Final Initial Study and Notice of Intent to Adopt a Mitigated Negative Declaration

Ramon 19 Cannabis Cultivation and Dispensary Project
Conditional Use Permit (CUP) No. 16-013

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Cathedral City

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List of Acronyms

AB 52	Assembly Bill 52
ACBCI	Agua Caliente Band of Cahuilla Indians
ADT	Average Daily Traffic
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APS	Alternate Planning Strategy
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
BACM	Best Available Control Measures
BAU	Business as Usual
BMP	Best Management Practices
BTU	British Thermal Units
CAAQS	California Ambient Air Quality Standards
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CCAA	California Clean Air Act
CDFFP	California Department of Forestry and Fire Protection
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CFCs	Chlorofluorocarbons
CG	General Commercial
CNDD	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CRWQCB	Colorado River Basin Regional Water Quality Control Board
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CVAG	Coachella Valley Association of Governments
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
CWA	Clean Water Act
CVWD	Coachella Valley Water District
dB	Decibel
DCFFP	California Department of Forestry and Fire Protection
DPM	Diesel Particulate Matter
EIC	Eastern Information Center

EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
GHG	Greenhouse Gas
GWP	Global Warming Potential
HACCP	Hazard Analysis Critical Control Points
HAZMAT	Hazardous Materials
HBMP	Hazardous Materials Business Plan
HFCs	Hydrofluorocarbons
HCP	Hazard Communication Plan
IPCC	International Panel on Climate Change
IS	Initial Study
Ldn	Day-Night Average Noise Level
LOS	Level of Service
LST	Localized Significance Threshold
MEP	Maximum Extent Practicable
MGD	Million Gallons per Day
MLD	Most Likely Descendent
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSDS	Material Safety Data Sheets
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	Nitrogen Dioxide
NOI	Notice of Intent
NO_x	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
O_3	Ozone
OES	Office of Emergency Services
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCC	Planned Community Commercial
PM_{10}	Particulate Matter – 10 microns or less
$PM_{2.5}$	Particulate Matter – 2.5 microns or less

ppb	parts per billion
ppm	parts per million
ppt	parts per trillion
PPV	Peak Particle Velocity
PSUSD	Palm Springs Unified School District
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RAC	Replenishment Assessment Charge
RCALUC	Riverside County Airport Land Use Commission
RCNM	Road Construction Noise Model
REC	Recognized Environmental Concern
REMEL	Reference Mean Emission Level
RHNA	Regional Housing Needs Allocation
ROG	Reactive Organic Gas
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SF_6	Sulfur Hexafluoride
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SP	Service Population
SRA	Source Receptor Area
SRRE	Source Reduction Recycling Element
SSAB	Salton Sea Air Basin
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCR	Tribal Cultural Resource
THC	Tetrahydrocannabinol
TIA	Traffic Impact Analysis
TDS	Total Dissolved Solids
THPO	Tribal Historic Preservation Office
UBC	Uniform Building Code
USFWS	United States Fish and Wildlife Service

USGS	United States Geological Survey
VOC	Volatile Organic Compound
WDID	Waste Discharge Identification
WDR	Waste Discharge Requirement
WQMP	Water Quality Management Plan
WRP	Water Reclamation Plant

Chapter 1 Introduction

1.1 Overview

CP Logistics, LLC is proposing to construct and operate a medical cannabis facility that includes cultivation and dispensary functions, on an approximately 19.14 acre site at 69-375 Ramon Road on the south side of the street at approximately 1,300 feet east of Date Palm Drive, in the City of Cathedral City, Riverside County. The facility will consist of two buildings totaling approximately 489,099 square feet, with 370 parking spaces, a retention basin at the southeast corner of the site, and a "laydown area" for construction materials and unloading deliveries during operations at the southwest corner of the site.

1.2 Purpose

The City of Cathedral City is the lead agency for the proposed project. The Planning Commission is the governing body for the approval of the project and for the adoption of the Mitigated Negative Declaration, and Mitigation Monitoring and Reporting Program. The project includes an application for a Conditional Use Permit (CUP) to allow cannabis cultivation in a commercial zone that requires consideration by the Planning Commission to exercise its judgment on whether to approve or deny the project. Therefore, the project is a discretionary action subject to the California Environmental Quality Act (CEQA). This Initial Study and its appendices have been prepared in accordance with CEQA Statute (PCR Sections 21000-21189.3) and the State's Guidelines for Implementation of CEQA (Guidelines) (as amended, 2009). This Initial Study, when combined with the Notice of Intent to Adopt a Mitigated Negative Declaration, serves as the environmental document for the proposed project under review pursuant to the provisions of CEQA (Public Resources Code 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000, et seq.).

1.3 Scope of Environmental Review

The Initial Study evaluates the proposed project's potential environmental effects on the following topics:

- Aesthetics
- Agricultural and Forestry
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic

- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Tribal Cultural Resources
- Utilities/Service Systems

1.3.1 Impact Assessment Terminology

The Environmental Checklist identifies impacts using four levels of significance as follows:

- No Impact. A finding of no impact is made when it is clear from the analysis that the project would not affect the environment.
- Less than significant. A finding of less than significant is made when it is clear from the analysis that a project would cause no substantial adverse change in the environment and no mitigation is required.
- Less than significant with mitigation incorporated. A finding of less than significant with mitigation incorporated is made when it is clear from the analysis that a project would cause no substantial adverse change in the environment when mitigation measures are successfully implemented by the project proponent.
- Potentially Significant. A finding of potentially significant is made when the analysis concludes that the proposed project could have a substantially adverse impact on the environment related to one or more of the topics listed in the previous section, *Scope of the Initial Study,* and that an Environmental Impact Report must be prepared.

1.3.2 Organization of the Initial Study

The content and format of this Initial Study meet the requirements of CEQA and contain the following sections:

Chapter 1 Introduction. This chapter provides a brief summary of the proposed entitlements for the project, identifies the lead agency, summarizes the purpose and scope of the Initial Study, and identifies documents incorporated by reference.

Chapter 2 Project Description. This chapter provides a project overview including a description of the regional location and project vicinity, including exhibits; and provides a description of the project elements, e.g. dimensions of the project, functions within each building; access and circulation, etc., and identifies other agencies that may have permitting authority over the project.

Chapter 3 Environmental Evaluation. This chapter provides a copy of the City's Environmental Checklist and responses to each question posed in the checklist. This chapter also provides a brief description of the sources used to evaluate the proposed project, a brief description of the existing conditions for each topic and an analysis of potential environmental impacts. Mitigation measures are also identified where necessary.

Chapter 4 List of Preparers. This chapter identifies City of Cathedral City staff and consultants who were responsible for the preparation of the Initial Study and implementation of the project.

Chapter 5 References. This chapter lists all reports used, websites accessed, and persons consulted to prepare the Initial Study.

1.4 Documents Incorporated by Reference

As allowed by CEQA Guidelines Section 15150, a Mitigated Negative Declaration may incorporate by reference all or portions of another document that is generally available to the public. The document used must be available for interested parties to access during public review of the Initial Study and Notice of Intent to Adopt a Mitigated Negative Declaration for this project. The following documents are incorporated by reference:

- Cathedral City General Plan
- Cathedral City Zoning Ordinance

These documents are also available for review at City Hall, 68-700 Avenida Lalo Guerrero, Cathedral City, CA 92234. The project specific reports are attached to the Initial Study as appendices.

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Chapter 2 Project Description

2.1 Project Location and Setting

Exhibit 1, *Regional Location*, shows the location of the project site within the larger Coachella Valley region of Riverside County. The 19.14-acre project site is located at 69375 Ramon Road, east of Date Palm Drive and adjacent to Ramon Road on the south side of the street; further defined by longitude 33°48'50.4" N and latitude 116°27'09.3" W. The project site is located within the northwest quarter of Section 22, T4S R5E of the Cathedral City USGS 7.5 minute quad. The project site consists of Assessor's Parcel Nos. 673-020-039, -040, -041, -042, and -043. Exhibit 2, *Project Site and Vicinity*, shows the location of the project site within an area developed with a mix of residential and commercial uses. Exhibit 3, *Project Parcels*, shows the parcels that make up the site, with the project's associated Assessor's Parcel Numbers as labelled.

The project site is mostly vacant with a relatively flat slope, sandy soils and scattered areas of brush. An abandoned building is located in the northeastern portion of the site. Additionally, the eastern portion of the site is fenced with a chain-link fence. A block wall is located along the east property line and west property line. The site was previously used as part of a commercial target golf and garden facility operation. A hotel was previously located on the site as well but has been demolished. The site has since been grubbed except for a tamarisk break remaining along the western boundary. Exhibit 4, *Photo Locations*, shows an aerial photo of the site with arrows showing where photos were taken. Photos of the site follow Exhibit 4.

Outdoor Resorts of America, an RV and golf course community, is located to the east and southeast of the project site, and a self-storage facility (Cathedral Village Self Storage) is located to the immediate west. To the immediate south and southwest is the Desert Sands residential community. To the north across Ramon Road, there are primarily vacant parcels with intermittent commercially developed parcels along the Ramon Road frontage, and a single-family residential development further north. Community shopping centers are located on the northwest and southeast corners of the Ramon Road/Date Palm Drive intersection located less than one mile west of the project site's primary access on Ramon Road.

2.2 General Plan and Zoning Designations

The project site is currently located in the PCC (Planned Community Commercial) District and is designated CG (General Commercial) on the General Plan Land Use Map. Exhibit 5, *Existing Zoning and General Plan Designations*, shows the designations in the project area.

2.3 Project Description

The project applicant, CP Logistics LLC, is proposing the construction and operation of a medical cannabis cultivation facility and a dispensary at the project site. The project will include a Conditional Use Permit (CUP 16-013) for both the dispensary and cultivation land uses, which is a discretionary action approved by the Planning Commission. The project will require a Parcel Merger so the project buildings would not be built across parcel lines, which is a ministerial action that is approved by Staff. The Conditional Use Permit will have a Condition of Approval requiring the Parcel Merger to be completed prior to the issuance of a Building Permit. In order to construct the buildings, the applicant will be required to obtain a grading permit from the Engineering Department and a building permit from the Building and Safety Department. Prior to operation, the applicant will also be required to acquire a local medical cannabis license from the City for Cultivation.

The facility will be housed in two buildings totaling approximately 489,099 square feet (see Exhibit 6, *Site Plan*). Building One will be constructed on the northern portion of the property and will be approximately 325,599 square feet. Building Two will be constructed in the central portion of the property and will be approximately 163,500 square feet. Table 1, *Building Summary,* shows the square footage of each building broken down by use. A visual depiction of each building is included in Exhibit 7A, *Building One Floor Plan – First Floor,* Exhibit 7B, *Building One Floor Plan - Mezzanine* and Exhibit 8, *Building Two Floor Plan*.

Table 1 Building Summary

Building Use	Floor Area (SF)	Construction Phase
Building One		
Dispensary	3,175	Phase One
Offices	10,419	Phase One
Storage and Mechanical	7,222	Phase One
Cultivation	301,684	Phase One
Mezzanine	3,099	Phase One
Total Building One	**325,599**	**Phase One**
Building Two		
Offices	3,783	Phase Two
Storage and Mechanical	7,273	Phase Two
Cultivation	152,444	Phase Two
Total Building Two	**163,500**	**Phase Two**
Total Building SF	**489,099**	**Build Out**

Source: Sunniva, 2017.

As shown on the floor plans (Exhibits 7 and 8), each building consists of a greenhouse structure, with a typical industrial type façade, which houses offices, storage and mechanical space, restrooms and rooms for trimming and curing the plants. The buildings will be up to 27 feet in height. (see Exhibit 9, *Building One Elevations* and Exhibit 10, *Building Two Elevations*).

Exhibit 11, *Project Color and Finish Board*, shows the design elements of the project. The pre-fabricated greenhouses will be constructed using a steel and aluminum frame, which will hold diffused/translucent, double-layered polycarbonate panels along the sides of the building, and with diffused/translucent, anti-reflective coated glass panels on the remainder of the building height and roof. Metal decorative panels will be included for architectural relief on the façade of the buildings and along the base of the cultivation areas. Insulated metal sandwich panels will be installed as the interior walls for the dispensary, processing, storage, and office areas.

Onsite Drainage

The southeastern portion of the property will include a retention basin to accommodate drainage from the site. A storm-drain system installed around the perimeter of each building will direct the drainage from the rooftops to an underground gravity drain system that will direct drainage to the south into the retention basin. Additionally, the site will be graded to direct onsite drainage to the retention basin in the southeast corner of the site. The retention basin has been designed to hold 100-year storm flows.

Onsite Circulation

Access to the project site will be taken from Ramon Road via two ingress/egress points situated at the northwestern and northeastern portions of the project site (see Exhibit 6). The northwestern access will line up with El Toro Road on the north side of Ramon Road in order to create a signalized intersection. Trucks, delivery vehicles, and emergency vehicles will enter the facility on the east side through a controlled gated entry, will then travel south along the east side of the buildings, then west along the southern end of Building Two, north along the west side of the buildings, then exit the facility through another controlled, gated access point on the west side of the site.

Parking will be located along the Ramon Road frontage in front of Building One, in the central portion of the site in front of Building Two, and behind Building Two. A total of 370 parking spaces will be provided, eight of which will be ADA spaces. A laydown area will be located in the southwest corner of the site. Tractor-trailer deliveries will be directed to the Laydown Area. In this area, there is a loading platform for the tractors to back in their trailers. Offloading of the trailer will be done by power jack from the loading platform. Once a trailer is unloaded onto the platform, it leaves the area. Then a smaller Sunniva 5-ton flatbed truck will back into the platform, where it will be loaded with a power jack. Then the 5-ton truck delivers its load to the Receiving Bay in the main facility.

Domestic Water

The proposed project will tie into an existing CVWD domestic water line on Ramon Road, which will provide water for sanitary facilities, kitchen, processing activities, etc.

Private Wells

There is an existing well on the site that will be decommissioned prior to construction (it is located under the greenhouse making it un-usable). Two new wells will be drilled on the property and will be located in bunkers in the front parking lot, with a lid on top so that the bunker can be parked on (no loss of parking spots). The wells will be designed to supply 250 gallons per minute and will be located approximately 450 feet apart. The applicant will only draw from one well at a time to avoid the cone of depression effect. Water from these wells is not potable and will only be used for cultivation, landscaping, and evaporative cooling. All potable water use will come from an established point of connection with a CVWD domestic water line.

Cultivation

Operations

The cultivation facility will be operated in one shift: 7:30am - 4pm, Monday through Friday. Typically, a shift for this size of facility would consist of approximately 325 employees in performing non-automated, physical labor-related procedures in the cultivating of medical marijuana. Originally, the applicant chose this strategy and therefore the required technical studies (i.e., Air Quality and Green House Gas, Traffic, Noise) evaluated the project under this strategy.

However, during the preparation of this Initial Study, the applicant opted to modify cultivation procedures by including automated components that would involve machinery to move, relocate and water plants in various stages of growth. Such a procedure requires approximately 140 fewer staff. Thus, the applicant estimated only 185 employees would be needed to monitor cultivation[RM1] operations. However, the technical studies (air quality and greenhouse gas analysis, noise, and transportation and traffic) have not been revised and still reflect the higher employee count. Therefore, the technical studies present a worst-case scenario that resulted in higher levels of impact that would happen if the studies were revised with the lower employee count."

The greenhouse structures are unique, in that they will be sealed for the desert climate, and equipped with several commercial-grade systems designed to reduce energy consumption. Low-energy evaporative cooling pad technology will be used for air conditioning in the greenhouses. Low-energy, natural gas boilers will be used for radiant hot-water heating of the greenhouses. Water from the air-capture system will be recirculated into the irrigation system.

Grow

The grow cycle proposed for the facility will take place in the greenhouses (labeled Zones 1-9), and will utilize the typical flori-culture model, where cuttings will be propagated from mother plants. Cuttings will then be put on fixed rolling benches in the propagation bay for two weeks. These plantlets are then walked via cart out of the propagation bay into the planting room where they are placed onto a conveyor belt that takes the plantlets into the transplant room where automated

equipment loads the plants onto a mobile bench. The mobile bench loaded with plants then automatically moves out of the transplant room into Zone 9, the vegetation bay. After vegetation, mobile benches move back into the transplant room where equipment automatically re-spaces the plants onto new rolling benches (wider spacing with less plants per bench), which are then automatically transported to one of the flower bays: Zones 1 through 8. All plants will receive a scan-able tag in order to be tracked throughout the process from cutting to vault by system software.

Harvest

Removable rolling benches will be moved into the harvest room from the flowering greenhouse bays. Rolling benches are a continuous pull-system of approximately 60 benches per day, processed 5 days a week on a single shift. There will be no batch harvesting, eliminating the need for a large transitory staff. In the harvest room, plants will be cut down and removed from the rolling bench, then hung on a mobile cart (similar to a clothing rack). The cart will be wheeled into the cure rooms to allow the plants to dry. Once dry, the plants will be wheeled into a trim room for trimming (mostly hand trim but also machine trim). The trimmed product will then be moved to a packaging room for packaging. Depending on the retail outlet, packaging of dried flowers will vary from small packages to large bulk packages. Following this, the packaged product will then be moved to the vault for storage. The rest and remaining part of the plant becomes trim waste which is then mixed with a neutralizing agent on the site to denature the THC (tetrahydrocannabinol – a crystalline compound that is the main active ingredient of cannabis) to render it safe for common disposal.

Distribution

Orders will be received by a shipping manager who will pull a selected packaged product from the vault and arrange it for delivery. Loading of the product will occur inside the shipping bay. Transport vehicles entering the bay will have the bay door shut from behind the vehicle before loading the product. Once paperwork and physical load have been verified by the shipping manager, the bay door will be re-opened to allow for the vehicle to exit the facility.

Cleaning

All tasks, including the scheduled cleaning of all production areas, will be driven by software developed by Benchmark Labs / TheraCann International. The system includes an extensive list of Standard Operating Procedures driven by a Hazard Analysis Critical Control Points (HACCP) protocol developed specifically for the manufacture of medical grade cannabis. Computer terminals in each processing area will prompt employees of tasks that are required. Deviations from expected inputs into the system, or expected time for a given task, will alert a manager to quickly address anomalies.

Hazardous Materials

The cultivation facility will use several different single-element fertilizers that feed into larger irrigation tanks via an automated pump/recipe system. Fertilizers that would be used include the following:

Californicus	Chelated Iron	Nitrate Nitrogen
Swirskii	Chelated Magnesium	Seaweed
Hypoaspis	Chelated Zinc	Soluble Magnesium
Atheta	Cobalt	Soluble Potash
Beauvaria bassiana	Copper	Sulfur
Procidic2	Humic Acid	Sulfur Combined
Ammoniacal Nitrogen	Hydrogen peroxide	Vitamin B-1
Available Phosphate	Iron	Vitamin C
Boron	Magnesium	Water Insoluble Organic Nitrogen
Calcium	Molybdenum	Water Soluble Organic Nitrogen
Chelated Calcium	Monosilicic Acid	Yucca Extract
Chelated Copper	Montmorillonite Clay	Soluble Organic Nitrogen
Chelated Manganese		

The floors in the fertilizer room will have a corrosion resistant coating as some of the single elements can damage a concrete floor over time. Additionally, because the product being grown is medical grade and could potentially be consumed by immunocompromised patients, no pesticides will be used.

In order to reduce the amount of wastewater generated during cultivation, the applicant plans to install a reverse osmosis water treatment system to treat irrigation water infused with fertilizers. This will remove fertilizers and allow the water to be used again for irrigation. The reverse osmosis process can create concentrated levels of total dissolved solids (TDS) and brine solutions in the filters that must be removed and disposed of as hazardous solid waste. This will be removed by a third party licensed hazardous waste hauler.

Odors

The cultivation facility will be developed as a closed system with no open venting to the atmosphere, as required by Section 9.108.050(C) of the Cathedral City Zoning Code. Air will be drawn into the greenhouses through a series of climate chambers which condition the air. Air will be expelled out of the gable ends of the greenhouses through an expandable carbon filter system. Designed for facilities that emit strong odors, these carbon filters would be designed to handle the facility's volume of expelled air; however, if any odors were detected during operation, more filters could be stacked onto this expandable system. The proposed exhaust air filtration system will ensure that odors from within the buildings will not be emitted externally by use of a system that includes vents every few feet on the roof to passively exhaust air (vents open and hot air comes out) which is called a semi-sealed greenhouse because there is only one row of vents that are controlled via suction fans that

exhaust air in exact amounts as determined by our climate control system. This system is capable of handling much stronger odors than cannabis. More importantly, this in-line cylinder system can easily be expanded. If we receive complaints about odor, we can address this by physically adding more cylinder units in-line to filter out more odor.

Dispensary

The dispensary will be operational seven days a week, from 8:00 am to 10:00 pm. Medical cannabis patients will enter the dispensary through a small access control vestibule. The customer will be required to present identification to the clerk who will then buzz the customer into the waiting area. The clerk will guide the customer to the bud room, where the product will be stored in display cases. The customer will request what they would like from the clerk, who will take it to the register and charge the customer for the product. Between six and 10 employees may work in the dispensary which is part of the overall 185 employees projected for the facility. The applicant anticipates approximately 50 patients per day at the dispensary.

Site Security

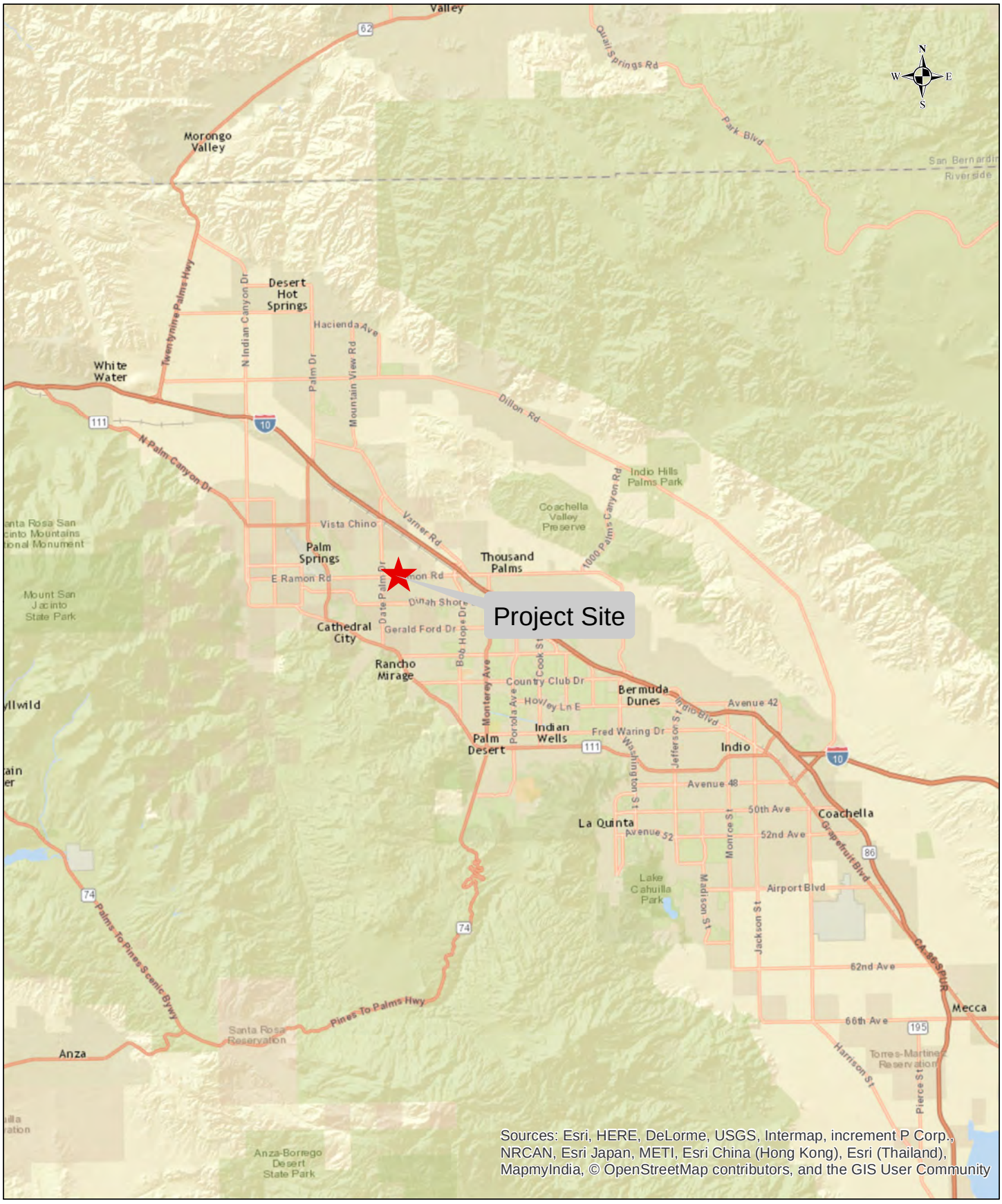
The site will have an external and internal security alarm system, external and internal video surveillance monitoring by an onsite security guard at all times, external security lighting and restricted access doors and gates. All windows will have security film which will be applied from the inside. Doors will be either reinforced with security film and steel, tamper-proof hinges or bullet-resistant doors will be installed. All gates will have access controls and be monitored by the security system.

2.4 Construction

Phase 1 of the project is expected to commence construction in September/October 2017 and will include demolition of the existing building and parking lot that are located on the northern portion of the site and construction of Building One. The retention basin to be located at the southern portion of the site will also be included in Phase One along with the driveways and parking necessary for the operation of Building One. Phase One is expected to conclude in 2018. Phase Two will include the construction of Building Two and will begin in 2019. Phase Two is expected to conclude 2020. Construction activities are anticipated to take 12 months total, but the project phases may not be constructed consecutively. The technical studies prepared for this project anticipated “build out” to be 2018 to provide the worst-case scenario analysis.

