoned underground utilities and other deleterious material shall be removed from the proposed building, structural, tank, pavement areas and areas that receive fill. The surface shall be stripped of organic growth and removed from the construction area.

**SC 3.6-8:** The grading contractor shall work in accordance with the Grading Ordinance of the City of Cathedral City, throughout all grading activities.

**MM 3.6-1:** The project contractors shall adhere to the recommendations contained within the site specific Geotechnical Feasibility and Infiltration Report throughout grading and construction activities.

Although the seismic related liquefaction is not expected, seismically induced settlement can potentially affect the project site. However, seismic-related settlement can be reduced to a less than significant impact with the implementation of the recommended design standards outlined in the Geotechnical Report, Geotechnical

Investigation, NCESP, and NCESP EIR, as well as compliance with City and state building standards. Therefore, the project will result in a less than significant impact from liquefaction and ground settlement resulting from seismic-related events.

- iv. **Less than Significant Impact.** Landslides occur when a loss of ability of earth materials to maintain their integrity at a specific slope and the internal strength of the material is lost, causing it to move downslope. The Cathedral City General Plan recognizes that the land adjacent to the Indio Hills and the slopes of the Santa Rosa Mountains are areas with moderate to high susceptibility to rock falls and landsliding.

The 300-acre project site is currently defined by vacant desert land with scattered vegetation, located in Cathedral City's NCESP. Similar land characteristics are found north, east, and west of the project site; with Varner Road and the Interstate 10 Freeway bordering the north and south property boundary, respectively. The closest slope is Edom Hill, approximately 0.75 miles north of the project site. Based on the distance from the project site to Edom Hill, landslides and rock falls are not anticipated.

The 2013 Geotechnical Report also analyzed the likelihood of an earthquake-induced landslide. Similarly, RJR Engineers in their 2005 geotechnical investigation found that based on the relatively flat topography of the project site, the risk of seismically induced landslides is not anticipated. The 2005 Geotechnical Report did recommend that the proposed basin walls be constructed utilizing native soils compacted as engineered fill, and that the slopes be in accordance with industry standards and extensive experience with similar basins, to minimize the potential for earthquake-induced failures. As with the previous analysis, the project is required to implement MM 3.6-1 that requires compliance with all recommendations contained in project-specific geotechnical investigations. With the compliance of the recommended requirements for slopes on the project property and compliance with MM 3.6-1, the impact from seismically induced landslides and rockfalls is less than significant.

- b) **Less than Significant Impact with Mitigation.** According to the Safety Element in the Riverside County General Plan, 20 percent of the land area in Riverside County is vulnerable to high and very high wind erosion. The Riverside County Wind Erosion Susceptibility Areas Map, however, designated that the project property is located in an area with moderate susceptibility to wind erosion (Figure S-8, 2016).

The Cathedral City General Plan states that most of the City's planning area is located within a severe wind erosion hazard zone. Blowing sand constitutes a significant local environmental and health hazard. The City requires mitigation of this hazard through a submittal of a Fugitive Dust Control Plan prior to development. Pursuant to SCAQMD Rules 403 and 403.1, which requires the implementation of best management practices (BMPs) during operations capable of generating fugitive dust in the Coachella Valley, the project contractor is required to submit a Fugitive Dust (PM10) Control Plan. This PM10 Plan is to be reviewed as part of the City's grading permit process to minimize potential impacts caused by blowing dust and sand during construction. Procedures set forth in the Plan will ensure that potential erosion is controlled during the construction process.

These mitigation measures may include watering of the site during construction, the installation of retaining walls and landscaping materials, or the application of chemical soil stabilizers. See the Air Quality Section of this document for further discussion.

The mitigation of waterborne erosion at the project site includes the developer's compliance with the State's most current Construction General Permit (CGP) (Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ). Compliance with the CGP involves the development and implementation of a project specific Stormwater Pollution Prevention Plan (SWPPP) designed to reduce potential adverse impacts to surface water quality during the period of construction. The required plan will identify the locations and types of construction activities requiring best management practices (BMPs) and other necessary compliance measures to prevent soil erosion and stormwater runoff pollution. The plan will also identify the limits of allowable construction-related disturbance to prevent any exceedances or violations. Waterborne erosion and

the City's Standard Conditions associated with it are thoroughly discussed in the Hydrology and Water Quality Section of the document.

According to the NCESP EIR, the Extended North City is suitable for development provided the following recommendations primarily contained within the site specific Geotechnical Report, and Standard Conditions (SC) in the NCESP EIR are followed in the design and construction of the project. The SC from the EIR are listed as follows (numbering of SC is consistent with the NCESP EIR):

**SC 3.6-2:** Design Level Geotechnical Engineering Report(s) shall be prepared for grading and construction activities.

**SC 3.6-3:** Site grading shall be in strict compliance with the requirements of the South Coast Air Quality Management District. Dust control shall be implemented throughout all phases of construction. (Further discussion contained in Air Quality Section in the NCESP EIR).

**SC 3.6-7:** Prior to issuance of a Grading Permit, the developer of the roads and infrastructure, and structures shall prepare a Storm Water Pollution Prevention Plan and a PM10 Fugitive Dust Control Plan. These plans shall be implemented throughout all construction activities.

The project site, currently defined by vacant, undisturbed desert land, proposes a cannabis business park and residential component in Cathedral City's NCESP, between the Interstate 10 freeway and Varner Road. The cultivation portion of the project intends to construct three, approximately 500,000 square-foot, greenhouse buildings, one 79,000 square-foot processing building, and one 56,000 square-foot administration building. Approximately 140 acres of retention basins and open space will be located primarily on the western side of the project property and will be covered with landscaping including native vegetation. The project will be covered by both pervious and impervious surfaces, including hardscapes, such as paved roads and structures, and softscaped open space areas, which will be landscaped with drought tolerant plants. These landscaped and paved surfaces will aid in lowering the amount of windblown soils and erosion emitted from the area. The NCESP EIR recommended that all SP Areas implement the applicable portions of Mitigation Measure (MM) 3.3-6, which employs design standards in order to avoid the effects of blowsand. MM 3.3-6 is stated as follows:

**MM 3.3-6:** To minimize potentially significant impacts of blowsand exposure on future sensitive receptors that locate within the project site, the Specific Plan should incorporate design standards and development guidelines detailing appropriate techniques to be implemented to control and reduce wind erosion and blowsand over the long term. **Permanent blowsand abatement elements should be implemented onsite to protect and stabilize the soil within the project site. Appropriate techniques to prevent the accumulation of blowsand on-site should be incorporated in the project design to minimize future damage from and exposure to blowsand.**

Chapter 8 Section D.8 *Windscreen and Blow Sand Protection* in the NCESP also contains recommendations to limit potentially significant impacts of blowsand exposure on future residents. To reduce impacts to less than significant, the following site-specific mitigation measure shall be implemented by the applicant:

**MM 3.6-2:** The project applicant shall prepare plans for review and approval by the City showing how the project is consistent with the windscreen and blowsand protection recommendations contained in Section 8.D.8 *Windscreen and Blow Sand Protection* of the NCESP.

The required implementation of the Fugitive Dust Control Plan, the Stormwater Pollution Prevention Plan, the Standard Conditions and Mitigation Measure outlined within the NCESP EIR, and MM 3.6-2 will ensure that impacts caused by erosion will be less than significant.

- c) **Less than Significant Impact.** As discussed in previously in this Geotechnical Section, liquefaction, lateral spreading and landslides are not anticipated at or near the project site. Although some soils susceptible to liquefaction were found on the project site, the deep groundwater will not allow liquefaction, and subsequently

lateral spreading, to occur. The project site is also not located at or near a slope and the proposed project is not expected to create large artificial slopes. Overall, the risks of landslides, lateral spreading or liquefaction is low.

Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement, and is usually associated with the extraction of oil, gas, or groundwater. Water contained in subsurface clay layers is squeezed out, and the clay is compacted by overlaying sediments. Subsidence is an environmental concern in the Coachella Valley due to the increased regional demand for groundwater. The NCESP Geotechnical Report concluded that mitigation of this hazard will require regional efforts to conserve and recharge the groundwater which will aid in the avoidance of ground subsidence. RJR Engineers determined that evidence of subsidence was not available for the assessed area. Therefore, it was labeled as a Class 1 hazard. With this, building and seismic code requirements assure that the potential impact associated with ground subsidence is reduced to less than significant levels through site preparation techniques such as ground compaction to ensure site soils are stable.

Soil collapse occurs when soils undergo a rearrangement of their grains and a loss of cementation, resulting in substantial and rapid settlement under relatively low loads. This typically occurs in recently deposited Holocene soils in a dry or semi-arid environment. The combination of weight from a building or other structure, and an increase in surface water infiltration (such as from irrigation or a rise in the groundwater table) can initiate rapid settlement and cause structural foundations and walls to crack (Cathedral City General Plan 2002). The Riverside County General Plan, Safety Element (updated in 2016), states that collapsible soils occur predominantly at the base of the mountains, where Holocene-age alluvial fan and wash sediments have been deposited during rapid runoff. As discussed previously in section a)iii of this Geotechnical Section, the Geotechnical Report prepared by RJR Engineering provides design standards such as removing upper soils and replacing it with engineered fill. The implementation of the recommended design standards at the project site as required by EIR mitigation measure **MM 3.6-1** which requires the project applicant/proponent to adhere to the recommendations contained within the site specific Geotechnical Feasibility and Infiltration Report throughout grading and construction activities will result in a less than significant impact related to ground subsidence.

- d) **No Impact.** Expansive soils contain a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). When these soils swell, the change in volume can exert significant pressures on loads that are placed on them, such as buildings, and can result in structural distress and/or damage. However, due to the lack of clay in the City, expansive soils are not considered a hazard in Cathedral City (Cathedral City General Plan 2002).

A Hydrologic Soil Group Map, created with data from the United States Department of Agriculture (USDA), identified the various soil groups at the project site. These soil groups are categorized by estimates of runoff potential and are assigned to one of four groups according to the rate of water infiltration when the soils are: not protected by vegetation, are thoroughly wet, and receive precipitation from long-duration storms. The soils are categorized into four groups, A, B, C or D, from high infiltration rate to slow infiltration rate, respectively. The USDA data shows the soil at the project site as group A. Group A soils have a high infiltration rate (low runoff potential) when thoroughly wet, they also have a low potential to shrink or swell.

The Geotechnical Investigation, and Soils Update Letter provided by Sladden Engineering on August 16, 2018, also analyzed the onsite soils and found that the bearing soil is non-expansive and falls within the “very low” expansion category in accordance with the California Building Code (CBC) classification criteria. Therefore, the risk of expansive soils is considered low.

Based on the Cathedral City General Plan, USDA data, the Geotechnical Investigations, and Soils Update Letter, the soils found onsite are not considered expansive. Therefore, the project will not result in any impacts related to expansive soils.

- e) **No Impact.** The proposed project site and its surroundings within the NCESP are currently vacant and undeveloped. Planning Area 2, located east of Bob Hope Drive, is currently being constructed by others. The development of this area will include a sanitary sewer service located throughout the project site, and connect to an existing 15 inch sewer main located southeast of the project site, at Rio Del Sol and Varner Road. The Coachella Valley Water District (CVWD) will provide this sanitary sewer service. The proposed project will be required to connect to sanitary sewer lines in the area and no septic systems will be permitted. No impact is expected.

**Standard Conditions and Mitigation:** (listed in order of appearance in NCESP EIR, not in the order of the Initial Study)

**SC 3.6-1:** All structural design shall adhere to the structural recommendations within the site specific Geotechnical Reports for each portion of the project. Minimum seismic design should comply with the California Building Code using the seismic coefficients given in the Geotechnical Report.

**SC 3.6-2:** Design Level Geotechnical Engineering Report(s) shall be prepared for grading and construction activities.

**SC 3.6-3:** Site grading shall be in strict compliance with the requirements of the South Coast Air Quality Management District. Dust control shall be implemented throughout all phases of construction. (Further discussion contained in Air Quality Section in the NCESP EIR).

**SC 3.6-4:** Additional site specific geotechnical investigations may be necessary based onsite specific design proposals. Local variation in soil conditions may warrant adjustments such as increasing depth recompaction and over-excavation. A representative of the soils consultant shall observe site clearing and the bottoms of excavations before placing fill.

**SC 3.6-5:** At the start of site grading for all portions of the project, existing vegetation, trees, large roots, pavements, foundations, non-engineered fill, construction debris, abandoned underground utilities and other deleterious material shall be removed from the proposed building, structural, tank, pavement areas and areas that receive fill. The surface shall be stripped of organic growth and removed from the construction area.

**SC 3.6-8:** The grading contractor shall work in accordance with the Grading Ordinance of the City of Cathedral City, throughout all grading activities.

**SC 3.6-7:** Prior to issuance of a Grading Permit, the developer of the roads and infrastructure, and structures shall prepare a Storm Water Pollution Prevention Plan and a PM10 Fugitive Dust Control Plan. These plans shall be implemented throughout all construction activities.

**MM 3.6-1:** The project contractors shall adhere to the recommendations contained within the site specific Geotechnical Feasibility and Infiltration Report throughout grading and construction activities.

**MM 3.3-6:** To minimize potentially significant impacts of blowsand exposure on future sensitive receptors that locate within the project site, the Specific Plan should incorporate design standards and development guidelines detailing appropriate techniques to be implemented to control and reduce wind erosion and blowsand over the long term. Permanent blowsand abatement elements should be implemented onsite to protect and stabilize the soil within the project site. Appropriate techniques to prevent the accumulation of blowsand on-site should

be incorporated in the project design to minimize future damage from and exposure to blowsand.

**Project Specific Mitigation:**

**MM 3.6-2:** The project applicant shall prepare plans for review and approval by the City showing show how the project is consistent with the windscreen and blowsand protection recommendations contained in Section 8.D.8 *Windscreen and Blow Sand Protection* of the NCESP.

7. GREENHOUSE GAS EMISSIONS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**BACKGROUND**

References: The following analysis is based on the findings of the *Glass House Pharms Cultivation Facility Air Quality and Greenhouse Gas Impact Study* (Air Quality Impact Study), prepared by MD Acoustics, LLC, 2018. The air quality and greenhouse gas (GHG) analysis was prepared to evaluate whether the project would result in GHG emissions generated from the project would cause a significant impact on the environment.

Greenhouse gases (GHG) are a group of gases that trap solar energy in the Earth's atmosphere, preventing it from becoming too cold and uninhabitable. Common greenhouse gases in the Earth's atmosphere include: water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), ozone, and to a lesser extent chlorofluorocarbons. Carbon dioxide is the main GHG thought to contribute to climate change. Carbon dioxide reflects solar radiation back to Earth, thereby trapping solar energy and heat within the lower atmosphere. Human activities (such as burning carbon-based fossil fuels) create water vapor and CO<sub>2</sub> as byproducts, thereby impacting the levels of GHG in the atmosphere.

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. GCC is currently one of the most controversial environmental issues in the United States, and much debate exists within the scientific community about whether or not GCC is occurring naturally or as a result of human activity. Some data suggests that GCC has occurred in the past over the course of thousands or millions of years. These historical changes to the earth's climate have occurred naturally without human influence, as in the case of an ice age. However, 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.

Many countries around the globe have made an effort to reduce GHGs since climate change is a global issue. In 1988, the United Nations and the World Meteorological Organization established the Intergovernmental Panel on Climate Change to assess the scientific, technical and socio-economic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation. The United States participates in the United Nations Framework Convention on Climate Change (UNFCCC) (signed on March 21, 1994). Under the Convention, governments gather and share information on greenhouse gas emissions, national policies, and best practices; launch national strategies for addressing greenhouse gas emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. It has been estimated that if the commitments outlined in the Kyoto Protocol are met, global GHG emissions could be reduced by an estimated 5 percent from 1990 levels during the first commitment period of 2008 – 2012 (UNFCCC 1997). On December 8, 2012, the Doha Amendment to the Kyoto Protocol was adopted. The amendment includes: New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 2013 – 2020; a revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

On December 2, 2009, the EPA announced that GHGs threaten the public health and welfare of the American people. The EPA also states that GHG emissions from on-road vehicles contribute to that threat. The decision was based on *Massachusetts v. EPA* (Supreme Court Case 05-1120) which argued that GHGs are air pollutants covered by the Clean Air Act and that the EPA has authority to regulate those emissions.

To address the long-term adverse impacts associated with global climate change, California's Global Warming Solutions Act of 2006 (AB 32) requires California Air Resource Board (CARB) to reduce statewide emissions of greenhouse gases to 1990 levels by 2020. In 2016, Governor Jerry Brown signed Senate Bill 32 (SB32) that requires California to reduce GHG emissions to 40 percent below 1990 levels by 2030. With the passage of the California Global Warming Solutions Act of 2006 (Assembly Bill 32) in California, environmental documents for projects pursuant to CEQA are required to analyze greenhouse gases and assess the potential significance and impacts of GHG emissions.

Executive Order S-3-05. California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following targets:

- By 2010, California shall reduce greenhouse gas emissions to 2000 levels;
- By 2020, California shall reduce greenhouse gas emissions to 1990 levels.
- By 2050, California shall reduce greenhouse gas emissions to 80 percent below 1990 levels.

The executive order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. To comply with the Executive Order, the secretary of CalEPA created the California Climate Action Team (CAT), made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of businesses, local governments, and communities and through State incentive and regulatory programs.

a,b) **Less than Significant Impact with Mitigation.** The Air Quality Impact and GHS Study utilized the California Emissions Estimator Model (CalEEMod Version 2016.3.2) to estimate the operational air pollutant emissions and the greenhouse gas emissions that would result from the implementation of the proposed project based on project- specific information.

#### SCAQMD GHG Threshold Development

The SCAQMD has established recommended significance thresholds for greenhouse gases for local lead agency consideration (“SCAQMD draft local agency threshold”). SCAQMD has published a five-tiered draft GHG threshold which includes a 10,000 metric ton of CO<sub>2</sub>e per year for stationary/industrial sources and 3,000 metric tons of CO<sub>2</sub>e per year significance threshold for residential/commercial projects (South Coast Air Quality Management District 2010c). Tier 3 is anticipated to be the primary tier by which the SCAQMD will determine significance for projects. The Tier 3 screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects. A 90-percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to CEQA analysis. The 90-percent capture rate GHG significance screening level in Tier 3 for stationary sources was derived using the SCAQMD’s annual Emissions Reporting Program.

The current draft thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether or not the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose but must be consistent. A project’s construction emissions are averaged over 30 years and are added to a project’s operational emissions. If a project’s emissions are under one of the following screening thresholds, then the project is less than significant:
  - All land use types: 3,000 MTCO<sub>2</sub>e per year
  - Based on land use types: residential is 3,500 MTCO<sub>2</sub>e per year; commercial is 1,400 MTCO<sub>2</sub>e per year; and mixed use is 3,000 MTCO<sub>2</sub>e per year
- Tier 4 has the following options:
  - Option 1: Reduce emissions from business as usual by a certain percentage; this percentage is currently undefined
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures

- Option 3: Year 2020 target for service populations (SP), which includes residents and employees: 4.8 MTCO<sub>2</sub>e/SP/year for projects and 6.6 MTCO<sub>2</sub>e/SP/year for plans;
- Option 3, 2035 target: 3.0 MTCO<sub>2</sub>e/SP/year for projects and 4.1 MTCO<sub>2</sub>e/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

As this project is a mixed use, the SCAQMD draft tier 3 threshold of 3,000 MTCO<sub>2</sub>e per year for all land uses was used in this analysis. If the project’s emissions exceed 3,000 MTCO<sub>2</sub>e per year, then the project’s emissions would be compared to the SCAQMD tier 4 Service Population Thresholds.

Construction Greenhouse Gas Emissions

Greenhouse gas emissions from project construction equipment and worker vehicles are shown in Table VII-1. The emissions are from all phases of construction. The total construction emissions amortized over a period of 30 years are estimated at 390.59 metric tons of CO<sub>2</sub>e per year.

**Table VII-1  
Construction Greenhouse Emissions**

Emission Source	Emissions (MTCO <sub>2</sub> e)		
	Onsite	Offsite	Total
Site Preparation	310.0	11.6	321.6
Grading	1,280.6	32.0	1,312.7
Building Construction	1,097.0	8,467.7	9,564.8
Paving	333.1	15.1	348.2
Coating	42.2	128.4	170.6
Total	2,572.9	8,643.3	11,717.8
Averaged over 30 Years	92	288	390.59

Source: Glass House Pharms Cultivation Facility Air Quality and Greenhouse Gas Impact Study  
Note: MTCO<sub>2</sub>e=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane and nitrous oxide).

Operational Greenhouse Gas Emissions

Operational emissions occur over the life of the project. Based on the Air Quality Impact Study, the service population for the project was estimated to be 1,770. Based on the Glass House Pharms Trip Generation Analysis, Cathedral City, prepared in January of 2019, 81 employees are projected per greenhouse area. This estimate is considered a conservative number that factors a 25 percent cushion above the anticipated numbers. The unmitigated operational emissions for the project are 10,643.09 metric tons of CO<sub>2</sub>e per year as shown in Table VII-2. These emissions exceed the tier 3 draft SCAQMD threshold for all land uses of 3,000 metric tons of CO<sub>2</sub>e per year, and mitigation is required.

**Table VII-2  
Opening Year Unmitigated Project-Related Greenhouse Gas Emissions**

Greenhouse Gas Emissions (Metric Tons/Year)						
Category	Bio-CO <sub>2</sub>	NonBio-CO <sub>2</sub>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Area Sources	0.00	46.20	46.20	0.00	0.00	46.49
Energy Usage	0.00	7,668.13	7,668.13	0.31	0.07	7,696.82

Mobile Sources	0.00	2,075.12	2,075.12	0.10	0.00	2,077.53
Solid Waste	65.67	0.00	65.67	3.88	0.00	162.69
Water	16.10	199.18	215.28	1.66	0.04	268.97
Construction	0.00	416.68	416.68	0.04	0.00	390.59
Total Emissions	81.77	10,405.31	10,487.07	5.99	0.11	10,643.09
SCAQMD Tier 3 Draft Threshold for All Land Uses				3,000		
Exceeds Threshold?				Yes		

Source: Glass House Pharms Cultivation Facility Air Quality and Greenhouse Gas Impact Study

Note: MTCO<sub>2e</sub>=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane and nitrous oxide).

**Table VII-3  
Mitigation for Mobile Emissions Factored into CalEEMod**

Measure Number	Strategy	Range of Effectiveness	Basis
<b>LUT-1</b>	Increase Density	0.8 – 30.0% vehicle miles traveled (VMT) reduction and therefore a 0.8 – 30.0% reduction in GHG emissions	VMT Reduction: The proposed project will allow for an increase in terms of persons, jobs and dwellings compared to the undeveloped condition.
<b>LUT-3</b>	Increase Diversity	9-30% vehicle miles traveled (VMT) reduction and therefore 9-30% reduction in GHG emissions	VMT Reduction: The project is part of a Mixed-Use neighborhood district (MU-N), which is designed to include a variety of housing types and cannabis uses.
<b>LUT-4</b>	Improved Destination Accessibility	6.7 – 20% vehicle miles traveled (VMT) reduction and therefore 6.7-20% reduction in GHG emissions	VMT Reduction: The project is located approximately 1.20 miles from commercial uses.
<b>LUT-5</b>	Increase Transit Accessibility	0.5 – 24.6% VMT reduction and therefore 0.5-24.6% reduction in GHG emissions	VMT Reduction: As a standard condition identified as SC 3.16, the project proponent shall coordinate with the SunLine Transit Agency regarding the need for public transit facilities on or adjacent to the project site.

<b>SDT-1</b>	Improve Pedestrian Network	0 - 2% vehicle miles traveled (VMT) reduction and therefore 0 - 2% reduction in GHG emissions	VMT - Providing a pedestrian access network to link areas of the project site encourages people to walk instead of drive. This mode shift results in people driving less and thus a reduction in VMT. The project will incorporate sidewalk improvements on-site and along the Varner Road and Valley Center Boulevard frontages.
<b>WSW-3</b>	Use Locally Sourced Water Supply	0 – 60% for Northern and Central California, 11 – 75% for Southern California	California water supplies come from ground water, surface water, and from reservoirs, typically fed from snow melt. Using locally-sourced water or water from less energy-intensive sources reduces the electricity and indirect CO2 emissions associated with water supply and transport. The project proposes to use an on-site private water well and one 500,000 gallon water storage tank to serve the site.

The data provided in Table VII-4 below shows that the proposed project's mitigated emissions would be reduced to 3,317.40 MTCO<sub>2</sub>e per year; which still exceeds the SCAQMD tier 3 draft threshold of 3,000 MTCO<sub>2</sub>e per year. However, when the project's mitigated emissions of 1.87 MTCO<sub>2</sub>e/SP/year are compared against the interpolated SCAQMD tier 4 2025 Target Service Population threshold of 4.20 MTCO<sub>2</sub>e/SP/year<sup>3</sup>, the service population emissions are well under threshold. As shown in Table VII-3 below, with incorporation of mitigation measures mm 3.1 through 3.6 and incorporation of the CAPCOA-based mobile land use reduction measures: LUT-1 Increased Density, LUT- 3 Increase Diversity, LUT-4 Improve Destination Accessibility, LUT-5 Increase Transit Accessibility, SDT-1 Improve Pedestrian Network on-site (as it is anticipated that sidewalks will be built for the residential portion of the site), and WSW-3 Use Locally Sourced Water Supply (see notes in the Annual CalEEMod output in Appendix B) the project's emissions would no longer exceed the interpolated SCAQMD tier 4 2025 Target Service Population threshold of 4.20 MTCO<sub>2</sub>e/SP/year. Therefore, the project's GHG emissions are considered to be less than significant with mitigation.

**Table VII-4  
Opening Year Mitigated Project-Related Greenhouse Gas Emissions**

Greenhouse Gas Emissions (Metric Tons/Year)						
Category	Bio-CO2	NonBio-CO2	CO2	CH4	N2O	CO2e
Area Sources	0.00	46.20	46.20	0.00	0.00	46.49
Energy Usage	0.00	1,238.84	1,238.84	0.04	0.02	1,244.52
Mobile Sources	0.00	1,452.13	1,452.13	0.08	0.00	1,454.14
Solid Waste	16.42	0.00	16.42	0.97	0.00	186.54
Water	10.78	139.80	158.58	1.11	0.03	390.59
Construction	0.00	589.18	589.18	0.05	0.00	390.59
Sequestration						-45.55
Total Emissions	27.19	3,466.15	3,493.34	2.26	0.04	3,317.40
SCAQMD Tier 3 Draft Threshold for All Land Uses				3,000		
Exceeds Threshold?				Yes		

SCAQMD Tier 4 2025 Target Service Population Threshold 4.20 MTCO <sub>2</sub> e/SP/year for projects	1.87
Exceeds Threshold?	No

Consistency with Greenhouse Gas Climate Action Plans

The City of Cathedral City adopted a Climate Action Plan in November of 2013. The plan was prepared to assist the City in conforming to the GHG emissions reductions as mandated under AB 32. The Plan calls for a 23.4 percent reduction from year 2010 emissions to achieve the AB 32 target by 2020.

SCAQMD's screening thresholds used Executive Order S-3-05 goal as the basis for deriving the screening level. The California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels
- 2020: Reduce greenhouse gas emissions to 1990 levels
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels

In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires CARB, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012.

Therefore, as the project's emissions meet the threshold for compliance with Executive Order S-3-05, the project's emissions also comply with the goals of AB 32; which is also the goal of the Cathedral City Climate Action Plan.

As the SCAQMD uses EO S-3-05 as the basis for their emissions screening levels, and EO S-3-05 includes the long-term goal to reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050, the project would also be consistent with the goal of SB 32 (to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030). Therefore, projects that meet the current interim emissions targets/thresholds established by SCAQMD would also be on track to meet the reduction targets for 2030. Furthermore, all of the post 2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the project will be required to comply with these regulations as they come into effect.

The project's emissions would not exceed the interpolated SCAQMD tier 4 2025 Target Service Population threshold of 4.20 MTCO<sub>2</sub>e/SP/year and will meet the threshold for compliance with Executive Order S-3-05. The project's emissions also comply with the goals of AB 32 and SB 32. At a mitigated level of 1.86 MTCO<sub>2</sub>e/SP/year, the project's GHG emissions fall well below the aforementioned interpolated Service Population Threshold and is in compliance with the reduction goals of the City's Climate Action Plan. Furthermore, the project will comply with applicable Green Building Standards and City of Cathedral City's policies regarding sustainability. Furthermore, the project is required to comply with applicable Green Building Standards designed to reduce energy usage. Therefore, the project will not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Impacts are considered to be less than significant with mitigation.

**Project Specific Mitigation:**

- MM 3-1:** The project applicant shall require the use of the on-site sustainability design features that will provide at least 90 percent of the proposed project's electrical energy needs.

- MM 3-2:** The project applicant shall require that ENERGY STAR-compliant appliances are installed wherever appliances are required on-site.
- MM 3-3:** The project applicant shall require that all faucets, toilets and showers installed in the proposed structures utilize low-flow fixtures that would reduce indoor water demand by 20% per CalGreen Standards.
- MM 3-4:** The project applicant shall implement recycling programs that reduces waste to landfills by a minimum of 75 percent (per AB 341).
- MM 3-5:** All cultivation runoff water shall be recycled and a water-efficient landscape irrigation system and drought tolerant landscaping be installed that conform to the City code requirements.

<b>8. HAZARDS AND HAZARDOUS MATERIALS --</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) 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"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Sources:** Cathedral City General Plan, July 2002; Riverside County General Plan December 2016; California Code of Regulations, Bureau of Cannabis Control, 2018; Code of Federal Regulations, 2012; Enforcement and Compliance History Online, 2018; GeoTracker, State Water Resources Control Board, 2018; EnviroStor, Department of Toxic Substances Control, 2018.

**BACKGROUND**

The Code of Federal Regulations (CFR Title 40, Part 261) defines hazardous materials based on ignitability, reactivity, corrosivity, and/or toxicity properties. The State of California defines hazardous materials as substances that are toxic, ignitable or flammable, reactive and/or corrosive, which have the capacity of causing harm or a health hazard during normal exposure or an accidental release. The use and management of hazardous or potentially hazardous substances is regulated under existing federal, state and local laws. Hazardous wastes require special handling and disposal methods to reduce their potential to damage public health and the environment.

The Federal Resource Conservation and Recovery Act (RCRA) defines a hazardous waste as any solid, liquid, or contained gaseous material that is either disposed, incinerated or recycled. A hazardous material may become hazardous waste upon its accidental release into the environment. All hazardous waste must be discharged into a Class I landfill. No Class I landfill is currently operated within Riverside County. Hazardous waste generated within Riverside County and disposed of off-site is transported to Kern County or Santa Barbara County, where active Class I landfills are located. Some waste is also transported out of the State.

Senate Bill 1082 of 1993 (Health and Safety Code Chapter 6.11) required the Secretary of the California Environmental Protection Agency (Cal/EPA) to establish a “Unified Hazardous Waste and Hazardous Materials Management” regulatory program (Unified Program). A local agency, such as a county, could apply to Cal/EPA for certification as a Unified Program Agency and become responsible for implementing the Unified Program within its jurisdiction. This responsible agency is called a Certified Unified Program Agency (CUPA). Riverside County Department of Environmental Health Materials Management Division Riverside County’s designated CUPA. Therefore, the Division manages various groups and plans including: Business Plan Program, the Hazardous Materials Release Response Plan and Inventory Program, Hazardous Materials Emergency Response Team, Risk Management Prevention Program, Underground Storage Tank Program, and the Aboveground Petroleum Storage Act (APSA) Program within the County.

The County of Riverside Department of Environmental Health (DEH) has a Regional Household Hazardous Waste Collection Program (HHW) that provides household waste collection facilities for residents of the County to dispose of materials at no charge. The nearest Permanent HHW collection facility is located in Palm Springs.

Cannabis waste, as defined by the California Code of Regulation's Bureau of Cannabis Control, is organic waste that contains cannabis that has been made unusable and unrecognizable. However, cannabis waste is not considered hazardous. According to the Riverside County DEH, hazardous materials typically found at cannabis related facilities include but are not limited to: liquefied carbon dioxide, alcohols, liquid nitrogen, propane, plant nutrients/fertilizers, gaseous carbon dioxide, butane, gaseous nitrogen, other extraction solvents, and pesticides. If a facility generates hazardous waste it is required to have a permit with the DEH. Hazardous waste streams typically found at cannabis related facilities include, but are not limited to: processed waste contaminated with solvents, contaminated absorbent materials, waste pesticides, universal waste, waste fertilizers/plant nutrients, mechanical components from equipment with residual solvent material, used batteries, and waste solvents. Therefore, the Riverside County DEH shall require a project to submit applicable permits and plans to the Department for compliance purposes.

Cathedral City, in their General Plan, coordinates with appropriate county, state and federal agencies in the identification of hazardous material sites, and their timely cleanup. In order to manage these issues, the City may establish and maintain information on these sites, and periodically monitor facilities and operations that produce, utilize or store hazardous materials in the City. City involvement in multi-agency monitoring of illegal dumping in the City, conferring the regulation of underground storage tanks and septic systems, and regulating the transport of hazardous materials through the community, the City can better protect against potential hazards associated with hazardous materials and wastes.

In regard to cannabis facilities, Cathedral City provides standards and regulations to control all cannabis activities in the City through Municipal Codes 5.88 and 9.108. Cathedral City Municipal Code (CCMC) 5.88 supplies standards regarding commercial cannabis activity in Cathedral City, as defined in the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), to extent authorized by state law and in a manner designated to minimize negative impacts on the city and neighboring uses. CCMC 9.108 regulates cannabis business land uses, as permitted by Section 26200 of the California Business and Professions Code, in a manner designed to minimize negative impacts on the city and neighboring uses. Both codes also intend to promote the health, safety, morals, and general welfare of residents and businesses within the City. Cannabis projects within the City are required to comply with the standards set in the CCMC, in addition to all relevant state and federal laws.

The records search conducted for the purpose of this document was accomplished pursuant to Government Code 65962.5, which requires that a records search for hazardous waste facilities subject to corrective action, underground storage tanks, and waste disposal facilities are recorded and accessible. The databases utilized for the records search for the project site included the State Water Resources Control Board's database GeoTracker, The Department of Toxic Substance Control's database EnviroStor, and the EPA's database Enforcement and Compliance History Online (ECHO). Each of these sites provide environmental data of sites where known contamination has occurred or can potentially occur.

a,b) **Less than Significant Impact:** The project will not involve the use or storage of hazardous materials other than organic certified fertilizers and California approved natural pesticides and fungicides. These materials will be stored and applied according to manufacturer's instructions to mitigate the potential for incidental release of hazardous materials or explosive reaction.

As stated in this section's background discussion, the Code of Federal Regulations (CFR Title 40, Part 261) defines hazardous materials based on ignitability, reactivity, corrosivity, and/or toxicity properties. The State of California defines hazardous materials as substances that are toxic, ignitable or flammable, reactive and/or corrosive, which have the capacity of causing harm or a health hazard during normal exposure or an accidental release. The use and management of hazardous or potentially hazardous substances is regulated under existing federal, state and local laws. Hazardous wastes require special handling and disposal methods to reduce their potential to damage public health and the environment. Manufacturer's specifications also dictate the proper use, handling, and disposal methods for the specific substances. The applicant will be required to submit a Hazardous Materials Business Plan (HMBP) to the County of Riverside Department of Environmental. The

Riverside County Department of Environmental Health's Hazardous Materials Management Division, as the State Certified Unified Program Agency (CUPA), is responsible for review and approval of the site specific HMBP, in compliance with Assembly Bill 1285, which addresses emergency response and the accessibility of hazardous materials information. The HMBP is a document containing detailed information on: inventory of hazardous materials at a facility, emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material, training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material. The Plan sets forth operational procedures, emergency contact information, emergency response plan for containment spills or release of vapors and other information required in the HMBP. Implementation of the HMBP will ensure that an emergency response plan is in place in the event that hazardous materials are accidentally released, during operations and impacts will be less than significant.

Construction of the proposed project will involve the temporary management and use of oils, fuels and other potentially flammable substances. The nature and quantities of these products would be limited to what is necessary to carry out construction of the project. Some of these materials would be transported to the site periodically by vehicle and would be stored in designated controlled areas on a short-term basis. When handled properly by trained individuals and consistent with the manufacturer's instructions and industry standards, the risk involved with handling these materials is considerably reduced. As a requirement of the State's most current Construction General Permit (CGP) (Order No. 2009-0009-DWQ as amended by 2010-0014- DWQ and 2012-0006-DWQ), the project proponent will be required to implement a Stormwater Pollution Prevention Plan (SWPPP). Per the SWPPP, the contractor will be required to identify a staging area for storing materials and equipment and will be required to implement best management practices (BMPs) to assure that impacts are minimized and that any minor spills are immediately and properly remediated.

Additionally, the SWPPP will regulate the management of potentially hazardous materials and other potential pollutant sources to prevent a threat to the environment during construction. The SWPPP requires a list of potential pollutant sources and the identification of construction areas where additional control measures are necessary to prevent pollutants from being released on-site or into the surroundings. Best management practices (BMPs) are necessary for Material Delivery and Storage; Material Use; and Spill Prevention and Control. These measures outline the required physical improvements and procedures to prevent impacts of pollutants and hazardous materials to workers and the environment during construction. For example, all construction materials, including paints, solvents, and petroleum products, must be stored in controlled areas and according to the manufacturer's specifications. In addition, perimeter controls (fencing with wind screen), linear sediment barriers (gravel bags, fiber rolls, or silt fencing), and access restrictions (gates) would help prevent temporary impacts to the public and environment. With such standard measures in place, less than significant impacts are anticipated during construction.