2.5 Permits and Approvals

Agency	Permit/Approval Required
FEDERAL	
None	N/A
STATE	
State Water Resources Control Board	• Construction Storm-water General Permit • Notice of Intent to Comply with Section 402 of the Clean Water Act • Construction Storm-water Pollution Prevention Plan (SWPPP) • Supervising Riverside County Department of Environmental Health for permitting of the proposed drilling of two private wells onsite.
REGIONAL	
South Coast Air Quality Management District (SCAQMD)	PM-10 Plan for compliance with Rule 403.1, Dust Control in the Coachella Valley
Regional Water Quality Control Board	Water Quality Management Plan
LOCAL	
County of Riverside Fire Department	Hazardous Materials Business Plan Approval
County of Riverside Department of Environmental Health (DEH)	Issuing permitting under the supervision of State Water Resources Control Board for the decommissioning of the on-site well and the installation of two new wells.
City of Cathedral City	• Conditional Use Permit (CUP) • Parcel Merger Application • Various building permits • Cultivation License • Dispensary License



1 inch = 5 miles

The Altum Group

Regional Location
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 1

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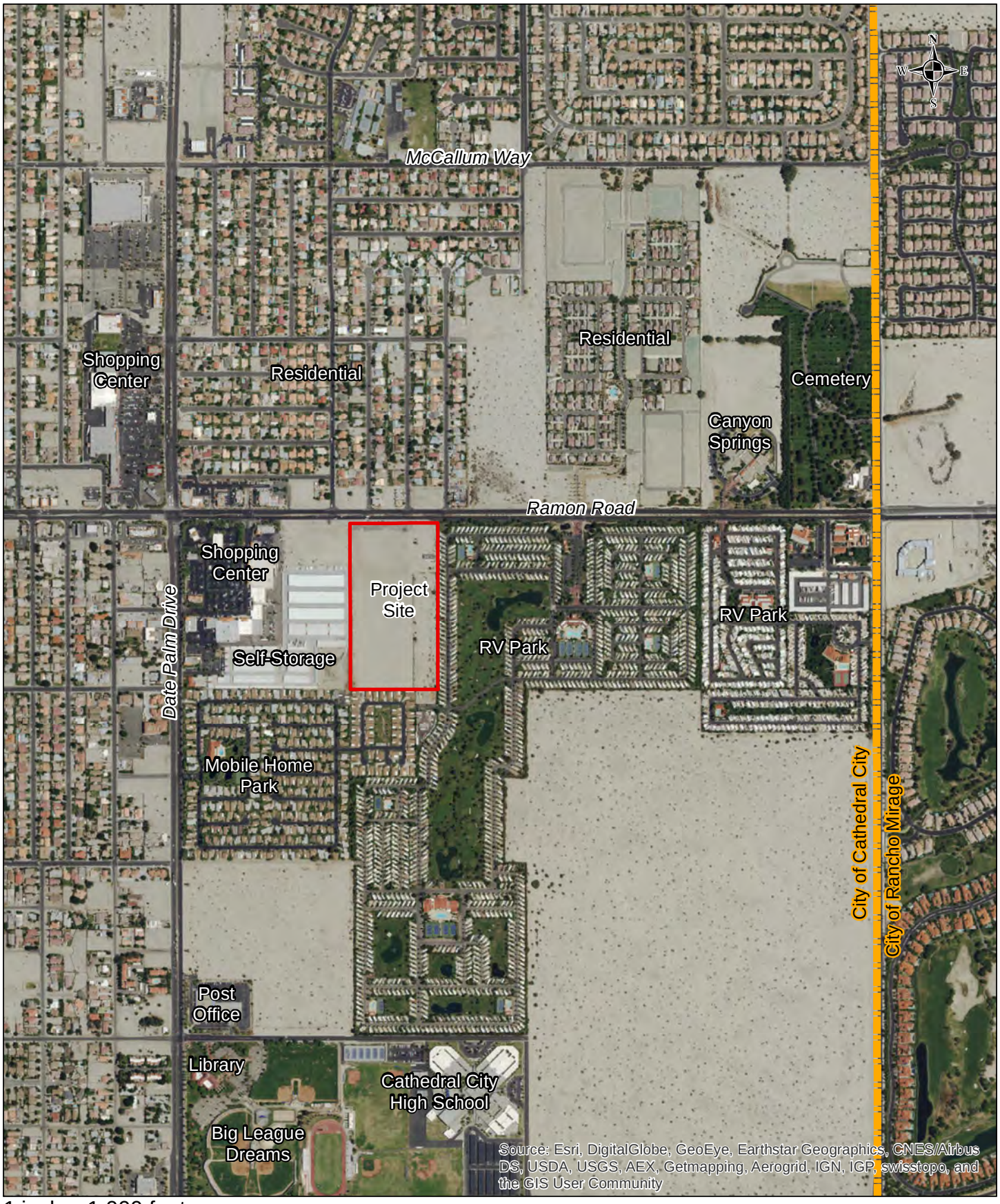

1 inch = 1,000 feet

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Project Site and Vicinity
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 2

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1 inch = 150 feet

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Project Parcels
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 3

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1 inch = 300 feet

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Photo Locations
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 4

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Site Photos 1-4
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit
4

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The Altum Group

Site Photos 5-8
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit
4

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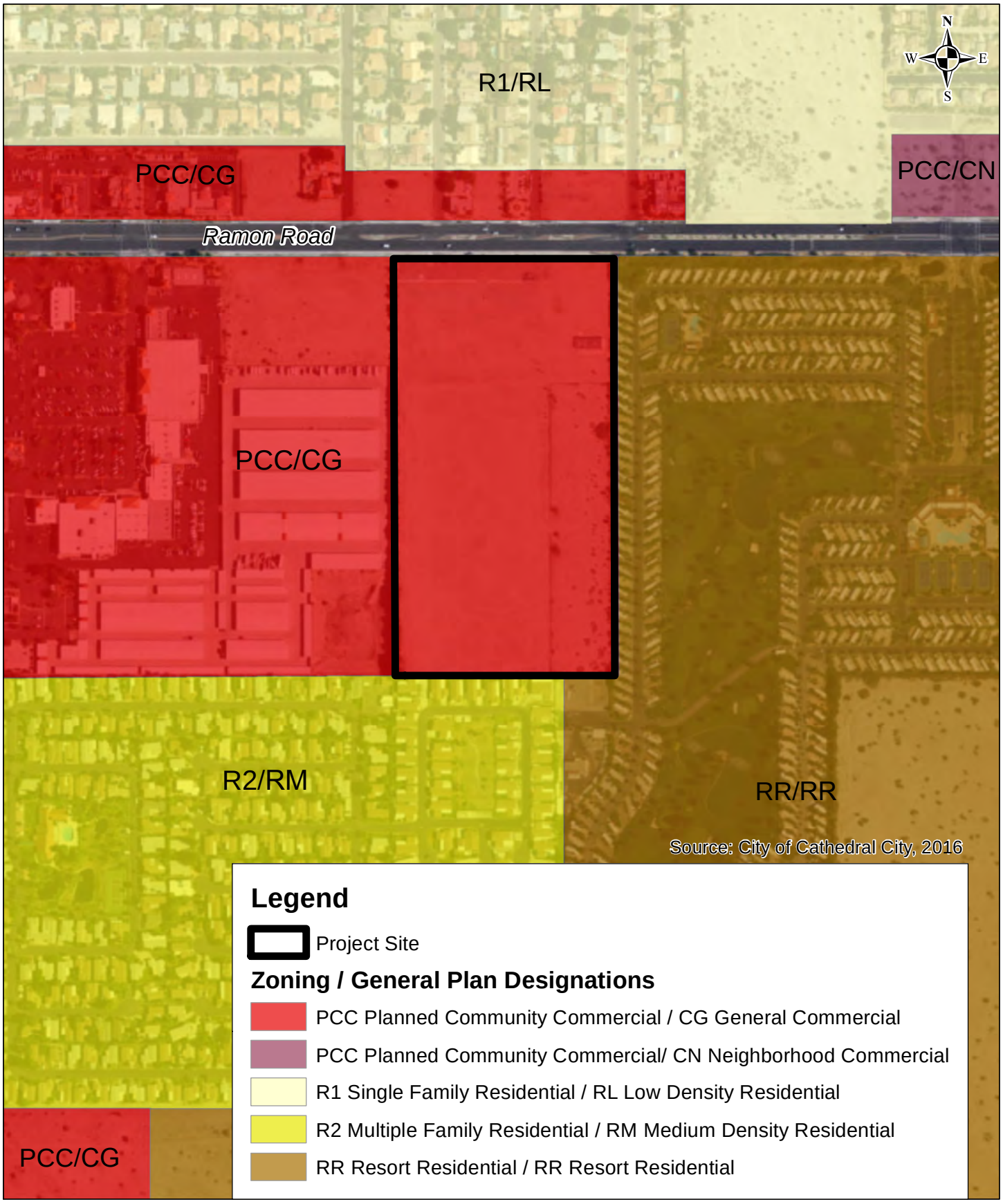

1 inch = 400 feet

The Altum Group

Existing Zoning and General Plan Designations
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 5

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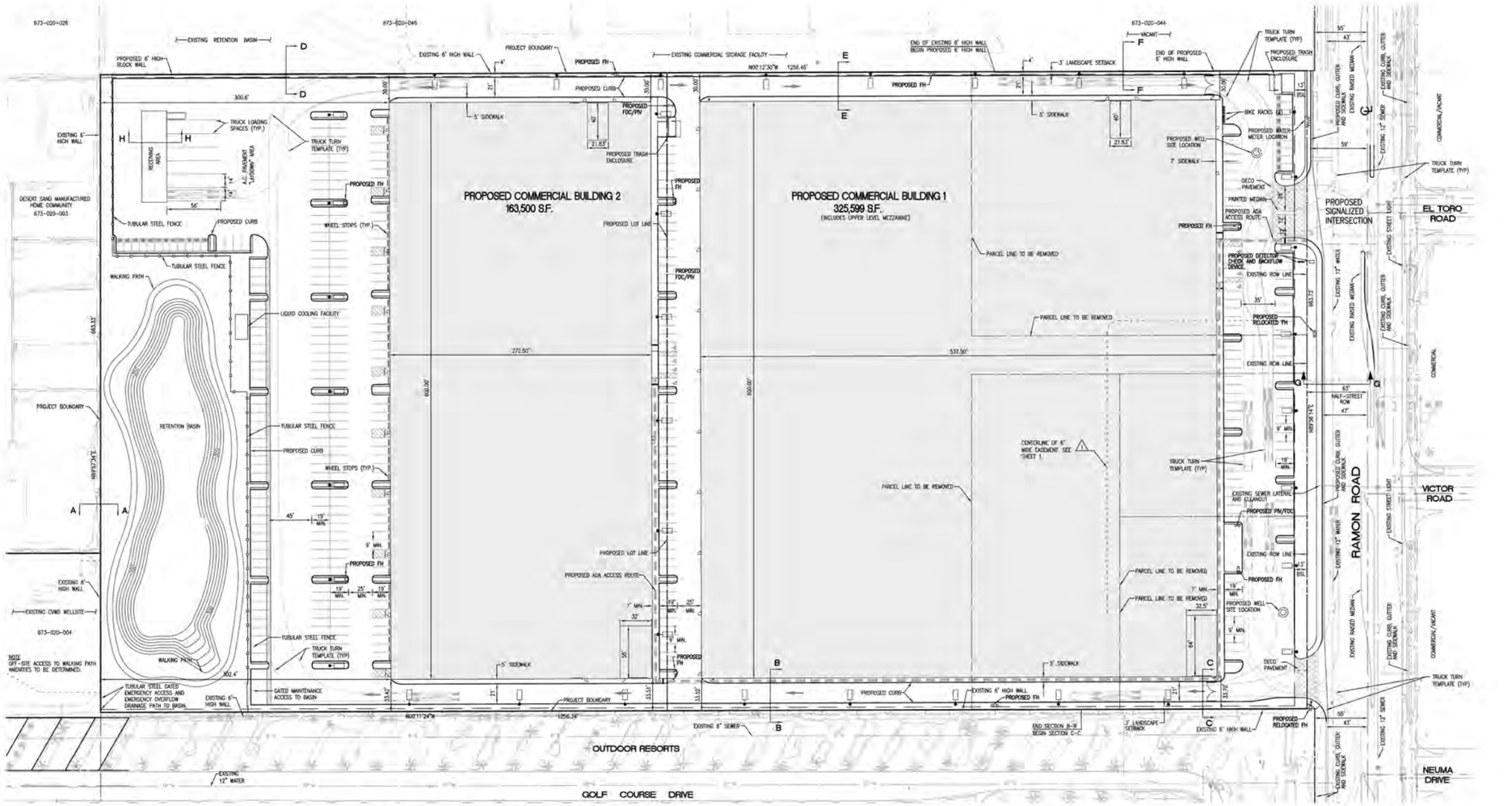

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Site Plan
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit
6

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MAIN FLOOR PLAN

GENERAL NOTE:
ALL GROW ZONES & TRANSPORT CORRIDOR OPEN TO ABOVE;
DIMENSIONS SAME AS SHOWN ON MAIN FLOOR PLAN

DRAWING NOTE

DIMENSION LINES FOR GENERAL REFERENCE ONLY: DENOTE FREE (CLEAR) SPACE WITHIN ROOMS, NOT REPRESENTATIVE OF BUILDING 1 MODULAR AREA

NO INTERIOR OR EXTERIOR ROOF ACCESS IS PROVIDED.

LABEL LEGEND

MAIN FLOOR AREA 322,500 sqft

UPPER FLOOR AREA 3,099 sqft

TOTAL AREA 325,599 sqft

Source: Larssen Ltd, 2017

The Altum Group

Building One Floor Plan - First Floor
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 7A

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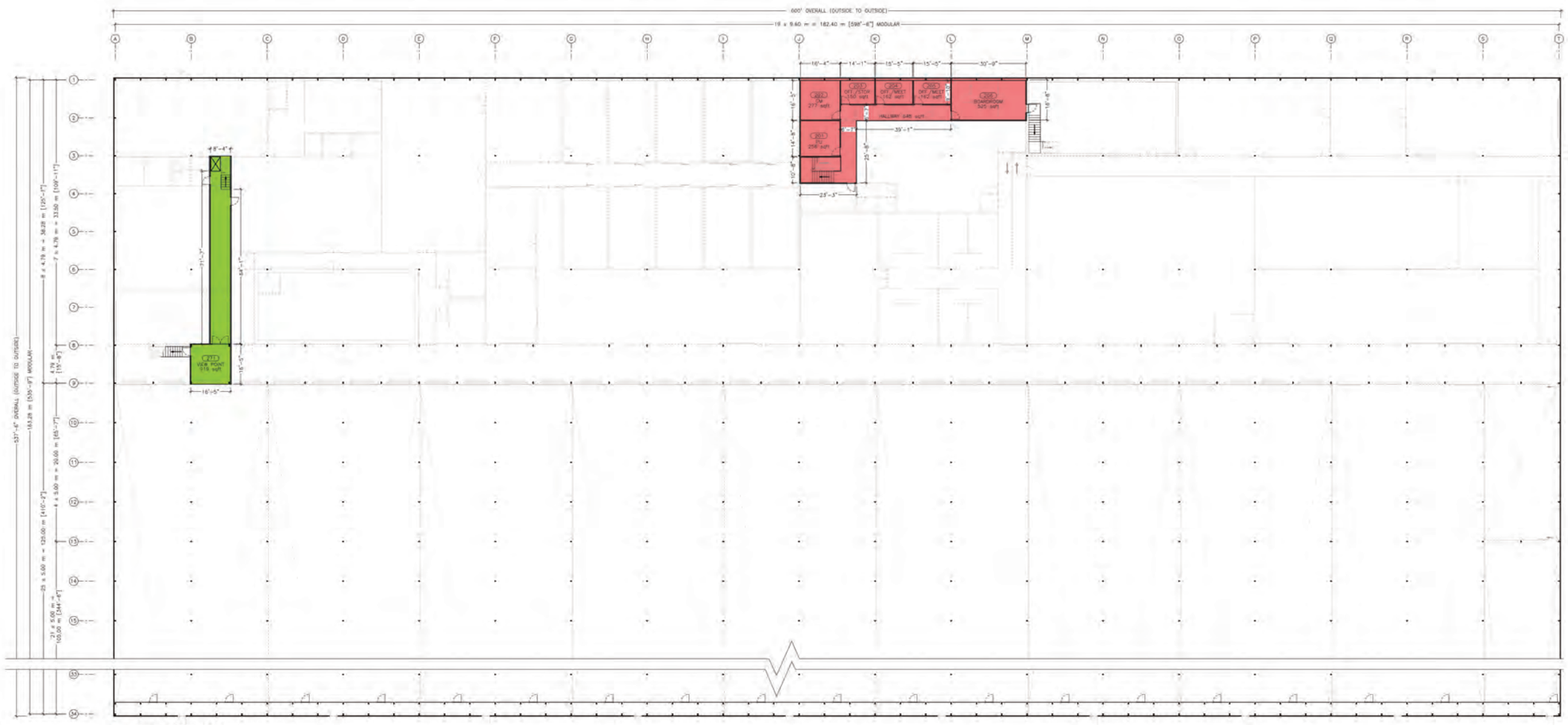

UPPER FLOOR PLAN

GENERAL NOTE:
ALL GROW ZONES & TRANSPORT CORRIDOR OPEN TO ABOVE;
DIMENSIONS SAME AS SHOWN ON MAIN FLOOR PLAN

DRAWING NOTE

DIMENSION LINES FOR GENERAL REFERENCE ONLY: DENOTE FREE (CLEAR) SPACE WITHIN ROOMS, *NOT* REPRESENTATIVE OF BUILDING I MODULAR AREA

NO INTERIOR OR EXTERIOR ROOF ACCESS IS PROVIDED.

LABEL LEGEND

MAIN FLOOR AREA 322,500 sqft

UPPER FLOOR AREA 3,099 sqft
TOTAL AREA 325,599 sqft

Source: Larssen Ltd, 2017

The Altum Group

Building One Floor Plan - Mezzanine
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 7B

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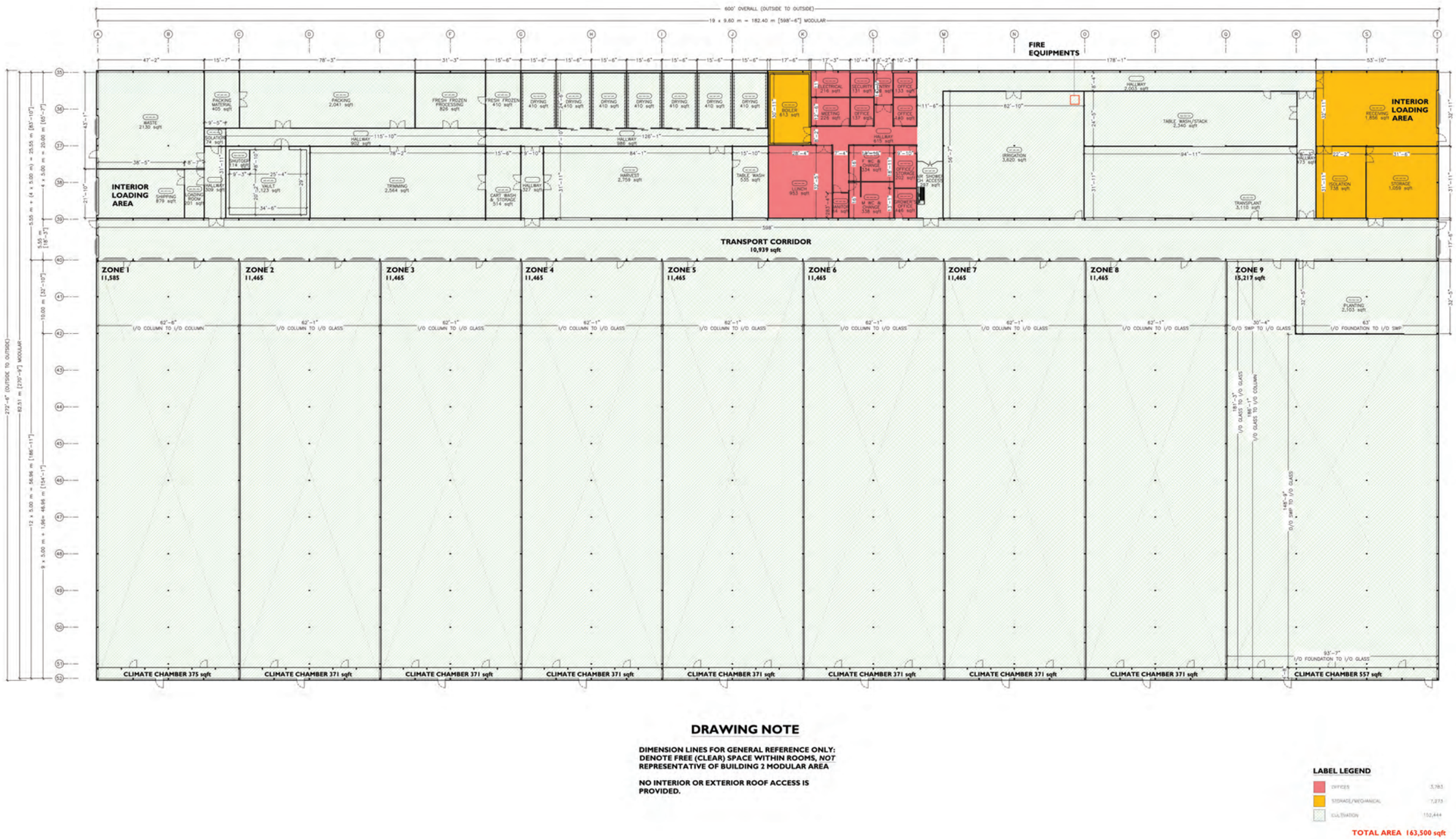

DRAWING NOTE

DIMENSION LINES FOR GENERAL REFERENCE ONLY: DENOTE FREE (CLEAR) SPACE WITHIN ROOMS, *NOT* REPRESENTATIVE OF BUILDING 2 MODULAR AREA

NO INTERIOR OR EXTERIOR ROOF ACCESS IS PROVIDED.

LABEL LEGEND

OFFICES	3,783
STORAGE/MECHANICAL	7,273
CULTIVATION	152,444

TOTAL AREA 163,500 sqft

Source: Larssen Ltd, 2017

The Altum Group

Building Two Floor Plan
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 8

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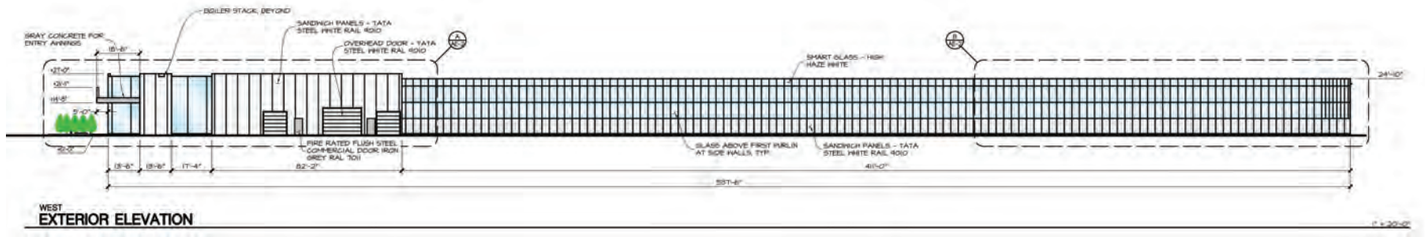

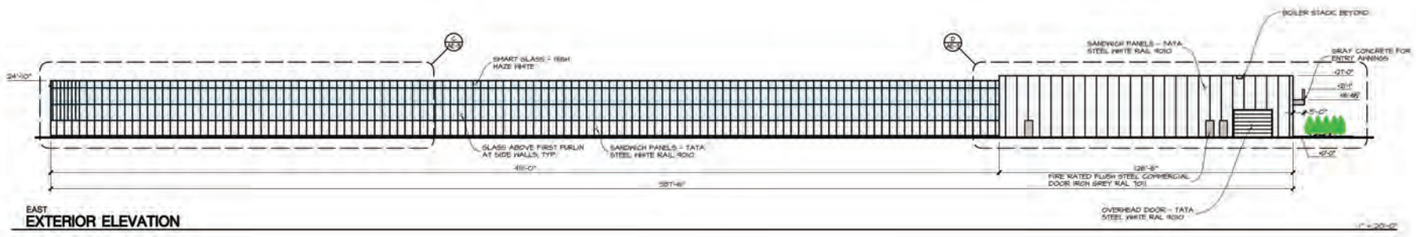

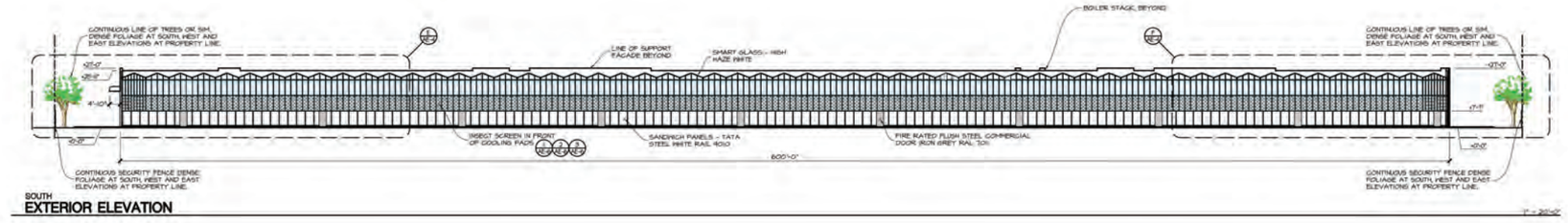

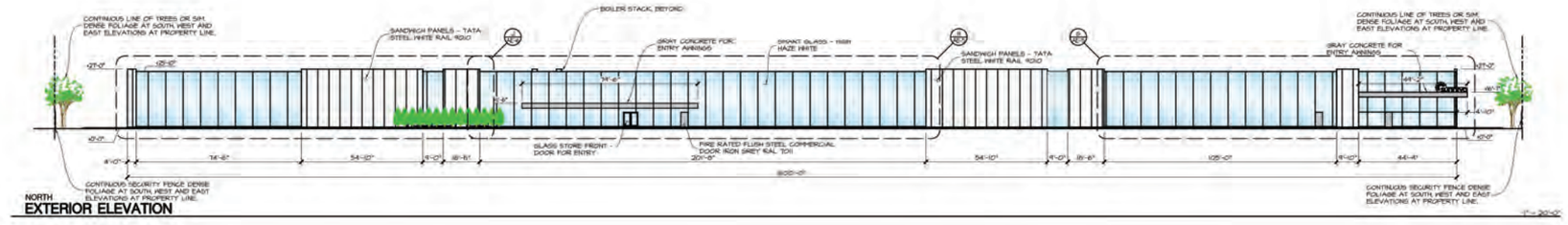

Source: Larssen Ltd, 2017

The Altum Group

Euilding One Elevations
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 9

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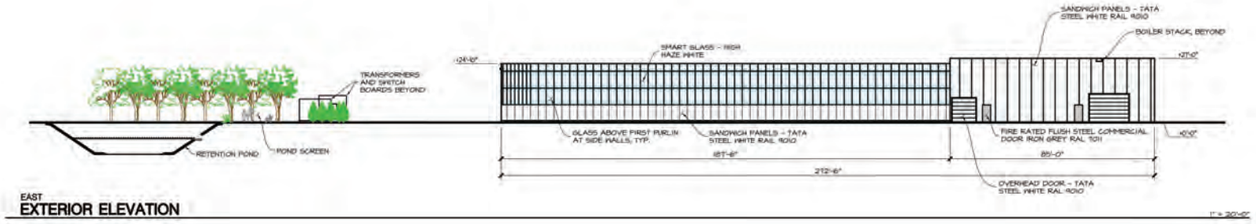
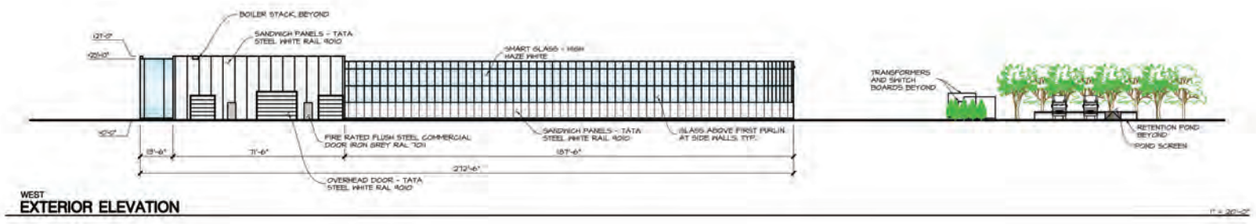
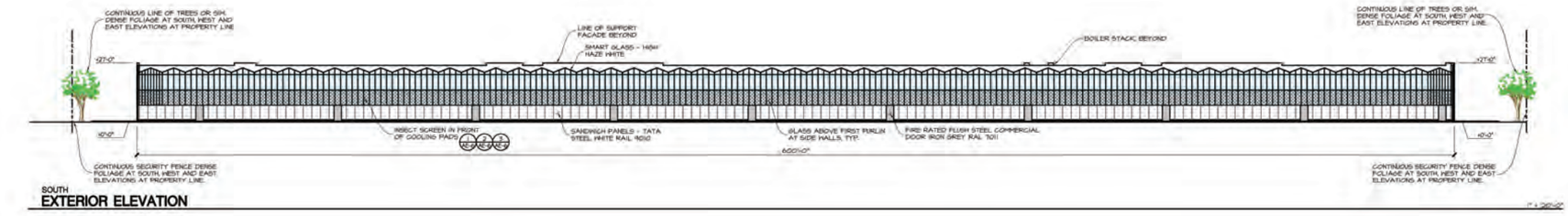