During operation of the proposed cultivation facilities, activities involving the presence and transport of chemicals will be used in the facility's maintenance. However, these will occur in limited quantities and are not expected to represent a potentially significant impact. Additionally, the proposed activities are not expected to involve the routine transport, use or disposal of hazardous materials in quantities or conditions that would pose a hazard to public health and safety of the environment. CCMC Section 5.88.065.R requires all cannabis businesses to comply with all federal, state and local laws pertaining to disposal of chemical, dangerous or hazardous waste.

Cultivation and processing activities would involve plant treatment with fertilizers, insecticides, acaricides, fungicides, and other crop protection agents. The application and management methods of fertilizers and crop protection agents would be required to comply with all manufacturer-specific instructions, precautionary requirements, and accidental release measures. In most cases, it would be a violation of federal law to apply these products in a manner that is inconsistent with the instructions provided in each corresponding product labeling.

Odor control at the project site will be controlled by Ecosorb 607 and Ecosorb CNB 100. These odor neutralizers are designed to control broad spectrum odors, and odors caused by odor causing chemical compounds found in cannabis including but not limited to the cannabinoids, terpenes, and sesquiterpenes groups. The products are non-toxic and non-hazardous by OSHA Hazard Communication Standard 29 CFR 1910.1200. According to manufacturer standards, the products are stored in high density polyethylene (HDPE) containers and should be handled following manufacturer-specific instructions which the project will also be required to do by federal law.

Along with following manufacturer-specific instructions, required by federal law, the project operator would be required to abide by the manufacturer's standards and requirements, as well as standards stated within the California Code of Regulations Bureau of Cannabis Control to provide the proper storage facilities and containers designed to protect and isolate these substances, therefore minimizing the threat to the public or the environment. Facility employees shall be trained on safety rules to prevent personal or public risk, as required by the HMBP, and applicable state and federal regulations, including the Occupational Safety and Health Administration (OSHA). Solid waste produced by the project will be stored in a designated staging area with enclosures.

With compliance with federal, state and local laws and regulations pertaining to hazardous waste handling and disposal, the project will not result in a significant impact. Therefore, less than significant impacts are anticipated.

- c) **No Impact.** The project site is not located within ¼ mile of an existing or proposed school. The nearest school to the project site is the Rancho Mirage High School located approximately 0.50 miles south of the project site. The California Department of Toxic Substances Control's EnviroStor database listed a proposed elementary school north of the existing high school. However, this proposed elementary school also does not lie within ¼ miles of the project property. No impacts to schools are anticipated.
- d) **No Impact.** The project proposes the development and operation of a cultivation facility on a 300-acre property within Cathedral City's NCESP, between the Interstate 10 Freeway and Varner Road. In order to comply with Government Code 65962.5, and its subsections, record searches on the project property were performed within multiple database platforms. The resources consulted included GeoTracker, EnviroStor and the EPA Enforcement and Compliance History Online (ECHO).

GeoTracker is a database maintained by the State of California Water Resources Control Board that provides online access to environmental data. It serves as the management system for tracking regulatory data on sites that can potentially impact groundwater, particularly those requiring groundwater cleanup and permitted facilities, such as operating underground storage tanks and land disposal sites.

EnviroStor is a database maintained by the State of California Department of Toxic Substances Control (DTSC). The EnviroStor database identifies sites with known contamination or sites for which there may be reasons to investigate further. It includes the identification of formerly contaminated properties that have been released for reuse; properties where environmental deed restrictions have been recorded to prevent inappropriate land uses; and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

Additionally, the ECHO database focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), Clean Water Act (CWA) and Resource Conservation and Recovery Act (RCRA), and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data.

In October of 2018, a search was performed on all three database platforms. The search results did not identify any records or sites in connection with the project property on any of the databases. The GeoTracker and EnviroStor database results did not identify any Leaking Underground Storage Tank (LUST) Cleanup Sites,

Land Disposal Sites, Military Sites, DTSC Hazardous Waste Permits, DTSC Cleanup Sites, or Permitted Underground Storage Tanks on or within a one-mile radius of the project property. The ECHO database did not discover any sites within one mile of the property violating the CAA, CWA, RCRA, SDWA, and the TRI.

Per the records search, the project site is not registered on the GeoTracker, Envirostor, or ECHO databases, and it is not expected to create a significant hazard to the public or the environment. No impacts are anticipated.

- e, f) **No Impact.** The project is not located near an existing airport or airport land use plan or in the vicinity of a private airstrip. The nearest airport facility to the project is the Palm Springs International Airport, located approximately 3.50 miles to the southwest. The project site is located outside of the Palm Springs International Airport Land Use Compatibility Plan (Riverside County Airport Land Use Compatibility Plan Policy Document, adopted March 2005). No impacts are anticipated.
- g) **Less than Significant Impact.** The Emergency Preparedness Element of the City's 2002 General Plan outlines critical facilities and services necessary to respond adequately to emergencies and discusses potential impacts of natural and man-made threats which would significantly affect the City. The Element set forth the goals, policies and programs developed by Cathedral City to ensure adequate preparation for such emergencies.

The major intercity and regional access routes serving Cathedral City include East Palm Canyon Drive, Dinah Shore Drive, Ramon Road and the Interstate 10 Freeway. The proposed project site is located on vacant desert land north of Interstate 10 Freeway, east of DaVall Drive, and south of Varner Road. The approximately 300-acre project site will include both a residential component and a cultivation business park, with approximately 140 acres for open space and retention. Primary ingress and egress from the residential and cultivation components will be accessed from Varner Road and Valley Center Boulevard, which will be completed in City approved phases d. Two additional access roads will provide emergency access to the cannabis cultivation campus. These roads are located on "M" Street (discussed further in the Transportation and Traffic Section).

The project is not expected to physically interfere with the City's adopted emergency response plan or emergency evacuation plan. Interstate 10 can be accessed from the project site via Date Palm Drive, approximately 1.25 miles northwest, or Bob Hope Drive, approximately 1.0 mile southeast. The proposed project site design will be reviewed by the City's Fire Department for compliance with project specific emergency access, water pressure and similar requirements as a routine aspect of the City's design review process. This will ensure emergency access and evacuation of the site will not be impaired by project development. Therefore, less than significant impacts are anticipated.

- h) **No Impact.** The site is currently characterized as vacant land with scattered, low-lying desert vegetation. Similar characteristics are found on the surrounding properties to the north, east and west. The scattered vegetation found on the project site, and surrounding areas include low-lying Sonoran creosote scrub. According to Cal Fire's Fire and Resource Assessment Program the proposed project site is not located within a Very High Fire Hazard Severity Zone. As a result, the project is not expected to expose people or structures to wildland fire hazards and no impact is expected to result from the project.

**Project Specific Mitigation:** None

<b>9. HYDROLOGY AND WATER QUALITY --</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<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, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Sources:** Project-Specific Preliminary Water Quality Management Plan for Glass House Pharms, prepared by MSA Consulting, Inc. on January 22, 2019. Preliminary On-Site Hydrology Report for Glass House Pharms, prepared by MSA Consulting, Inc. on January 24, 2019. Glass House Pharms Phase 1 Improvements Flood Hazard Mitigation Report, prepared by Q3 Consulting on December 7, 2019. North City Extended Specific Plan, adopted on January 15, 2014. 2014 Whitewater River Region Water Quality Management Plan Guidance Document

a,f) **Less than Significant Impact.**

**BACKGROUND**

The Clean Water Act (CWA) of 1972 was enacted to restore and maintain the chemical, physical, and biological integrity of the nation’s waters by regulating the discharge of pollutants to waters of the U.S. from point sources. Subsequent amendments to the CWA as part of the National Pollutant Discharge Elimination System (NPDES), established a framework for regulating non-point source discharges from urban land runoff and other diffuse sources that were also found to contribute pollutants. Under CWA, the Environmental Protection Agency (EPA) authorized the NPDES permit program to some state, tribal, and territorial governments, enabling them to perform many of the permitting, administrative, and enforcement aspects of the program. California is a delegated NPDES state and has authority to administer the NPDES program within its borders. The Porter-Cologne Act is the principal law governing water quality regulation for surface waters in California. It established a comprehensive program to protect water quality and the beneficial uses of water. Presently in the State of California, the State Water Resources Control Board (SWRCB) and nine California Regional Water Quality Control Boards (RWQCBs) administer the regulation and protection of water quality pursuant to NPDES. Their regulations encompass storm water discharges from construction sites, municipal separate storm sewer systems (MS4s), and major industrial facilities.

The project is located in the Colorado River Region (Region 7), where the approved Colorado River Basin Water Quality Control Plan (Basin Plan) identifies the beneficial water uses, describes the water quality which must be maintained to support such uses, and describes the programs, projects, and other actions necessary to achieve the standards and protect water quality. As part of Region 7, the Whitewater River Watershed Municipal Separate Storm Sewer System (MS4), is a compliance program that covers approximately 1,645 square miles, including Cathedral City and the proposed project.

The regional Basin Plan establishes water quality standards for surface waters within the Colorado River Region, which include designated beneficial uses of those water bodies and the levels of water quality that must be met and maintained to protect those uses. Based on the project’s location and setting, the nearest receiving water to the project is the Coachella Valley Stormwater Channel (CVSC), which is located approximately 12.3 miles to the southeast. For CVSC, the designated beneficial uses include freshwater replenishment (FRSH), water contact recreation (REC1), non-contact water recreation (REC2), warm freshwater habitat (WARM), wildlife habitat (WILD), and rare (RARE). The RARE beneficial use pertains to waters that support habitats

necessary for the survival and successful maintenance of plant or animal species established under state and/or federal law as rare, threatened, or endangered. The corresponding water quality objectives include measures that must be followed to protect against water quality degradation. To reach consistency with these objectives, the proposed project must comply with the MS4 regulations and ensure that no discharge from the project degrades the aesthetic qualities or impair the dissolved oxygen concentrations in the receiving surface waters. Accordingly, the project is not permitted to discharge tainted substances, toxicity, altered runoff temperature, altered runoff pH, suspended and settleable solids, total dissolved solids, bacteria, biostimulatory substances, sediment, turbidity, radioactivity, chemical constituents, and pesticide waters outside of any permit parameters.

Water bodies where the assessed water quality does not meet the standards to support beneficial uses are regionally listed pursuant to Section 303(d) of the CWA. The most current 2014 and 2016 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report indicates that portions of CVSC are impaired by DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Indicator Bacteria, PCBs (Polychlorinated Biphenyls), Toxaphene, and Toxicity. The sources of all pollutants causing impairment to CVSC are unknown, and many of these are linked to substances which are now banned, such as DDT, Dieldrin, PCBs, and Toxaphene; therefore, they are not associated with new development, such as the proposed project.

In addition to the applicable CWA, NPDES, and MS4 provisions, the Cathedral City Municipal Code also establishes floodplain and stormwater management regulations consistent with the regional, state and federal requirements. Specifically, Title 8, section 8.24.070 (Storm water storage facilities) serves as the local retention ordinance requiring the project to provide the necessary improvements and facilities to capture and retain the storm volume resulting from the controlling 100-year storm event for the project area. Being part of Planning Area 4 of the NCESP, the project is also required to incorporate the appropriate retention facilities in a manner consistent with local and regional drainage plans, including the management of off-site tributary areas to the project.

The proposed development involves a combination of cultivation facilities, open space, and residential uses. Phase 1 involves development of a cultivation campus component with three 500,000 square-foot greenhouse buildings, one processing building of 79,000 square feet, one two-story administration building of 56,000 square feet, a guard house of 500 square feet, the associated parking lot improvements, and stormwater retention facilities. Phase 2 involves 64 residential units and open space on approximately 66 acres. Phase 2 also includes designated areas for stormwater retention. The northwesternmost area of approximately 140 acres will remain open space and will include three future regional retention basins which will be designed to accept runoff from undeveloped land to the north and northwest. These regional basins will be constructed in phases. In particular, the westernmost regional base will be constructed as part of Phase 1. The second regional base will be constructed in Phase 2 and the third (westernmost) regional base will be constructed in Phase 3. These regional retention basins are expected to be reviewed, accepted and managed by the Coachella Valley Water District (CVWD).

The proposed project design will prevent violations to water quality standards and waste discharge requirements by implementing adequate stormwater management facilities at each stage of development and operation, which are designed to contain project runoff and prevent discharges into any receiving waters. The project is also required to obtain the appropriate permit approvals that ensure compliance with the NPDES, MS4 and City retention ordinance regulations applicable during construction and at each phase of project operation.

### Project Construction

Before start of construction, the project proponent must obtain coverage under State's most current Construction General Permit (CGP), Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-006-DWQ. Compliance with the CGP involves the development and implementation of a project- specific Storm Water Pollution Prevention Plan (SWPPP) designed to reduce potential adverse impacts to surface water quality during

the period of construction. The required SWPPP must identify the limits of disturbance during each phase of construction with specific locations where activities will require implementation of storm water Best Management Practices (BMPs). Storm water BMPs refer to a schedule of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent, eliminate, or reduce the pollution of waters of the receiving waters. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff spillage or leaks. Consistent with the CGP, SWPPP implementation must include good site management (housekeeping), non-stormwater management, erosion control, sediment controls, run-on and runoff controls, along with inspection, maintenance and repair measures. Other relevant requirements of the SWPPP include proper waste management, proper material handling and storage within the allowable construction limits. As construction progresses, any on-site proposed storm drain inlets that become operational will require temporary protection to prevent sediment or pollutants from entering the on-site storm drain system.

During construction, the project will also be required to comply with South Coast Air Quality Management District's (SCAQMD) Rule 403 and 403.1, which requires the project applicant/proponent to prepare and implement a Fugitive Dust (PM10) Control Plan. Implementation of the Fugitive Dust Control Plan primarily pertains to air quality, but also supports water quality protection through the requirement of soil stabilization measures to prevent sediment erosion and track-out. The concurrent implementation of the required SWPPP and Dust Control Plan plans will prevent the potential construction-related impacts to water quality at the site and its surroundings, therefore resulting in less than significant impacts.

#### Project Operation

After construction and during operation of the project, the proposed project will rely on will rely on a system of retention basins designed to capture and retain the tributary stormwater volume resulting from the controlling 100-year storm event. Based on the *Whitewater River Region Water Quality Management Plan Guidance Document*, these retention facilities are deemed low impact development (LID) and site design best management practices (BMPs) because they are aimed at reducing urban runoff, increasing infiltration, reducing pollutant transport mechanisms, and minimizing the difference between pre- and post-development urban runoff.

To comply with the regional LID and site design requirements, the project's hydrologic area is divided into four preliminary drainage management areas, identified as "A", "B", "C", and "D". Preliminary design capture volume quantities have been calculated for each drainage area based on the *Riverside County - Whitewater River Region Water Quality Management Plan* worksheets and based on the results of a project-specific hydrology report. The specific drainage area calculations are summarized below:

Drainage Area "A" corresponds to the third phases of development and encompasses 113.198 acres at the northwest side of the project. Based on the currently planned condition, a majority of this area will have a pervious condition in the form of open space or landscaping, with only 11% percent of impervious cover. The WQMP Design Capture Volume ( $V_{bmp}$ ) associated with this area is currently estimated at 19,226 cubic feet. Drainage Area "A" includes three regional retention basins, which have been designed to retain the required VBMP and storm volume resulting from the controlling 100-year storm event. The total retention capacity serving Drainage Area "A" is approximately 4,039,369 cubic feet. The final design volumes and stormwater management facilities for this drainage area will be determined in the corresponding Final WQMP.

Drainage Areas "B" and "D" correspond to the second phase of development and are designed to work in conjunction. Drainage Area "B" encompasses 100.915 acres in the central area of the project with a residential component of approximately 68.24 acres. Drainage Area "D" consists of 9.852 acres primarily reserved for retention facilities. A total of 8,956 cubic feet will be retained in Drainage Area "B". In the final condition, portions of this drainage area will be conveyed to the retention basins in Drainage Area

“D”, which have the storage capacity of 386,935 cubic feet. The combined retention capacity provided in Drainage Areas “B” and “D” is 395,891 cubic feet, which will be sufficient to handle the WQMP Design Capture Volume (V<sub>bmp</sub>) of 37,518 cubic feet associated with these portions of the project. The final design of stormwater facilities will be determined in the corresponding F-WQMP.

Drainage Area “C” corresponds to the first phase of development, encompassing 80.096 acres in the southeast area of the project. In the developed condition, this area will include three 500,000-square-foot greenhouse buildings, one processing building of approximately 79,000 square feet, one administration building of approximately 56,000 square feet, and a security building of approximately 500 square feet. Based on an impervious cover of 61.201 acres or 76%, the WQMP Design Capture Volume (V<sub>bmp</sub>) associated with this area is 64,986 cubic feet. In the proposed condition, tributary runoff from on-site impervious surfaces (building rooftops, hardscape, asphalt) will be carried along proposed surface and piped conveyances into the retention basin designated for this drainage area, which has been designed to retain the required VBMP and storm volume resulting from the controlling 100-year storm event. The total retention capacity serving Drainage Area “C” is approximately 835,960 cubic feet. Table 1 below shows the expected retention capacities for each drainage management area. As a whole, the project is designed to provide sufficient storage capacity to address the required storage for the 100-year controlling storm event and the WQMP volumes.

**Table IX – Summary of Preliminary Retention Capacities**

Drainage Area ID	Area	WQMP V <sub>bmp</sub>	Required Storage for 100-Year Controlling Storm Event	Storage Volume Provided by Basin
A	113.198 AC.	19,226 CF	494,927 CF	4,039,369 CF
B	100.915 AC.	33,896 CF	487,893 CF	8,956 CF
C	80.096 AC.	64,986 CF	458,094 CF	835,960 CF
D	9.852 AC.	3,622 CF	44,505	386,935 CF
Total Site	304.060 AC.	121,730 CF	1,485,419 CF	5,271,220 CF

The design criteria require that all basins must dewater the controlling 100-year storm event within 36 hours. Based on the approved On-Site Preliminary Hydrology Report, Percolation tests were performed on the property, indicating percolation rates of 9 to 11.5 inches per hour. The project will meet the 36-hour drawdown requirement using a conservative infiltration rate of 2.0 inches per hour, therefore preventing vector breeding concerns. As such, the increase in stormwater volume quantity and rate that is typically associated with land development is addressed by on-site LID retention, rather than off-site discharge. In conclusion, during construction and operation, project implementation will be required to comply with CWA and NPDES regulations to prevent impacts to water quality standards and the beneficial uses assigned to local receiving waters. By adhering to these established regulations noted above, the project is not expected to contribute storm water volumes or pollutants to the local MS4 or any receiving water in a manner that would degrade the local beneficial uses or contribute to any local water quality impairment. Pertaining to water quality and waste discharge, less than significant impacts are anticipated.

- b) **Less than Significant Impact.** Groundwater is the primary source of domestic water supply in the Coachella Valley. The project area and City of Cathedral City are underlain by the Whitewater River subbasin, which forms part of the Coachella Valley groundwater basin. The Whitewater River subbasin underlies a major portion of the Coachella Valley floor and is shared and managed by the Coachella Valley Water District (CVWD),

Desert Water Agency (DWA), Myoma Dunes Mutual Water Company, and the cities of Indio and Coachella. The project site and most of City of Cathedral City are within the service area of the Coachella Valley Water District (CVWD), which is the largest provider of potable water in the Coachella Valley.