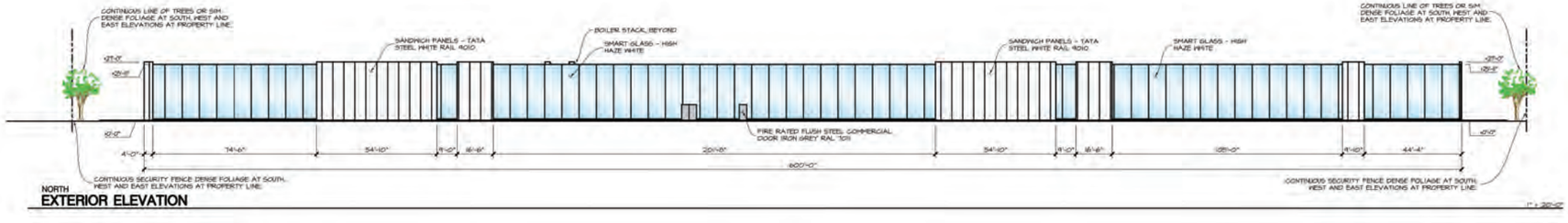
EAST
EXTERIOR ELEVATION



WEST
EXTERIOR ELEVATION



SOUTH
EXTERIOR ELEVATION



NORTH
EXTERIOR ELEVATION

Source: Larssen Ltd, 2017

The Altum Group

Building Two Elevations
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 10

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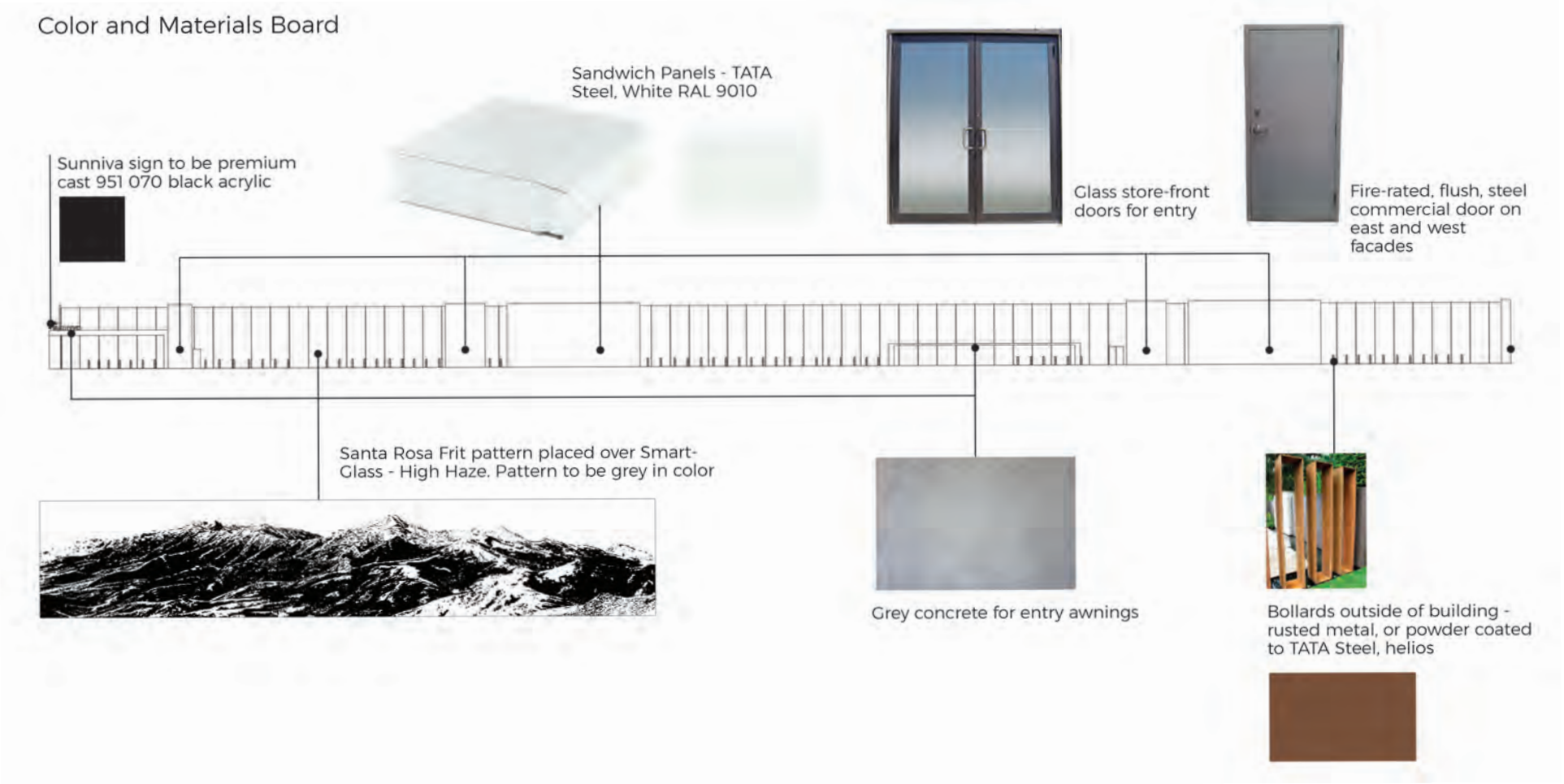

The Altum Group

Project Color and Finish Board
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 11

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Chapter 3 Environmental Evaluation

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.

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

DETERMINATION:
On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as describe on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

Signature Date

3.1 Aesthetics

3.1.1 Sources

- Cathedral City Comprehensive General Plan, *Community Image and Urban Design Element*, 2009.
- Riverside County Airport Land Use Commission, *ALUC Development Review – Director's Determination,* January 5, 2017. (Appendix E.4)
- CP Logistics, *Building Elevations and Line of Sight Study*, April 2017.

3.1.2 Environmental Setting

The project site is currently vacant, except for one building in the northeast corner of the site and a parking lot across the front of the site that served as part of a previously developed hotel, driving range and date palm nursery/grove. The Santa Rosa Mountains are visible south of the project site and the San Jacinto Mountains are visible west of the project site. Due to development north of the project site, the San Bernardino Mountains are only minimally visible. The project site is located in an area that is mostly developed with commercial and residential uses. There is a commercial shopping center (Cathedral Village) at the southeast corner of Date Palm Drive and Ramon Road and a mini-storage site (Cathedral Village Self Storage) directly west, between the project site and the shopping center. To the east is an existing recreational vehicle park (Outdoor Resorts of America) with a golf course. Directly south of the site is a residential neighborhood. To the north along Ramon Road are commercial properties that are alternately developed or vacant land, and single-family residential north of this strip of commercial property.

The site is not located in an area with identified scenic resources such as rock outcroppings or historic buildings, and is not located within a State scenic highway viewshed. The project site does not currently have outdoor lighting.

3.1.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.1 AESTHETICS– Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

a. **Less than Significant Impact.** The City of Cathedral City is located within the Coachella Valley and is surrounded by several mountain ranges including the San Jacinto and Santa Rosa mountains. The City's General Plan Community Image and Urban Design Element states that scenic resources include views of the San Jacinto, Santa Rosa, San Bernardino and other mountain ranges that surround the Coachella Valley. The project site and surrounding area have immediate views of the Santa Rosa Mountains to the south (Santa Rosa and Toro Peak) and the San Jacinto Mountains to the southwest (Palm View Peak) and to the west (Mt. San Jacinto). Views towards these mountains from the single-family homes to the north of the project site from Ramon Road and from the RV resort east of the project site could be impacted by development of the proposed project. The proposed buildings on the project site will encompass the majority of the width of the site, leaving room for landscaping and onsite circulation at the east and west property boundaries. Landscaping and onsite parking at the north end of the site will allow for an adequate setback and screening to reduce the visual impact of the large building façade on Ramon Road. A retention basin/passive park and a laydown area are located at the southern end of the project site to allow for adequate setback of the project buildings from the residential development south of the project site. The proposed structures will be a maximum of 28 feet in height.

Visual simulations were prepared for three points around the proposed project site to determine if impacts to the mountain views would be significant. Exhibit 12, *Visual Simulation Locations,* shows the locations of the sections that were prepared. Exhibits 13 through 18 show the existing conditions and results of the three points analyzed.

View from Northeast Looking Southwest

Currently, as shown in Exhibit 13, *Existing Conditions from Northeast,* the San Jacinto and Santa Rosa Mountains are visible from this view due to the vacant nature of the project site. As shown in Exhibit 14, *Visual Simulation from Northeast*, vehicular traffic and pedestrians along Ramon Road will have a view of the building façade at the north end of the property that will be partially screened by landscaping along the roadway and in the parking area at the north end of the site. The proposed buildings onsite will obstruct the views of the lower-lying desert foothills, but will not completely remove the upper-elevated mountain viewshed of the San Jacinto and Santa Rosa Mountains. Additionally, views of the San Jacinto Mountains to the west will not be obstructed by development of the project for vehicular traffic and

pedestrians on Ramon Road. The San Jacinto and Santa Rosa Mountains will still be visible with development of the proposed project, so the project is not anticipated to have a significant impact on the scenic vista to the southwest of the site from Ramon Road.

View from Northwest Looking Southeast

Currently, as shown in Exhibit 15, *Existing Conditions from Northwest,* mountain viewsheds at this location are minimal, and only a partial view of the Santa Rosa Mountains can be seen. As Shown in Exhibit 16, *Visual Simulation from Northwest,* vehicular traffic and pedestrians along Ramon Road will have a view of the building façade at the north end of the property that will be partially screened by landscaping along the roadway and in the parking area at the north end of the site. Views of the Santa Rosa Mountains to the southeast will be fully obstructed with development of the project, which are already mostly obstructed by existing vegetation and windbreaks on the project site and landscaping in development surrounding the project site. The view of the Santa Rosa Mountains would be more visible with increasing distance, so residential development north of the project site (closest residence over 350 feet north of Building One) would still have a view of the mountains to the south that are not currently visible from the project site. Due to minimal viewshed of the Santa Rosa Mountains to the southeast from Ramon Road, development of the project will not result in a significant impact.

View from East (RV Resorts) Looking West

Currently, as shown in Exhibit 17, *Existing Conditions from RV Resort,* Mount San Jacinto is visible from the RV resort to the east, however the majority of the San Jacinto Mountains from this vantage point are already partially obstructed by an existing berm, six-foot masonry wall, and landscaping on the western property boundary of the RV Resort. Exhibit 18, *Visual Simulation from Northwest* shows a simulated view from Sunset Drive within the RV Resort, facing west toward the project site. The views of the San Jacinto Mountains would be obstructed following completion of Building One. Therefore, development of the project site has the potential to completely obstruct the views of the San Jacinto Mountains for lots on the west side of the RV resort. The proposed buildings on the project site will be visible above the existing wall, further reducing the mountain views to the west. The 25 lots on the western property boundary of the RV resort will be the most visually impacted as they are closest to the proposed buildings for the project. Viewing availability of the San Jacinto Mountains to the west will increase with distance from the proposed project, yielding partial mountain views similar to existing views for lots further east within the RV resort, which are obstructed by landscaping, other RVs, and onsite amenities.

The project buildings will be intermittently visible from lots within the resort. A line of trees will be planted along the eastern project boundary for additional screening of the project buildings from the RV resort. Since the lots most visually impacted by the proposed project

(lots adjacent to project's eastern property boundary) already have a limited view of the San Jacinto Mountains due to the existing berm, masonry wall and landscaping on the western boundary of the RV Resort, the proposed project will not significantly reduce the views of a scenic vista from this location. Additionally, the design of the proposed project is consistent with the Cathedral City Zoning Code and the proposed maximum building height of 28 feet is less than the maximum building height of 36 feet permitted within the PCC zoning designation. Therefore, impacts to viewshed of the San Jacinto Mountains from the RV Resort will be less than significant.

View from West Looking East

Pedestrians on the storage facility access road adjacent to the western property line of the proposed project will have a view of the project structures, but views will be minimal due to an existing 6-foot tall perimeter fence and a line of Acacia trees that will be planted during development of the project (See Exhibit 19, *Project Preliminary Landscape Plans*). Additionally, the use of the mini-storage facility is considered intermittent as tenants would visit the facility for the storing and retrieving of belongings. Therefore, views from the west looking east would not be adversely affected by the proposed project.

View from South Looking North

Residents in the northern portion of the Desert Sands Community (directly south of the project) may be able to see the tip of the greenhouses given the fact that the southern greenhouse (when completed under Phase 2) is to be setback 300 feet from the southern property line of the project and thus would not significantly impact views from this area.

In conclusion, based on the Visual Simulations prepared for the project, project impacts on scenic vistas will be less than significant.

b. **No Impact.** Based on a review of the City's General Plan Environmental Resources Element and Caltrans website, the project site is not located on a designated State Scenic Highway. Therefore, the project will have no impact on scenic resources within a State Scenic Highway.

c. **Less than Significant Impact.** Currently, the project site is in the PCC (Planned Community Commercial) District and is designated CG (General Commercial) on the General Plan Land Use Map. Development of a medical cannabis cultivation and dispensary facility is conditionally permitted in the existing zoning district, per Municipal Code Section 9.108.090. The project applicant will also be required to be consistent with the City's development guidelines and will require review for consistency with the General Plan goals relating to building design.

The proposed project will not substantially degrade the existing visual character and its surroundings. As shown in Exhibit 19, landscaping will be applied along the project's east and west side boundaries, the project's retention basin, parking dividers and islands and along the south side abutting Ramon Road. The proposed landscaping will provide screening of Building

One from the public roadway (Ramon Road) and soften the appearance of the building. The applicant will utilize low to moderate demand plant species that will provide a variety flowering trees (i.e., Jacaranda) and shrubs (i.e., bougainvillea) to aesthetically add to the project's overall appearance. The following discussion below demonstrates how the project development aesthetically supports the following City Community Image Goals and Policies:

Goal 2

Community design, architecture, and landscaping that enhance and are compatible with the City's desert setting and natural scenic resources.

> ***Policy 1 -*** *Public and private sector development shall be subject to citywide design guidelines that include the Ahwahnee Principles and are intended to protect the community's scenic viewsheds, provide community cohesion, and enhance the image of Cathedral City as a residential and smart-growth community.*

The proposed buildings will be large structures that will encompass the majority of the width of the project site, leaving space for onsite circulation and landscaping along the east and west perimeter of the site. Although the maximum permitted building height in the PCC zone is 36 feet, the roofline of the buildings is proposed to be flat to reduce overall building height (max. 28 feet) well below the permitted building height and minimize visual impacts from surrounding land uses. The cultivation area on the south side of each building will not be flat, however, the highest point will be less than the roof height on the façade of the buildings. The project site has been designed to provide easy accessibility from the public right-of-way with an attractive façade. The applicant has chosen building materials and colors that are neutral, consistent with surrounding development and desert landscapes. The cultivation area of each building is enclosed by glass, but the glass is diffused/translucent and anti-reflective to ensure interior operations are shielded and the building exterior blends with the other architectural coatings. Additionally, all mechanical equipment on the site will be screened to further improve the visual appearance of the building façade. Landscaping throughout the project site is consistent with design guidelines, providing sufficient landscaping along the Ramon Road frontage, shade trees in the parking lots and trees for a visual buffer along the eastern and western project boundaries. These aspects, among others, have been designed in accordance with the City's design guidelines. City Staff will review all plans submitted for the CUP and ensure that the project site is consistent with the City design guidelines, which will confirm that the proposed buildings onsite are consistent with surrounding development and community goals.

> ***Policy 6 -*** *Native desert landscape materials and site-sensitive architectural designs shall be incorporated into all public and private building projects to enhance the cohesion between the natural and built environments.*

The proposed project will utilize landscaping onsite to screen the buildings from surrounding land uses, as shown in Exhibit 19, *Project Preliminary Landscape Plans.* A dense line of trees will be planted along the north end of the project site to partially screen the building façade from vehicular traffic and pedestrians along Ramon Road. The landscaping will be consistent with other, existing water-conscious landscaping found along the Ramon Road which will add to and help enhance the native desert atmosphere in the developed area.

Trees will be spaced along the eastern and western property boundaries to assist in screening the buildings from surrounding land uses. The trees will break up the view of the large-scale buildings onsite, enhancing cohesion between the built environmental and native desert landscape.

> ***Policy 7 -*** *Commercial development projects shall contribute to the design objectives of the community and the specific district or corridor in which they are located.*
>
> > *Program 7.A - The City shall review all commercial development to assure pedestrian-oriented circulation, safe and convenient ingress and egress, screening of outdoor storage/loading and other unsightly areas, lighting, signage, and the planting of mature landscaping to provide an immediate effect of permanency.*

As shown on the Site Plan (Exhibit 6, Chapter 2, *Project Description*), the project frontage along Ramon Road will be developed with a sidewalk and landscaping consistent with the City's requirements. Parking will be located at the north end of the project site, providing adequate setback of the building structures from the roadway and residences north of the project site. Additional parking will be included between the two buildings onsite and south of Building Two for employees. Parking at the site entrance will be utilized for employees and for customers visiting the dispensary. The traffic circulation system has been designed to limit access and create easy circulatory flow of traffic throughout the project site. All storage and loading areas will be situated behind the gated access point and will not be accessible or visible to the general public. Ultimately, the project site is being designed to maximize usable space onsite while attempting to minimize impacts on views from surrounding properties and roadways by utilizing large-scale, mature landscaping and subtle architectural colors and features consistent with the surrounding development.

In conclusion, the project's compliance with the City's Community Image goals and policies demonstrates how the project will add to the existing visual character of the site and its surroundings. The project is required to be reviewed by the City's Architectural Review Committee for consistency with the City Design Guidelines. As such, the City will ensure that the project architectural design, landscaping, and site plan will be compatible with the site and surrounding area. Therefore, impacts in this regard are considered less than significant.

d. Less than Significant Impact with Mitigation Incorporated. The transformation from vacant land to a cannabis cultivation and dispensary facility would create new permanent sources of

light and glare. All project lighting is required to be consistent with Chapter 9.89 of the City's Zoning Ordinance. Compliance with these regulations will avoid or minimize the impacts of light and glare within the project site and on surrounding areas. Standard design techniques are required to be employed in the project's lighting plan to shield outdoor light fixtures and control direct glare and light spillover from emanating off-site. Also, the Riverside County Airport Land Use Commission placed lighting conditions on the site due to its proximity to the Palm Springs International Airport. Compliance with Mitigation Measure HAZ-4 and HAZ-5 will further ensure minimal impacts from lighting (also see Section 3.8, *Hazards and Hazardous Materials*). Therefore, the project will have a less than significant impact on adjacent properties or to the desert night sky with implementation of Mitigation Measures HAZ-4 and HAZ-5.

3.1.4 Mitigation Measures

The following mitigation from Section 3.8, *Hazards and Hazardous Materials,* is required to ensure lighting impacts are less than significant:

HAZ-4 Any outdoor lighting installed shall be hooded or shielded to prevent either spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.

HAZ-5 The following uses shall be prohibited:

- Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with the airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at the airport, other than an FAA approved navigational signal light or visual approach slope indicator.
- Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at the airport.
- Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, artificial marshes, trash transfer stations that are open on one or more sites recycling centers containing putrescible wastes, and construction and demolition debris facilities.)
- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

3.1.5 Regulatory Requirements

No Regulatory requirements are necessary to reduce impacts for Aesthetic Resources.

3.1.6 Level of Significance After Mitigation

With approval of the project's design features and implementation of mitigation measures of the proposed project the level of significance would be less than significant.

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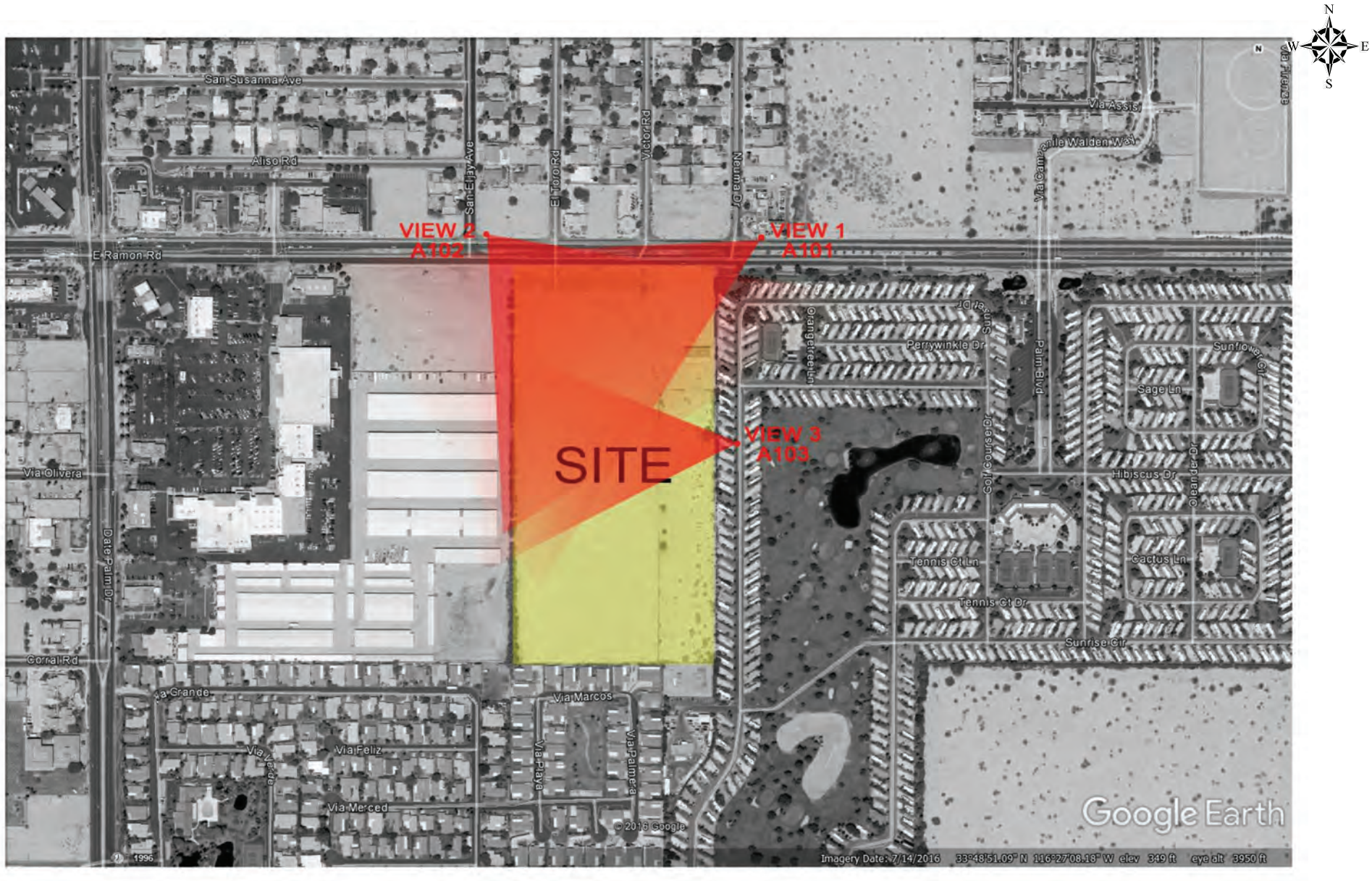

Source: Prest Vuksic, 2017

The Altum Group

Visual Simulation Locations
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 12

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Before

Source: Prest Vuskic, 2017

The Altum Group

Existing Conditions from Northeast
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit
13

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After

Source: Prest Vuskic, 2017

The Altum Group

Visual Simulation from Northeast
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit
14

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Before

Source: Prest Vuskic, 2017

The Altum Group

Existing Conditions from Northwest
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit
15

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After

Source: Prest Vuskic, 2017

The Altum Group

Visual Simulation from Northwest
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit
16

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Before

Source: Prest Vuskic, 2017

The Altum Group

Existing Conditions from RV Resort
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 17

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After

Source: Prest Vuskic, 2017

The Altum Group

Visual Simulation from RV Resort
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 18

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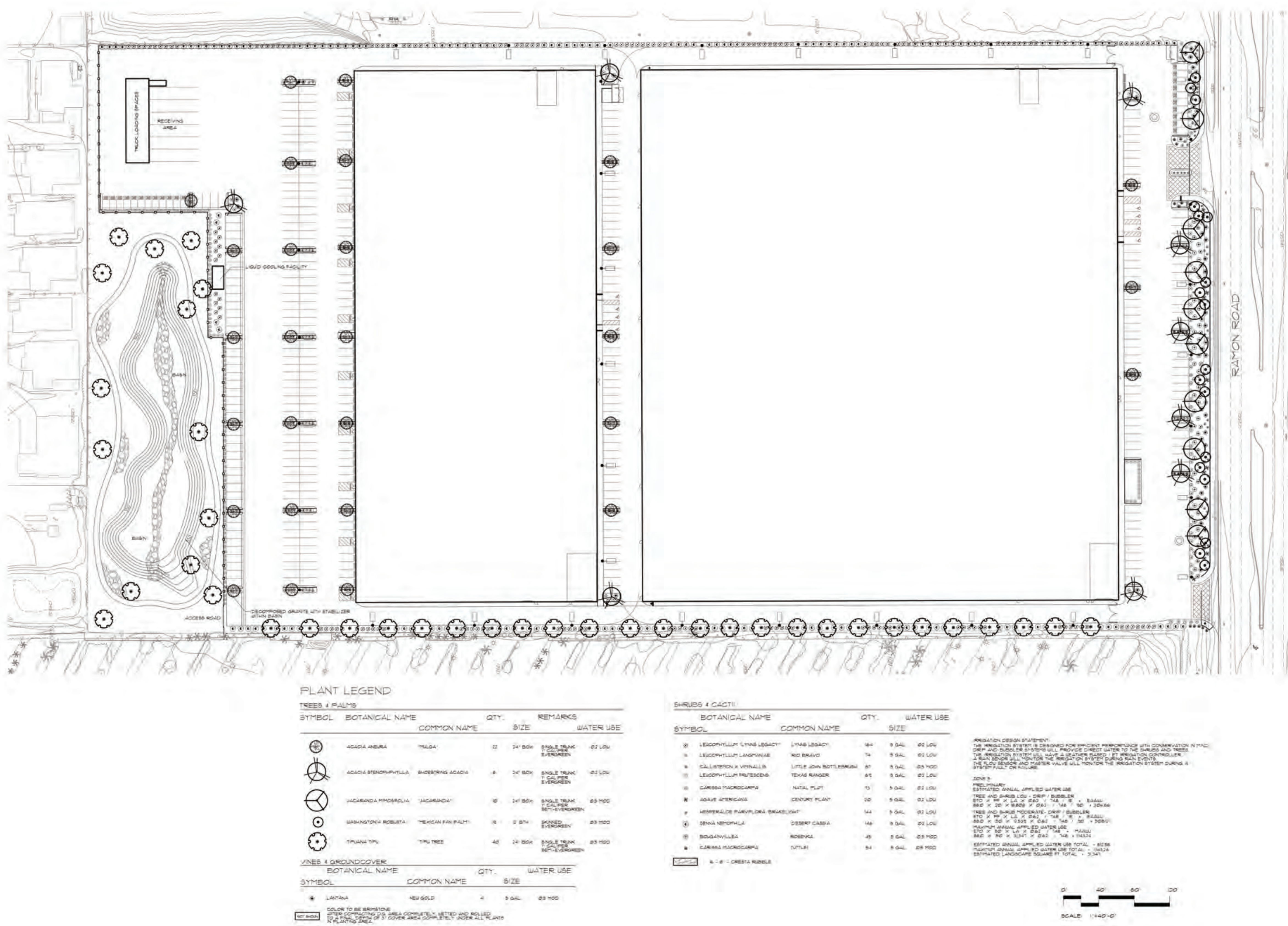

Source

The Altum Group

Landscape Plan
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 19

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3.2 Agriculture and Forestry

3.2.1 Sources

- California Department of Conservation, *Riverside County Important Farmland 2014 Map, Sheet 2 of 3,* ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/riv14_c.pdf, accessed December 8, 2016.
- California Fire Resource and Assessment Program (FRAP) website http://frap.cdf.ca.gov/ accessed December 8, 2016.