Local groundwater resources are managed under the 2015 adopted CVWD Urban Water Management Plan (2015 UWMP) Final Report, dated July 1, 2016. The 2015 UWMP serves as a planning tool that documents actions in support of long-term water resources planning and ensures adequate water supplies are available to meet the existing and future urban water demands. Page 6-6 of the 2015 UWMP indicates that the Coachella Valley groundwater basin historically has been in a state of overdraft, which occurs when the outflows (demands) exceed the inflows (supplies) to the groundwater basin over a period of time. To address this condition, the CVWD and other water agencies have prepared water management strategies that combine water conservation measures with groundwater replenishment facilities to stabilize the groundwater levels and eliminate the overdraft. Artificial replenishment, or recharge, is recognized by the water districts as one of the most effective methods available for preserving local groundwater supplies, reversing aquifer overdraft and meeting demand by domestic consumers. According to the CVWD web site on Ground Replenishment and Imported Water, the CVWD and DWA groundwater replenishment program has percolated 650 billion gallons of water back into the aquifer to date (<http://www.cvwd.org/162/Groundwater-Replenishment-Imported-Water>). Local replenishment efforts have also been coupled with a reduction in demand through improved water efficiency use in homes, yards, gardens, and businesses. The project is required to conform to the local strategies and policies set forth by CVWD.

As previously mentioned, the project includes a system of LID retention basins designed to capture and infiltrate project runoff and runoff from off-site tributary areas which are currently undeveloped. Stormwater capture and infiltration practices are recognized for helping recharge groundwater levels to increase supply reliability, promote conjunctive use, and provide additional benefits that meet the regional objectives related to flooding and water quality. The combined retention capacity introduced by the four drainage areas is approximately 5,271,220 cubic feet, which represents the total amount of stormwater which would be infiltrated during the controlling storm event. This information is provided in the Project-Specific Water Quality Management Plan (WQMP), which is required to comply with the most current standards of the *Whitewater River Region Water Quality Management Plan for Urban Runoff* and the *Whitewater River Watershed MS4 Permit* and is subject to review and approval by the City prior to issuance of a grading permit. Furthermore, the proposed development will be required to implement water conservation measures to reduce impacts to public water supplies. These measures will include low-flow plumbing fixtures, drought-tolerant (native) outdoor landscaping, and water-efficient irrigation systems that comply with the Coachella Valley Water District (CVWD) Ordinance No. 1302.3, which is adopted by reference in Chapter 8.57 (Water Efficient Landscape) in the Cathedral City Municipal Code. The intent of CVWD Ordinance No. 1302.1 is to promote water conservation through climate-appropriate, low water usage plant material and efficient irrigation systems. As indicated in the Utilities and Service Systems section, there are existing water point of connections to the site. The project proposes to install 6,049 linear feet of 18" water main to connect to an existing connection point on Varner Road. Additionally, the project proposes a private water well and one 500,000-gallon agriculture storage tank to serve the site. Up to 1.3 A.F. of water will be used. The well water will be pumped into the storage tank to be used for all indoor irrigation. The developer will pay a Replenishment Assessment charge to CVWD for the use of this well. By implementing the appropriate water efficient systems and infiltration facilities designed to infiltrate stormwater, the project is not expected to interfere with the groundwater recharge conditions or impact groundwater supplies. An assessment of the water supply available to serve the project has been provided in the Utilities and Service Systems section. Less than significant impacts are anticipated.

- c,d) **Less than Significant Impact with Mitigation:** The project area includes a path of overland sheet flow generally trending from northwest to southeast, controlled by the topographic gradient and existing local road embankments. This drainage path accepts off-site tributary flows associated with the Morongo Wash Watershed, including the Morongo Wash, Long Canyon, East and West Wide Canyon, and Willow Hole. Historically, flows from the adjacent mountains were conveyed to the alluvial plains either by sheet flow or by

dissected alluvial channel transport. The construction of the railroad embankment and Interstate 10 to the south interrupted and altered historic flows, which were diverted in a more east to west direction.

There are currently no flood prevention facilities or storm drain facilities within the project or the NCESP area. Small drainage devices are located at Bob Hope Drive to the southeast, which consist of inlet catch basins designed to collect flows from the street, curb, and gutter. An existing box culvert under Varner Road appears to be a low frequency facility (10 years or less) that prevents low flow runoff buildup.

As described in page 3.9-14 in the NCESP DEIR, this regional drainage condition, which includes a portion of the NCESP and the project, is identified as the Riverine Drainage Area Corridor (RDAC) and is therefore subject to the Coachella Valley Water District (CVWD) ordinance for the area. In this context, the term "riverine" used to characterize the area as relating to, formed by, or resembling a river. Except for periods during and immediately following rainstorms, there is little or no flow in most of the streams in the Study Area. Climatic and drainage area characteristics are not conducive to continuous runoff. Additionally, when storm flows do enter the project, they are not channelized but conveyed in a sheet flow condition across the NCESP area.

On January 24, 2003, the Board of Directors of CVWD adopted an ordinance that established storm water management requirements for the Riverine Drainage Corridor (RDAC) in order to preserve the existing storm water flow attenuation for possible floodwaters from the tributary area. Projects within the area are required to implement construction of flood control retention basins in order to decrease flood hazard potential. The implementation of the regional basins will be subject to review and approval by CVWD.

The specific requirements of the ordinance are as follows:

1. Developments larger than 5 acres will be required to design retention facilities to preserve natural storage such that the downstream hydrograph is not increased above that established in the FLO-2D model for the "Existing Conditions" Flood Hazards along Interstate 10 Morongo Wash Bridges to Washington Street, Coachella Valley, California, by Exponent dated, August 26,2002.
2. Developments smaller than 5 acres and larger than one acre will be required to retain estimated natural losses based on a retention coefficient which is calculated by determining the difference in volume between upstream and downstream hydrographs and evenly distributing that difference over the geographic area on an acre-foot per acre basis.
3. Developments smaller than one acre will be required to comply with Ordinance 458 and are not permitted to construct diversions such as channels, levees, and block walls that will concentrate flows away from the development and onto the adjacent Riverine Drainage Area.

The NCESP EIR previously analyzed the Specific Plan's role in designing the appropriate stormwater management and flood prevention facilities. Page 80 of the NCESP describes a system of three regional retention basins to be located on the project site that are intended to capture and infiltrate runoff from the Riverine Drainage Area Corridor (RDAC), thereby minimizing the flood potential to the NCESP. These facilities are described as follows:

*Each retention basin shall be a shallow open design intended to provide wide runoff capture areas. Storm water sheet flows which enter into the basins are captured and held allowing for the contained water to percolate into the soil. Each basin will be designed with 3:1 side slopes and a minimum of three feet of freeboard. The basin shape, size, and bank heights shall be designed to capture the debris potential of the design storm. The captured sediment would settle within the basins as the storm water percolates into the soil.*

An important component of local drainage condition is the Morongo Wash Interim Project Improvements Conditional Letter of Map Revision (CLOMR), prepared in January of 2017 and submitted to the Federal Emergency Management Agency (FEMA) for the proposed channelization for a portion of Morongo Wash and detention basins within the existing floodplain. This CLOMR starts the process for improving the floodplain condition along the channel and the I-10 corridor from east of Gene Autry Trail to Bob Hope Drive on the basis of two separate project improvements: 1) Morongo Wash Union Pacific Rail Road (UPRR) Bridge Channel and Slope Lining and 2) NCESP Detention Basins. The objective of the CLOMR is to fulfill the engineering analysis and obtain a Letter of Map Revision (LOMR) from FEMA for the associated flood control improvements to the UPRR Bridge, slope lining along the east bank of the proposed channel downstream of the bridge, and basins proposed within NCESP. As described in the subsequent sections, the proposed on-site regional retention basins are engineered to address the regional drainage system while preventing alterations that would result in substantial erosion, siltation or flooding, on- or off-site. It is worth noting that the CLOMR and LOMR process will address a mitigation measure previously identified in the NCESP EIR (MM 3.9-1).

The City of Cathedral City is a permittee of the Whitewater River Watershed Municipal Separate Storm Sewer System (MS4) with an existing local retention ordinance included in Title 8, Section 8.24.070. As a result, the project is required to provide improvements and facilities to capture and retain the storm volume resulting from the controlling 100-year storm event for the project area. Being part of Planning Area 4 of the NCESP, the project is also required to incorporate the appropriate regional retention facilities in a manner consistent with local and regional drainage plans, including the management of off-site tributary areas to the project.

To achieve this, the project's hydrologic area is divided into three drainage management areas, for which, preliminary design capture volume quantities have been calculated based on the *Riverside County - Whitewater River Region Water Quality Management Plan (WQMP)* worksheets and based on the results of a project-specific hydrology report. The specific drainage area management strategy is described below. The WQMP Design Capture Volume refers to the 85<sup>th</sup> percentile 24-hour storm events used for purposes of urban runoff quality management.

As previously discussed, the project's hydrologic area will be divided into four drainage management areas where the combined retention capacity provided in a system of retention basins is approximately 5,271,220. This amount will be sufficient to accept and infiltrate the on-site storm volume resulting from the controlling 100-year event and the smaller design capture volume for water quality purposes (V<sub>bmp</sub>). A approved Preliminary Hydrology Report. The phased construction of retention facilities will be designed with a sufficient storage capacity to retain the runoff volume from the controlling 100-year storm event, therefore meeting the hydrologic requirements established by the City of Cathedral City and works toward addressing Mitigation Measure 3.9-1 from the NCESP EIR.

The hydrology calculations and facility sizing for the proposed cultivation, residential and open space components of the project are designed to prevent runoff rates that could result in erosion, sedimentation and flooding impacts to the property or to adjoining land. Moreover, the design criteria require that no standing water be present in the retention basin after 36 hours of any storm event. Based on the maximum design percolation rate of 2 inches per hour and calculations provided in the hydrology report, these criteria will be met. All proposed basins will draw down their entire volume in under 36 hours using the 2 inch/per hour percolation rate, therefore preventing vector breeding concerns. Pertaining to the alteration of drainage patterns and impacts due to erosion, siltation, or flooding, less than significant impacts are anticipated with implementation of mitigation measures MM 3.9-1 through MM 3.9-5.

**NCESP Mitigation Measures:**

**MM 3.9-1:** An approved CLOMR for the site shall be obtained by the Project Applicant before a Certificate of Occupancy is issued for any portion of the development, unless demonstrated to be safe from the flooding conditions to the satisfaction of the City of Cathedral City and CVWD.

**MM 3.9-3:** Individual developers of Planning Area Projects shall be required to submit plans including on-site provisions for capture of incremental storm water associated with project impervious surfaces prior to project approvals. The incremental storm water flowing off-site shall be equal to predevelopment conditions. Plans shall be reviewed and approved by the City.

**MM 3.9-4:** Design and Construction of the 3 Basins and PA2 flood walls intended to address offsite flooding shall be reviewed and approved by all applicable agencies. Drainage plans and hydraulic calculations for the regional retention final project design shall be prepared by a civil engineer and submitted for review and approval to the following:

- a. Coachella Valley Water District (CVWD);
- b. Riverside County Flood Control and Water Conservation District (RCFCWCD);
- c. U.S. Army Corps of Engineers (USACE);
- d. FEMA;
- e. State Water Resource Control Board; and,
- f. City of Cathedral City

**MM 3.9-5:** CWA Section 404 Consultation with The US Army Corps of Engineers, RWQCB and California Department of Fish and Wildlife will be required relative to potential impacts to Waters of the U.S. prior to approval of the proposed regional flood control measures.

- e) **Less than Significant Impact.** As previously discussed, the vacant project site and adjacent areas of the NCESP lack any formal storm drain improvements but are part of a regional drainage condition and the Riverine Drainage Area Corridor (RDAC), which has been incorporated into the NCESP site design. The project incorporates two types of retention basins. The project-specific basins have been configured around the cultivation component to capture project-specific runoff from the proposed impervious surfaces (buildings, parking lots, and hardscape). Retention basins have also been designed to accommodate future runoff from the residential component. Moreover, the project also includes the phase construction of regional retention basins, which are sized to accept runoff from the undeveloped portions of Planning Area 4 and from off-site undeveloped areas associated with the RDAC. Based on the approved Preliminary Hydrology Report, the total retention capacity provided in all drainage areas is approximately 5,271,220 cubic feet, which will be sufficient to retain and infiltrate the on-site storm volume resulting from the 100-year storm event with a dewatering time of 36 hours or less. The dewatering time will prevent instances of prolonged standing water and vector breeding concerns.

As such, the increase in stormwater volume quantity and rate that is typically associated with land development and runoff is addressed by on-site retention, rather than off-site discharge. The project proponent will be required by the City to develop and implement a Project-Specific Water Quality Management Plan (WQMP) to comply with the most current standards of the *Whitewater River Region Water Quality Management Plan for Urban Runoff* and the *Whitewater River Watershed MS4 Permit*. The Project-Specific WQMP will identify a strategy of site design, source controls, and treatment controls with a maintenance and monitoring program that throughout the life of the project will address post- construction runoff quality and quantity. The site plan, grading design, storm drain design, and retention basin features of the project will be developed in the project-specific WQMP. Through this required compliance, the project will prevent impacts to the local receiving waters and avoids project violations to the established water quality standards and waste discharge requirements. As a standard process for new development projects, the City requires project-specific WQMPs to be submitted to and approved by the City prior to approval of the first building permit permit. The project-specific WQMP is also required to include required maintenance practices necessary to ensure that the water

quality facilities remain effective during the life of the project, preventing discharge to the City's storm drain system or other MS4 facilities. With compliance with the project-specific WQMP, less than significant impacts are anticipated as a result of project runoff water that would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

g,h) **No Impact.** The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) serve as the basis for identifying potential hazards and determining the need for and availability of federal flood insurance. The proposed area is covered by FIRM Panel Numbers 06065C1577G, 06065C1579G and 06065C1585G, revised August 28, 2008, which indicates the project area lies within two zones; Zone X (SHADED) which is defined as "Areas of 0.2% annual chance flood: areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile: and areas protected by levees from 1% annual chance flood. Insurance purchase is not required in these zones." And Zone A0 (Depth 2') (Velocity 7 fps) which is defined as "River or stream flood hazard areas, and areas with a 1% or greater chance of shallow flooding each year, usually in the form of sheet flow, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. Average flood depths derived from detailed analyses are shown within these zones.

As indicated in the approved Preliminary Hydrology Report, a CLOMR/LOMR process has begun to revise these maps, with the Conditional Letter of Map Revision (CLOMR) having been submitted to the Federal Emergency Management Agency (FEMA), prepared by Michael Baker International. The drainage control improvements proposed in the CLOMR/LOMR will be built in phases. Each phase of the project will include the flood control improvements necessary to provide the 100-year storm event protection, including a corresponding Flood Hazard Mitigation Report prepared by Q3 Consulting; for off-site storm flows. In addition an On-Site Hydrology and Hydraulics Report will be submitted for on-site retention and storm drain system. Once all improvements are complete, a letter of Map Revision (LOMR) will be filed to remove the AO flood zone designation.

The proposed phased development will include a system of retention basins designed to accept and infiltrate the project runoff, therefore, preventing any erosion, sedimentation, and flooding conditions generated on-site. The required improvements associated with the CLOMR and LOMR process include three regional retention basins on the project site which are intended to accept on- and off-site flows associated with the Riverine Drainage Area Corridor (RDAC), therefore protecting the cultivation, open space, and residential components of the project from off-site drainage. Less than significant impacts are anticipated pertaining to the placement of structures or housing within a 100-year flood hazard area.

i, j) **Less than Significant Impact.** As previously mentioned, a CLOMR is undergoing FEMA review with two separate improvements designed to ultimately improve the existing drainage conditions and allow better stormwater management and flood control in the vicinity and within the NCESP. Ultimately, the LOMR will revise the floodplain with improvements to convey flows toward a proposed Morongo Wash Union Pacific Rail Road (UPRR) Bridge Channel and Slope Lining and toward the NCESP basins. These basins will be incorporated into the 140 acres of open space located in the western portion of Planning Area 4. The design and sizing of these retention facilities must be consistent with the CLOMR requirements and must satisfy the FEMA review process. The project is required to comply with a project-specific WQMP that includes hydrology calculations and facility sizing are designed to prevent runoff rates and volumes from causing flooding impacts, resulting in less than significant impacts.

The project is located inland and is not in an area that includes the possibility of inundation by a tsunami. A seiche is defined as the sloshing of a closed body of water resulting from seismic ground shaking. The proposed stormwater retention basins are not expected to represent a sieche risk from earthquake ground-shaking because they will only be filled or partially filled by runoff volume after a storm event and for a period that will not exceed 72 hours due to the basin percolation function. As a result, the project will not involve stormwater storage that will result in a seiche from a seiche.

The project site is located within an alluvial fan area. There is a potential for mudflow in the alluvial fan areas and, therefore, on the project site. Flash floods are short in duration but have high peak volumes and high velocities. This type of flooding occurs in response to the local geology and geography, and the built environment. When a major storm moves in, water collects rapidly and runs off quickly, making a steep, rapid descent from the mountains into man-made and natural channels within developed areas. Flood flows often carry large amounts of mud, sand, and rock fragments. As stated in the NCESP EIR, proposed basins have been located and sized to accommodate the appropriate runoff volumes based on the local soil conditions, which include factoring into the design mudflow and debris flows from upstream. The system of proposed basins will be consistent with the previously analyzed conditions by being adequately sized to factor debris and mudflows for the revised site plan configuration. Less than significant impacts are anticipated pertaining to inundation by mudflows.

10. LAND USE AND PLANNING - Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source:** Cathedral City General Plan, 2009; North City Extended Specific Plan, 2014; Cathedral City Ordinance 805, 2017.

- a) **No Impact.** The project proposes the development of approximately 300 acres of vacant land in Cathedral City’s NCESP, north of the Interstate 10 Freeway. The land use designations for the project site are Mixed Use Neighborhood (MU-N) and Open Space (OS). The project site is located on vacant desert land. The areas to the north, east and west are also undeveloped desert land. Interstate 10 Freeway forms the southern boundary of the project site. The northern property boundary is met by Varner Road. Due to the fact that the project site and its surroundings are currently vacant, the development of the project will not physically divide an established community. No impacts are anticipated.
- b) **Less than Significant Impact.** As discussed previously, the approximately 300-acre project site is located in Cathedral City’s NCESP. The NCESP classifies the project area, also known as Planning Area 4, within MU-N and OS districts. According to the NCESP, the MU-N District is intended to provide for a variety of housing

types including apartments, town homes, and single-family residences and mixed use residential and commercial development. The project property proposes an approximately 72.32-acre cannabis cultivation campus, an approximately 68.24-acre residential component, and approximately 140 acres of open space and retention basins. As a mixed-used development, the project is consistent with the intent of the MU-N District.

The OS District of the NCESP is intended for flood control and drainage and other open space related uses. The areas of the project located in the OS portion will include retention basins and open space. Therefore, the project is consistent with the OS District.