3.2.2 Environmental Setting

The project site is a vacant property comprised of approximately 19.14 acres and located in a suburban area surrounded by commercial and residential properties. The northern portion of the site was used previously for a small hotel and golf driving range. According to the Riverside County Important Farmland 2014 Map, the site is designated as urban and built up land. The site is currently vacant, except for a small existing building and parking lot in the northern portion of the project site, and is not zoned for agricultural use. However, the southeastern portion (a third of the overall project area) of the project site was once a date palm grove that appeared in historic aerial photographs in 2004, but by 2009, aerial photographs showed that the grove had been abandoned. Therefore, agriculture uses within the project site are considered to have been a short-term, interim use, and have not occurred on-site since 2009.

3.2.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.2 AGRICULTURE AND FORESTRY: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526) or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. **No Impact.** The site is not designated as Farmland of Local Importance in the Riverside County Important Farmland Map from 2014. The project site is currently zoned Planned Community Commercial (PCC), which allows for a range of conditionally permitted uses, such as cannabis dispensaries and cultivation facilities. Therefore, because the site has not been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, there is no impact from the project on these types of farmland.

b. **No Impact.** The project would not conflict with any agricultural zoning or Williamson Act contracts since the site is not zoned for agricultural use and is not under Williamson Act contract. Therefore there would be no impact.

c. **No Impact.** Based on the Fire and Resource Assessment Program Land Cover Map, the project site is in an area designated as Urban. Furthermore, the project site is zoned PCC, which does not permit forest or timberland production uses. There are no forest lands on or near the site. with forest land or timberland zoning.

d. **No Impact.** There are no forest lands on or near the site; therefore, the project would have no impact on forest or timberlands.

e. **No Impact.** The proposed project includes development of two large buildings to house cannabis cultivation and a dispensary facility. The project will be developed in an area already developed with commercial properties on the west and north, and with residential areas on the east and south. There is no agricultural or forested land on the site or in the vicinity. Therefore, the project will not result in any changes to the existing environment that could negatively impact existing agricultural or forestland resources.

3.2.4 Mitigation Measures

The project was found to have no impact on Agricultural and Forestry Resources. Therefore, no mitigation is required.

3.2.5 Regulatory Requirements

No Regulatory Requirements are necessary to reduce impacts on Agricultural and Forestry Resources.

3.2.6 Level of Significance After Mitigation

Not Applicable.

3.3 Air Quality

3.3.1 Sources

- Kunzman Associate Inc., *Ramon 19 Cultivation Air Quality and Global Climate Change Impact Analysis,* April 28, 2017. (Appendix A)

3.3.2 Environmental Setting

Regional Air Quality

The project site is located in the City of Cathedral City which is located in the larger Salton Sea Air Basin (SSAB). Air quality conditions in this portion of the County are regulated by the South Coast Air Quality Management District (SCAQMD). SCAQMD is responsible for the development of the regional Air Quality Management Plan and efforts to regulate pollutant emissions from stationary, mobile and indirect sources.

During the summer, the SSAB is generally influenced by a Pacific Subtropical High Cell that sits off the coast of California, inhibiting cloud formation and encouraging daytime solar heating, causing daytime temperatures to consistently rise to over 100 degrees. 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 Coachella Valley which is ringed with mountains. 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.

Cathedral City, in relation to other areas in Southern California, has relatively good air quality. In the past few decades, however, noticeable deterioration of air quality has occurred due to increased development and population growth, traffic, construction activity, and various site disturbances. It is apparent that although air pollution is emitted from various sources in the Coachella Valley,

substantial degradation of air quality may be attributed primarily to outside sources to the west that reach the Valley through the San Gorgonio Pass.

Criteria Pollutants

The criteria pollutants of concern to the SCAQMD in the SSAB include: ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), lead, and particulate matter. Particulate matter is further defined as 10 microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$). These pollutants can harm human health and the environment, and cause property damage. The U.S. Environmental Protection Agency (EPA) calls these pollutants "criteria" air pollutants because EPA regulates them by developing human health-based and/or environmentally-based criteria for setting permissible levels. These are listed in Table 2, *State and Federal Criteria Pollutant Standards.*

In addition, although not a criteria pollutant, reactive organic gases (ROG), also referred to as Volatile Organic Compounds (VOC), are defined as any compound of carbon—excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROG/VOC, the two terms are often used interchangeably. Indoor sources of VOCs include paints, solvents, aerosol sprays, cleansers, tobacco smoke, etc. Outdoor sources of VOCs are from combustion and fuel evaporation. A reduction in VOC emissions reduces certain chemical reactions that contribute to the formulation of ozone. VOCs are transformed into organic aerosols in the atmosphere, which contribute to higher PM_{10} and lower visibility.

Other Pollutants of Concern

Toxic Air Contaminants

In addition to the criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are less pervasive in the urban atmosphere than criteria air pollutants, however they are linked to short-term (acute) or long-term (chronic or carcinogenic) adverse human health effects. Sources of toxic air contaminants include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least forty different toxic air contaminants. The most important of these toxic air contaminants, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Public exposure to toxic air contaminants can result from emissions from normal operations as well as from accidental releases. Health effects of toxic air contaminants include cancer, birth defects, neurological damage, and death.

According to the 2005 California Almanac of Emissions and Air Quality, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important of which is diesel particulate matter (DPM). Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material. The visible emissions in diesel exhaust are known as particulate matter or PM, which includes carbon particles or "soot." Diesel exhaust also contains a variety of harmful

gases and over 40 other cancer-causing substances. Diesel particulate matter is a subset of $PM_{2.5}$ because the size of diesel particles are typically 2.5 microns and smaller. The State's identification of diesel particulate matter as a TAC was based on its potential to cause cancer, premature deaths, and other health problems.

Table 2 State and Federal Criteria Pollutant Standards

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Ozone (O_3)	0.09 ppm/1-hour 0.07 ppm/8-hour	0.070 ppm/8-hour	(a) Decline in pulmonary function and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage.
Carbon Monoxide (CO)	20.0 ppm/1-hour 9.0 ppm/8-hour	35.0 ppm/1-hour 9.0 ppm/8-hour	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) possible increased risk to fetuses.
Nitrogen Dioxide (NO_2)	0.18 ppm/1-hour 0.03 ppm/annual	100 ppb/1-hour 0.053 ppm/annual	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra- pulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric
Sulfur Dioxide (SO_2)	0.25 ppm/1-hour 0.04 ppm/24-hour	75 ppb/1-hour 0.14 ppm/24-hour	(a) Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma.
Suspended Particulate Matter (PM_{10})	50 µg/m^3/24-hour 20 µg/m^3/annual	150 µg/m^3/24-hour	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; (c) Increased risk of premature death from heart or lung diseases in elderly.
Suspended Particulate Matter ($PM_{2.5}$)	12 µg/m^3 / annual	35 µg/m^3/24-hour 12 µg/m^3/annual	

Table 2 State and Federal Criteria Pollutant Standards (Continued)

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Sulfates	25 µg/m^3/24-hour	No Federal Standards	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; (f) property damage.
Lead	1.5 µg/m^3/30-day	0.15 µg/m^3/3-month rolling	(a) Learning disabilities; (b) Impairment of blood formation and nerve conduction.
Visibility Reducing Particles	Extinction coefficient of 0.23 per kilometer-visibility of 10 miles or more due to particles when humidity is less than 70 percent.	No Federal Standards	Visibility impairment on days when relative humidity is less than 70 percent.

Exposure to diesel particulate matter is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources.

Asbestos

Asbestos is listed as a TAC by the California Air Resources Board (CARB) and as a Hazardous Air Pollutant by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. Naturally occurring asbestos is not present in Riverside County.

Regulatory Setting

Federal Regulations

The EPA is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. Table 2 lists the NAAQS pollutants and human health effects.

As part of its enforcement responsibilities, EPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the national standards. A SIP must integrate federal, State, and local components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

As indicated in Table 3, *Salton Sea Air Basin Attainment Status,* the SSAB has been designated by EPA as a nonattainment area for ozone (O_3) and suspended particulates (PM_{10} and $PM_{2.5}$). Currently, the SSAB is in attainment with the ambient air quality standards for CO, lead, SO_2, and NO_2.

Table 3 Salton Sea Air Basin Attainment Status

Pollutant	State Status[1]	National Status[2]
Ozone	Nonattainment	Nonattainment
Carbon monoxide	Attainment	Attainment
Nitrogen dioxide	Attainment	Unclassified/Attainment
Sulfur dioxide	Attainment	Attainment
PM10	Nonattainment	Nonattainment
PM2.5	Unclassified	Unclassified/Attainment

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 4, April 28, 2017.

Notes:

1. Source of State status: California Air Resources Board 2011.
2. Source of National status: U.S. Environmental Protection Agency 2012.

State Regulations

California Air Resources Board (CARB), which is a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within the State. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The CAAQS for criteria pollutants are shown along with the NAAQS in Table 2. In addition, CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g., hairspray, aerosol paints, and barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

The SSAB has been designated by CARB as a nonattainment area for O_3 and PM_{10}. Currently, the SSAB is in attainment with the ambient air quality standards for CO, lead, SO_2, NO_2, and sulfates and is unclassified for visibility reducing particles ($PM_{2.5}$) and Hydrogen Sulfide.

On September 27, 2007 CARB approved the South Coast Air Basin (SCAB) and the Coachella Valley 2007 Air Quality Management Plan (AQMP) for attaining the federal 8-hour Ozone and $PM_{2.5}$ standards. The AQMP projects attainment for the 8-hour Ozone standard by 2024 and the $PM_{2.5}$ standard by 2015.

On December 12, 2008 CARB adopted Resolution 08-43, which limits NO_x, PM_{10} and $PM_{2.5}$ emissions from on-road diesel truck fleets that operate in California. On October 12, 2009 the resolution was codified into Section 2025, Title 13 of the California Code of Regulations. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California must meet model year 2010 (Tier 4) or later emission standards. Until 2024 this regulation provides annual interim targets for fleet owners to meet.

CARB is also responsible for regulations pertaining to TACs. The Air Toxics "Hot Spots" Information and Assessment Act or AB 2588 was enacted in 1987 as a means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release into the South Coast Air Basin. The data is ranked by high, intermediate, and low categories, which are determined by: the potency, toxicity, quantity, volume, and proximity of the facility to nearby receptors.

Regional Regulations

SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources and has responded to this requirement by preparing a sequence of AQMPs. On June 30, 2016, SCAQMD released its Draft 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 AQMP 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 SCAB is to reduce nitrogen oxide (NO_x) emissions sufficiently to meet the upcoming ozone standard deadlines.

A revised draft of the 2012 AQMP, released in September, 2012, was adopted by the SCAQMD Board on December 7, 2012, then adopted by CARB via Resolution 13-3 on January 25, 2013. The 2012 AQMP was prepared in order to meet the federal Clean Air Act requirement that all 24-hour $PM_{2.5}$ non-attainment areas prepare a SIP, and submit it to the U.S. EPA by December 14, 2012. The AQMP must demonstrate attainment with the 24-hour $PM_{2.5}$ standard by 2014. The 2012 AQMP demonstrates attainment of the federal 24-hour $PM_{2.5}$ standard by 2014 in SCAB through adoption of all feasible measures, and therefore, no extension of the attainment date is needed.

The 2012 AQMP is designed to satisfy the California Clean Air Act's (CCAA) emission reductions of five percent per year or adoption of all feasible measures requirements and fulfill EPA's requirement to update transportation conformity emissions budgets based on the latest approved motor vehicle

emissions model and planning assumptions. The 2012 AQMP updates and revises the previous 2007 AQMP and was prepared to comply with the federal and State CCAA and amendments, to accommodate growth, to reduce the high pollutant levels in the South Coast Air Basin, to meet federal and State ambient air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The purpose of the 2012 AQMP is to set forth a comprehensive program for the South Coast Air Basin that will lead this area into compliance with all federal and State air-quality planning requirements.

The 2007 AQMP demonstrated attainment with the 1997 8-hour ozone (80 ppb) standard by 2023, through implementation of future improvements in control techniques and technologies. These "black box" emissions reductions represent 65 percent of the remaining NO_x emission reductions by 2023 in order to show attainment with the 1997 8-hour ozone NAAQS. Given the magnitude of these needed emissions reductions, additional NO_x control measures have been provided in the 2007AQMP even though the primary purpose of this AQMP is to show compliance with 24-hour $PM_{2.5}$ emissions standards.

The 2003 Coachella Valley SIP (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. In the 2003 CVSIP, SCAQMD requested that EPA replace the approved transportation conformity budgets in the 2002 CVSIP with those in the 2003 CVSIP. EPA approved the budgets on March 25, 2004 with an effective date of April 9, 2004.

SCAQMD Rules

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

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

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

Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression

techniques to prevent fugitive dust from creating a nuisance off-site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM10 component). Compliance with these rules would reduce impacts on nearby sensitive receptors. Rule 403 measures may include but are not limited to the following:

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

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

(d) General Requirements of 403.1

(1) Any person who is responsible for any active operation, open storage pile, or disturbed surface area, and who seeks an exemption pursuant to Rule 403, paragraph (g)(2) shall be required to determine when wind speed conditions exceed 25 miles per hour. The wind speed determination shall be based on either District forecasts or through use of an on-site anemometer as described in subdivision (g).

(2) Any person involved in active operations in the Coachella Valley Blowsand Zone shall stabilize new man-made deposits of bulk material within 24 hours of making such bulk material deposits. Stabilization procedures shall include one or more of the following: (A) Application of water to at least 70 percent of the surface area of any bulk material deposits at least 3 times for each day that there is evidence of wind driven fugitive dust; or (B) Application of chemical stabilizers in sufficient concentration so as to maintain a

stabilized surface for a period of at least 6 months; or (C) Installation of wind breaks of such design so as to reduce maximum wind gusts to less than 25 miles per hour in the area of the bulk material deposits.

(3) Any person involved in active operations in the Coachella Valley Blowsand Zone shall stabilize new deposits of bulk material originating from off-site undisturbed natural desert areas within 72 hours. Stabilization procedures shall include one or more of the following: (A) Application of water to at least 70 percent of the surface area of any bulk material deposits at least 3 times for each day that there is evidence of wind driven fugitive dust; or (B) Application of chemical stabilizers in sufficient concentration so as to maintain a stabilized surface for a period of at least six months.

(4) A person who conducts or authorizes the conducting of an active operation shall implement at least one of the control actions specified in Rule 403, Table 2 for the source category "Inactive Disturbed Surface Areas" to minimize wind driven fugitive dust from disturbed surface areas at such time when active operations have ceased for a period of at least 20 days.

(5) Any person involved in agricultural tilling or soil mulching activities shall cease such activities when wind speeds exceed 25 miles per hour. The wind speed determination shall be based on either District forecasts or through use of an on-site anemometer as described in subdivision (g).

(e) Fugitive Dust Control Plan and Other Requirements for Construction Projects/Earth-Moving Activities

(1) Any person who conducts or authorizes the conducting of an active operation with a disturbed surface area of more than 5,000 square feet shall not initiate any earthmoving activities unless a fugitive dust control plan is prepared and approved by the Executive Officer in accordance with the requirements of subdivision (f) and the Rule 403.1 Implementation Handbook. These provisions shall not apply to active operations exempted by paragraph (i)(4).

(2) Any operator required to submit a fugitive dust control plan under paragraph (e)(1) shall maintain a complete copy of the approved fugitive dust control plan on-site in a conspicuous place at all times and the fugitive dust control plan must be provided upon request.

(3) Any operator required to submit a fugitive dust control plan under paragraph (e)(1) shall install and maintain signage with project contact information that meets the minimum standards of the Rule 403.1 Implementation Handbook prior to initiating any type of earth-moving activities.

(4) Any operator required to submit a fugitive dust control plan under paragraph (e)(1) for a project with a disturbed surface area of 50 or more acres shall have an Dust Control Supervisor that: (A) is employed by or contracted with the property owner or developer; and (B) is on-site or is available to be on-site within 30 minutes of initial contact; and (C) has the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule 403 and 403.1 requirements; and (D) has completed the AQMD Coachella Valley Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class.

(5) Failure to comply with any of the provisions of an approved fugitive dust control plan shall be a violation of this rule.

SCAQMD Rule 445 prohibits permanently installed wood burning devices into any new development. A wood burning device means any fireplace, wood burning heater, or pellet-fueled wood heater, or any similarly enclosed, permanently installed, indoor or outdoor device burning any solid fuel for aesthetic or space-heating purposes, which has a heat input of less than one million British thermal units (BTU) per hour.

SCAQMD Rule 481 applies to all spray painting and spray coating operations and equipment. The rule states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

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

(2) Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.

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

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

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

SCAQMD Rule 1143 governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

SCAQMD Rule 1401, New Source Review of Toxic Air Contaminants, specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.

SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options, is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. It applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average.

Local Policies

Local jurisdictions, such as the City of Cathedral City, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. The General Plan contains the following goals, policies and programs aimed at reducing air pollution:

Air Quality Goal

Preservation and enhancement of local and regional air quality to assure the long-term protection of the community's health and welfare.

Policy 1

The City shall be proactive in regulating local pollutant emitters and shall cooperate with Coachella Valley Association of Governments (CVAG) and SCAQMD to assure compliance with air quality standards.

Policy 2

The City shall fully implement dust control ordinances, and coordinate with local, regional, and federal efforts to monitor, manage and reduce the levels of major pollutants affecting the City and region, with particular emphasis on PM10 emissions.

Program 2.A

On an on-going basis, the City shall continue to cooperate and participate in efforts to monitor and control PM10 emissions from the construction and other sources, and all other air pollutants of regional concern. The City shall coordinate with CVAG and the SCAQMD to provide all reporting data for SCAQMD annual report.

Program 2.B

The City shall maintain records of historic and current regional and local air quality trends and make them available to the public. Access to data may be made available via an Internet link, printed material or by other means.

Policy 4

Development proposals brought before the City shall be reviewed for their potential to adversely impact local and regional air quality and shall be required to mitigate any significant impacts.

Program 4.B

Projects that may generate significant levels of air pollution shall be required to conduct detailed impact analyses and incorporate mitigation measures into their designs using the most advanced technological methods feasible. All proposed mitigation measures shall be reviewed and approved by the City prior to the issuance of grading or demolition permits.

Program 4.C

The City shall continue to enforce a Fugitive Dust Emissions Ordinance in an effort to reduce and control local PM10 emissions. All dust control mitigation plans prepared by contractors, developers, and other responsible parties shall be reviewed and approved by the City prior to the issuance of grading or demolition permits.

Program 4.D

Provide consistent and effective code enforcement of construction and grading activities and off-road vehicle use to assure that the impacts of blowing sand and fugitive dust emissions are minimized.

Monitored Air Quality

The quality of the air at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the South Coast Air Basin and the SSAB. Estimates of the existing emissions in the SCAB provided in the Final 2012 AQMP, prepared by SCAQMD, December 2012, indicate that collectively, mobile sources account for 59 percent of the VOC, 88 percent of the NO_x emissions and 40 percent of directly emitted $PM_{2.5}$, with another 10 percent of $PM_{2.5}$ from road dust.

The local air quality can be evaluated by reviewing relevant air pollution concentrations near the project area. For evaluation purposes, the SCAQMD has divided the District into 36 Source Receptor Areas (SRAs), operating monitoring stations in most of the areas. These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area. The project is within Source Receptor Area 30. SCAQMD operates two air monitoring stations in SRA 30, one in Indio, California, approximately 15.4 miles southeast of

the project site and the other in Palm Springs, California, approximately 4.48 miles east of the project site. The Palm Springs monitoring station was used to collect monitoring data.

Table 4, *Air Quality Monitoring Summary*, summarizes 2013 through 2015 published monitoring data, which is the most recent 3-year period available. The data shows that during the past few years, the project area has exceeded the ozone, and PM_{10} standards.

Ozone

Ozone is a secondary pollutant as it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO_2, which occur only in the presence of bright sunlight. Many areas of the SSAB contribute to the ozone levels experienced at the monitoring station, with the more significant areas being those directly upwind.

The Palm Springs Station recorded an exceedance of the State 1-hour Ozone standard between three and 10 days over the last three years. The State 8-hour Ozone standard was exceeded between 51 and 82 days and the federal 8-hour Ozone standard was exceeded between 26 and 46 days during the 2013 to 2015 monitoring period.

Particulate Matter

According to the EPA, some people are much more sensitive than others to breathing fine particles (PM10 and PM2.5). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience decline in lung function due to breathing in PM_{10} and $PM_{2.5}$. Other groups considered sensitive are smokers and people who cannot breathe well through their noses.

The Palm Springs Station recorded an exceedance of the state 24-hour PM_{10} standard of two days each year over the last three years. The federal 24-hour PM_{10} standard was exceeded one day each year at the Palm Springs Station.

Table 4 Air Quality Monitoring Summary

Pollutant (Standard)[1]	Year		
	2013	2014	2015
Ozone:			
Maximum 1-Hour Concentration (ppm)	0.113	0.108	0.102
Days > CAAQS (0.09 ppm)	10	9	3
Maximum 8-Hour Concentration (ppm)	0.104	0.093	0.093
Days > NAAQS (0.070 ppm)	**76**	**55**	**47**
Days > CAAQS (0.070 ppm)	**82**	**61**	**51**
Carbon Monoxide:			
Maximum 8-Hour Concentration (ppm)	*	*	*
Days > CAAQS (9 ppm)	0	0	0
Days > NAAQS (9 ppm)	0	0	0
Nitrogen Dioxide:			
Maximum 1-Hour Concentration (ppm)	0.0522	0.0463	0.0415
1-Hour 98th Percentile	0.0388	0.0412	0.0377
Annual Average (ppm)	0.007	0.007	0.006
Days > CAAQS (0.18 ppm)	0	0	0
Inhalable Particulates (PM_{10}):			
Maximum 24-Hour Concentration (ug/m^3)	185.8	313.8	199.0
Days > NAAQS (150 ug/m^3)	**1**	**1**	**1**
Days > CAAQS (50 ug/m^3)	**2**	**2**	**2**
Annual Average (ug/m^3)	23.1	25.4	20.9
Ultra-Fine Particulates ($PM_{2.5}$):			
Maximum 24-Hour Concentration (ug/m^3)	18.5	15.5	22.7
Days > NAAQS (35 ug/m^3)	0	0	0
Annual Average (ug/m^3)	6.5	*	*

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 5, April 28, 2017.

Notes:

1. CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million.

* Insufficient Data Available.

Air Quality Standards

Regional Air Quality

The incremental regional air quality impact of an individual project is generally very small and difficult to measure. Therefore, SCAQMD has developed significance thresholds based on the volume of pollution emitted rather than on actual ambient air quality because the direct air quality impact of a project is not quantifiable on a regional scale.

The SCAQMD CEQA Handbook states that any project in the South Coast Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. A regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table 5, *SCAQMD Air Quality Significance Thresholds for Coachella Valley*.

Local Air Quality

Project-related construction air emissions may have the potential to exceed the State and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact in the South Coast Air Basin. In order to assess local air quality impacts SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. SCAQMD has also provided the Final Localized Significant Threshold Methodology (LST Methodology), June 2003, which details the methodology to analyze local air emission impacts. The LST methodology found that the primary emissions of concern are NO_2, CO, PM_{10}, and $PM_{2.5}$.

Odor Impacts

The SCAQMD CEQA Handbook states that an odor impact would occur if a proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states:

> *A person shall not discharge 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 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.*
>
> *The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.*

If a proposed project results in a violation of Rule 402 with regards to odor impacts, then the proposed project would create a significant odor impact.

The LST for the local emissions of NO_2 and CO are determined by subtracting the highest background concentration from the last three years of these pollutants from Table 4, from the most restrictive ambient air quality standards for these pollutants that are outlined in the LST. Table 5 shows the ambient air quality standards for NO_2, CO, and PM_{10} and $PM_{2.5}$.

Table 5 SCAQMD Air Quality Significance Thresholds for Coachella Valley

Mass Daily Thresholds		
Pollutant	**Construction (lbs/day)**	**Operation (lbs/day)**
NO_x	100	100
VOC	75	75
PM10	150	150
$PM_{2.5}$	55	55
SO_x	150	150
CO	550	550
Lead	3	3
Toxic Air Contaminants, Odor and GHG Thresholds		
TACs	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index > 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO_2e for industrial facilities	
Ambient Air Quality Standards		
Pollutant	**SCAQMD Standards**	
NO_2 -1-hour average	0.18 ppm (338 µg/m^3)	
PM_{10} -24-hour average Construction Operations	 10.4 µg/m^3 2.5 ug/m^3	
$PM_{2.5}$ -24-hour average Construction Operations	 10.4 µg/m^3 2.5 µg/m^3	
SO_2 1-hour average 24-hour average	 0.25 ppm 0.04 ppm	
CO 1-hour average 8-hour average	 20 ppm (23,000 µg/m^3) 9 ppm (10,000 µg/m^3)	
Lead 30-day average Rolling 3-month average Quarterly average	 1.5 µg/m^3 0.15 µg/m^3 1.5 µg/m^3	

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 6, April 28, 2017.

3.3.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.3 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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
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)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

a. Less Than Significant Impact. The assumptions from the 2012 AQMP apply to the proposed project, as the 2016 AQMP has not been approved at this time. The purpose of this discussion is to set forth the issues regarding 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.

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 AQMP is usually not required but a proposed project is considered to be consistent with the AQMP if it furthers one or more General Plan 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 2012 or increments based on the year of project buildout and phase.

Criterion 1 – Increase in Frequency or Severity

Short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance (See discussion 3.3.3.b). Likewise, the analysis also concluded that long-term operations impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance (See discussion 3.3.3.b and 3.3.3.d).

Therefore, the proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Criterion 2 – Exceed 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, is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. The RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry and utilize resources more efficiently. 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 General Plan Land Use Element defines the assumptions that are represented in the AQMP.

The project site is currently designated as “CG” (General Commercial) in the General Plan. General Commercial (CG). The proposed cannabis cultivation and manufacturing facility and dispensary would be consistent with the existing General Plan land use designation with approval of a Conditional Use Permit. Therefore, the proposed project would not result in an inconsistency with the General Plan land use designation. Therefore, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur.

b. **Less Than Significant Impact.** The Air Quality Impact Analysis (Appendix A), evaluated the proposed project for both short-term construction and long-term operational impacts.

Short Term Construction Emissions

Construction-related air emissions may have the potential to exceed the State and federal air quality standards in the project vicinity, even though these pollutant emissions may not be

significant enough to create a regional impact to the SSAB. The proposed project has been analyzed for the potential local air quality impacts created from: construction-related fugitive dust and diesel emissions; toxic air contaminants; and construction-related odor impacts. Table 6, *Construction-Related Regional Pollutant Emissions*, shows the peak daily emissions associated with the project. None of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from construction of the proposed project.

Table 6 Construction Related Regional Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Grading						
On-Site[1]	5.75	67.94	38.78	0.06	5.69	4.15
Off-Site[2]	0.71	25.25	4.17	0.07	1.77	0.58
Subtotal	6.46	93.19	42.95	0.13	7.45	4.72
Building Construction						
On-Site[1]	3.11	26.55	18.18	0.03	1.79	1.68
Off-Site[2]	2.45	17.38	18.57	0.06	3.78	1.13
Subtotal	5.56	43.94	36.75	0.09	5.57	2.81
Paving						
On-Site[1]	2.21	17.52	14.80	0.02	0.96	0.88
Off-Site[2]	0.07	0.05	0.57	0.00	0.13	0.03
Subtotal	2.28	17.57	15.37	0.02	1.08	0.91
Architectural Coating[3]						
On-Site[1]	43.50	2.01	1.85	0.00	0.15	0.15
Off-Site[2]	0.35	0.22	2.68	0.01	0.59	0.16
Subtotal	43.85	2.22	4.54	0.01	0.74	0.31
Total for overlapping	51.69	63.73	56.66	0.12	7.39	4.03
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 7, April 28, 2017.

Notes:

1. On-site emissions from equipment operated on-site that is not operated on public roads.
2. Off-site emissions from equipment operated on public roads.
3. Emissions include SCAQMD Rule 1113 limiting architectural coatings to 50 g/L VOC or less.
4. Construction, painting and paving phases may overlap.

SCAQMD Rule 403 and 403.1

Although the proposed project is not anticipated to exceed SCAQMD thresholds for any criteria pollutants, the project applicant will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rules 403 and 403.1 establish these procedures. Compliance with these rules is achieved through application of standard

best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent and stabilizing ground cover on finished sites. Compliance with Rules 403 and 403.1 would also require the use of water trucks during all phases where earth moving operations would occur.

In addition, 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, must prepare and implement a Fugitive Dust Control Plan pursuant to the provisions of the Coachella Valley Fugitive Dust Control Handbook and approved by the City. The applicant will be required to prepare a Fugitive Dust Control Plan, implemented with Mitigation Measure AQ-1.

The Air Quality Impact Analysis concluded that none of the analyzed criteria pollutants would exceed regional emissions thresholds, and compliance with Rule 403 and 403.1, will ensure that air quality impacts are minimal. Therefore, impacts associated with short-term construction of the project will be less than significant.

Long-Term Operation Impacts

The on-going operation of the proposed project would result in a long-term increase in air emissions. This increase would be due to emissions from the project-generated vehicle trips and through operational emissions from the on-going cultivation and dispensary functions. Although the proposed project is expected to be constructed in two phases, to be conservative, it has been modeled as one phase, with construction being completed in 2020. Project construction is anticipated to be completed over a period of 12 months, but the phases are not anticipated to be completed consecutively.

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the proposed project. The vehicle trips associated with the proposed project have been analyzed by using the trip generation rate determined by the traffic analysis for a cannabis cultivation facility and dispensary. Project traffic is analyzed in detail in Section 3.16, *Transportation and Traffic.*

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. As specifics

were not known about the landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment.

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site.

Project Impacts

Both summer and winter VOC, NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ emissions created from the proposed project's long-term operations have been calculated and the highest values from either summer or winter are summarized below in Table 7, *Regional Operational Pollutant Emissions*. Table 7 shows that none of the analyzed criteria pollutants for the project would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the proposed project.

Table 7 Regional Operational Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area Sources[1]	13.85	0.00	0.08	0.00	0.00	0.00
Energy Usage[2]	0.47	4.29	3.61	0.03	0.33	0.33
Mobile Sources[3]	4.62	31.17	53.45	0.18	12.21	3.40
Total Emissions	**18.94**	**35.46**	**57.14**	**0.21**	**12.54**	**3.73**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 10, April 28, 2017.

Notes:

1. Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
2. Energy usage consists of emissions from generation of electricity and on-site natural gas usage.
3. Mobile sources consist of emissions from vehicles and road dust.

The Air Quality Impact Analysis prepared for the project concluded that construction and operation of the proposed project will not exceed regional air quality standards, but due to the size of the project, a Fugitive Dust Control Plan must be prepared and approved by the City prior to issuance of a grading permit (Regulation Requirement RR-1). With implementation of a Fugitive Dust Control Plan the project will have a less than significant impact on regional air quality standards.

c. **Less Than Significant Impact**. Cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects

and when wind patterns are considered, would cover an even larger area. Accordingly, the cumulative analysis for the project's air quality must be generic by nature.

The SSAB is out of attainment for ozone and PM_{10}. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the SSAB. The greatest cumulative impact on the local air quality will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. With respect to long-term emissions, this project would create a less than significant cumulative impact.

d. Less Than Significant Impact. Those who are sensitive to air pollution include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. The SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities. Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours.

The nearest sensitive receptors that may be impacted by the proposed project are the residents of the RV Resort adjacent to the east and the residential community at the southern property line of the project site. Homes are also located approximately 300 feet north of the project site across Ramon Road. Cathedral City High School is located approximately 0.5 miles south of the site and Sunny Sands Elementary School is located approximately 0.6 miles north of the site.

Localized Significance Threshold Analysis

The Local Significant Threshold (LST) construction analysis used thresholds that represent the maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard. The thresholds are based on the ambient concentrations of that pollutant for each source receptor area and on the location of the sensitive receptors. If a project would result in emissions under the thresholds, it follows that the project would not cause or contribute to an exceedance of the standard. The standards are set to protect the health of individuals. The emission thresholds for the proposed project were calculated based on the Coachella Valley source receptor area (SRA) 30 and a disturbance of five acres per day.

Construction Impacts

Table 8, *Local Construction Emission at Closest Receptors,* shows that none of the analyzed criteria pollutants would exceed the calculated local emissions thresholds at the nearest sensitive receptors during construction of the project. Therefore, a less than significant local air quality impact would occur from construction of the proposed project.

Table 8 Local Construction Emissions at Closest Receptors

Activity	On-Site Pollutant Emissions (pounds/day)[1]			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Grading	67.94	38.78	5.69	4.15
Building Construction	26.55	18.18	1.79	1.68
Paving	17.52	14.80	0.96	0.88
Architectural Coating	2.01	1.85	0.15	0.15
SCAQMD Thresholds[2]	**304**	**2,292**	**14**	**8**
Exceeds Threshold?	No	No	No	No

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 9, April 28, 2017.

Notes:

1. Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for five acres at a distance of 25 meters in Coachella Valley (SRA 30).
2. Closest receptors are adjacent to the site, within 25 meters (82 feet) of the project boundary.

Operational Impacts

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The proposed project is a medical cannabis cultivation facility and dispensary and does not include such uses. Deliveries would typically be made with cargo vans or small box truck type delivery vehicles that would not idle on-site. Specifically, as shown in the Traffic Impact Analysis, the project is expected to receive only two to three trailer (53 foot) deliveries per week and two to five cube truck or van deliveries per week. Therefore, due the lack of stationary source emissions, no long-term localized significance threshold analysis is warranted.

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. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk", which is defined as the likelihood that a person exposed to concentrations of toxic air contaminants over a 30 year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment and the relatively

short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

Local CO Emissions from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. The Traffic Impact Analysis showed that the project would only generate a maximum of approximately 1,814 trips per day with the highest traffic volume located at the intersection of El Toro Road and Ramon Road. The highest Year 2035 With Project Average Daily Traffic (ADT) volume is 50,100 vehicles, located at the road segment of Ramon Road west of Date Palm Drive. 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. Therefore as the intersection with the highest traffic volume falls far short of 100,000 vehicles, 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.

Based on the size and land use of the proposed project, construction and operation of the project will not expose sensitive receptors to substantial pollutant concentrations and impacts will be less than significant.

e. **Less Than Significant Impact.** 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.

Construction Impacts

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.

Operational Impacts

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. As mandated by the City's Municipal Code Chapter 5.88.065, all medical marijuana cultivation activities are to be conducted in a secure manner and shall not be visible from a public street. Pursuant to Cathedral City Municipal Code Section 9.108.050(c), all medical cannabis businesses are required to install odor filtration systems that prevent odors from being detected outside the building. Further, the cultivation facility is to be developed as a closed system. The applicant proposes an exhaust air filtration system whose ventilation will not be connected to the building's exterior. Air will be drawn into the greenhouses through a series of climate chambers and expelled out of the gable ends of the greenhouses through an expandable carbon filter system. The proposed air filtration system will be expandable, so if any odors are detected outside the buildings during operations, additional filters can be installed. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances. Therefore, potential operation-source odor impacts are considered to be less than significant.

3.3.4 Mitigation Measures

The project was found to have a less than significant impact on Air Quality. Therefore, no mitigation is required.

3.3.5 Regulatory Requirements

RR-1 Pursuant to City Code Section 8.54.040, the project applicant must prepare and submit a Fugitive Dust Control Plan in accordance with SCAQMD Rule 403.1, prior to issuance of grading permits.

3.3.6 Level of Significance After Mitigation

Compliance with applicable SCAQMD Rules (402, 403, 403.1) and implementation of a Fugitive Dust Plan will ensure that project related impacts are less than significant.

3.4 Biological Resources

3.4.1 Sources

- James W. Cornett Ecological Consultants, *General and Focused Biological Resources Assessment, Ramon 19 Cultivation Project,* December 23, 2016. (Appendix B)

- Agua Caliente Band of Cahuilla Indians Tribal Habitat Conservation Plan, August 2010, http://www.aguacaliente.org/downloads/thcp/thcp_report.pdf, accessed August 17, 2017.

3.4.2 Environmental Setting

The project site is a vacant 19.14-acre property composed of five parcels and located approximately 1,300 feet east of Date Palm Drive and directly south of Ramon Road. The site has been graded within the past two decades with off-road vehicle tracks that have impacted approximately twenty percent of the project site. A dense tamarisk windbreak forms with site's western boundary. The project site is surrounded by residential and commercial development and has become an ecological island, with little or no genetic exchange between plant and terrestrial animal species present on site, or with the same species elsewhere in the Coachella Valley.

Literature Search

Prior to the initiation of field work, reviews of the literature and institutional records were conducted to determine the biological resources that might exist within the general area and to determine the possible occurrence of special-status species. Records, collections, websites and/or staff of the University of California at Riverside Herbarium, the Boyd Deep Canyon Desert Research Center and the Coachella Valley Association of Governments (CVAG) were consulted for specific information as to occurrence of sensitive species. A California Department of Fish & Wildlife (CDFW) Natural Diversity Database check was also reviewed.

Field Survey

Protocol-level surveys were initiated in December 2016, when perennial plant species and most resident vertebrate species could be detected. The dry seasons experienced by the Coachella Valley over the past five years reduced the likelihood that species would be recorded, but it was concluded that the drought conditions did not impact the survey findings.

Animal surveys were conducted simultaneously with plant surveys. Surveys were conducted by walking north/south transects at 10-yard intervals through the project site, as approved by the US Fish and Wildlife Service (USFWS). No surveys were conducted beyond the project site boundaries due to presence of private commercial and residential properties.

In an effort to determine if large animal corridors existed on the project site, special attention was given to observing and identifying animal tracks.

Regulatory Setting

~~***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 species covered under the Plan.~~

Agua Caliente Band of Cahuilla Indians Tribal Habitat Conservation Plan

The Agua Caliente Indian Reservation, home of the Agua Caliente Band of Cahuilla Indians, consists of approximately 31,500 acres of land in Riverside County, California. The Reservation lies within the geographical boundaries of three cities (Palm Springs, Cathedral City and Rancho Mirage) and the County of Riverside, and is composed of a checkerboard pattern of landholdings, including Tribal trust land, allotted trust land, and fee land. The Tribal Habitat Conservation Plan (THCP) was established to (1) continue to exercise its long-standing tradition as a land use manager and steward of the natural resources in and around the Reservation and (2) to establish consistency and streamline permitting requirements with respect to protected species for itself, Tribal members, and third parties developing the Reservation and other Tribal Lands.

The THCP covers 36,055 acres of non-federally owned portions of the Reservation and off-Reservation lands owned by or held in trust for the Tribe. The Tribe has identified 19 sensitive wildlife species and 3 sensitive plant species that occur or have potential to occur within the THCP area and are thus covered by the THCP. Eight of these species are listed as threatened or endangered under the Endangered Species Act.

The project site is located within the Valley Floor Plan Area (VFPA), which consists of active or ephemeral sand fields, stabilized or stabilized shielded sand fields, and other habitat types. Portions of the VFPA currently provide habitat for sand-dependent species; however, with the exception of Section 6 (Township 4 South, Range 5 East), which contains active and ephemeral sand fields, the VFPA generally is determined not to be viable habitat for these species over the long term due to their isolation and fragmentation. Therefore, with the exception of the viable habitat remaining in the Section 6 Target Acquisition Area, in which on-site avoidance, minimization, and mitigation measures will be imposed, on-site mitigation measures are not required of covered projects in the VFPA for the benefit of sand-dependent species; instead, covered project proponents are required to pay a mitigation fee that will fund Tribal acquisition and management of the Habitat Preserve.

3.4.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.4 BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status	☐	☒	☐	☐

species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

a. Less Than Significant Impact with Mitigation Incorporated.

Plant Species

A single native plant association or community was found on site: the Sonoran creosote bush scrub community (sp. *Larrea tridentata*). This community dominates vegetation of the eastern margin of the site and is the pervasive plant community throughout the Colorado Desert of southeastern California.

During the literature search, four plant species were found that could conceivably occur on the project site. These are Glandulare ditaxis (*sp. Glandulare ditaxis*), Ribbed cryptantha (*sp. Cryptantha costata*), Flat-Seeded spurge (*sp. Chamaesyce platysperma*), and Coachella Valley Milkvetch (*sp. Astragalus coachellae*). No sign of the Glandulare ditaxis, Ribbed cryptantha, and Flat-Seeded spurge was found on the site. Seed pods of the Coachella Valley Milkvetch were found across the southeastern quarter of the site. The Milkvetch is listed as endangered by the USFWS. However, impacts to the Milkvetch are fully mitigated by the THCP ~~CVMSHCP~~ through the payment of the Plan's habitat Mitigation ~~acquisition~~ Fee. Therefore, no further action is necessary with regard to this species.

Animal Species

Anthropods

Three insect species known to occur within the Coachella Valley have been placed on the CDFW's Special Animals list. They are the Coachella giant sand treader cricket (sp. *Macrobaenetes valgum*), Coachella Valley Jerusalem cricket (sp. *Stenopelmatus cahuilaensis*) and Coachella Valley grasshopper (sp. *Spaniacris deserticola*). The USFWS has listed as endangered a fourth insect species, Casey's June beetle (sp. *Dinacoma caseyi*). Casey's June beetle is not a covered species under the THCP ~~CVMSHCP~~. Nonetheless during the survey, none of these four insect species were found and are expected on the site because of past grading.

Amphibians and Reptiles

The only detected reptile was the side-blotched lizard (sp. *Uta stansburiana*). The western whiptail (sp. *Cnemidophorus tigris*), desert iguana (sp. *Dipsosaurus dorsalis*) and western shovel-nosed snake (sp. *Chionactis occipitalis*) may also be present.

The officially threatened Coachella Valley fringe-toed lizard was not detected during the surveys. The isolated nature of the project site, several consecutive drought years, past grading, gradual substrate compaction and free-ranging domestic dogs and cats have presumably eliminated the lizard from the site.

Impacts to the fringe-toed lizard would be fully mitigated by the payment of a habitat Mitigation Fee ~~acquisition fee~~ as required under the THCP ~~CVMSHCP~~.

A concerted effort was made to locate signs of the officially listed desert tortoise (sp. *Goperhus agassizi*). However, no evidence of any kind was found and no direct observations were made. In addition, the California Natural Diversity Database (CNDD) (November, 2016) has no records of the tortoise on or within one mile of the project site.

It was concluded the species does not occur within the project site boundaries or immediate vicinity.

An intensive effort was made to locate individuals or sign of the flat-tailed horned lizard, (sp. *Phrynosoma mcallii).* No observations or evidence of this species within the project boundaries were recorded. Impacts to the horned lizard are fully mitigated under the THCP ~~CVMSHCP~~.

Birds

Detected birds within the project area were the common raven (sp. *Corvus corax*), mourning dove (sp. *Zenaida macroura*), house finch (sp. *Carpodacus mexicanus*) and Say's phoebe (sp. *Sayornis saya*).

No observations of LeConte's thrasher (sp. *Toxostoma lecontei*) were recorded during surveys. In the Coachella Valley this species is closely associated with golden cholla (sp. *Cylindropuntia echinocarpa*), an arborescent cactus that provides nesting sites for the thrasher. The cactus species was not found onsite and, therefore, it was concluded the thrasher does not nest within the project boundaries.

An intensive survey for the Burrowing Owl (sp. *Athene cunicularia*) was undertaken following protocols established by State and federal wildlife agencies. No observations of the owl were recorded and no evidence of its presence was found. Because the project site habitat is considered suitable and owls are known to occur in the immediate area, it was concluded the burrowing owl could take up residence on site at any time. Therefore, to ensure that new populations of burrowing owls haven't taken up residence at the project site, a clearance survey for the Burrowing Owl shall be conducted no more than five days prior to grading, grubbing or other site disturbance, as implemented with Mitigation Measure BIO-1.

The loggerhead shrike (sp. *Lanius ludovicianus*), a State Species of Special Concern (SSC), was not observed or detected on or near the project site. The absence of dense shrubs or trees in excess of four feet in height, as required by the shrike for nesting would likely preclude this species from nesting within the project site boundaries.

Mammals

Recorded mammals during the survey included the coyote (sp. *Canis latrans*) and desert cottontail (sp. *Sylvilagus audubonii*). No individuals of the Palm Springs Pocket Mouse (sp. *Perognathus longimembris bangsi*), a THCP ~~CVMSHCP~~ covered species, were found.

The Palm Springs Ground Squirrel (sp. *Spermophilus tereticaudus*) may occur within project site boundaries. However, no evidence of this species was found. It is also a covered species under the THCP ~~CVMSHCP~~ and impacts to the squirrel would be mitigated by the payment of the required habitat Mitigation ~~acquisition~~ F~~f~~ee.

With implementation of Mitigation Measure BIO-1, the project will have a less than significant impact on special status species.

b. **No Impact.** ~~Desert washes are not covered under the CVMSHCP and biological evaluations are required if washes are present.~~ According to a review of recent aerial photographs and a recent visual inspection of the site during the field survey, there is no plant or soil indication warranting the existence of a desert wash or other riparian environment on site. Additionally, there are no sensitive natural communities at the site. Therefore, there would be no impact.

c. **No Impact.** There are no wetlands located on or near the project site, as defined by Section 404 of the Clean Water Act. Therefore, the project would result in no impact to wetlands.

d. **Less Than Significant Impact.** The project site is a vacant lot surrounded by residential and commercial development. There is no established corridor of vacant parcels that would allow

movement of wildlife species through the site. Smoothing of ground surfaces to yield tracks was performed during the field survey for the project to determine if important wildlife corridors exist on the site. Tracks of ravens (sp. *Corvus corax*), roadrunners (sp. *Geococcyx californianus*), and coyotes (sp. *Canis latrans*) were recorded; however no discernable or routinely used corridors could be found. Due to its degraded condition and location within an urban area, the site will have a less than significant impact on the movement of native wildlife, the use of the site as a migratory wildlife corridor.

e. **Less Than Significant Impact with Mitigation Incorporated.** The City of Cathedral City does not have an ordinance addressing special status trees or other vegetation. The General Plan includes the following goals for Biological Resources in the City:

Goal 1 – Preservation and protection of the unique biological resources in the City and planning area.

Goal 2 – A functional, productive, harmonious and balanced relationship between the built and natural environment.

The project site has been disturbed due to past development and is currently vacant besides a building and parking lot at the north end of the site that were used for the previously developed hotel and driving range onsite. The Biological Resources Assessment conducted for the project found no evidence of special status species onsite, but concluded that the project site is considered suitable habitat for the burrowing owl. To ensure that new populations of burrowing owls have not taken up residence at the project site, a clearance survey for burrowing owls must be conducted no more than five days prior to grading, grubbing, or other site disturbance, as implemented with Mitigation Measure BIO-1. As there is minimal existing vegetation on the project site, the applicant proposes to include water-conscious landscaping throughout the project site to create a harmonious relationship between the proposed built environment and the natural environment historically, but no longer, inhabiting the area. Due to the minimal biological resources on the project site, the proposed project is consistent with goals and policies within the General Plan and will not conflict with local policies protecting biological resources with implementation of Mitigation measure BIO-1. Therefore, impacts will be less than significant.

f. **Less than Significant Impact.** Although the project is located within the City of Cathedral City, the project site is within the Agua Caliente Indian Reservation, which is "not a part" of the CVMSHCP. The Indian Reservation, including the project site, is within the THCP boundaries, within the Valley Floor Planning Area.

The project site is not within a conservation area for the plan so on-site mitigation measures are not required for the benefit of sand-dependent species that are present in one portion of the VFPA. Instead, the project applicant is required to pay a mitigation fee that will fund Tribal acquisition and management of the THCP Habitat Preserve, implemented with Regulatory

Requirement RR-2. The project would, therefore, not conflict with the provisions of the THCP and will result in a less than significant impact to an adopted conservation plan protecting biological resources.

~~Cathedral City is a signatory to the CVMSHCP, which is a regional conservation plan comprising close to 1.14 million acres. The CVMSHCP currently includes a number of permittees including eight 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. The proposed project is not within, nor does it abut, a designated conservation area and thus will not impact conservation areas.~~

~~Since the site is located within the CVMSHCP boundaries, the developer is required to pay a habitat acquisition fee to offset incremental impacts to plants and wildlife protected under the CVMSHCP (RR-2). The project would, therefore, not conflict with the provisions of the CVMSHCP and will result in less than significant impacts to an adopted conservation plan or local policies or ordinances protecting biological resources.~~

3.4.4 Mitigation Measures

BIO-1 Burrowing Owl. No more than five days before land disturbance or issuance of a grading permit by the City, the applicant shall have a biological survey conducted at the project site to determine presence/absence of the species. 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.

3.4.5 Regulatory Requirements

RR-2 The project applicant is required to pay the THCP Valley Floor Planning Area ~~CVMSHCP~~ Mitigation Fee prior to issuance of building permits.

3.4.6 Level of Significance After Mitigation

With implementation of Mitigation Measure BIO-1 and payment of the Agua Caliente THCP Valley Floor Planning Area ~~CVMSHCP~~ Mitigation Fee, impacts to biological resources would be less than significant.

3.5 Cultural Resources

3.5.1 Sources

- CRM Tech, *Historical/Archaeological Resources Survey Report, Ramon 14 Project, City of Cathedral City, Riverside County, California,* July 2015. (Appendix C.1)
- CRM Tech, *Addendum to Historical/Archaeological Resources Survey, Ramon 19 Project, City of Cathedral City, California,* December 2016. (Appendix C.2)
- Cathedral City Comprehensive General Plan, *Environmental Resources Element,* 2009.
- Earth Systems *Southwest, Report of Phase I Environmental Site Assessment Ramon 19 Cultivation APNs 673-020-039, -040, -041, -042, Cathedral City, Riverside County, California,* December 20, 2016. (Appendix E.2)

3.5.2 Environmental Setting

The Coachella Valley is a historical center of Native American settlement occupied by the Cahuilla Indians. The Cahuilla were primarily hunters and gatherers adapted to the arid conditions and survived using a seasonal mobility system. Prior to European contact, the Native American population was estimated to be between 3,600 and 10,000, but was decimated during the 19th century, largely as a result of European diseases. Today, Native Americans of the Cahuilla heritage are mostly affiliated with one or more of the Indian reservations in the Coachella Valley, including: Agua Caliente, Morongo, Cabazon, Torres Martinez, and Augustine. The current project area lies within the boundaries of the Agua Caliente Indian Reservation.

Cathedral City was founded in 1925 and incorporated in 1981. The City began as a development for low- to moderate-income housing, characterized by narrow streets lined with small houses and odd-shaped lots. In the 1930s, Cathedral City gained status by enticing Palm Springs visitors with two prominent gambling casinos. Post WWII, Cathedral City along with other nearby cities, became a major driving force in regional development and began to play an increasingly important role in the regional economy.

Historical/Archaeological Assessment for Parcel 5

CRM Tech conducted a historical/archaeological resources study for a previously proposed residential development project which covered most of the Ramon 19 Project Area, comprising approximately 14.13 acres in Parcel 5. The survey included a records search, historical background research, contact

with Native American representatives, and an intensive-level field survey. On June 3, 2015, a records search was completed at the Eastern Information Center (EIC), University of California, Riverside. Findings indicated that 18 cultural studies have been completed within a one-mile radius of the project site, but the site had not been previously surveyed, and no historical/archaeological sites were identified within the one-mile radius. Other sources reviewed for the Cultural Resources Assessment included the U.S. General Land Office land survey plat map dated 1856, USGS topographic maps dated 1904-1979, and aerial photographs taken between 1972 and 2012. Based on these historic maps and subsequent aerial photographs, the project area remained undeveloped, and indeed largely untouched by human activities, throughout the historic period and as late as 1972. Therefore, it can be concluded that the project area is low in sensitivity for cultural resources.

A field survey was performed on June 3, 2015 which resulted in completely negative results for potential cultural resources to occur on Parcel 5. The entire 14.3-acre study area was closely inspected for any human activities dating to the prehistoric and historic periods, but none was found. Golf balls and wooden tees left by the former driving range operation were observed throughout the project area. Other refuse items of modern origin were also encountered on the property and especially in an area of a former transient camp in the eastern portion of Parcel 5, which is no longer occupied. Nonetheless, none of these items are of any historical/archaeological interest.

Historical/Archaeological Assessment for Parcels 1-4

CRM Tech prepared an addendum to the *Historical/Archaeological Resources Survey Report* prepared for Parcel 5. The addendum covered an additional 5.03 acres on the north end of the project site adjacent to Ramon Road, with a project site overall total area of 19.14 acres. The purpose of the study was to identify any "historical resources" or "tribal cultural resources" that may exist within the additional project area (Parcels 1-4).