In December 2017 the City of Cathedral City adopted Ordinance 805, which allows cannabis businesses in the MU-N districts in the North City Extended Specific Plan. The Ordinance amends paragraph E(5)(Setbacks) of Chapter 7 Section 2 of the NCESP stating:

*“For any cannabis business proposed within the MU-N district, a minimum setback of 250 feet is required from any existing residential use. Cannabis businesses are prohibited in any structure in the MU-N district that also houses residential zones.”*

To comply with the above requirement, project design establishes a minimum 250-foot-wide setback, which includes green space and retention basin, and includes a wall between the proposed cannabis and residential components.

The NCESP MU-N Districts requires that 35 percent of the floor area of a mixed-use development be residential floor area. To comply with this requirement, the proposed residential component must include a minimum floor area of 880,654 square feet. (The cannabis campus floor area (1,635,500 sf) would be 65% of the total floor area with the remaining floor area residential.  $1,635,500 \text{ sf} = .65 \times 2,516,153.85$  total project area.  $2,516,153(.35) = 880,653.8$  sf of residential.) As a result, the residential component calculates to be a minimum of 880,654 sf of floor area. The project includes a 68.2-acre residential component of the project property with 64 single-family residential units (see breakdown below). Further refinement of the residential component will be determined in the future. However, development of the residential project will be required to contain a minimum of 880,653 sf of residential floor area. The project is currently consistent with this requirement.

The residential portion of the project has not been designed at this time. However, the residential portion will be required to be designed to be consistent with the development standards contained in the NCESP. Once plans are submitted to the City they will be reviewed for consistency and additional review by the City’s Architectural Review Committee and Planning Commission will be required at that time.

The open space portion of the project is consistent with the land use designation of the NCESP providing approximately 140-acres of both open space and retention basins. Per project design, this will occupy the western portion of the approximately 300-acre property.

Therefore, the proposed project is compatible with MU-N and OS land use designations set forth in the NCESP, applicable sections of the Cathedral City Municipal Code and Ordinance 805, allowing for cannabis businesses and a 35 percent residential component in MU-N districts. Less than significant impacts are anticipated.

- c) **No Impact.** The project site is not within a Conservation Area designated by the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). All new development within the CVMSHCP is required to pay the most current mitigation fees for the implementation of the CVMSHCP and support the acquisition of conservation lands. The CVMSHCP establishes a simple and uniform mechanism for mitigating the effects of development through the payment of a Local Development Mitigation Fee. The City requires all development projects to pay the CVMSHCP Mitigation Fee Ordinance based on the project’s total acreage before issuance of permits. No impacts are expected.

**Project Specific Mitigation:** None

11. MINERAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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"/>

**BACKGROUND**

The following analysis is based on the Cathedral City General Plan, 2009; Mineral Land Classification Map, 2007.

a,b) **No Impact.** The knowledge of valuable mineral resources and their availability is vital for not only community development and commerce, but also the environment (Cathedral City General Plan 2009). In accordance with the Surface Mining and Reclamation Act (SMARA), mineral land classification maps and reports have been developed to assist in the protection and development of mineral resources. According to the Mineral Land Classification Map contained in the City’s General Plan, the project site is located in Mineral Zone MRZ-3, which indicates an area containing mineral deposits where the significance of these deposits cannot be evaluated from available data. Additionally, there are no mining/extraction sites within the City.

The nature of the project does not involve the extraction of mineral deposits. Construction of the proposed facilities would rely on existing local and regional aggregate resources from permitted facilities. The project is not expected to result in a considerable extraction and/or loss of known mineral resources that are considered important to the Coachella Valley Region or residents of California. Moreover, the project area is not designated as a locally important mineral resource recovery site, as indicated in the City of Cathedral City General Plan. No impacts are anticipated related to the loss of availability of known mineral resources

**Project Specific Mitigation:** None

12. NOISE -- Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels 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) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 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"/>
f) For a project within the vicinity of a private airstrip, 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"/>

**BACKGROUND**

The following discussion and analysis is based on the *Glass House Pharms Cultivation Facility Noise Impact Study* prepared by MD Acoustics, LLC and dated November 12, 2018, the January 31, 2019 Traffic Impact Analysis contained in the City of Cathedral City Traffic Letter prepared by TJW Engineering, Inc., and *Cathedral City Annexation and North City Extended Specific Plan Impact Study*, prepared by Endo Engineering dated 8/9/13 and the Noise and Traffic Impact section of the North City Extended Specific Plan Environmental Impact Report (NCESP EIR).

Additional referenced material includes the Noise Element of the City of Cathedral City General Plan and CCMC Section 11.96 pertaining to Noise Control.

a, c) **Less than Significant Impact with Mitigation.** Noise is defined as unwanted sound that disrupts normal activities or that diminishes the quality of the environment. It is usually caused by human activity that adds to the existing acoustic setting of a locale. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The human ear does not respond uniformly to sounds at all frequencies, being less sensitive to low and high frequencies than to medium frequencies that correspond with human speech. In response to this, the A-weighted noise level or scale has been developed to correspond better with peoples’ subjective judgment of sound levels. This A-weighted sound level is called the “noise level” referenced in units of dB(A). The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

Noise sources are classified as a “line source” (a busy street) or a “point source” (a commercial compressor). As noise travels through the air, elements including temperature, wind speed and direction, hard and soft ground

surfaces, and landscaping and walls add to the factors that affect noise. Point sources are generally stationary, such as HVAC units, air compressors or the treatment equipment proposed as part of the project. HVAC units are placed outdoors, and the noise of the units mostly cannot be heard from within structures. Stationary noise sources, which are normally associated with residential and commercial structures, emit a constant noise that is somewhat normalized or standardized. The constant noises from the a/c units can emit vibrations that can be felt, though the vibrations are not strong enough for residents to complain.

The project is located within a largely undeveloped area on the north side of Interstate 10. The project site is vacant land in its natural state of desert land. As a result, the project site does not constitute an existing source of ambient noise. The property is surrounded by vacant land to the north, east and west of the property. The closest development are primarily residential homes are located approximately 1800 to 2,700 feet to the south, on the other side of the I-10. Interstate-10 is located immediately south of the project and the Union Pacific Rail Road is located south of the Interstate.

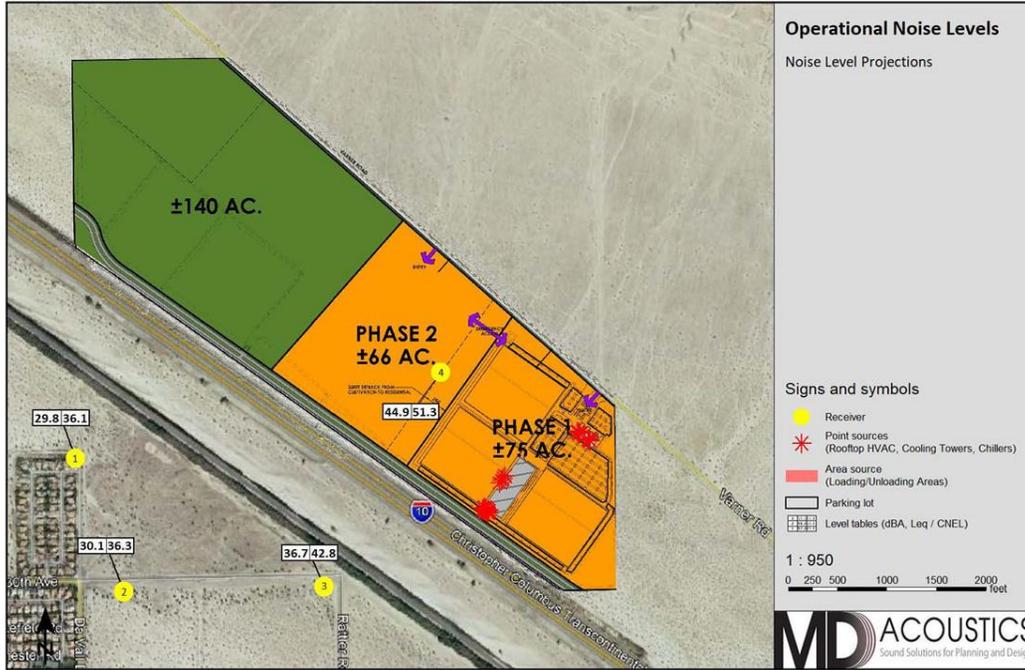
The Trip Generation Analysis prepared on January 31, 2019 by TJW Engineering for the project, concludes that the proposed project would generate approximately 6,344 fewer trips than the project development proposed in the NCESP and analyzed NCESP EIR, which included a larger amount of residential development. The Technical Noise Study, prepared in 2013 for the NCESP EIR, concluded that traffic generated by development proposed in the specific plan would not result in a significant noise impact from project traffic.

#### Ambient Noise

A Noise Impact Study for the Glass House Pharms Cultivation Facility was prepared by MD Acoustics on September 2018 and updated on November 11th, 2018. As part of this study, existing ambient noise measurements were measured at the project site approximately 200 feet from the center of Varner Road and 1,800 to 2700 feet from the centerline of the I-10 Freeway. Noise data indicated that the proposed ambient hourly levels ranged between 52.3 dBA to 58.7 dBA at these locations. Maximum ambient levels reached 58.7 dBA during the hour between 11AM and 12PM and the lowest ambient noise level measured at 52.3 dBA between the hours of 11AM and 12PM.

Future worst-case noise level projections were modeled using reference area sound data for the proposed main building, processing building, the proposed parking lot's peak trip generation data and 64 residential units. The model also took into account the point source noise from the processing building a/c units. Current location of the chiller/a/c units will be processed through a piping system and are all located on the ground, behind the Processing Building. The a/c units have a reference noise level of 95 dBA at 3 feet from the source, four cooling towers with a reference noise level of 86 dBA at 3 feet from the source, and seven chiller units with a reference noise level of 84.5 dBA at a distance of three feet from the source.

**Exhibit XII-1  
 Operational Noise Levels**



A total of four off-site and on-site sensitive receptor locations were analyzed to evaluate the proposed project's operational noise impacts to noise sensitive land uses. Three sensitive receptors included residential uses located approximately 1,300, 1,800 and 2,700 feet southwest of the project site. The fourth site was located in the future residential portion of the proposed project, approximately 200 feet south of Varner Road. The existing ambient noise level at all locations was measured at approximately 52.3 dBA. The total Combined Operational Noise Levels for the three offsite receptors was estimated to be between 52.3 and 52.4 dBA. The proposed onsite residential development was projected to be approximately 53.0 dBA. Therefore, the daytime operational noise levels would be expected to result in a change of up to 0.7 dBA at the various sensitive receptors. According to the Noise Study, these noise levels would not be expected to exceed the City's noise limit.

Construction-Related Noise

The construction activities of the project are expected to generate short-term noise increases compared to the existing levels. Construction activities will be limited to the hours prescribed in the City Noise Ordinance (CCMC Section 11.96.070). Construction operations, in accordance with Section 11.96.070, are limited to the following:

October 1st through April 30th

- Monday through Friday 7:00 a.m. to 5:30 p.m.,
- Saturday 8:00 a.m. to 5:00 p.m.;

May 1st through September 30th

- 6:00 a.m. to 7:00 p.m. Monday through Friday,
- 8:00 a.m. to 5:00 p.m. on Saturday

Two types of noise impacts are anticipated during future construction activities. First. The transport of workers and equipment to the site would incrementally increase noise levels along the local roadways leading to and from the site. Second, noise will be generated by the actual on-site construction activities. The loudest construction noise generally occurs during the grading phase when heavy equipment is used more consistently on a site. Noise levels are periodic and decrease significantly with distance, thus having less impact on sensitive

receptors at greater distances. Applicable policies and standards governing environmental noise contained in Section 11.96.030 of the CCMC standards for acceptable noise standards for daytime/late night noise are 65 dBA/dBA for exterior residential noise and 50 dBA/ 40 dBA for interior residential noise for residential use. The project will be required to comply with the City's noise standards with the exception of construction noise. Construction noise may exceed these standards but are limited to the days and times in the CCMC. However, to further ensure that construction activities do not disrupt adjacent land uses, the following mitigation measures are recommended in the project noise study. These recommendations are included in mm-2 shown below.

#### Project Operation Noise

Operation of the proposed project is not expected to generate noise conditions that will exceed the City's noise limit. Vehicle traffic noise to and throughout the project area will represent the most perceptible form of noise. The project noise study concluded that low traffic levels are expected within neighborhoods and truck routes will be limited to major roadways. In addition, the proposed project will result in less traffic than that analyzed in the NCESP, which concluded that traffic noise generated by development within the specific plan area will not result in significant noise impacts on sensitive receptors. As a result, the project-related noise study found that operation of the project will not exceed the City's noise limits and no mitigation is needed.

The project site is located within the 70 to 75 dBA CNEL contour of the I-10 Freeway. According to the project noise study report, the loudest roadway in the area is the I-10 freeway, and due to the high noise levels from the I-10 Freeway, mitigation is needed to reduce noise impacts on the residential portion of the project site. Noise reduction strategies will be required to be designed as part of the project plans. Noise barriers and/or setbacks from the I-10 Freeway are strategies that are designed to reduce noise levels on the project site from the I-10 Freeway. The mitigation measure mm-1 will reduce freeway noise impacts on the proposed residential uses to less than significant.

With implementation of standard conditions, project design features and the Mitigation Measures listed below, less than significant impacts are anticipated from the project related to generation of excessive noise levels or substantial permanent increases in ambient noise levels.

**MM N-1:** Prior to issuance of building permits for the residential component of the proposed project, an acoustic study (based on the final grading plan for the residential portion of the project) is required to be submitted to the City demonstrating that project includes the necessary wall or berm heights to mitigate I-10 Freeway traffic noise on the proposed residences.

**MM N-2:** During construction operations, the applicant/project proponent shall ensure that construction activities comply with the following:

1. Construction should occur during the permissible hours as defined in Section 11.96.070.
2. During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices.
3. The contractor should locate equipment staging areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the project site during all project construction.
4. Idling equipment should be turned off when not in use.
5. Equipment shall be maintained so that vehicles and their loads are secured from rattling and banging.

- b) **Less than Significant Impact.** Groundborne vibration, also referred to as earthborne vibration, can be described as perceptible rumbling, movement, shaking or rattling of structures and items within a structure. Groundborne vibration can generate a heightened disturbance in residential areas. These vibrations can disturb residential structures and household items while creating difficulty for residential activities such as reading or other tasks. Although groundborne vibration is sometimes perceptible in an outdoor environment, impacts are

more perceptible inside structures. Groundborne vibration can be measured in terms of amplitude and frequency or vibration decibels (VdB). Trains, buses, large trucks and construction activities that include pile driving, blasting, earth moving, and heavy vehicle operation commonly cause these vibrations. Other factors that influence the disturbance of groundborne vibration include distance to source, foundation materials, soil and surface types. Groundborne vibration can also result in damage sensitive structures such as historic buildings and mobile homes.

Vibration levels associated with project construction activities are not anticipated to generate vibration levels capable of causing building damage to nearby residential homes, the closest of which is location south of the I-10 Freeway over 1,000 feet from the project site. The Federal Transit Administration (FTA) identifies construction vibration levels capable of building damage ranging from 0.12 to 0.5 in/sec Peak Particle Velocity (PPV). The peak project-construction vibration levels are expected to approach 0.0042 in/sec PPV and will not exceed the FTA vibration levels necessary for building damage at the residential homes near the project site. No fragile structures are located on or within 1,000 feet from the project site. In addition, vibration levels are expected to be periodic and to occur only during the operation of heavy construction adjacent to the project site perimeter. Construction at the project site will be restricted to daytime hours consistent with City requirements thereby eliminating potential vibration impacts during the sensitive nighttime hours.

Construction of the project is expected to involve the temporary use of vehicles and equipment that would result in localized, short-term groundborne vibration increases within the permitted construction hours established by the City. However, best practices in construction management would likely minimize the use of such equipment to the best practicable extent. The construction of the proposed project would also not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. Primary vibration during construction will be associated with bulldozers. A large bulldozer has a vibration impact of approximately 0.089 inches per second peak particle velocity (PPV) at 25 feet. This can be perceptible but no significant risk to structures is anticipated. During operation, the proposed residential development would not typically involve activities that would generate vibration. Less than significant impacts are anticipated from the project related to exposure of persons to or generation of excessive vibration levels.

- d) **Less than Significant Impact.** There would be some short-term increases in noise levels during construction of the proposed project. However, the City’s Municipal Code limits the time that construction activities may occur, as specified by the City’s Noise Control Ordinance above. Construction is expected to occur only during the less sensitive daylight hours, when ambient levels of noise are higher, and therefore construction noise is less perceptible. Less than significant impacts are anticipated from the project related to a temporary increase in ambient noise levels.
  
- e, f) **No Impact.** The project is not located in the vicinity of an airport or private airstrip or located within the 65 dBA CNEL contours of any public or private airports. The project site is located approximately two miles from Palm Springs International Airport PSIA. The project site is located outside the 65 dBA noise contours for the airport. (Noise Compatibility Contours, Riverside County Airport Land Use Compatibility Plan Document, March 2005) No impacts are anticipated related to excessive airport noise.

**Project Specific Mitigation: MM N-1 & MM N-2**

<b>13. POPULATION AND HOUSING –</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
-----------------------------------------------------------	--------------------------------	-----------------------------------------------------	------------------------------	-----------

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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **No Impact.** The proposed project includes the three components, a cannabis cultivation campus, residential component and open space/retention basin component. The cannabis cultivation campus will include the construction and operation of three greenhouse buildings for cannabis cultivation campus and one processing buildings on approximately 72 acres on the eastern portion of the project site. The residential portion is proposed to include 64 single-family homes on approximately 68 acres located in the center portion of the project site. The open space component will include three retention basins and open space on approximately 140 acres on the western portion of the project site. The proposed project will include development of infrastructure including improvements to Varner Road and development of Valley Center Boulevard and Streets “M” and “N”, as well as other water and sewer infrastructure. This mixed-use project is currently located north of Interstate 10 Freeway, east of DaVall Drive and south of Varner Road, in Cathedral City’s North City Extended Specific Plan area.

Average household size for Cathedral City is 2.99 persons per household. As such the residential portion of the project would result in an increase of approximately 192 residents. Based on the development proposed in Planning Area 4, the NCESP EIR estimated a population increase in the number of residents based on the maximum density permitted in the MU-N of 25 dwelling units per acre. The project proposes a total of 64 units on 68 acres, well below that analyzed in the EIR. The maximum commercial FAR for the MU-N District is 1. The project proposes a maximum FAR for the cannabis cultivation campus of 0.51, also well below that analyzed in the EIR. In addition, the NCESP also included in the population analysis development of all necessary infrastructure for the entire specific plan area.