In order to accomplish this objective, CRM Tech reviewed the pertinent results of research procedures conducted during the 2015 study. Results from the records search indicated that the additional project area had not been surveyed for cultural resources prior to the current study. On December 5, 2016, CRM Tech carried out a field survey of the additional project area. The additional project area was evidently used as a small hotel resort with a driving range until 2005-2006, and several golf balls and wooden tees remain on the grounds today. The western portion of the additional project area was once occupied by the resort building with a swimming pool and was associated with the driving range operation. In 2002-2004, the building was joined by a large garage/shed in the eastern portion of the additional project area. In 2014-2015, the main building, and most of the associated features, were demolished, leaving the garage and paved parking lots as the only remnants of the driving range and of the small hotel resort. A full summary of historical site usage is shown in Table 11 of Section 3.8, *Hazards and Hazardous Materials*.

3.5.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.5 CULTURAL RESOURCES - Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a. **No Impact.** Historic maps consulted for the *Historical/Archaeological Resources Study* suggested that the project area possesses low sensitivity for cultural resources from the historic period. In the mid-19th and the early 20th centuries, no man-made features of any kind were known to be present in the immediate vicinity of the project area. Over the next few decades, and especially amid the post-WWII boom, some residential development occurred in the adjacent sections around the project area, but as part of the Agua Caliente Indian Reservation, the project area and the rest of Section 22 demonstrated no signs of such development in the 1950s. Based on the historic maps and aerial photographs reviewed for the project site, the project area remained largely untouched by human activities, throughout the historic period and as late as 1972. The resort hotel and associated structures were built after 1972 and are less than 50 years old; therefore, the building onsite is not considered historical.

Since no historical resources were found on the site during the field survey and including a search of historical records that did not indicate any historical resources onsite or on any adjacent sites, the project would have no impact on historical resources.

b. **Less Than Significant Impact with Mitigation Incorporated.** The *Historical/Archaeological Resources Study* and Addendum (Appendix C.1 and C.2) did not indicate the presence of any archaeological resources on or near the project site. The field survey did not result in the discovery of any archaeological resources present on the site. Therefore, the project site is considered to have low sensitivity for cultural resources. However, there is a remote possibility of uncovering unknown archaeological resources during construction activities. Therefore, mitigation measures must be implemented during construction activities. Implementation of Mitigation Measure CR-1 requires a qualified archaeological monitor to be

present during all project-related ground disturbing activities that occur in undisturbed native sediments and Mitigation CR-2 will require all work to halt if any significant archaeological materials are encountered until a qualified archaeologist can visit the site of discovery and assess the significance. Therefore, with implementation of Mitigation Measures CR-1 and CR-2, the project will have a less than significant impact on archaeological resources.

c. **Less Than Significant Impact With Mitigation Incorporated**. The project site is relatively flat and covered with sandy soils. There are no unique geological resources known from the site. The western portion of the Coachella Valley has been over-deposited with deep sediments from drainage runoff and Aeolian (wind-blown) sand deposits over time that would bury any paleontological resources. The potential for resources to be uncovered would increase proportionately to the depth of excavation. While deep excavation is not normal with the type of project proposed, excavation for utilities and foundations or footings have the potential to unearth paleontological deposits.

The City's General Plan does not identify any paleontological resources in the vicinity of the project site. The Riverside County General Plan includes an inventory of paleontological and geological resources of the entire Riverside County. The inventory map shows Cathedral City as having a low potential for finding paleontological resources. It is unlikely that the project will result in the uncovering of significant paleontological resources.

However, if in the event paleontological resources are discovered, implementation of Mitigation Measure CR-3 will reduce impacts to less than significant.

d. **Less Than Significant Impact.** The proposed site is not located on, or in close proximity to a known cemetery and therefore, is not expected to disturb human remains. However, if in the event that human remains are discovered, State law requires that the Riverside County Coroner be contacted and the find assessed. If the remains are determined to be Native American, then the THPO must be contacted. As such, implementation of Regulatory Requirement RR-3 will ensure that impacts to unknown human remains are less than significant.

3.5.4 Mitigation Measures

CR-1 If during the course of excavation, grading or construction, artifacts or other archaeological resources are discovered, all work in the immediate area of the find shall be halted and the applicant shall immediately notify the City Planner. A qualified archaeologist shall be called to the site by, and at the expense of, the applicant to identify the find and propose mitigation if the resource is culturally significant. Work shall resume after consultation with the City of Cathedral City and implementation of the recommendations of the archaeologist.

CR-2 Copies of any resource documentation (report and site records) generated in connection with the project shall be transmitted to the Agua Caliente Band of Cahuilla Indians (ACBCI) THPO for review and comment.

CR-3 If a paleontological resource is accidentally uncovered during grading or construction activities for the proposed project, the project applicant/developer shall be required to notify the City of Cathedral City Planner immediately and all excavation work within ten feet of the find shall cease immediately. A qualified paleontologist or archaeologist shall be consulted to determine the necessity for monitoring any excavation and to evaluate any paleontological resource exposed during construction. Construction activity shall resume upon consultation with the City and upon implementation of the recommendations of the paleontologist or archaeologist.

3.5.5 Regulatory Requirements

RR-3 If human remains are uncovered during excavation or grading activities on the project site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

A) The Riverside County Coroner has been contacted and determined that no investigation of the cause of death is required, and

B) If the coroner determines the remains to be Native American:

The coroner shall contact the Native American Heritage Commission (NAHC) or the Agua Caliente Tribal Historic Preservation Office (THPO) within 24 hours. The NAHC or THPO shall identify the person or persons it believes to be the Most Likely Descendent (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Sec. 5097.98. The City and developer shall work with the designated MLD to determine the final disposition of the remains.

3.5.6 Level of Significance After Mitigation

Implementation of Mitigation Measures CR-1 through CR-3 and RR-3 will ensure that the project's impacts on Cultural Resources would be less than significant.

3.6 Geology and Soils

3.6.1 Sources

- Landmark Consultants, Inc., *Geotechnical Engineering Report, APN 673-020-039 – The Ramon Road Project,* May 20, 2016. (Appendix D.1)
- Landmark Consultants, Inc., *Geotechnical Engineering Report, APN 673-020-040, 041, and 042 – The Ramon Road Project III,* May 4, 2016. (Appendix D.2)
- Earth Systems Southwest, *Geotechnical Engineering Report, APN 673-020-043, Proposed Ramon 14 Project*, November 21, 2014. (Appendix D.3)
- Natural Resources Conservation Service, *Custom Soil Resource Report,* December 8, 2016. (Appendix D.4)

3.6.2 Environmental Setting

Geologic Setting

The project site is located in the Coachella Valley portion of the Salton Trough physiologic province. The Salton Trough is a geologic structural depression resulting from large scale regional faulting. The trough is bounded on the northeast by the San Andreas Fault and Chocolate Mountains and the southwest by the Peninsular Ranges (Santa Rosa and San Jacinto Mountains) and faults of the San Jacinto Fault Zone. The Salton Trough represents the northward extension of the Gulf of California, containing both marine and non-marine sediments since the Miocene Epoch. Tectonic activity that formed the trough continues at a high rate as evidenced by deformed young sedimentary deposits and high levels of seismicity.

The surrounding regional geology includes the Peninsular Ranges to the south and west, the Salton Basin to the southeast, and the Transverse Ranges (Little San Bernardino and Orocopia Mountains) to the north and east. Hundreds of feet to several thousand feet of Quaternary fluvial, lacustrine, and Aeolian soil deposits underlie the Coachella Valley.

Seismicity

The project site is located within the seismically active Coachella Valley of Southern California with numerous mapped faults of the San Andreas Fault System traversing the region. A map illustrating known active faults relative to the site is included in Exhibit 20, *Location of Local Faults.* California's Alquist-Priolo Earthquake Zoning Act of 1972 prohibits cities from issuing development permits for project sites located within an earthquake fault zone. The nearest mapped Earthquake Fault Zone is the San Andreas Fault with its nearest point located approximately 4.3 miles northeast of the project site.

Onsite Soils

A Natural Resources Conservation Service (NRCS) Soil Survey report was generated for the project (Appendix D.4). The report concluded that the entire project site consists of Myoma fine sand, which is an excessively draining sand that is typical of alluvial fan deposits. Onsite soils were further investigated during the preceding Geotechnical Engineering Reports (Appendices D.1, D.2, and D.3), which cover the entire project site. Field exploration for parcels 1 through 4 included subsurface exploration within test pits, ranging from 11 to 15 feet deep. Subsurface conditions for Parcel 5 were investigated onsite by drilling six exploratory borings, ranging from 20 to 51 feet deep. No water was encountered during any field explorations conducted on the project site. Laboratory testing results of the sample soils were used to identify possible impacts associated with onsite soils.

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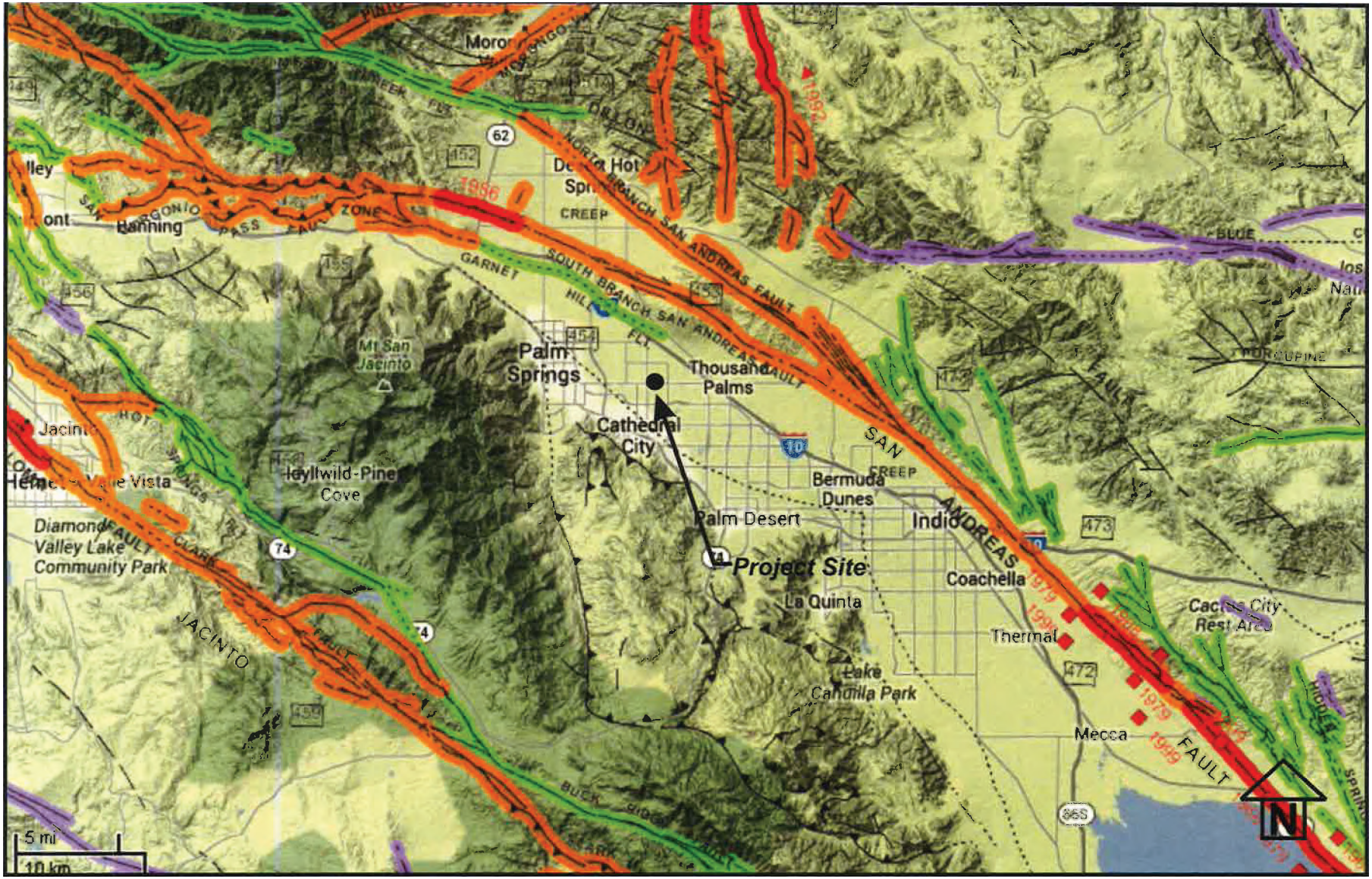

Source: Land Mark Geo-Engineers and Geologists, 2016

The Altum Group

Location of Local Faults
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 20

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3.6.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.6 GEOLOGY AND SOILS - Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

a.i. **Less Than Significant Impact.** The project site does not lie within a State of California, Alquist-Priolo Earthquake Fault Zone. The closest active fault is the Banning trace of the San Andreas fault, located approximately 4.3 miles northwest of the site. Surface rupture would be most likely to occur along previously established fault traces; therefore, surface rupture is considered to be unlikely at the project site because there are no fault traces on the site and the predominance of well-delineated fault lines through the Coachella Valley. Therefore, the probability of primary surface rupture is considered low, so the project would result in a less than significant impact from rupture of a known earthquake fault.

a.ii. **Less Than Significant Impact with Mitigation Incorporated**. Approximately 40 active faults or seismic zones lie within 50 miles of the project site. The project site is considered likely to be subjected to moderate to strong ground motion from earthquakes in the region. The primary

seismic risk at the site is a potential earthquake along the San Andreas Fault located about four to six miles from the site. Geologists believe that the San Andreas Fault has characteristic earthquakes that result from rupture of each fault segment. The estimated characteristic earthquake is approximately magnitude 7.7 for the southern segment of the fault. This segment has the longest elapsed time since rupture of any part of the San Andreas Fault. The last rupture occurred about 1680 AD, based on dating by the USGS near Indio. This segment has an average recurrence interval of about 220 years. The San Andreas Fault may rupture in multiple segments, producing a higher magnitude earthquake. Therefore, implementation of Mitigation Measure GEO-1 and GEO-2, requiring compliance with the recommendations contained in the project's Geotechnical Engineering Report, and the 2016 California Building Code (or latest edition) (Regulatory Requirement RR-4) will reduce impacts associated with strong seismic ground shaking to be less than significant.

a.iii. **Less Than Significant Impact with Mitigation Incorporated.** Liquefaction is the loss of soil strength from sudden shock (usually seismic shaking), causing the soil to become a fluid mass. In general, for the effects of liquefaction to be manifested at the surface, groundwater levels must be within 50 feet of the ground surface and the soils within the saturated zone must also be susceptible to liquefaction. The potential for liquefaction to occur at this site is considered negligible because the current and historic high groundwater levels at the site are deeper than 100 feet below the ground surface. Additionally, according to the Cathedral City General Plan Geotechnical Exhibit V-4 (*Liquefaction Susceptibility Map*), the project site is located in an area with low to very low probability of liquefaction susceptibility.

Nonetheless, all construction of structures must comply with the seismic requirements of the California Building Code and recommended engineering design measures to be incorporated as set forth in Mitigation Measures GEO-1 and GEO-2. Compliance with these standards will limit hazards as a result of seismic ground failure, including liquefaction, and thus reduce impacts in this regard to less than significant.

a.iv. **No Impact.** Per the geotechnical engineering reports prepared for the project (Appendices D.1, D.2, and D.3), the site is relatively flat and, therefore, the likelihood of landslides is negligible.

b. **Less Than Significant Impact.** The City's General Plan Exhibit V-2, *Wind Hazards Zones,* shows that the project site, as well as the majority of the City, is located within an area of moderate to very severe wind erosion. During construction of the proposed project, earth-moving activities would result in disruption of on-site soils and exposure of uncovered soils, thereby increasing the potential for wind or water-related erosion until construction is completed. In accordance with the SCAQMD Rules 403 and 403.1 pertaining to fugitive dust, the project developer will be required to submit a fugitive dust control plan to the City for approval before issuance of grading permits (RR-1). The plan must contain best available control measures (BACM) that will avoid or minimize soil erosion caused by high winds.

After construction, the site soils will be stabilized long-term by landscaping, paving, and structures. Consequently, the project will result in a less than significant impact from soil erosion and loss of topsoil from wind erosion.

Initial Study Section 3.3, *Air Quality*, identifies Best Management Practices (BMPs) to be implemented during grading and construction activities. Also see Section 3.9, *Hydrology and Water Quality*, for a discussion of the required Storm Water Pollution Prevention Plan (SWPPP) (Regulatory Requirement RR-5), which will require inclusion of BMPs for wind and water erosion during construction. With implementation of Regulatory Requirement RR-1 and RR-5, the project will result in a less than significant impact from soil erosion.

c. **Less Than Significant Impact with Mitigation Incorporated.** According to the General Plan *Geotechnical Element*, the proposed project is located in an area that has low to very low susceptibility to seismically induced landslide, liquefaction, or lateral spreading hazards. The Geotechnical Engineering analysis prepared for the project found that the potential for soil liquefaction to occur at the site is considered negligible because of the current and historical high groundwater on-site being deeper than 50 feet below ground surface. Also, the potential for lateral spreading is very low due to the deep groundwater, distance from the Whitewater River flood control channel, and low potential for liquefaction.

The Geotechnical Engineering Report prepared for the project concluded that potential hazards associated with slope instability, landslides and debris flows are considered low because the site is relatively flat.

In the Geotechnical Engineering Report prepared for Parcel 5 (Appendix D.3), upper soils onsite were found to be relatively non-uniform, poorly graded sands with silt which are loose and unsuitable to support structures, fill and hardscape. The site was formerly a driving range on the western portion of the site and a nursery/date palm grove on the eastern portion of the site. Although evidence of their existence is limited, portions of the site may contain buried debris and organics. Such debris has the potential to create instability in soils, so that if encountered, such soils must be located and removed for proper compaction. The Geotechnical Engineering Report for Parcel 5 includes recommendations for proper clearing and site preparation for construction. Therefore, compliance with Mitigation Measure GEO-1 will ensure that impacts associated with ground failure are reduced to less than significant.

d. **Less Than Significant Impact with Mitigation Incorporated.** Based on the NRCS Soil Survey report (Appendix D.4), the project site is primarily comprised of Myoma fine sand. Sandy soils are non-expansive in nature. The Geotechnical Engineering Report for Parcel 5 (Appendix D.3) recommended that samples of the building pad soil be tested during grading to confirm results. Therefore, with implementation of Mitigation Measure GEO-1, in requiring the developer to comply with all recommendations set forth in the geotechnical analysis

(Appendix D.1, D.2, and D.3), impacts in regard to expansive soils would be reduced to less than significant.

e. **No Impact.** The applicant is not proposing the use of septic tanks or alternative wastewater disposal systems as the project will hook in to City's sewer system.

3.6.4 Mitigation Measures

GEO-1 Prior to issuance of each building permit for Phases 1 and 2, the project applicant shall submit plans to the City of Cathedral City for review and approval demonstrating project compliance with the 2016 California Building Code (or most recent version) seismic requirements and the recommendations of the design level geotechnical analysis (Appendix D.1, D.2, and D.3). All soils engineering recommendations and structural foundation recommendations shall be designed by a licensed professional engineer and shall be incorporated into the approved Grading and Building Plans. All onsite soil engineering activities shall be conducted under the supervision of a licensed geotechnical engineer or certified engineering geologist.

GEO-2 As part of the grading plan, any remnant of the former date palm nursery and golf course in Parcel 5 shall be located and identified for proper abandonment. All buried structures which are removed shall have the resultant excavation backfilled with soil compacted as engineered fill with a minimum two-sack sand slurry, or as approved by the project geotechnical engineer. The Grading Plan shall be reviewed and approved by the City Engineer prior to issuance of grading and building permits.

3.6.5 Regulatory Requirements

RR-1 Pursuant to City Code Section 8.54.040, the project applicant must prepare and submit a Fugitive Dust Control Plan in accordance with SCAQMD Rule 403.1, prior to issuance of grading permits.

RR-4 The applicant shall ensure that the project engineer designs the project consistent with the most current version of the California Building Code.

RR-5 A SWPPP must be prepared prior to issuance of construction permits and implemented during all construction activities.

3.6.6 Level of Significance After Mitigation

Adherence to the recommendations made by the project's Geotechnical Engineer and compliance with the regulatory requirements associated with the proposed project, will ensure that impacts to the project in regard to geotechnical hazards would be less than significant.

3.7 Greenhouse Gas Emissions

3.7.1 Sources

- Kunzman Associate Inc., *Ramon 19 Cultivation Air Quality and Global Climate Change Impact Analysis,* April 28, 2017. (Appendix A)

3.7.2 Environmental Setting

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHG), play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's GHG emissions, followed by electricity generation. The six most important GHGs that are assumed to be responsible for global climate change are described below.

Carbon Dioxide (CO_2)

The natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean. CO_2 was the first GHG demonstrated to be increasing in atmospheric concentration with the first conclusive measurements being made in the last half of the 20th century. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC) indicates that concentrations were 379 ppm in 2005, an increase of more than 30 percent. Left unchecked, the IPCC states that the concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources. This could result in an average global temperature rise of at least 2° Celsius or 3.6° Fahrenheit.

Methane (CH_4)

CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO_2. Its lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO_2, N_2O, and Chlorofluorocarbons (CFCs). CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric

concentration of methane. Other anthropocentric sources include fossil- fuel combustion and biomass burning.

Nitrous Oxide (N_20)

Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant, (i.e., in whipped cream bottles, in potato chip bags to keep chips fresh, and in rocket engines and in race cars).

Chlorofluorocarbons (CFCs)

CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source, but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons (PFCs)

PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above the Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). Concentrations of CF_4 in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

Sulfur Hexafluoride

Sulfur Hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO_2. Concentrations in the 1990s were about four ports per thousand (ppt). Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Aerosols

Aerosols are particles emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols. Sulfate aerosols are emitted when fuel containing sulfur is burned. Black carbon (or soot) is emitted during biomass burning due to the incomplete combustion of fossil fuels. Particulate matter regulation has resulted in the lowering of aerosol concentrations in the United States; however, global concentrations are likely increasing.

Water Vapor

Water vapor is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to "hold" more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there is also dynamics that put the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up).

Global Warming Potential

GHGs have varying global warming potential (GWP). The global warming potential is the potential of a gas or aerosol to trap heat in the atmosphere; it is the cumulative radiative forcing effect of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to the reference gas, CO_2. One teragram of carbon dioxide equivalent (Tg CO_2e) is essentially the emissions of the gas multiplied by the global warming potential. One teragram is equal to one million metric tons. The carbon dioxide equivalent is a good way to assess emissions because it gives weight to the global

warming potential of the gas. A summary of the atmospheric lifetime and the global warming potential of selected gases is summarized in Table 9, *Global Warming Potentials and Atmospheric Lifetimes,* and shows that the global warming potential of GHGs ranges from 1 to 23,900.

Table 9 Global Warming Potentials and Atmospheric Lifetimes

Gas	Atmospheric Lifetime	Global Warming Potential[1] (100 Year Horizon)
Carbon Dioxide (CO_2)	—[2]	1
Methane (CH_4)	12	28-36
Nitrous Oxide (NO)	114	298
Hydrofluorocarbons (HFCs)	1-270	12-14,800
Perfluorocarbons (PFCs)	2,600-50,000	7,390-12,200
Nitrogen trifluoride (NF_3)	740	17,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 2, April 28, 2017.

Notes:

1. Compared to the same quantity of CO2 emissions.
2. Carbon dioxide's lifetime is poorly defined because the gas is not destroyed over time, but instead moves among different parts of the ocean–atmosphere–land system. Some of the excess carbon dioxide will be absorbed quickly (for example, by the ocean surface), but some will remain in the atmosphere for thousands of years, due in part to the very slow process by which carbon is transferred to ocean sediments.

GHG Emission Sources

The CalEEMod GHG analysis took into account GHG emissions from several sources to identify the total GHG emissions for the project. Each source of GHG emissions is described in greater detail below.

- **Area Sources -** Area sources include emissions from consumer products, landscape equipment and architectural coatings.
- **Energy Usage -** Energy usage includes emissions from the generation of electricity and natural gas used on-site.
- **Mobile Sources -** Mobile sources include emissions from the additional vehicle miles generated from the proposed project. The vehicle trips associated with the proposed project have been analyzed by using the trip generation rate determined by the traffic analysis for a marijuana cannabis cultivation facility and dispensary. The trip generation rate of 1,814 trips per day from the Traffic Impact Analysis for 325 employees has been used as it is represents the worst-case scenario.
- **Waste -** Waste includes the GHG emissions generated from the processing of waste from the proposed project as well as the GHG emissions from the waste once it is interred into a landfill.

- **Water -** Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy used to transport and filter the water.
- **Construction -** The construction-related GHG emissions were also included in the analysis and were based on a 30 year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009.

Regulatory Setting

State

The California Air Resources Board (CARB) identified interim statewide CEQA thresholds for GHG emissions and released *Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act* in 2008. The State currently has no regulations that establish ambient air quality standards for GHGs. However, the State has passed laws directing CARB to develop actions to reduce GHG emissions, which are listed below.

Assembly Bill 1493 - California Assembly Bill 1493 (also known as the Pavley Bill) was enacted on July 22, 2002 and requires CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks.

Executive Order S-3-05 - 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.

The executive order directed the secretary of CalEPA to coordinate a multi-agency effort to reduce GHG emissions to the target levels.

Assembly Bill 32 - In 2006, the California State Legislature adopted Assembly Bill 32 (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.

Senate Bill 1368 - Senate Bill 1368 (SB 1368) is the companion Bill of AB 32 and was also adopted 2006. SB 1368 requires the California Public Utilities Commission (CPUC) to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007 and for local publicly owned utilities by June 30, 2007.

Executive Order S-1-07 - Executive Order S-1-07 was issued in 2007 and proclaimed that the transportation sector is the main source of GHG emissions in the State, since it generates more than 40 percent of the State's GHG emissions. It established a goal to reduce the carbon intensity of transportation fuels sold in the State by at least ten percent by 2020.

Senate Bill 97 - Senate Bill 97 (SB 97) was adopted August 2007 and acknowledged that climate change is a prominent environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB, guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009.

Senate Bill 375 - Senate Bill 375 (SB 375) was adopted in 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) such as the Southern California Association of Governments (SCAG) to adopt a sustainable communities strategy (SCS) or alternate planning strategy (APS) that prescribes land use allocation in that MPOs Regional Transportation Plan (RTP). The proposed project is located within SCAGs jurisdiction, which has authority to develop the SCS. For the SCAG region, the targets set by CARB are at eight percent below 2005 per capita GHG emissions levels by 2020, 13 percent below 2005 per capita GHG emissions levels by 2035 and 21 percent below 2005 per capita GHG emissions by 2040.

Senate Bill X7-7- Senate Bill X7-7 (SB X7-7), enacted in 2009, mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers.

Executive Order B-30-15 - Executive Order B-30-15, established a new interim statewide greenhouse gas emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030, was signed by Governor Brown in April 2015.

Senate Bill 32 – Related to EO-B-30-15, Senate Bill 32, enacted in 2016, requires California to reduce its GHG emissions to 40 percent below 1990 levels by December 31, 2030.