In 2017, the City had a population of 54,596 with an average household size of 2.10 persons (U.S. Census Bureau, Quick Facts). The project site does include 35% of the developed land a permanent residential element due to the requirement in the MU-N District requirements contained in the NCESP. As stated in the NCESP EIR, build-out of the mixed-use community within Cathedral City is anticipated to occur over a 15-20-year period. The NCESP will be divided into 5 planning areas with areas one (1) and two (2) to include a single/multi-family residential and a hotel. The residential units will include 3,200 single/multi-family units and 400 hotel rooms. However, based on the analysis contained in the NCESP, the proposed project will not result in a significant increase in population. As a result, development of the project would not cause potentially growth inducing effects by extending utilities into an undeveloped area and development of the proposed residential and commercial use. Therefore, project build-out is not expected to significantly increase population growth in the City and a less than significant impact will result.

b-c) **No Impact.** The project site is currently vacant open space. Development of the proposed project would not displace any existing housing, people, or require any replacement housing. No impacts are expected.

**Project Specific Mitigation:** None



14. PUBLIC SERVICES –	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Fire**

**Less than Significant Impact.** The Cathedral City Fire Department (CCFD) provides 24-hour fire protection and emergency medical services to the City. CCFD has 46 full time employees and maintains three fire stations within the City of Cathedral City. Fire Station No. 12, located at 32100 Desert Vista Drive is the departments headquarter station and is approximately 2 miles from the project site boundary. Fire Station No. 411 serves the Cathedral City Downtown Area and located at 36913 Date Palm Drive. This station is approximately 7.1 miles southeast of the project site. Fire Station 413 is located at 27610 Landau Boulevard and is considered the City’s north end station and is 5.9 miles from the project site. Per a cooperative operation agreement between Cathedral City and Riverside County Fire, the firefighters and fire apparatus from Cal Fire Station 35, located at 31920 Robert Road in Thousand Palms would be the first responder to the project site, which is less than one mile from project site. Cathedral City Fire Station 12 will serve as the second responder.

The project proposes a mixed-use development comprised of a cannabis cultivation campus and 64 single family residential units to be completed in three phases. Phase 1 would develop approximately 72 acres with three 500,000-square-foot greenhouse buildings, one processing buildings (79,000 sf), one administration building (56,000 sf), and a guard building (500 sf). Retention basins, landscaped features, drive aisles, associated parking lots, and an open space area are also proposed as part of the associated improvements. Phase 2 would include the development of 64 single family residential units and associated improvements on approximately 68 acres. Phase 3 involves the construction of the additional regional retention basin. Project Streets will be constructed in City approved phases. .

The NCESP EIR included an analysis of the specific plan’s impacts on fire services within the City. The EIR found that development of the entire specific plan area would result in a significant impact on fire services. However, development of individual projects would require review and approval of the Fire Department as to adequacy of provision of fire services. As part of the LAFCO approval for the annexation of the NCESP EIR, the City of Cathedral City entered into an agreement with Riverside County for Cal Fire services to service the NCESP area until a new Cathedral City fire station is developed north of the freeway. the Development of the project would result in an incremental increase in the demand for fire services, however based on the project site’s proximity to Cal Fire Station 35, the proposed project could be adequately served by fire protection services within the 5-6-minute priority one response time and no new or expanded facilities would be required.

The City has adopted the current California Fire Code which provides required construction standards in new structures and configurations to accommodate passage of fire trucks and engines and minimum fire flow rates for water mains. The project would be required to implement all applicable fire safety requirements in the code, to include, installation of fire hydrants, and sprinkler systems. Additionally, the project would be required to pay all applicable Fire and Police Facilities and Equipment Fund (CCMC Chapter 3.17) Impact Fees in place at the time of construction. Payment of these fees helps offset impacts by providing sufficient revenue for necessary improvements to ensure acceptable fire facilities, response times, equipment and personnel are maintained. Less than significant impacts to fire services with mitigation are anticipated with project implementation.

### **Police**

**Less than significant Impact.** Law enforcement services are provided to the City by the Cathedral City Police Department (CCPD). The department is a full-service organization, consisting of around the clock services and patrols approximately 21.5 square miles and service to over 52,000 residents. The police station is located at 68-700 Avenida Lalo Guerrero and is approximately 4.5 miles from the project site. Per the 2016-2020 CCPD Strategic Plan, the department consists of 48 sworn officers, and 24 non-sworn positions. The City's force is comprised of various divisions to include Patrol, Detective Bureau, Swat and a K-9 team. The City also has a Citizen on Patrol (COPS) division with 23 unpaid volunteers that are trained by sworn police officers in non-confrontational methods. They assist the Police Department with parking citations, traffic control for special events, DUI checkpoints and patrol. Approximately 4,555 volunteer hours were provided to the CCPD in 2016.

Project development will increase the need for police services. However, this demand is not expected to hinder the City's ability to provide police services to the project site or create demands that would require the construction of a new police facility. The project involves construction of a cannabis cultivation campus and 64 single-family residences.

The project will undergo further review by City and police staff to ensure adequate services is maintained as a result of project implementation. Moreover, the City's Municipal Code Section 58.88.065.20 includes detailed security measures required of all cannabis businesses. The project would also be required to pay applicable Fire and Police Facilities and Equipment Fund (CCMC Chapter 3.17) Impact Fees before development of the project. These development fees required for new development allow the City to continue to finance public facilities and goes towards the funding of various public services including police. Payment of these fees helps offset impacts by providing sufficient revenue for necessary improvements to ensure acceptable response times, equipment and personnel are maintained. Development of the proposed project will result in less than significant impacts to police services.

### **Schools**

**Less than Significant Impact.** Public education services are provided to the City of Cathedral City by Palm Springs Unified School District (PSUSD). Within Cathedral City, Palm Springs Unified School District operates five elementary schools, two middle schools and one high school.

The project is proposing a mixed-use development comprised of a cannabis cultivation facility and 64 single family residential units. Per the Californian Department of Finance, the average person per household (PPH) in Cathedral City is 3.11 persons (2018 data). The project has the potential to generate 20 new students based on the District's Student Generation Rate (Table XVI-1). The PSUSD 2018 Fee Justification Report indicates that the District's 2017/2018 Facilities Capacity has an excess capacity at the elementary and high school levels and a shortage for middle schools. Overall the 2017/2018 student enrollment was 23,205 with an excess capacity of 2,449. An additional 20 students would not result in over capacity.

**Table XIV-1  
PSUSD Student Generation Factors Rate**

School Type	Dwelling Units	Single Family Generation Rate*	Students Generated
Elementary School	64	0.1211	7
Middle School	64	0.0795	5
High School	64	0.1332	8
<b>Total New Students</b>			<b>20</b>
<b>*Source: 2018 PSUSD Residential Development School Justification Study</b>			

Employment generated by the projects cultivation facility is expected to be mainly filled by existing local residents and is not projected to draw a substantial number of new residents that would generate school age children requiring public education or result in the need to substantially alter school facilities or the demand for the demand for public education, and no new facilities would need to be constructed.

Additionally, Assembly Bill 2926 and Senate Bill 50 (SB 50) allow school districts to collect “development fees” for all new construction for residential/commercial and industrial use. Currently PSUSD development fees are \$3.79/per sq.ft. for residential and \$0.61/per sq.ft for commercial. Monies collected are used for construction and reconstruction of school facilities. PSUSD development fees are required to be paid before issuance of building permits. Less than significant impacts to local schools are expected.

**Parks**

**No Impact.** As discussed below in Section 15 (a) and (b), the proposed project would not create additional demand for public park facilities, nor result in the need to modify existing or construct new park facilities. Additionally, the NCESP requires residential projects to include on-site recreational facilities for the residents. No impacts are expected to parks.

**Other public facilities**

**No Impact.** No increase in demand for government services or other public facilities is expected beyond those discussed in this section (14) due to the minor increase in population expected from the project.

**Project Specific Mitigation:** None

15. RECREATION –		Less Than	Less Than	No Impact
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	Potentially Significant Impact	Significant with Mitigation Incorporation	Significant Impact	
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>

a-b) **Less than Significant Impact.** Cathedral City has a mix of neighborhood parks that offer a range of recreational activities. The proposed project site is currently vacant. It is located on approximately 300 acres in the North City Extended Specific Plan (NCESP,) north of I-10 and West of Rio Del Sol Drive, in Cathedral City. The site is primarily covered with natural desert terrain. A mountain range and open desert views are visible from all directions.

The proposed project includes 64 residential units. The 2011 U.S. Census estimates the household size is 2.95 persons in Cathedral City. This would result in approximately 189 new or relocated residents in the proposed project.

Within the overall NCESP park system, the following will be dedicated by the developer to Park and Recreation facilities:

- One Community Park at 7.0 acres;
- Four Neighborhood Parks at 8.6 acres (combined) and
- A minimum of 8.5 acres of dedicated park land within the 49.7 acre “Freeway Buffer.”

The North City Extended Specific Plan (NCESP) proposes an average 75-foot setback along the I-10 frontage which would continue the parkway proposal from the adopted 2009 North City Specific Plan. Features of this parkway would include a naturalistic desert landscape theme, multi-use recreational trail, shaded rest stations, view preservation and screening where necessary.

The open space, bike and trail network of the proposed NCESP would provide passive and active recreational opportunities. In addition, the NCESP includes development standards for the MU-N District that require a minimum amount of common open space with amenities be provided per unit for residential uses. The required open space, bike and trail network as well as the open space requirements for residential uses would aid in meeting the City of Cathedral’s City’s park requirements of 3 acres per 1,000 residents through a combination of land dedication, improvements and in-lieu fees.

Potential impacts to parks and recreation facilities associated with the development of the proposed project are considered less than significant following implementation of Standard Conditions. The following standard conditions are required to be implemented by the project.

**SC 15-1:** The Project Developer will provide on-site recreational or open space facilities and contribute to the public development of additional facilities to offset additional demands generated by future project residents in tandem with implementing development.

**SC 15-2:** The Project Developer shall ensure that the elements of the proposed project such as buildings, open spaces, landscape, and activities will be designed to enhance efficiency and compatibility with

adjacent uses. Proposed landscape locations and species will be coordinated with architectural and site design.

**SC 15-3:** The Project Developer will comply with the Quimby Act and will be required to pay Park Fees to the City upon development of the property.

**Project Specific Mitigation:** None

16. TRANSPORTATION/TRAFFIC – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a 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"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**BACKGROUND**

The following analysis and discussion is based on the “Glass House Pharms Trip Generation Analysis, City of Cathedral City” Traffic Letter prepared by TJW Engineering, Inc. January 31, 2019; 2013 North City Extended Specific Plan Environmental Impact Report (NCESP EIR); Cathedral City General Plan, Coachella Valley Association of Governments Transportation Uniform Mitigation Fee (TUMF) Handbook, effective July 1, 2012.

- a) **Less than Significant Impact with Mitigation.** The proposed project is located on PA 4 of the NCESP. The property consists of approximately 300 acres and is located south of Varner Road, north of Interstate 10 and approximately 2.6 miles west of Bob Hope Drive/Rio Del Sol Road. At buildout, the proposed project will have three points of access on Varner Road and two on Valley Center Boulevard. Due to project phasing, emergency access will be provided to Phase 1 at a second location on Varner Road in two access points on Varner Road for the Phase 1 Cultivation Component. Varner Road parallels I-10 along the north side of the project site in an east-west direction. Varner Road is currently classified as an Arterial Highway in Riverside County. Varner Road is currently a two-lane undivided road which connects to Bob Hope Drive 550 feet west of Bob Hope Drive and approximately 1.2 miles east of the subject property’s eastern boundary. From this point to the east, Varner was improved to a four-lane divided arterial in conjunction with the construction of the I-10 interchange project at Bob Hope Drive. The NCESP designated Varner Road as a Modified Major Highway which is defined as a four-lane divided roadway with a raised median and landscape parkway. As such, when each Planning Area within the NCESP is developed, Varner Road, Valley Center Boulevard and Streets “M” and “N” will be improved to meet the NCESP standards.

Regional access for the project site is currently from the Interstate 10 Freeway via the interchange at Bob Hope Drive located east of the project site. Motorists can access I-10 in both (east and west) directions via the Bob Hope interchange with Varner Road.

Level of Service (LOS) is a qualitative measure of several factors which includes speed and travel time, traffic interruptions, freedom to maneuver, safety, driving comfort and convenience and operating costs. The average delay that is calculated is used to judge the LOS of the intersection or roadway segment. The definitions of LOS for interrupted traffic flow (flow restrained by the existence of traffic signals and other traffic control devices) differ slightly depending on the type of traffic control. The LOS is typically dependent on the quality of traffic flow at the intersections along a roadway. Table 16-1, Roadway Level of Service Descriptions, describes LOS definitions for intersections. The City of Cathedral City General Plan Circulation Element states that LOS D is assumed to be the “acceptable” LOS for a given roadway in the City. If the project contributes to an unacceptable LOS (i.e. LOS E or F), then the project impact would be considered significant.

**Table XVI-1  
Roadway Level of Service Descriptions**

<b>Level of Service</b>	<b>Quality of Traffic Flow</b>
<b>A</b>	Primarily free-flow operations at average travel speeds, usually about 90 percent of the free-flow speed for the arterial classification. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Stopped delay at signalized intersections is minimal.
<b>B</b>	Reasonably unimpeded operations at travel speed usually, about 70% of the free-flow speed of the arterial classification. Ability to maneuver within the traffic stream is only slightly restricted. Stopped delays are not bothersome, and drivers generally are not subject to appreciable tension.
<b>C</b>	Traffic operations are stable. However, mid-block maneuverability may be more restricted than LOS B. Longer queues, adverse signal coordination (or both) may contribute to lower travel speeds of about 50% of the average free-flow speed for the arterial classification. Motorists will experience some appreciable tension while driving.
<b>D</b>	Borders on a range where small increase in flow may cause substantial increases in approach delay and decreases in arterial speed. LOS D may be due to adverse signal progression, inappropriate signal timing, traffic volumes or some combination of these factors. Average travel speeds are about 40% of the free-flow speed. For planning purposes, this LOS is the lowest that is considered acceptable. <i>For the Cathedral City General Plan purpose, the upper level of LOS D is assumed to be the “acceptable” LOS for a given roadway in the City.</i>
<b>E</b>	Characterized by significant approach delays and average travel speeds of one-third or less of the free-flow speed. Typically caused by some combination of adverse progression, high signal density (More than two signalized intersections per mile), high volumes, extensive queuing, delays at critical intersections, and/ or inappropriate signal timing.
<b>F</b>	Arterial flow at extremely slow speeds, below one-third to one-fourth of the free-flow speed. Intersection congestion is likely at critical signalized intersections, with high approach delays and extensive queuing. Adverse progression is frequently a contributor to this condition

Source: Highway Capacity Manual, Transportation Research Board, 1994.

**Table XVI-2**

**Daily Roadway Volume Estimates for Each Level-of-Service (1)  
 Ave. Daily Traffic Volume @ Upper Limit of Each LOS (1)**

<b>Classification</b>	<b>Typical Lane Configuration</b>	<b>LOS A(2)</b>	<b>LOS B(2)</b>	<b>LOS C(3)</b>	<b>LOS D(2)</b>	<b>LOS E(3)</b>
Freeway	8-lane divided	74,000	103,000	132,000	161,000	190,000
Arterial Highway	6-lane divided	17,000	27,500	38,000	48,500	59,000
Major Highway	4-lane divided	10,000	17,000	24,000	31,000	38,000
Secondary Highway	4-lane undivided	10,000	15,000	20,000	25,000	30,000
Collector	2-lane undivided	6,000	9,000	12,000	15,000	18,000

(1) The upper limit of LOS D was assumed to be the “design” capacity in Cathedral City. All capacities are based upon improvement to full city standards under optimum operating conditions.

(2) Source: Endo Engineering, based on LOS C and LOS E values provided by Riverside County.

(3) Source: Riverside County Road Dep., “Information Pamphlet for Riverside County Traffic Circulation and Roadway Improvement Requirements”, revised 11/24/87.

Source of Table: “Cathedral City General Plan Update Traffic Background Study” prepared by Endo Engineering, January 2002.

According to the Coachella Valley Association of Governments 2015 Traffic Census Report, Varner Road had approximately 4,511 Daily Trips east of Date Palm Drive. This number was a 3.09% decrease from the 2013 ADT. As mentioned previously, Varner Road is currently a 2-lane undivided roadway. Table 16-2 indicates that if a 2-lane undivided roadway experiences traffic counts below 6,000 ADT, LOS is considered to be A.

Proposed Project:

The proposed project includes construction of an approximately 300-acre master planned mixed-use project that includes a cannabis cultivation campus and residential development. Three access points are proposed on Varner Road. The two access points proposed to connect Varner Road with Valley Center Boulevard are designated as “M” Street and “N” Street (Exhibit 3a). Emergency access for the cultivation campus will be provided west of the campus through two points on “M” Street, which can also be accessed from Valley Center Boulevard.

The project will be constructed in three phases described below:

**Table XVI-3: Project Phasing**

Phase 1	Phase 2	Phase 3
1,500,000 SF of Cannabis cultivation floor area (three Greenhouse buildings @ 500,000 sf each)	64 Single-Family dwelling units	Regional Basin
79,000 SF Processing building	Regional retention Basin and on-site retention areas	PA4 Adjacent Portion of Valley Center Drive
56,500 SF administrative (1 Building)	Adjacent Portion of Varner Road	Signalization of Varner Road Project Entries
500 SF security gate house (1)		
Parking Lot		
Regional retention Basin		
Adjacent Portion of Phased Roads		

Glass House Pharms Trip Generation Analysis Traffic Letter was prepared for the proposed project by TJW Engineering, Inc. The purpose of the letter was to compare the projected trip generation of the Glass House Pharms project proposed land uses, with the projected trip generation of Planning Area 4 contained in Table 4-1 of Cathedral City Annexation & North City Extended Specific Plan Revised Traffic Impact Study (Endo Engineering, August 2013).

Project Impacts:

According to the Traffic Letter, the Transportation Engineers (ITE) 10th Edition trip generation rates were utilized to determine trip generation for the proposed project. The land use types used were General Light Industrial, Single-Family Detached Housing, General Office Building and Wholesale Nursery. The traffic letter calculates that, upon buildout, the project will generate approximately 2,315 daily vehicle trips or average daily trips (ADT), with 309 ADT expected to be generated in the morning peak hour and 312 ADT in the evening peak hour.

**Table XVI-4  
ITE Trip Generation Rates for Proposed Project Land Uses**

Land Use (ITE Code)	Unit	Daily Trip Rate	AM Peak Hour		PM Peak Hour	
			In:Out Split	Trip Rate	In:Out Split	Trip Rate
Single-Family Detached Housing	DU	9.44	25:75	0.74	63:37	0.99
General Office Building (710)	TSF	9.74	86:14	1.16	16:84	1.15
General Light Industrial (110)- processing	TSF	4.96	88:12	0.70	13:87	0.63
General Light Industrial (110) - greenhouse	EMP	3.05	83:17	0.52	22:78	0.49

**Table XVI-5  
ITE Trip Generation Rates for Proposed Project Land Uses**

Land Use	Quantity	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Phase 1								
Processing Facility	79.0 TSF	392	48	7	55	7	43	50
Administrative Bldg	56.5 TSF	550	57	9	66	10	55	65
Cultivation Area	243 Emp	741	105	21	126	26	93	119
<b>Total Phase 1 Project Trip Generation (A)</b>		<b>1,711</b>	<b>224</b>	<b>37</b>	<b>261</b>	<b>43</b>	<b>205</b>	<b>248</b>
Phase 2								
Single-Family Dwelling Units	64 DU	604	12	36	48	8	56	64
<b>Total Phase 2 Project Trip Generation (B)</b>		<b>604</b>	<b>12</b>	<b>36</b>	<b>48</b>	<b>8</b>	<b>56</b>	<b>64</b>
<b>Total Project Trip Generation (A)+(B)</b>		<b>2,315</b>	<b>236</b>	<b>73</b>	<b>309</b>	<b>51</b>	<b>261</b>	<b>312</b>

**Table XVI-6  
Comparison of Glass House Pharms Trip Generation to Previously Analyzed Land Use**

Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Glass House Pharms	2,315	236	73	309	51	261	312
NCESP PA 4	8,659	177	532	709	526	309	835
Increase (Decrease)	(6,344)	59	(459)	(400)	(475)	(48)	(523)

The proposed project is not expected to have a significant adverse impact on the area transportation network over those analyzed in the NCESP EIR. The Traffic Letter indicates that overall, the proposed project is a less intense land use than that analyzed in the NCESP EIR as it will produce 400 fewer AM peak hour trips, 523 fewer PM peak hour trips and 6,344 fewer daily trips. While there would be an increase in the number of inbound AM peak hour trips to the project site due to the change in land use, this is more than compensated for by a large decrease in outbound trips.

#### Roadway and Intersection Improvements

The NCESP EIR traffic analysis concluded that the NCESP roadway and intersection improvements will be needed to assure that the traffic generated by the proposed uses in the NCESP will not result significant impacts. The project is consistent with the required improvements for PA 4 and will include the following improvements:

- Widening of Varner Road along the northern project boundary;
- Construction of Valley Center Boulevard along the entire southern project boundary line.

The proposed cultivation campus entrance is located at Street L. This entrance closely replicates the condition of the NCESP Street L, however, the street does not connect to Valley Center Boulevard. Streets M and N most closely replicates the condition of the NCESP and are proposed as the access points for the residential portion of the property. The improvements cited for Street L, Street M, and Street N locations are the following and represent roadway improvements included in the NCESP for the corresponding streets:

#### Street "L" @ Varner Road

- add a northbound left-turn lane;
- add a northbound right-turn lane;
- add a westbound left-turn lane.

#### Street "M" @ Varner Road

- add a northbound left-turn lane;
- add a northbound right-turn lane;
- add a westbound left-turn lane.

#### Street "N" @ Varner Road

- add a northbound left-turn lane;
- add a northbound right-turn lane;
- add a westbound left-turn lane.

#### Standard Conditions

The following Cathedral City ordinance or policy requirements apply to all development as conditions of approval and most are included in the Traffic Study/EIR prepared for the NCESP:

**SC 3.16-1:** The project proponent shall dedicate appropriate right-of-way, as needed, to accommodate the ultimate improvements of all public roadways abutting the site.

**SC 3.16-2:** The Cathedral City General Plan Circulation Element and NCESP roadways shall be implemented, as required by the City of Cathedral City.

**SC 3.16-4:** All required off-site public and on-site private streets shall be designed in accordance with City of Cathedral City design standards, as required by the City Engineer.

**SC 3.16-5:** The project developer/applicant shall submit street improvement plans for construction of required streets to the Cathedral City Engineer for review and approval before start of construction.

- SC 3.16-6:** Ingress and egress design shall include adequate vehicle maneuvering and stacking space to avoid conflicts with internal and external traffic and circulation patterns.
- SC 3.16-7:** The controlled primary entryways to the site shall include provisions to facilitate access by emergency vehicles in a manner approved by the chief of police per Cathedral City Municipal Code Section 8.04.190. All power-operated controlled access devices shall have a radio- controlled override system capable of opening the gate or barrier when activated by a special transmitter located in emergency vehicles and be equipped to facilitate opening in the event of a power failure.
- SC 3.16-8:** The project proponent will comply with City requirements regarding the master planned bikeway. Bike lanes shall be provided within and adjacent to the site along the General Plan roadways, as required by the City of Cathedral City.
- SC 3.16-9:** A traffic control plan shall be submitted and approved. Schedules and Routes of construction traffic will be included in the plan.
- SC 3.16- 10:** The project proponent shall coordinate with the SunLine Transit Agency regarding the need for public transit facilities on and adjacent to the project site.
- SC 3.16- 11:** Adequate off-street parking shall be provided on-site to meet the requirements of the *Cathedral City Municipal Code*.
- SC 3.16- 12:** The proposed internal circulation layout and site access plans shall be subject to the review and approval of the City Engineer during the development review process to ensure compliance with City access and design standards.
- SC 3.16-13:** The project proponent shall contribute on a fair-share basis to area wide roadway improvements by participating in the TUMF (Transportation Uniform Mitigation Fees) program and may also be required to contribute on a fair-share basis to the cost of circulation improvements required on roadways and/or at intersections that are not in the TUMF program.

The following Mitigation Measures are found in the NCESP EIR and apply to the proposed project. Mitigation Measures indicate Streets L, M and N when referencing the project entrance, Varner Road and Valley Center Boulevard. References to the additional streets from the NCESP EIR that will not be constructed/impacted have been removed:

#### **NCESP EIR Mitigation**

- MM 3.16-1:** Project proponent shall ensure that all proposed full-turn site access intersections that will be signalized shall include at least two approach lanes on the minor-street approach during the construction of all roads. (An Engineering approved equal may be utilized for the Cultivation Campus driveway access on Varner Road.)
- MM 3.16-2:** Project proponent shall ensure that clear unobstructed sight distances shall be provided at the site access points on Varner Road, as well as all internal intersections to ensure that motorists can enter and exit the site with minimal hazard and disruption of through traffic during all construction activities.
- MM 3.16-4:** On-street curb parking should be prohibited along Valley Center Boulevard, Street “L” Street “M” and Street “N”, to maximize the capacity of the minor-street approaches.

#### **Project Specific Mitigation**

**MM T-1:** The project shall include all recommendations contained in the EIR mitigation and Standard Conditions. The project plans shall be reviewed and approved by the City Engineer before issuance of any building permits for the project.

Following implementation of review and approval of project design, Standard Conditions and Mitigation Measures contained in the NCESP EIR, and project-specific mitigation, the project is expected to result in less than significant impacts relative to conflict with measures of effectiveness for performance of the circulation system.

b) **Less than Significant Impact.**

Congestion Management Program (CMP)

According to the NCESP, the Congestion Management Program (CMP,) prepared by the Riverside County Transportation Commission (RCTC), is intended to link land use, transportation and air quality with reasonable growth management methods, strategies and programs that effectively utilize new transportation funds to alleviate traffic congestion and related impacts. As the designated Congestion Management Agency (CMA), the RCTC prepares the CMP that designates a system of highways and roadways to include all State Highway facilities within Riverside County and a system of “principal arterials” to be included as the Congestion Management System (CMS.) It is the responsibility of local agencies, when reviewing and approving development proposals to consider the traffic impacts to the CMS. All development proposals and circulation projects to be included within the City of Cathedral City are required to comply with the current policies and procedures set forth by the Riverside County Transportation Commission’s Congestion Management Program. Interstate Highway 10, Bob Hope Drive and Varner Road are regionally significant roadways in the study area that are included in the CMP system.

The Coachella Valley Association of Governments has developed a Transportation Uniform Mitigation Fee (TUMF) that complements the objectives of the Congestion Management Program. The City follows the Riverside County CMP since all new development projects are required to participate in the TUMF program. The City will continue to participate in the TUMF program to assure that appropriate fees are assessed for development projects as a means of supporting the financing of regional transportation infrastructure. Impact fees will be collected prior to the issuance of building permits and may be incrementally assessed in conformance with the TUMF program.

The Transportation Uniform Mitigation Fees (TUMF)

The TUMF program identifies network backbone and local roadways that are needed to accommodate growth. The regional program was put into place to ensure that developments pay their fair share of funding to finance the construction of facilities needed to maintain an acceptable level of service for the regional transportation system. The TUMF is a regional mitigation fee program. Fees are calculated using either number of dwelling units (for residential) or 1000 sq ft of gross floor area (for commercial,) and are determined using ITE ADT rates for the specific land use.

The County Congestion Management Plan (CMP) requires a LOS E or better for regional roadways. As noted above and in the Traffic Letter prepared for this project, the generation, distribution and management of project traffic is not expected to conflict with the CMP; The project and background traffic will not exceed City level of service standards or travel demand measures, or other standards established by the City or Riverside County Transportation Commission (RCTC) for designated roads or highways. As mentioned previously, the project applicant will be conditioned to pay the appropriate TUMF fees. Less than significant impacts are expected.

c) **Less than Significant Impact.** The project will have a very limited impact on the facilities or operations of regional airports and will not result in a change in air traffic patterns, including an increase in traffic levels. The project is located approximately 6 miles northeast of the Palm Springs International Airport (PSIA). The project is located outside of the PSIA land use compatibility plan and no impacts will result. The proposed development

will not affect the operations of these airports nor create substantial safety risks. Less than significant impacts are anticipated.

- d) **Less than Significant Impact.** The project will be developed in accordance with City design guidelines and will not create a substantial increase in hazards due to a design feature. The project access points will be located with adequate sight distances, and sharp curves will be avoided through compliance with City design guidelines. These guidelines provide specific metrics of features such as streets and parking lots that encourage development of a safe and “livable” community. They can be found in a variety of locations on the City’s website, including the General Plan, Municipal Code and the City of Cathedral City Design Guidelines. In addition, the project will be required to construct all required safety and operational improvements with the implementation of the NCESP EIR Standard Conditions 3.16-1, 3.16-2, 3.16-4 through 3.16-7 and mitigation mm 3.16-1, 3.16-2 and 3.16-4 shown above. With implementation of the Standard Conditions and mitigation, impacts are expected to be less than significant relative to design feature hazards.
  
- e) **Less than Significant Impact.** Currently, access to the project site is provided by Varner Road which connects to Bob Hope Drive to the east and Date Palm Drive to the west. Bob Hope Drive and Date Palm Drive provide access to the I-10 Freeway and areas to the south. Design guidelines further ensure that emergency access will be created and reserved for the proposed project. Both the Fire department and Police department will review project plans to ensure safety measures are addressed, including emergency access. The proposed project will not result in inadequate emergency access. Less than significant impacts are anticipated.
  
- f) **Less than Significant Impact.** SunLine Transit has one bus line near the proposed project, Route 220. Route 220 runs from Palm Desert to the Riverside Metrolink Station, with a stop at the Sunline Transit Hub on Varner Road, approximately 0.75 miles east of the project. The NCESP contains a system of pedestrian paths and multi-use trails that are required to be constructed as part of the project. The project will include a system of pedestrian sidewalks along Varner Road and a multi-use trail along Valley Center Boulevard, consistent with the requirements of the NCESP, that are open to the public to provide an additional option for pedestrian travel throughout the area. The project design will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Less than significant impacts are anticipated. As mentioned previously, the project will be required to coordinate with Sunline Transit Agency to determine if transit related improvements, such as a bus turnout, are required.

Depending on their location, trails are composed according to City of Cathedral City standards. The trail system provides public access to bicyclist and hikers throughout the site and serves to connect the existing development to the east and proposed development to the west. A less than significant impact is expected.

**Project Specific Mitigation: MM T-1**

<b>17. TRIBAL CULTURAL RESOURCES –</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project cause a substantial				

Adverse change in the significance of a Tribal cultural resource, defined in Public Resource Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local Register of historical resources as defined in Public Resource Code Section 5020.1(k), or:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sources: The following discussion is based on the findings in the Phase I Historical/Archaeological Resources Survey: Glass House Pharms Project, CRM Tech, 10/4/18 and 11/21/18.

**BACKGROUND**

A Phase I cultural resources survey was prepared for the project by CRM Tech that included the 300-acre project site along with an adjacent portion of Varner Road. The survey was conducted in October and November of 2018. The cultural resources assessment included an historical/archaeological records search, historical background research, consultation with Native American representatives, and an intensive-level field survey of the entire project area.

Pursuant to AB 52, the City conducted correspondence with Native American Tribes associated with the project area.

- a) **Less than Significant Impact.** The assessment included records searches, historical background research, and field survey. The site is approximately 300 acres of vacant and undeveloped land. Per the project’s cultural report, the site does not contain any buildings, structures, or objects of prehistoric or historic origin. On August 14, 2018, CRM TECH submitted a written request to the State of California’s Native American Heritage Commission (NAHC) for a records search in the commission’s Sacred Lands File. The Native American Heritage Commission (NAHC) reported that the Sacred Lands File search yielded negative results for Native American Cultural Resources within the project area. Following the NAHC’s recommendations and previously established consultation protocol, on August 17, CRM TECH contacted a total of 11 local tribal representatives in writing for additional information on potential Native American cultural resources that may be present in and near the project area. The correspondence between CRM TECH and the Native American representatives is attached to the cultural resources report in Appendix 2. As of the date of this Initial Study, five Tribal representatives contacted responded in writing. Three of the Tribes stated that their tribe has no information on any Native American cultural resources in the project area and encouraged further consultation with other Native American groups in the region and Native American Monitoring. Morongo Band of Mission Indian identified the site as part of their Traditional Use Area and requested Tribal monitoring by a Morongo representative. However, no Native American TCRs were reported to be present on the project site or immediate

surrounding area by the Tribe. Therefore, the project will result in a less than significant impact on TRCs listed or eligible for listing in the California Register of Historical Resource.

- b) **Less than Significant Impact with Mitigation.** Public Resource Code 21074 identifies “Tribal Cultural Resources” (TRCs) as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” and that are either included or determined to be eligible for inclusion on the national state, or local register, of historic resources, or that are determined by the lead agency, in its discretion, to be significant when taking into consideration the significance of the resource to a California Native American Tribe.

AB 52 requires lead agencies to notify relevant tribes about development projects. It also mandates lead agencies to consult with tribes if requested, and sets the principles for conducting and concluding the required consultation process. Pursuant AB 52 consultation requirements, the City of Cathedral City initiated a 30-day consultation period with local Tribes from November 14, 2018 to December 14, 2018 as part of the AB 52 process.

During the consultation period, four Tribes were notified, and no further consultation was requested. Therefore, less than significant impacts are expected following the recommended mitigation measure CR-2 identified in the Cultural Resources Section of this IS/MND.

During the consultant-initiated consultation with local Native American tribes associated with the project area, the Morongo Band of Mission Indian identified the site as part of their Traditional Use Area and requested Tribal monitoring by a Morongo representative. Because the project site is in a mostly natural state and has never been developed, there is potential for previously unknown TRCs to be uncovered by grading activities on the project site. Implementation of the following mitigation will ensure that impacts to unknown TRCs that may be uncovered during site disturbing activities for the project will be less than significant:

**Mitigation Measure:**

**MM CUL-2:** The project applicant shall ensure the presence of an approved Native American Cultural Resource Monitor during any ground disturbing activities (including archaeological testing and surveys) for the proposed project.

**MM CUL-3:** Should buried historical/archaeological deposits be encountered during ground-disturbing activities for the project, all destructive construction shall be halted and the monitor and/or project proponent shall notify a qualified archaeologist (meeting the Secretary of the Interior’s Historic Preservation Professional Qualifications Standards) to evaluate the find. If the archaeologist determines that the resource may be significant, the archaeologist shall notify the project proponent and the City and, if necessary, prepare a mitigation/treatment plan for the resource. The archaeologist shall consult with the appropriate Native American representative in determining the appropriate treatment for the resource if the resource are prehistoric or Native American in nature.

**MM CUL-4:** The archaeologist shall prepare a final report to be reviewed and accepted by the City. The report shall include a description of the resource(s) unearthed, if any, treatment of the resource(s), and evaluation of the resource with respect to the CRHR and National Register of Historic Places criteria for designation. The archaeologist shall provide copies of any studies or reports to the Eastern Information Center for the State of California located the University of Riverside, the

City, and the Agua Caliente Tribal Historic Preservation Office (THPO) for permanent inclusion in the Agua Caliente Cultural Register.

With implementation of mitigation MM CUL-2 through MM CUL-4, the project will result in a less than significant impact the to TRCs.

**Project Specific Mitigation:** MM CUL-2, MM CUL-3 & MM CUL-4

17. UTILITIES AND SERVICE SYSTEMS – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion or existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statues and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Less Than Significant Impact.** The project falls under the jurisdiction of the Coachella Valley Water District (CVWD) wastewater service area. CVWD has developed a Sewer System Management Plan (SSMP) pursuant to the State Water Resources Control Board Order No. 2006-0003, Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems. The primary goal of the SSMP is to minimize frequency and severity of Sanitary Sewer Overflows (SSOs). The SSMP will cover the management, planning, design, and operation and maintenance of the District's sanitary sewer system. The wastewater system serves approximately 265,000 customers. The system collects municipal waste from residential and commercial users, delivering the collected wastewater to one of six Wastewater Reclamation Plants. The system includes approximately 1,100 miles of sewer, 34 lift stations and approximately 17,000 manholes.

As discussed throughout this document, the project proposes a mixed-use development on approximately 300 acres. The project would be developed in three phases. Phase 1 consists of an approximately 72-acres cannabis cultivation campus comprised of three 500,000 sf greenhouse buildings, one processing building (79,000 sf), one two-story administration building (56,000 sf), a guard building (500 sf) and associated landscape, retention basins, and on-site parking improvements. Phase 2 is comprised of 64 single family residential units on approximately 68 acres. (The proposed residential portion has not been fully realized at this time and the exact layout and design of the residential portion has not been developed.) Approximately 7,712 linear feet of 24” PVC will be installed for offsite connection to the existing sewer main on Varner Road. Waste-water services would then be provided to the development from the connection of private 8” sewer lines. These improvements will be completed as each phase develops, beginning with Phase 1. The infrastructure and design components

for the project will be consistent with local utility management requirements and water management plan. Towards this end, the following Standard Conditions from the NCESP EIR apply to the project:

**SC 3.17-1:** Project developer will pay for the costs of construction and expansion of water, sewer/wastewater, and storm drainage improvement and other public utilities which are necessitated by the proposed project prior to building permits.

**SC 3.17-2:** Project developer will notify utility agencies of its intentions to develop property in the early stages of the development process to provide sufficient time to plan for necessary improvements.

**SC 3.17-3:** Prior to issuance of permit, Project Developer will submit onsite utility design, especially related to storm drain.

**SC 3.17-4:** Domestic water services to the project site shall be subject to all applicable rules, regulations, ordinances and orders of the Coachella Valley Water District (CVWD). Project Developer shall complete financial arrangements with CVWD, along with the installation of required facilities, prior to CVWD providing domestic water services.

**SC 3.17-4:** Sanitary sewer services to the project site shall be subject to all applicable rules, regulations, ordinances and orders of the Coachella Valley Water District (CVWD). Project Developer shall complete financial arrangements with CVWD, along with the installation of required facilities, prior to CVWD providing sewer services.