Regional

The project is within the South Coast Air Basin, which is under the jurisdiction of the SCAQMD. A variety of agencies have developed GHG emissions thresholds and/or have made recommendations for how to identify a threshold. However, the thresholds for projects in the jurisdiction of the SCAQMD remain in flux.

SCAQMD is in the process of preparing recommended significance thresholds for GHGfor local lead agency consideration ("SCAQMD draft local agency threshold"); however, the SCAQMD Board has not approved the thresholds. 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 the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG 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 with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to a project's operational emissions. If a project is less than significant:
  - All land use types: 3,000 $MTCO_2e$ per year.
  - Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 MTCO2e per year; or mixed use: 3,000 $MTCO_2e$ per year.
  - Based on land type: Industrial (where SCAQMD is the lead agency), 10,000 $MTCO_2e$ per year.
- Tier 4 has the following options:
  - Option 1: Reduce emissions from business as usual (BAU) by a certain percentage; this percentage is currently undefined.
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
  - Option 3, 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$ /SP/year for plans.
  - Option 3, 2035 target: 3.0 $MTCO_2e$ /SP/year for projects and 4.1 $MTCO_2e$ /SP/year for plans.
- Tier 5 involves mitigation offsets to achieve target significance threshold.

SCAQMD's draft threshold uses the Executive Order S-3-05 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap carbon dioxide concentrations at 450 ppm, thus stabilizing global climate.

Local

Cathedral City's Climate Action Plan was adopted in May 2013. The Climate Action Plan provides a framework for development to help reduce the City's emissions and improve air quality. With the policies and programs of the Climate Action Plan in mind, the GHG emissions were compared to SCAQMD's draft thresholds and the CARB Scoping Plan.

3.7.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.7 GREEHOUSE GASES - Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a. **Less Than Significant Impact.** The proposed project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water, and construction equipment. The Air Quality Impact Analysis (Appendix A) analyzed potential project-related GHGs utilizing CalEEMod Version 2016.3.1. The project's emissions were compared to the SCAQMD industrial threshold of 10,000 $MTCO_2e$ per year. If the project's emissions exceed the threshold, then, as per the City's Climate Action Plan, the project's baseline (2010) emissions is compared to the project's year 2020 emissions, to ensure that the project meets the 23.4 percent reduction from baseline emissions to meet the AB 32 target.

A summary of the GHG emissions results are shown in Table 10, *Project-Related Greenhouse Gas Emissions*. The proposed project's unmitigated GHG emissions would be 6,332.71 metric tons of CO_2 equivalents per year. According to the thresholds of significance established for the SCAQMD local agency Tier 3 threshold, a cumulative global climate change impact would occur if the GHG emissions created from the on-going operations would exceed the SCAQMD threshold of 10,000 metric tons per year of CO_2e for industrial projects. Therefore, operation of the proposed project would not create a significant cumulative impact to global climate change.

Table 10 Project-Related Greenhouse Gas Emissions

Category	Greenhouse Gas Emissions (Metric Tons/Year)					
	Bio-CO2	NonBio-CO_2	CO_2	CH_4	N_2O	CO_2e
Area Sources[1]	0.00	0.01	0.01	0.00	0.00	0.02
Energy Usage[2]	0.00	2,507.44	2,507.4	0.08	0.03	2,518.43
Mobile Sources[3]	0.00	2,837.84	2,837.8	0.17	0.00	2,841.99
Waste[4]	126.44	0.00	126.44	7.47	0.00	313.25
Water[5]	36.05	471.55	507.60	3.72	0.09	627.91
Construction[6]	0.00	31.01	31.01	0.00	0.00	31.11
Total Emissions	162.49	5,847.85	6,010.3	11.45	0.12	**6,332.71**
SCAQMD Industrial Threshold						**10,000**
Exceeds Threshold?						**No**

Source: Kunzman Associates, Ramon 19 Cultivation, Air Quality and Global Climate Change Impact Analysis, Table 11, April 28, 2017.

Notes:

1. Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
2. Energy usage consist of GHG emissions from electricity and natural gas usage.
3. Mobile sources consist of GHG emissions from vehicles.
4. Solid waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills.
5. Water included GHG emissions from electricity used for transport of water and processing of wastewater.
6. Construction GHG emissions CO2e based on a 30 year amortization rate.

b. **Less Than Significant Impact.** As stated previously, the 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.

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.

At a level of 6,471.44 $MTCO_2e$ per year, the project's GHG emissions falls well below the SCAQMD threshold of 10,000 metric tons per year of CO2e for industrial uses 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. Therefore, the project will result in a less than significant impact related to consistency with policies, plans, and regulations related to GHGs.

3.7.4 Mitigation Measures

The project was found to have a less than significant impact on Greenhouse Gas Emissions. Therefore, no mitigation is required.

3.7.5 Regulatory Requirements

No regulatory Requirements are necessary to reduce impacts associated with GHGs.

3.7.6 Level of Significance After Mitigation

Not Applicable.

3.8 Hazards and Hazardous Materials

3.8.1 Sources

- California Department of Toxic Substances Control (DTSC), *Envirostor database*, accessed December 8, 2016.
- California Department of Forestry and Fire Protection (CDFFP) website, *Land Cover Map*, 2006, accessed December 8, 2016.
- Earth Systems Southwest, *Report of Phase I Environmental Site Assessment Proposed Sandal Beach Development APN 673-020-043 Ramon Road East of Date Palm Drive Cathedral City, Riverside County, California*, January 10, 2014. (Appendix E.1)
- Earth Systems Southwest, *Report of Phase I Environmental Site Assessment Ramon 19 Cultivation APNs 673-020-039, -040, -041, -042, Cathedral City, Riverside County, California*, December 20, 2016. (Appendix E.2)

- Riverside County, *Riverside County Airport Land Use Compatibility Plan Policy Document*, 2004.
- Riverside County Airport Land Use Commission, *ALUC Development Review – Director's Determination,* January 5, 2017. (Appendix E.4)
- California Governor's Office of Emergency Services, *Hazardous Materials Business Plan FAQ,* 2014, accessed December 16, 2016, http://www.caloes.ca.gov/FireRescueSite/Documents/HMBP%20FAQ%20-%20Feb2014.pdf

3.8.2 Environmental Setting

Existing Conditions

Earth Systems Southwest conducted two Phase I Environmental Site Assessments (ESA) that cover the entire project site. A Phase I ESA was prepared for Parcel 5 in January 2014 and a Phase I ESA was prepared for Parcels 1 through 4 in December 2016. The purpose of the reports is to observe current site conditions and adjacent land uses, and evaluate the potential for the site to contain hazardous materials. The following narrative summarizes existing site conditions on Parcel 5 (Photographs of Parcel 5 are included in Appendix B of the Phase I ESA (see Initial Study Appendix E.1)).

- In general, the site was observed to consist of a former golf practice driving range to the west and a former date grove to the east.
- The former driving range area was observed to be dry and devoid of grass and vegetation. Evidence of an east to west trending irrigation line bisected the central portion of the former driving range. Features of interest from a hazardous materials perspective were not observed in the driving range area.
- The former date grove area occupied the eastern 1/3 of the rectangular portion of the site, and was also dry with a few desert trees, bushes, and annual vegetation. Most of the date trees had been removed and evidence of the previous date grove nursery was limited to remaining plastic surface irrigation lines and a few isolated palm fronds.
- The northern extension of the site was a portion of the paved parking lot and landscaping area for the former hotel, including a portion of the tee boxes for the driving range. The exact location of the northern extension was not discernible during the site visit, but issues of environmental concern were not noted in this general area.
- At least three former or active homeless encampments were observed at the site during the December 24, 2013 site visit; a smaller abandoned encampment was located in the northern portion of the former date grove and two larger active encampments were observed along the west boundary among the large tamarisk trees. Debris observed among the encampments typically consisted of old mattresses, wood, plastic, paper, furniture, cans, bottles, and other solid debris. It should be noted that vehicle access to the site was locked and no trespassing signs had been posted during the January 3, 2014 site visit. One of the encampments to the west appeared to have been abandoned since the December 2013 visit but much of the debris remained onsite at the time of the January visit.

- Minor amounts of windblown debris were observed along the site perimeter, particularly to the east and south. The debris typically consisted of non-hazardous solid material such as paper and plastic.
- Structures, water wells, onsite utilities, significant soil stains, odors, or evidence of stored material were not observed during the site visits.
- Evidence of the on-site manufacture, storage, or disposal of hazardous materials was not observed.

The following narrative summarizes existing site conditions on Parcels 1 through 4 (Photographs of Parcels 1 through 4 are included in Appendix B of the Phase I ESA (see Appendix E.2)).

- A building was located in the southeastern portion of the site and contained two roll-up doors and three man-sized doors. All of the doors were locked, but one of the roll-up doors had been cut open. The area between the roll-up doors was a garage-type room while offices occupied the eastern half of the building. The interior contained an assortment of furniture and debris. The eastern-most portion of the building could not be observed from the entrance and was not entered due to safety concerns. Evidence of the storage or use of hazardous materials was not observed in the building.
- Two pits were observed in the eastern-central portion of the site and appeared to be remnants of sand traps for practice purposes. An artificial plateau was located along the southern boundary of the site, and was formerly used as the hitting gallery for the driving range. Remnants of grass were visible through the sand.
- Debris was observed scattered across the central and western portions of the site. The debris consisted of small fragments of gravel, wood, concrete, wire, glass, and other building materials. Hazardous materials or stained soils were not observed. Green dust-suppressant was observed in this area but was in poor condition.
- The parking lot along the northern boundary of the site contained two full-size manholes labeled as Sewer, and three small lids labeled as Sewer. This suggests that a septic system may be under the parking lot, and that the treated waste water may have been disposed of into three drywells at one point in time. Given the former hotel/recreational use of the site, the waste water system is not a Recognized Environmental Concern (REC).
- Three concrete pads were observed near the southeastern corner of the site, and may be slightly offsite to the south. Rust staining on the pads suggested a semi-permanent feature was on top of these pads.
- A bush was located northwest of the three concrete pads. Within that bush, remnants of a water supply well were observed. A 4-inch diameter PVC pipe was located south of the bush as well as a few smaller pipes. Soil staining was not observed.
- Evidence of the onsite manufacture, storage, or disposal of hazardous materials was not observed.

Information regarding the history of the project site was obtained from various sources, as listed in Table 11, *Summary of Historical Site Usage*.

Table 11 Summary of Historical Site Usage

Date	Source	Discussion
1958	USGS Topographic map	In the 1958 map, the site was depicted as undeveloped. The vicinity was depicted as undeveloped to the east, south and west. Ramon Road was a secondary highway along the north boundary. Properties north of Ramon Road were developed for residential purposes.
5-24-1974	Earth Systems aerial photo archive	In 1974, the site was undeveloped native desert. Small trees were located at the east and west boundaries of the rectangular portion of the site. The site vicinity was undeveloped to the west, south, and east. North of Ramon Road, the site vicinity was sparsely developed residential.
4-10-1980	Earth Systems aerial photo archive	In 1980, the western 2/3 of the rectangular portion of the site was a golf course driving range that was part of a larger hotel development that consisted of two buildings, a large swimming pool, five tennis courts, and associated parking area between the site and Ramon Road. The eastern 1/3 of the rectangular portion of the site remained undeveloped native desert. The vicinity remained largely undeveloped and sparsely developed residential properties.
1981	USGS Topographic map	The 1981 map depicts several structures to be located between the rectangular portion of the site and Ramon Road. The vicinity is generally unchanged.
2-4-1984	Earth Systems aerial photo archive	In 1984, the site remained generally unchanged from the 1980 photograph. East of the site, the adjacent RV park was being graded. A modest increase in residential development was noted to the north and a fully developed residential project had been constructed to the southwest.
1-19-1990	Earth Systems aerial photo archive	In 1990, site usage was unchanged, though the southern ¼ of the driving range was dry and lacking in grass/vegetation. In the vicinity to the west, the area remained undeveloped, the RV park to the east was fully occupied, and a new residential development was under construction to the south. The municipal water well to the southeast was present at the adjacent site.
2-6-1995	Earth Systems aerial photo archive	By 1995, the driving range appeared to be dry except that "target" features appearing to be either greens covered with grass, or sand traps containing water. The wind break tree line at the east boundary had been replaced with a block wall. The hotel complex was still present in to the north, but only a few vehicles were in the parking lot. The commercial development at the southeast corner of Date Palm and Ramon was complete but the property immediately west of the site remained undeveloped between the site and the shopping center.
3-11-2000	Earth Systems aerial photo archive	In 2000, the site and site vicinity were relatively unchanged from the 1995 photograph except that the "targets" on the driving range appeared to be sand traps.
9-27-2004	Google Earth	In 2004, the driving range was vegetated with grass with no sand traps. The east 1/3 of the rectangular portion of the site was a newly developed date grove. A new small building was offsite north of the date grove. The hotel and pool were still present to the north, but the tennis courts were no longer present.
6/5/2009	Google Earth	By 2009, the date grove and driving range appeared to have been abandoned and were dry and relatively barren. North of the site, the hotel appeared abandoned and the swimming pool was empty. A storage facility had been constructed immediately west of the site.

Source: *Table 1-1, Phase I Environmental Site Assessment, Earth Systems Southwest January 2014 (See Appendix E.1).*

Local Schools

The nearest school to the site is the Sunny Sands Elementary School, located approximately 0.5 miles north of the project site at 69-310 McCallum Way.

Public Airports/Private Airstrips

Palm Springs International Airport is located approximately 2.5 miles west of the project site at 3400 East Tahquitz Canyon Way. The project site is located within the Riverside County Airport Land Use Commission (RCALUC) Compatibility Plan Area, Zone E. The Bermuda Dunes Airport, a private airport, is located approximately 11.5 miles southeast of the site. The project site is not within that airport's Compatibility Plan Area.

Hazardous Waste Site

The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The site reconnaissance and records review conducted as part of the Phase I ESA did not find documentation or physical evidence of soil or groundwater impairments associated with the use of the project site, including past agricultural use. The ESA also did not find any asbestos on the project site. A review of regulatory databases maintained by county, State, and federal agencies found no documentation of hazardous materials violations or discharge on the project site. In accordance with American Society for Testing and Materials (ASTM) a review of regulatory agency records and available databases did not identify contaminated facilities within the appropriate ASTM search distances that would be expected to impact the site.

Regulatory Setting

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)

CERCLA, also known as the Superfund Act, was established in 1980 to provide a federal "superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. The EPA was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. There are no Superfund sites within the vicinity of the project site. All environmental cleanups and permitted hazardous material facilities are included in the Envirostor database, including CERCLA sites, and none were found within the City of Cathedral City. The Evirostor database was accessed on December 8, 2016 for the proposed project.

National Pollution Discharge Elimination (NPDES) Permit

The NPDES program regulates municipal, industrial, and construction stormwater discharges. The necessary NPDES permits required for project construction and operation are a Stormwater Pollution Prevention Plan (SWPPP) and a Water Quality Management Plan (WQMP). The developer will be responsible for preparing a SWPPP that will include a list of BMPs to be implemented during construction in order to prevent soil erosion and discharge of construction-related pollutants that

could contaminate nearby water sources. Prior to commencement of any site disturbance, the applicant must file a Notice of Intent with the State Water Resources Control Board and obtain a Waste Discharge ID Number to be attached to the SWPPP. The SWPPP must be implemented during construction at the site, and a copy of the SWPPP must be maintained on-site during construction. A WQMP is also required to be prepared for the project, which includes BMPs to be implemented during post-construction operations at the project site. More information on these requirements is included in Section 3.9, *Hydrology and Water Quality.*

3.8.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.8 HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident condition involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☒	☐	☐
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?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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 of where residences are intermixed with wildlands?	☐	☐	☐	☒

a. Less Than Significant Impact with Mitigation Incorporated. During long-term operation of the project, the following list of hazardous materials and brand named fertilizers would be stored or used at the project site.

Californicus	Chelated Iron	Nitrate Nitrogen
Swirskii	Chelated Magnesium	Seaweed
Hypoaspis	Chelated Zinc	Soluble Magnesium
Atheta	Cobalt	Soluble Potash
Beauvaria bassiana	Copper	Sulfur
Procidic2	Humic Acid	Sulfur Combined
Ammoniacal Nitrogen	Hydrogen peroxide	Vitamin B-1
Available Phosphate	Iron	Vitamin C
Boron	Magnesium	Water Insoluble Organic Nitrogen
Calcium	Molybdenum	Water Soluble Organic Nitrogen
Chelated Calcium	Monosilicic Acid	Yucca Extract
Chelated Copper	Montmorillonite Clay	Soluble Organic Nitrogen
Chelated Manganese		

The proposed project will not generate hazardous waste materials, but it will generate agricultural wastewater which contains nitrates, and other raw elements. Therefore, all run off water from the cultivation process that cannot be recycled will be stored in a separate storage tank and will be picked up by a third party licensed hazardous waste hauler. Additionally, the project applicant has developed a Hazard Communication Plan (HCP) per State Occupational Safety and Health Administration (OSHA) Standards. The plan includes protocol for classifying hazardous materials on the project site and communicating information concerning hazards and appropriate protective measures to employees. During project operations, the HCP will be available at the facility manager's office. The facility manager will be responsible for ensuring all containers are labeled appropriately, ensuring Material Safety Data Sheets (MSDS) are updated and available to inform employees of the types of chemicals used, and to ensure that employees are appropriately trained for their specific tasks in handling the containers/chemicals.

To reduce the amount of wastewater generated by the project, the applicant plans to install a reverse osmosis water treatment system. Reverse osmosis is a purification technology that uses a semipermeable membrane and high pressure to remove ions, molecules, and larger particles from water. Irrigation water infused with fertilizers will be recycled and run through the reverse osmosis system to remove fertilizers and reused again for cannabis irrigation once the water is treated to an acceptable level. The reverse osmosis process can create concentrated levels of total dissolved solids (TDS) and brine solution accumulation in filtering that must be removed and disposed of by a third party licensed hazardous waste hauler. Mitigation Measure HAZ-1, requires the applicant to contract with a licensed hazardous waste hauler that will be responsible for removing all hazardous wastewater and solid waste generated at the project site.

Implementation of the HCP and Mitigation Measure HAZ-1 will ensure that onsite procedures are in place for the proposed project in order to reduce hazards to public in regard to routine transport, use, or disposal of hazardous waste.

b. Less Than Significant Impact with Mitigation Incorporated. The accidental release of hazardous materials is possible during construction and operation of the proposed project.

Construction Impacts [AN2]

Construction of the proposed cannabis cultivation and dispensary facility would not require the routine transport, use, or disposal of hazardous materials other than building and paving materials. During construction, vehicles and equipment would require refueling and maintenance, however these activities are the responsibility of individual contractors and would not occur onsite or, if allowed onsite, would occur in a specific staging area where any spill of fuel oil or related material would be limited and containable through a cleaning and removal contingency plan. This requirement would be spelled out in detail in BMPs contained in the project's SWPPP that must be prepared by the applicant prior to any site disturbance (Regulatory Requirement RR-5). The SWPPP is discussed further in Section 3.9, *Hydrology and Water Quality*.

During site reconnaissance performed for the Phase I ESA (Appendix E.2), no recognized environmental concerns (RECs) (i.e., asbestos containing materials) were encountered. A water supply well was observed in the southeastern portion of Parcel 4, a few feet north of three concrete pads. Wells are not considered RECs by themselves, however, wells that are no longer in use are recommended to be properly destroyed or abandoned in accordance with State and county regulations. The applicant concluded that the existing well is located within the boundaries of the proposed buildings and therefore will be decommissioned prior to construction, as implemented through Mitigation Measure HAZ-2. Two new wells will be drilled on the property location and will be located in bunkers in the front parking lot, with a lid on top so that the bunker can be parked on (no loss of parking spots). The wells will be approximately 100 feet apart. Any wells to be constructed or abandoned onsite will require a permit with the Riverside Country Department of Environmental Health, to ensure they comply with State well standards. With implementation of Mitigation Measure HAZ-2 and compliance with all requirements under the Construction General Permit [AN3](RR-5 including the Storm Water Prevention Plan) , construction of the project will result in a less than significant impact with regard to release of hazardous materials.

Operational Impacts

Due to hazardous waste that will be used and stored on the project site, the applicant will be required to submit a Hazardous Materials Business Plan (HMBP) to the County of Riverside Department of Environmental (see Mitigation Measure HAZ-3). The Riverside County Fire Department, as the State Certified Unified Program Agency (CUPA) in the Coachella Valley, is

responsible for review and approval of the site specific HMBP that 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.

c. **No Impact.** There are no schools within 0.25 miles of the project site. The nearest school is Sunny Sands Elementary School, located approximately 0.5 miles north of the project. Therefore, the project would not result in impacts to schools due to hazardous materials handling or emissions and no mitigation is required.

d. **No Impact.** The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The site reconnaissance and records review conducted as part of the Phase I ESA did not find documentation or physical evidence of soil or groundwater impairments associated with the previous use of project site, including past agricultural use. A review of regulatory databases maintained by county, State, and federal agencies found no documentation of hazardous materials violations or discharge on the project site. A review of regulatory agency records and available databases did not identify contaminated facilities within the appropriate ASTM search distances that would be expected to impact the site. Therefore, no impact would occur.

e. **Less Than Significant Impact with Mitigation Incorporated.** The nearest airport, Palm Springs International Airport, is located approximately 2.5 miles west of the project site. According to the Riverside County Airport Land Use Compatibility Plan (ALUCP) Policy Document, Compatibility Criteria for land use actions are used to assess whether a land use plan, ordinance, or development proposal is compatible with a nearby airport. These criteria are to be used in conjunction with the compatibility map and policies for each airport.

Appendix E.3, *ALUC Compatibility Criteria and Map*, includes a copy of the Criteria Matrix and the Map of the Palm Springs International Airport Compatibility Zones. Map PS-1, Compatibility Map Palm Springs International Airport, shows that the project site is within Airport Land Use Compatibility Zone E. Table 2A in the ALUCP defines ALUC Zone E as a zone with no restriction on the number of residential dwelling units, restricts hazards to flights such as tall objects and visual or electronic forms of interference, or any land use that would cause the attraction of birds to increase.

The proposed project includes development of two structures (maximum 27 feet in height) that will contain medical cannabis cultivation facilities, a dispensary, and accessory uses. No cell towers or other tall objects are proposed and no large water features are proposed that would attract birds.

Because the project is located within the Riverside County Airport Land Use Compatibility Plan (ALUCP) Palm Springs International Airport area, the project was reviewed and approved by

the Riverside County Airport Land Use Commission (ALUC) under staff review. The determination letter, dated January 5, 2017, is included as Appendix E.4. Mitigation Measures HAZ-4 through HAZ-7 were identified by the ALUC to ensure that the project is compatible with the ALUCP. With implementation of these mitigation measures, the proposed project would be compatible with the operation of the Palm Springs International Airport and impacts would be a less than significant impact.

f. **No Impact.** There are no private air strips within the vicinity of the project site; therefore, no impacts would result from the implementation of the proposed project.

g. **Less Than Significant Impact.** The proposed project will be developed on a 19.14-acre site south of Ramon Road, surrounded by existing development. The Site Plan (Exhibit 6) shows two project access points that intersect Ramon Road. The main access point for the project site will be an entrance that lines up with the existing alignment of El Toro Road, north of Ramon Road. A traffic signal will be installed at the intersection of the main project access and Ramon Road. An additional access point to the project site will be located near the eastern property boundary. This access point will be designed as a right-in right-out only access. Proposed site access has been designed per City Standards and to complement existing traffic patterns in the area. Therefore, the project would not interfere with the City's existing emergency response or evacuation plans. For further discussion in this regard refer to Section 3.16, *Traffic and Transportation.*

h. **No Impact.** The project site is located within an urbanized area and is not near any wildland fire area. The State of California Department of Forestry and Fire Protection (CDFFP) website provides maps that display areas at high risk for wildland fires. The project site is not located within or near any areas at high risk for wildland fires as shown on the CDFFP maps. Therefore, the project would not result in any impacts relating to exposure of people or structures to significant risk from wildland fires.

3.8.4 Mitigation Measures

HAZ-1 Prior to commencing operation of the cannabis cultivation facility (Certificate of Occupancy), the applicant will be required to show the City proof of contract with a licensed hazardous waste hauler that will be responsible for removing all hazardous wastewater and solid waste generated at the project site.

HAZ-2 The applicant shall submit a Permit to the City from Riverside County Department of Environmental Health for an Abandoned Well Site prior to the issuance of a Grading Permit to ensure that the existing water supply well in Parcel 4 is properly destroyed/abandoned in accordance with State and County regulations.

HAZ-3 Prior to operation of the project, the applicant shall electronically submit a HBMP to the California Environmental Reporting System, to be reviewed and approved by the Riverside County Fire Department (CUPA).

HAZ-4 Any outdoor lighting installed shall be hooded or shielded to prevent either spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.

HAZ-5 In compliance with the determination letter from Riverside County ALUC, the following uses shall be prohibited:

- Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with the airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at the airport, other than an FAA approved navigational signal light or visual approach slope indicator.
- Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at the airport.
- Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, artificial marshes, trash transfer stations that are open on one or more sites recycling centers containing putrescible wastes, and construction and demolition debris facilities.)
- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

HAZ-6 The “Notice of Airport in Vicinity” sign attached to Appendix E.4 shall be provided to all potential purchasers of the property.

HAZ-7 Any new retention or detention basin on the site shall be designed to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around detention basin(s) that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.

3.8.5 Regulatory Requirements

RR-5 In accordance with the Construction General Permit, a SWPPP must be prepared prior to issuance of construction permits and implemented during all construction activities.

3.8.6 Level of Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 through HAZ-7 and Regulatory Requirement RR-5 will ensure the project-related impacts are reduced to less than significant levels.

3.9 Hydrology and Water Quality

3.9.1 Sources

- The Altum Group, *Preliminary Hydrology Report, Tract Map No. 31261 – Ramon 19,* December 15, 2016. (Appendix F)
- Federal Emergency Management Agency, *FEMA Flood Map Service Center, Panels* 06065C1579G and 06065C1587G, accessed December 19, 2016, https://msc.fema.gov/portal.

3.9.2 Environmental Setting

Federal and State Oversight

The federal Clean Water Act (CWA) is the principal federal law that provides for the protection of water quality. The primary objectives of the CWA are to, *restore and maintain the chemical, physical, and biological integrity of the Nation's waters, and to make all surface waters fishable and swimmable*. The U.S. Environmental Protection Agency (EPA) is the designated federal agency responsible for implementing the CWA and it has further delegated authority to the State Water Resources Control Board (SWRCB) and associated Regional Water Quality Control Boards (RWQCB) for compliance with the CWA. The SWQCB is sanctioned under the California Porter-Cologne Water Control Act, in providing the agency with the authority to adopt, review, and revise policies for all waters of the State as well as directing the RWQCB's around the State to develop regional basin plans. Relevant programs identified in the CWA include the National Pollution Discharge Elimination System (NDPES) program which regulates discharge of pollutants from known sources (point sources), as well as non-point sources, into waters of the United States through the issuance of permits. As part of the NPDES program, a Storm Water Pollution Prevention Plan (SWPPP) must be prepared for construction activities affecting greater than one acre because the discharge of stormwater during construction is considered a non-point source of water pollution.

Surface water quality is the responsibility of each RWQCB agency, water supply and wastewater treatment agencies, and City and County governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of wastewater discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water.