The required sewer infrastructure will comply with all applicable wastewater treatment requirements and City standards. Project developers within the NCESP are required to pay sewer fees associate with project development. All proposed development within the NCESP will be reviewed by the City and appropriate agencies to determine specific improvements to the sewer system. Therefore, the project is not expected to exceed wastewater treatment requirements of the Regional Water Quality Control Board. Less than significant impacts are expected.

- b) **Less than Significant Impact.** CVWD provides domestic water and wastewater service in the project vicinity and is the largest provider of potable water in the Coachella Valley. It operates more than 100 wells and serves a population of 283,000 in its service areas. CVWD's 2012 adopted Water Management Plan and 2015 Urban Water Management Plan have been developed to assist the agency in reliably meeting current and future water demands in a cost-effective manner. Additionally, CVWD treats nearly 6.3 billion gallons of wastewater a year. The CVWD operates six water reclamation plants and maintains more than 1,000 miles of sewer pipeline and more than 30 lift stations that transport wastewater to the nearest treatment facility.

There are existing water and wastewater point of connections to the site. The project proposes to install 6,049 linear feet of 18" water main to connect to an existing connection point on Varner Road. Additionally, the project proposes a private water well and one 500,000-gallon agriculture storage tank to serve the site. Up to 1.3 A.F. of water will be used. The well water will be pumped into the storage tank to be used for all indoor irrigation. The developer will pay a Replenishment Assessment charge to CVWD for the use of this well. The project will be required to obtain a well permit from Riverside County Environmental Health.

Approximately 7,712 linear feet of 24" PVC will be installed off-site and connected into the existing sewer main on Bob Hope Drive and Rio del Sol. Waste-water services would then be provided to the development from the connection of Private 8" sewer lines and extend throughout the site as each phase develops.

The wastewater discharge from the Reverse Osmosis system will be dispersed in a concrete lined orchard to filter this water through an organic system to then be used again in the irrigation of the cannabis cultivation. The Reverse Osmosis system is a filtration system to clean out all the minerals from the well water before

entering the irrigation system. This system will be reviewed and approved by the Regional Water Quality Control Board (RWQCB) and CVWD.

The NCESP EIR also contains Standard Conditions that are applicable to the project related to water and wastewater treatment facilities:

**SC 3.17-1:** Project developer will pay for the costs of construction and expansion of water, sewer/wastewater, and storm drainage improvement and other public utilities which are necessitated by the proposed project prior to building permits.

**SC 3.17-2:** Project developer will notify utility agencies of its intentions to develop property in the early stages of the development process to provide sufficient time to plan for necessary improvements.

**SC 3.17-3:** Prior to issuance of permit, Project Developer will submit onsite utility design, especially related to storm drain.

**SC 3.17-4:** Domestic water services to the project site shall be subject to all applicable rules, regulations, ordinances and orders of the Coachella Valley Water District (CVWD). Project Developer shall complete financial arrangements with CVWD, along with the installation of required facilities, prior to CVWD providing domestic water services.

**SC 3.17-4:** Sanitary sewer services to the project site shall be subject to all applicable rules, regulations, ordinances and orders of the Coachella Valley Water District (CVWD). Project Developer shall complete financial arrangements with CVWD, along with the installation of required facilities, prior to CVWD providing sewer services.

The proposed development is required through compliance with California Green Building Code and CVWD to implement water conservation measures to reduce impacts to public water supplies. These measures include low-flow plumbing fixtures, drought-tolerant (native) outdoor landscaping, and water-efficient irrigation systems. Through the development process, the project will undergo review by CVWD to ensure wastewater capacity and compliance with the current wastewater treatment requirements. The City requires all project developers to submit a letter from the CVWD stating that there is sufficient capacity to serve the project, which may or may include additional requirements to service the project. Additionally, sewer and water installation and connection fees in place at the time of development will be collected by CVWD. No new or expanded treatment facilities are expected as a result of project implementation, nor is the project expected to exceed existing wastewater capacity. Less than significant impacts are expected.

- c) **Less than Significant Impact.** The Clean Water Act (CWA) of 1972 establishes regulations pertaining to the discharge of pollutants to waters of the U.S. from point sources. Subsequent amendments to the CWA in 1987 established a framework for regulating non-point source stormwater discharges under the National Pollutant Discharge Elimination System (NPDES). The proposed project is located within the Whitewater River Watershed in the Colorado River Region (Region 7). The City of Cathedral City is a Permittee of the Whitewater River Watershed MS4. The City's Engineering Department is the local enforcer of the NPDES and individual projects, like the proposed development, are required to comply show how their projects comply with these existing regulations through submittal of hydrology studies prepared for the project that are reviewed and approved by the City's Engineering Department.

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) serve as the basis for identifying potential hazards and determining the need for and availability of federal flood insurance. The proposed project site is covered by FIRM Panel Numbers 06065C1577G, 06065C1579G and 06065C1585G, revised August 28, 2008, which indicates the project area lies within two zones; Zone X (SHADED ) which is defined as "Areas of 0.2% annual chance flood: areas of 1% annual chance flood with average depths of less

than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood. Insurance purchase is not required in these zones.” And Zone A0 (Depth 2’) (Velocity 7 fps) which is defined as “River or stream flood hazard areas, and areas with a 1% or greater chance of shallow flooding each year, usually in the form of sheet flow, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. Average flood depths derived from detailed analyses are shown within these zones.

As indicated in the approved Preliminary Hydrology Report, a CLOMR/LOMR process has begun to revise the Flood Insurance Rate Maps, with the Conditional Letter of Map Revision (CLOMR) having been submitted to the Federal Emergency Management Agency (FEMA), prepared by Michael Baker International. The drainage control improvements proposed in the CLOMR/LOMR will be built in phases. Each phase of the project will include the flood control improvements necessary to provide the 100-year storm event protection, including a corresponding Flood Hazard Mitigation Report prepared by Q3 Consulting for off-site storm flows. In addition an On-Site Hydrology and Hydraulics Report will be submitted for on-site retention and storm drain system. Once all improvements are complete, a letter of Map Revision (LOMR) will be filed to remove the AO flood zone designation.

The project includes a system of LID retention basins designed to capture and infiltrate project runoff and runoff from off-site tributary areas which are currently undeveloped. Stormwater capture and infiltration practices are recognized for helping recharge groundwater levels to increase supply reliability, promote conjunctive use, and provide additional benefits that meet the regional objectives related to flooding and water quality. The combined retention capacity introduced by the project is 5,271,220 cubic feet, which represents the total amount of stormwater which would be infiltrated during the controlling storm event. The design and sizing of the basins are based on a project-specific hydrology study, which is aimed at preventing erosion, sedimentation, and flooding conditions after factoring the FEMA Zone AO classification. This information is provided in the Project-Specific Water Quality Management Plan (WQMP), which is required to comply with the most current standards of the Whitewater River Region Water Quality Management Plan for Urban Runoff and the Whitewater River Watershed MS4 Permit and is subject to review and approval by the City prior to issuance of a grading permit. Less than significant impacts are anticipated.

- d) **Less than Significant Impact.** Groundwater is the primary source of domestic water supply in the Coachella Valley. CVWD is the largest provider of potable water in the Coachella Valley and currently provides potable water to portions of Cathedral City that includes the project site. It operates more than 100 wells and serves a population of 283,000 in its service areas. CVWD’s 2012 adopted Water Management Plan and 2015 Urban Water Management Plan have been developed to assist the agency in reliably meeting current and future water demands in a cost-effective manner. The comprehensive Water Management Plan guides efforts to eliminate overdraft, prevent groundwater level decline, protect water quality, and prevent land subsidence. The 2015 UWMP serves as a planning tool that documents actions in support of long-term water resources planning and ensures adequate water supplies are available to meet the existing and future urban water demands.

A Water Supply Assessment (WSA) for the entire 590-acre North City Extended Specific Plan was prepared and adopted by CVWD Board of Directors on January 14, 2014. The WSA concluded the NCESP project would need approximately 1,310 AFY. This estimation includes indoor and outdoor use for the residential and non-residential area. The WSA assessed Planning Area 4 as single-family residential under the MU-N zoning at 25 du/ac with a maximum of 1,000 du and a demand of 166,100 gpd. See Table 2.0-1 from the NCESP WSA for reference.

**Table 2.0-1  
 Indoor Residential Water Demands**

Planning Area	Land Use	Units	*gpd/unit	Demand (gpd)	Indoor Residential Annual Demand (AFY)
1	Single-Family Residential	300	166.1	49,830	55.82
1	Multi-Family Residential	1900	166.1	315,590	353.51
4	Single-Family Residential	1000	166.1	166,100	186.06
<b>Total</b>		<b>3200</b>			<b>595.33</b>

(\* 0.55 gpd/person x 3.02 person/unit = 166.1 gpd/unit)  
 3.02 person/dwelling unit derived from 2008-2012 US Census for Cathedral City)

Landscape water demands were also analyzed as part of the WSA, the water demand for the project is based on the estimated landscape irrigation area and water usage equations of CVWDs Landscape Ordinance 1302.1. Maximum Applied Water Allowance (MAWA) equation for the project was used to project the irrigation demand. Demand of 3.89 ac-ft per year per acre is applied to the landscape (either 35, 50, or 100% of the Net Land Area is used to reflect the desert scape type landscaping). Retention basins are minimally landscaped and only over perimeter (5% of Net Land Area). Per Table 2.0-3 of the NCESP WSA, Planning Area 4 has annual demand of 273.97 AFY. When combining the projected demand for the single family residential portion of Planning Area 4 and the projected annual demand of the outdoor usage, a total of 460.03 AFY of potable water would be used for Planning Area 4.

**Table 2.0-3  
 Outdoor – Open Space Water Demands**

Planning Area	Open Space Land Use	Total Outdoor Acreage (AC)	Landscaped Acreage (AC)	%	Water Allotment (AFY/ac)	Annual Demand (AFY)
1	Localized drainage, parks, setbacks, and circulation	58.82	29.41	50	3.89	114.40
3	Localized drainage, setbacks and circulation	16.77	8.38	50	3.89	32.59
4	Localized drainage, setbacks, parks, circulation and regional flood control	201.23	70.43	35	3.89	273.97
5	Localized drainage, landscape buffer and circulation	3.82	3.82	100	3.89	14.86
<b>Total</b>		<b>280.64</b>				<b>435.82</b>

The project now proposes a mixed-use development to be constructed in two phases in Planning Area 4. Phase 1 proposes a cannabis cultivation facility, consisting of three 500,000-square-foot greenhouse buildings, one processing building (79,000 square feet), one two-story administration building (56,000 square feet), and a guard building (500 square feet). Retention basins, landscaped features, drive aisles, and associated parking lots are also proposed as part of the projects improvements. Phase 2 proposes 64 single family residential dwelling units and associated street, and landscape improvements. As shown below in Table XVII-1, the new use of Cannabis combined with the reduced acreage of outdoor water use will demand a total of 460.03 AFY. Potable water for single family residential will be 11.91 AFY. Therefore, the water use the demand is still compliant with the overall water supply assessed for the NCESP.

**Table XVII-1 North City Extended  
 Cultivation Water Demand**

Planning Area	Description	Rooms / DU	Building Area (SF)	Net Land Area (AC)	Rate <small>Note: 1, 2, 3, 4</small>	Demand (gpd)	Demand Adjustment Factor	Adjusted Demand (gpd)	Demand (AFY)
PA4 - phase 1	Cultivation Buildings (1a, 1b, 1c)	0	1,500,000	34.43	35 gal/sf/year	143,836	71.0%	102,132	114.40
PA4 - phase 1	Processing Building (1p)	0	79,000	1.81	35 gal/sf/year	7,575	71.0%	5,379	6.03
PA4 - phase 1	Admin Building (1l)	0	56,000	0.64	35 gal/sf/year	5,370	71.0%	3,813	4.27
PA4 - phase 1	Guard House	0	500	0.01	35 gal/sf/year	48	71.0%	34	0.04
PA4 - phase 1	Open Space - Landscape and Retention	0	-	19.51	35 gal/sf/year	67,754	30.0%	20,326	22.77
PA4 - phase 1	Parking and Roadways	0	-	15.92	35 gal/sf/year	55,286	10.0%	5,529	6.19
PA4 - phase 2	single family - Estate Lots	64	-	0	166.1 gpd/EDU	10,630	100.0%	10,630	11.91
PA4 - phase 2	single family - Estate Lots - Outdoor		-	68.24	2258.9 gpd/EDU	144,568	148.2%	214,227	239.96
PA4 - p1 & 2	Open Space and Regional basins	0	-	140	3.89 ac-ft/yr/ac	486,187	10.0%	48,619	54.46
	off-site Streets/right of way dedication			20.23					
				<b>300.79</b>					<b>460.03</b>

Note:

- 1 - Indoor non-residential rate is based on AWWARF factor for Office: 35 gpd/sf/year
- 2 - Indoor residential rate is based on AWWARF factor: 55 gpd/capita; Cathedral City GP density: 3.02 people per capita = 166.1 gpd/home
- 3 - outdoor single family rate: 3.89 ac-ft/yr/ac based on CVWD approved WSA rate for Maximum applied Water Allowance (MAWA); 1 acre Estates
- 4 - Demand Adjustment Factor – derived from actual facility water use projection of 24.85 gal/sf/year, or 71% of the AWWARF Office building rate.

The infrastructure and design components for the project will be consistent with CVWD requirements and water management plan. Through the development review process, the project will also be reviewed by CVWD and City staff to assure compliance with all current and applicable requirements. The City requires all new development to provide a letter from the CVWD stating that there is sufficient capacity available to serve the project. The proposed development will be expected to implement water conservation measures to reduce impacts to public water supplies per the Coachella Valley Water Management Plan. Additionally, water installation and connection fees in place at the time of development will be collected by CVWD. Therefore, the project would not result in a significant impact to available water supplies.

e) **Less than Significant Impact.** As previously discussed, CVWD operates six water reclamation plants and maintains more than 1,000 miles of sewer pipelines and more than 30 lift stations that transport wastewater to the nearest treatment facility and nearly 6.3 billion gallons of wastewater is treated yearly. Wastewater generated from the operations of the proposed project will be retained in a holding tank where it will be treated and disposed of at a proper industrial waste treatment center. The project will undergo review by CVWD and City staff to ensure wastewater capacity and compliance with the current wastewater treatment requirements. The City requires project developers to submit a letter from the CVWD attesting to sufficient capacity. Additionally, sewer and water installation and connection fees in place at the time of development will be collected by CVWD. No new or expanded treatment facilities are expected as a result of project implementation. Nor is the project expected to exceed wastewater capacity. Less than significant impacts are expected.

f, g) **Less than Significant Impact.** Solid waste disposal and recycling services for the City of Cathedral City are provided by Burrtec. Solid waste and recycling collected from the proposed project will be hauled to the Edom Hill Transfer Station. Waste from this transfer station is then sent to a permitted landfill or recycling facility outside of the Coachella Valley. These include Badlands Disposal Site, El Sobrante Sanitary Landfill and Lamb

Canyon Disposal Site. Cal-Recycle data indicates the Bandlands Disposal site has 15,748.799 cubic yards of remaining capacity, the El Sobrante Landfill has a remaining capacity of 145,530,000 tons of solid waste, and Lamb Canyon Disposal has a remaining solid waste capacity of 19,242,950 cubic yards. Any unused plant materials derived from the cultivation campus would be composted and reintroduced into soil composite. Solid waste generated by the cultivation campus would only come from the admin and processing buildings and is estimated at 3 cubic yards for each with pickup 1x a week.

Using the residential solid waste generation factor of 0.41 tons per dwelling unit from the Riverside County EIR No. 521, the residential portion of the project could generate up 26.24 tons of solid waste.

As part of its long-range planning and management activities, the Riverside County Waste Management Department (RCWMD) ensures that Riverside County has a minimum of 15 years of capacity, at any time, for future landfill disposal. The 15-year projection of disposal capacity is prepared each year by as part of the annual reporting requirements for the Countywide Integrated Waste Management Plan. The most recent 15-year projection by the RCWMD indicates that no additional capacity is needed to dispose of countywide waste through 2024, with a remaining disposal capacity of 28,561,626 tons in the year 2024 (County of Riverside 2015b).

In addition, all future development would be required to comply with the mandatory commercial and multi-family recycling requirements of Assembly Bill 341. Therefore, the project will comply with all applicable solid waste statutes, policies and guidelines and the project will be served by a landfill with sufficient capacity to serve the project. Therefore, less than significant impacts are expected relative to solid waste and applicable regulations.

**Project Specific Mitigation:** None

<b>18. MANDATORY FINDINGS OF SIGNIFICANCE</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to 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, 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 type="checkbox"/>	<input checked="" 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"/>

- a) **Less than Significant Impact with Mitigation.** The project would develop a cannabis business park, residential component, and open space and retention basins on approximately 300-gross-acres of vacant land in Cathedral City’s Extended North City. The project is compatible with the City of Cathedral City General Plan and the North City Extended Specific Plan’s zoning designations and its surroundings. As stated throughout this document, cannabis businesses are allowed within MU-N land use designations within the City per Ordinance 805 and CCMC 9.108. The NCESP also requires a 35 percent residential component within MU-N land use designations. The project is currently consistent with this requirement. As concluded in the Biological and Cultural Resources sections of this document, the proposed project would result mitigated to less than significant with implementation of mitigation.

Mitigation measures MM BR-1, MM BR-2, and MM BR-3, listed within the Biological Resources Section of this Initial Study requires 1) a burrowing owl clearance survey prior to ground disturbing activities, 2) biological monitoring during earth moving activities, and 3) no construction or ground disturbing activities located within 500 meters of an active owl burrow, if found onsite. The project shall adhere to the mitigation measures listed in the Biological Resources Section in order to reduce impacts to less than significant levels. See Biological Resources Section for further discussion.

Mitigation measures regarding cultural resources were also included in the Cultural Resources Section. The project was found to have the potential to result in a significant impact on a historical resource. However, impacts will be reduced to less than significant with implementation of mitigation MM CUL-1. The mitigation measure MM CUL-2 requires that a Native American Cultural Resource Monitor be present onsite during any ground disturbing activities., MM CUL-3 mitigates the potential for unknown archaeological and Native American cultural resources to be uncovered on the site, and MM CUL-4 requires reporting of significant finds.

Less than significant impacts with mitigation will result from the project related to biological, archaeological and historical resources.

- b) **Less than Significant Impact.** The proposed project and its location, is found to be adequate and consistent with existing federal, state and local policies and is consistent with the City of Cathedral City General Plan,

North City Extended Specific Plan, and surrounding land use. The project was not found to result in project-specific cumulative impacts related to air quality or traffic. Therefore, the project will result in less than significant cumulative impacts.

- c) **Less than Significant Impact with Mitigation.** The proposed project was found to have the potential to result in impacts related to environmental effects that will cause substantial adverse effects on human beings. These impacts include those air quality, greenhouse gases, and fire department services. However, all these impacts were found to be less than significant with implementation of mitigation.

## REFERENCES

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