The City of Cathedral City is located in the Colorado River Basin Regional Water Quality Control Board (CRWQCB). The Colorado River Basin Region covers approximately 20,000 square miles in the

southeastern portion of California, including the Coachella Valley and other areas in Eastern Riverside County, eastern San Bernardino County, all of Imperial County and parts of San Diego County. It is bounded on the east by the Colorado River; on the south by the Republic of Mexico; and on the west and north by several mountain ranges.

Flooding

The project site is relatively flat with minimal vegetation including a few desert trees, bushes, and some annual vegetation on the eastern portion of the site. Flood Insurance Rate Map (FIRM) Panels 06065C1579G and 06065C1587G show that the project site is located with Zone X, which includes areas of 0.2 percent annual chance of flood, areas of one percent annual chance flood with average depths of one foot or with drainage areas less than one square mile, and areas protected by levees from one percent annual flood chance. Exhibit 21, *FEMA Flood Zone Designation*, illustrates that the project site and surrounding area are not within a designated flood zone.

The project site is located in the Coachella Valley where yearly rainfall is typically four inches or less. While annual rainfall is low, storm events, especially during the summer monsoonal season, can be very intense. There are no storm drains or retention basins currently developed on-site. The site was previously developed as a driving range and a date palm grove and was graded to drain inward, so that all storm flows are retained on-site, and thus prevents run-off from entering onto drainages in the vicinity.

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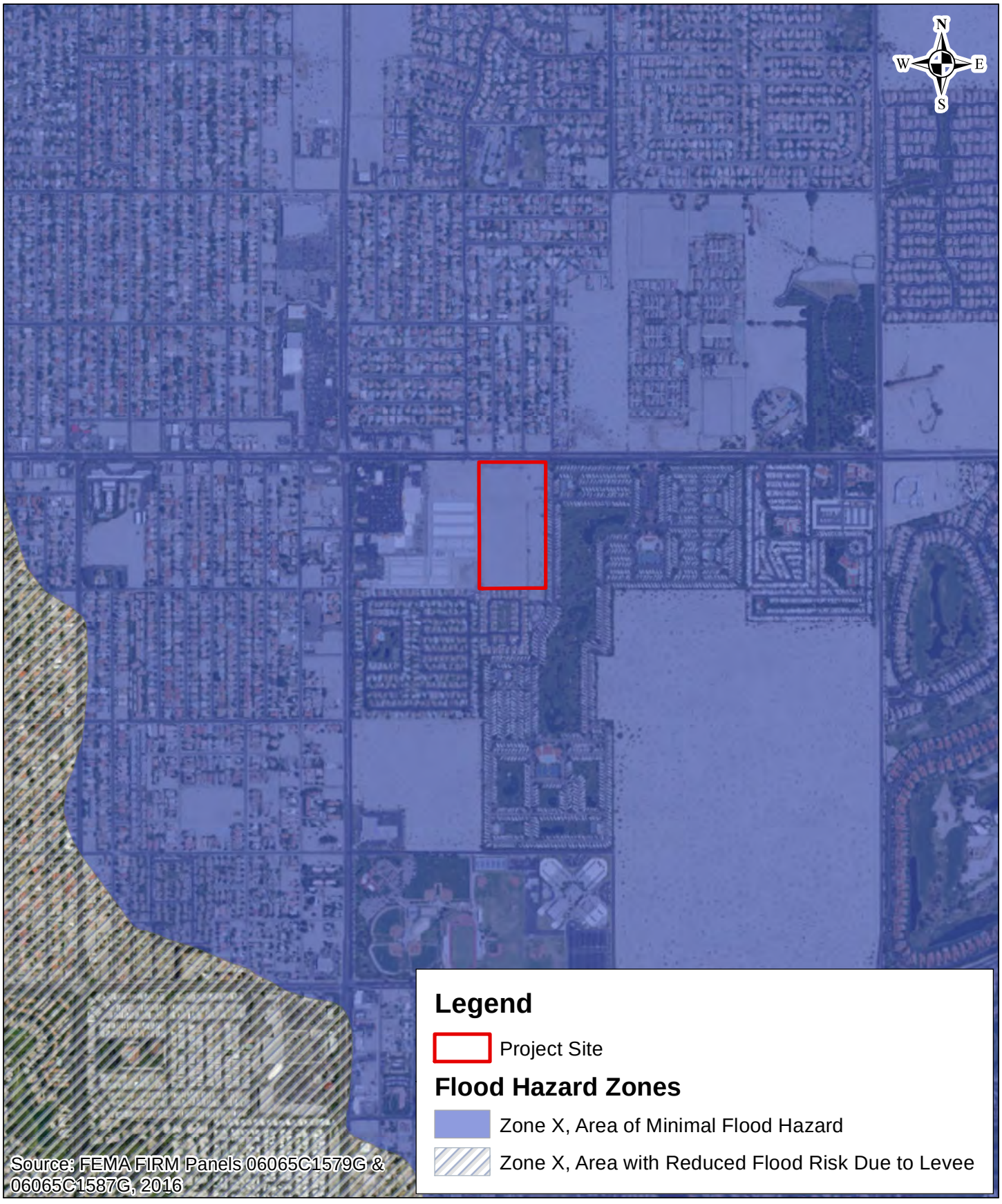

1 inch = 0.25 miles

The Altum Group

FEMA Flood Zone Designation
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 21

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3.9.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.9 HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
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)?	☐	☒	☐	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantially additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
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?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
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?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

a. Less Than Significant Impact. The project applicant will be required to comply with all State, regional, and local regulatory standards and permitting requirements regarding water quality

and storm water discharge to eliminate or reduce non-storm water discharges to storm water systems and other waters of the US.

SWPPP

Prior to commencement of grading, the project developer (or contractor) must prepare a SWPPP, and submit a Notice of Intent (NOI) to the SWRCB who will issue a Waste Discharge Identification (WDID) number for the project (Regulatory Requirement RR-5). A copy of the SWPPP and WDID must be available on site for review and implementation during all phases of construction. A SWPPP is meant to be a living document that can be periodically revised or updated to reflect actual construction conditions which is allowed under the State's General Construction Permit. The SWPPP must describe best management practices (BMPs) for the control and treatment of runoff from the project site for the following:

- Soil Stabilization (erosion control);
- Sediment Control;
- Tracking Control;
- Wind Erosion Control;
- Construction Site Management;
- Non-Stormwater control; and
- Waste Management and Materials Pollution Control.

A copy of the SWPPP prepared by a Qualified SWPPP Developer (QSD) and implemented by a Qualified SWPPP Practitioner (QSP) must be maintained and updated at the project site and available for review during the entirety of the construction period.

WQMP

Grading the site will direct future flows to the retention basin that will be developed in the southern portion of the project site to prevent flooding onsite; post construction. The entire 19.14 acres will be disturbed during construction. The post-construction impervious area is 16.75acres, or approximately 87.5 percent of the site. Pervious area is 2.39 acres, or approximately 12.5 percent of the site. The project site will be developed with a medical cannabis cultivation and dispensary facility; and ancillary uses such as parking lots, drive aisles and a retention basin. As part of the development of the site, the developer is responsible for ensuring that the site does not contribute to the downstream degradation of water quality.

The project must comply with water quality requirements under the Whitewater River Watershed Municipal Separate Storm Sewer System (MS4) Permit. The CRWQCB has issued Wastewater Discharge Requirements (WDRs) for discharges from the MS4 within the Whitewater River Watershed into waters of the United States (Whitewater flood control channel). The Riverside County Flood Control and Water Conservation District, County of Riverside, Coachella Valley Water District (CVWD) and incorporated cities within the

Whitewater River Basin are all co-permittees under this MS4 Permit. To comply with the City's Waste Discharge Requirements (WDRs) project developers must prepare and implement a Water Quality Management Plan (WQMP) (Regulatory Requirement RR-6). The intent of a WQMP is to provide information related to a project's generation and mitigation of water quality pollutants and assessment of hydrological impacts. The City requires projects to submit a project specific WQMP prior to the approval of an application for a grading permit. The WQMP contains information related to expected pollutants and hydrology impacts, and must show how the project will comply with the MS4 permit requirements relating to discharges of pollutants and non-stormwater discharges, and minimization of urban runoff from impacting receiving waters to the Maximum Extent Practicable (MEP).

The project-specific WQMP must include BMPs to be implemented during post-construction operations at the project site to ensure compliance with RWCQB water quality standards. The property owner will ensure that the WQMP is amended as appropriate to reflect up-to-date conditions on the site.

Compliance with the requirements for the preparation and implementation of a SWPPP and WQMP will ensure that impacts associated with water quality and compliance with the requirements associated with storm water treatment would be less than significant.

b. **Less Than Significant Impact with Mitigation Incorporated.** Domestic water supplied by CVWD will be used for the service areas of both Buildings One and Two, including: sanitary facilities, kitchen, processing, etc. Water for cultivation purposes and onsite landscaping will be supplied by two wells that the applicant proposes to operate onsite. The proposed medical cannabis cultivation and dispensary facility will result in additional water demands. The total estimated water demand for the proposed project is approximately 71.68 acre-feet per year. The estimated CVWD water demand for the project is approximately 5.7 acre-feet per year and well water demand is approximately 65.98 acre-feet per year. Ultimately, the well water used for the proposed project will impact the underlying groundwater at the project site which is within the Whitewater sub-basin of the Coachella Valley groundwater basin.

Domestic Water

According to the 2015 CVWD Urban Water Management Plan, CVWD has a current water supply of 101,723 acre-feet per year. The estimated domestic water demand for the service areas of the project will be approximately 0.005 percent of the current CVWD groundwater supply. Therefore, due to the minimal increase in CVWD domestic water demand from the proposed project, the proposed project will not result in CVWD significantly increasing groundwater pumping which will result in a less than significant impact.

Private Wells

The majority of water demand for the proposed project will be supplied by two private wells to be developed on the project site. The wells will supply water for indoor cannabis cultivation

and outdoor landscaping. The applicant estimates the total well water demand to be 65.98 acre-feet per year. Private well water is not included in the UWMP prepared by CVWD, but use of private wells can contribute to overdraft of groundwater basins in the area. CVWD developed a Replenishment Assessment Charge (RAC) that requires entities that use a well or multiple wells that collectively pump more than 25 acre-feet of water from the aquifer annually to pay an assessment charge to contribute to CVWD groundwater replenishment efforts. Since the project is anticipated to demand greater than 25 acre-feet annually for cultivation and landscape irrigation uses, the applicant will be required to pay the RAC to contribute to CVWD's groundwater replenishment program and reduce impacts associated with overdraft of the aquifer. Mitigation Measure HWQ-1 requires the applicant to pay the RAC prior to commencement of well operation. Therefore, this impact would be less than significant with implementation of mitigation.

c. **Less Than Significant Impact.** The project site is located in the Coachella Valley where rainfall is low, typically four inches or less, however, storm events, especially during the summer monsoonal season, can be very intense. There are no storm drains or retention basins currently developed onsite. The project site is mostly vacant, and slopes mildly from the northwest to the southeast. Currently, storm flows enter the northern end of the project site and sheet flow to the southeast with the natural terrain of the site. With development of the proposed project, storm flow will follow this historic path via surface flow throughout the proposed commercial site which includes underground storm drains to convey flows to the proposed retention basin located toward the southerly end of the project. The site retention is designed to capture the 100-year three-hour storm event per Cathedral City drainage requirements. Flows in excess of the 100-year storm will exit the southeast portion of the project site via an established emergency overflow corridor, which continues southerly over surface streets within Outdoor Resorts, as storm flows have historically drained. Additionally, the site will be graded to guide any surface flow on the site to the retention basin as well.

The drainage design for the project and implementation of BMPs set forth in the WQMP will ensure that stormwater on the project site does not cause substantial flooding in the vicinity. Therefore, impacts in this regard will be less than significant.

d. **Less Than Significant Impact.** Construction of the proposed project will create potential for a short-term increase in the likelihood of erosion on the project site. Preparation and implementation of the SWPPP for the project will reduce impacts associated with short-term erosions during construction.

Construction of the proposed project will result in the majority of the project site, approximately 87.5 percent, being developed with impervious surfaces. Therefore, development will reduce the amount of area that can be impacted by erosion during storm events. Additionally, the site will be designed to direct all storm flows toward a retention basin at the southern end of the site, and will be designed to capture a 100-year three-hour

storm event per City of Cathedral City drainage requirements. Storm flows will enter the retention basin via underground storm drains onsite and surface flow. Furthermore, preparation and implementation of a project-specific WQMP (RR-6) will further reduce impacts associated with storm flows onsite. Therefore, project drainage design and implementation of a WQMP will ensure that onsite stormwater runoff does not cause substantial erosion in the vicinity. Therefore, impacts in this regard will be less than significant.

e. **Less Than Significant Impact.** The drainage system for the proposed project has been designed to direct stormflows in the historic path from northwest to southeast on the project site. Development of a retention basin onsite to capture a 100-year three-hour storm event will reduce the storm flow that currently discharges from the site to the southwest and enters the storm flow system on surface streets south of the project site. Development of the retention basin with onsite drainage improvements will reduce runoff water outside project boundaries, ultimately reducing the amount of storm water that enters the existing stormwater drainage system south of the project site. The location of the retention basin is shown in Exhibit 6 in Chapter 2, *Project Description*. Therefore, impacts will be less than significant.

f. **Less Than Significant Impact.** The medical cannabis cultivation process for the proposed project will include the application of fertilizers, as discussed in Section 3.8.3 a/b, which will cause contamination of the well water being used for irrigation. A reverse osmosis system will be installed on the project site to treat irrigation water. Any water that cannot be fully treated by two rounds of processing through the system will be stored in a separate storage tank and picked up by a third-party licensed hazardous waste removal company. Although contaminants will be introduced to well water onsite for irrigation, onsite water treatment and hazardous waste removal, will ensure that all contaminated water is contained and overall water quality will not be significantly impacted. It should be noted that the outdoor landscaping will not be impacted by any chemicals or hazardoui waste.

g-h. **No Impact.** The project site is relatively flat with minimal vegetation including a few desert trees, bushes, and some annual vegetation on the eastern portion of the site. FIRM Panels 06065C1579G and 06065C1587G show that the project site is located in Zone X, which includes areas of 0.2 percent annual chance of flood, areas of one percent annual chance flood with average depths of one foot or with drainage areas less than one square mile, and areas protected by levees from one percent annual flood chance. Therefore, development of the project will not place housing or structures within a 100-year flood hazard area.

i. **No Impact.** The project site is not near any existing levees or dams and will not expose people or structures to a significant risk of loss, injury or death involving flooding.

j. **No impact.** The project site is not located in an area prone to seiches, tsunamis, or mudflows due to its location in the Southern California desert region, away from the ocean or other large body of water.

3.9.4 Mitigation Measures

HWQ-1 Since the proposed private wells on site are anticipated to pump more than 25 acre-feet per year from the aquifer, the project applicant will be required to pay the Replenishment Assessment Charge (RAC) to CVWD before issuance of a certificate of occupancy to contribute to groundwater replenishment efforts. The applicant shall provide proof of payment to the City before issuance of proof of occupancy and before start of project operations.

3.9.5 Regulatory Requirements

RR-5 A SWPPP must be prepared prior to issuance of construction permits and implemented during all construction activities.

RR-6 A WQMP must be prepared and approved by the City prior to issuance of a grading permit. All BMPs in the WQMP must be implemented during operation of the project.

3.9.6 Level of Significance After Mitigation

Implementation of Mitigation Measure HWQ-1 will assist CVWD with its groundwater replenishment program to offset the groundwater proposed on-site. Compliance with Regulatory Requirements RR-5 and RR-6 will further reduce impacts on Hydrology and Water Quality. Therefore, this impact is less than significant.

3.10 Land Use and Planning

3.10.1 Sources

- Cathedral City Comprehensive General Plan, *Land Use Element,* June 2009.
- Coachella Valley Multiple Species Habitat Conservation Program, *Local Development Mitigation Fee, Fiscal Year 2016/17,* accessed December 23, 2016, http://www.cvmshcp.org/pdf%20files/LDMF_Schedule_FY_16_17MA.pdf.
- Cathedral City Municipal Code
- Agua Caliente Band of Cahuilla Indians Tribal Habitat Conservation Plan, August 2010, http://www.aguacaliente.org/downloads/thcp/thcp_report.pdf, accessed August 17, 2017.

3.10.2 Environmental Setting

As described in Chapter 2, Project Description, the only existing improvements on the project site are a building on Parcel 4 and a parking lot adjacent to Ramon Road on Parcels 1 and 2 (Parcel numbers shown in Exhibit 3 in Chapter 2, *Project Description)*. The site is currently vacant, except for remnants of the date grove and driving range that previously operated within the project site boundaries.

The project site has a zoning designation of Planned Community Commercial (PCC), which allows for development of a variety of commercial uses, hotels, nurseries, small recycling facilities, and restaurants. Several land uses are conditionally permitted in the PCC designation, including medical marijuana cultivation and dispensaries, as stated in Section 9.108.090 of the City's Municipal Code. The project site has a General Plan designation of General Commercial (CG), which allows development of land uses consistent with the PCC zoning designation. Zoning and General Plan Land Use designations for the project site and surrounding properties are illustrated in Exhibit 5, in Chapter 2, *Project Description*. Future development of the project site and all lands within Cathedral City are subject to: (1) land use and other related development goals and policies contained in the Cathedral City Comprehensive General Plan, and (2) codified regulations, standards and other criteria provided in the Cathedral City Municipal Code.

Surrounding Land Uses

Lands surrounding the project site consist of a variety of uses that are consistent with General Plan and Zoning designations within the City. Properties to the north and west of the project site are designated PCC. A storage facility is located directly west of the project site with a shopping center further west at the corner of Ramon Road and Date Palm Drive. Two dental offices are located directly north of the project site, across Ramon Road and multiple fast food restaurants are located northwest of the project site. The land east of the project site is designated Resort Residential (RR), developed as Outdoor Resort Palm Springs, a resort-style RV community. The land south of the project site is designated Multiple Family Residential (R2), developed as Desert Sands, a manufactured home community.

3.10.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.10 LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
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	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a. **No Impact.** The project site has remained unused since the closure of a previously operated driving range on Parcel 5 and a former hotel, which has been demolished, and parking area on Parcels 1-4. The site is currently vacant with the exception of a small building on Parcel 4 and a paved parking lot along the Ramon Road frontage. The development of the project would not physically divide an established community because the project site is surrounded by, but does not prevent access to, any of the existing adjacent land uses. Because the site is vacant and located between commercial uses on the west and residential to the east and south, development of the site would not divide any established communities. Exhibit 2 in Chapter 2, *Project Description,* shows the project site and surrounding land uses. Surrounding land uses include resort residential adjacent to the east, residential development to the south, and commercial development to the north and west. Therefore, the proposed development of a 489,099-square-foot cannabis cultivation facility and dispensary will not divide any established communities adjacent to the project site.

b. **Less Than Significant Impact.** The proposed project includes development of a medical cannabis cultivation facility and dispensary, internal circulation, parking and a retention basin. The site is zoned PCC and is designated CG on the General Plan Land Use Map. Per Section 9.108.090 of the Cathedral City Municipal Code, cannabis cultivation and dispensary site may be located within the PCC zone, following the issuance of a local license and granting of a CUP by the Planning Commission, per Section 9.108.040 of the City's Municipal Code. The zoning code also includes mandatory minimum setbacks from schools/daycares, East Palm Canyon Drive, and residential development, which were considered during design of the proposed project. The land use designation Resort Residential, located east of the project site is not a permitted residential designation in the City and, therefore, does not require a minimum setback from cannabis businesses like residences to the south and north of the project site.

The project applicant submitted a revised CUP application (CUP 16-013) to the City of Cathedral City on June 13, 2017. Approval of the CUP would allow for the development the medical cannabis cultivation facility and dispensary on a 19.14-acre site. Development would include construction of two buildings totaling 489,099 square feet. All cultivation would take place in a greenhouse portion of each building, totaling 454,128 square feet. The 3,175 square-foot dispensary would be located in Building One on the north end of the project site. The remaining space in each building would be dedicated to storage, processing, office space,

employee areas, and sanitary facilities. Approval of the CUP will include conditions of approval placed on the project to limit impacts on the surrounding residential uses.

For the proposed development, all activities will be conducted pursuant to the City's Municipal Code requirements and standards to avoid any conflict with any land use plan, policy, or regulation, resulting in a less than significant impact.

c. **No Impact.** As discussed in Section 3.4, Biological Resources, the project site is within the Agua Caliente Indian Reservation, which is within the THCP boundaries, within the Valley Floor Planning Area. The project site is not within a conservation area for the plan so on-site mitigation measures are not required for the benefit of sand-dependent species that are present in one portion of the VFPA. Instead, the project applicant is required to pay a mitigation fee that will fund Tribal acquisition and management of the THCP Habitat Preserve, implemented with Regulatory Requirement RR-2. ~~The City of Cathedral City has adopted the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) which encompasses the Coachella Valley region of Riverside County. According to the CVMSHCP Conservation Area Map, the project site is not within a designated conservation area and will have no impact on conservation areas. The project is still subject to pay development impact fees which are currently set at $5,451 per acre which will contribute to ongoing mitigation of species covered under the CVMSHCP (RR-2).~~ Therefore the project will have no impact on the habitat conservation plan.

3.10.4 Mitigation Measures

The project was found to have a less than significant ~~no~~ impact on Land Use and Planning. Therefore, no mitigation is required.

3.10.5 Regulatory Requirements

RR-2 The project applicant is required to pay the THCP Valley Floor Planning Area ~~CVMSHCP~~ Mitigation Fee prior to issuance of building permits.

3.10.6 Level of Significance After Mitigation

Not Applicable.

3.11 Mineral Resources

3.11.1 Sources

- Cathedral City Comprehensive General Plan, *Open Space and Conservation Element,* 2009.

3.11.2 Environmental Setting

According to the City's General Plan, Exhibit IV-10 (Mineral Resources in the Planning Area), the majority of the City including the project site is within Mineral Resource Zone 3 (MRZ-3), which designates areas containing mineral resources where the significance cannot be evaluated from available data. MRZ-3 generally refers to areas where development has the limited ability to determine the presence or amount of mineral resources.

3.11.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.11 MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a/b. No impact. The General Plan Energy and Mineral Resources Element describes sand and gravel, found throughout the valley, as the sole locally important mineral resources. The project site does not have any known mineral resources except for sand and gravel and no mineral production occurs on or adjacent to the site. Mineral production is not compatible with the project area due to urbanization and location of residential uses on two sides of the project site. Therefore, the project will not result in any adverse impacts to a significant mineral resource.

3.11.4 Mitigation Measures

No potentially significant impacts regarding Mineral Resources were identified for the proposed medical cannabis development. Therefore, no mitigation measures are required.

3.11.5 Regulatory Requirements

No Regulatory Requirements are necessary to reduce impacts associated with Mineral Resources.

3.11.6 Level of Significance After Mitigation

Not applicable.

3.12 Noise

3.12.1 Sources

- Kunzman Associates, Inc., *Ramon 19 Cultivation Noise Impact Analysis*, May 1, 2017. (Appendix G)

3.12.2 Environmental Setting

Sensitive receptors that may be affected by the project include Outdoor Resorts – Palm Springs RV Park located adjacent to and east of the project site and the single-family detached residential dwelling units located adjacent and to the south of the project site. The closest RV resort units and the closest single-family detached residential dwelling units are located approximately 10 feet from the eastern and southern property lines, respectively. Additional single-family detached residential dwelling units are located north of the site across Ramon Road.

Existing Noise Levels

Three 10-minute daytime noise measurements were taken for the project between 12:00 PM and 1:00 PM on December 14, 2016. Ambient noise levels range between 45.7 to 67.4 dBA Leq. Exhibit 22, *Noise Measurement Locations,* shows the measurement locations at the north end of the project site near the existing Outdoor Resorts development, at the southern end of the project site near the existing single-family detached residential dwelling units, and near the northwest corner of the project site. The dominant noise source at the measurement locations was local traffic from nearby roadways. Table 12, *Short-Term Noise Measurement Summary (dBA)*, shows the ambient noise levels recorded.

Table 12 Short-Term Noise Measurement Summary (dBA)

Daytime								
Site Location	**Time Started**	**Leq**	**Lmax**	**Lmin**	**L(2)**	**L(8)**	**L(25)**	**L(50)**
1	12:21 PM	67.4	76.9	43.3	73.8	72.1	69.2	65.2
2	12:39 PM	45.7	49.2	43.9	47.6	46.6	46.0	45.6
3	1:02 PM	62.5	78.7	52.6	70.8	65.6	61.7	59.0

Source: Kunzman Associates Inc., Ramon 19 Cultivation Noise Impact Analysis, Table 3, May 1, 2017.

Noise Terminology

Sound is a pressure wave created by a moving or vibrating source that travels through an elastic medium such as air. Noise is defined as unwanted or objectionable sound. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and in extreme circumstances, hearing impairment.

The unit of measurement used to describe a noise level is the decibel (dB). The human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, the "A-weighted" noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA. Decibels are measured on a logarithmic scale, which means a doubling of the energy of a noise source, such as a doubled traffic volume, would increase the noise levels by 3 dBA; halving of the energy would result in a 3 dBA decrease.

Average noise levels over a period of minutes or hours are usually expressed as dBA Leq, or the equivalent noise level for that period of time. For example, $Leq_{(3)}$ would represent a 3-hour average. When no period is specified, a one-hour average is assumed.

1 inch = 200 feet

The Altum Group

Noise Measurement Locations
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 22

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Noise standards for land use compatibility are addressed in the Cathedral City General Plan Noise Element. They are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (Ldn). CNEL is a 24-hour weighted average measure of community noise. CNEL is obtained by adding five decibels to sound levels in the evening (7:00 PM to 10:00 PM), and by adding ten decibels to sound levels at night (10:00 PM to 7:00 AM). This weighting accounts for the increased human sensitivity to noise during the evening and nighttime hours.

It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA; that a change of 5 dBA is readily perceptible, and that an increase (decrease) of 10 dBA sounds twice (half) as loud. This definition is recommended by Caltrans publication, Transportation's Traffic Noise Analysis Protocol for New Highway and Reconstruction Projects.

The difference in sound (noise) levels from the exterior to the interior of a structure indicates the sound transmitted loss through the window, door, or wall. A Sound Transmission Class (STC) rating specifies the noise level reduction that windows, doors, wall construction materials, and insulation provide. Typically, higher STC ratings indicate greater interior noise reductions.

Vibration

Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of groundborne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Groundborne noise is an effect of groundborne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Peak particle velocity (PPV) is the term most commonly used to describe vibration. Table 13, *Vibration Source levels for Construction Equipment,* shows the PPV of some common construction equipment. Typically, groundborne vibration is readily perceptible at 0.08 PPV. Off-site sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible groundborne noise or vibration.

Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Recreational Vehicle (RV) motor homes to the east (Outdoor Resorts RV Park) and manufactured homes to the south are in the immediate vicinity of proposed project construction activities and thus would respond to construction vibrations with varying results. A further analysis of this impact is discussed in detail below in Section 3.12.3b.

Table 13 Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 in soil	66
(slurry wall)	0.017 in rock	75
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Kunzman Associates Inc., Ramon 19 Cultivation Noise Impact Analysis, Table 1, May 1, 2017.

Noise Standards

State Regulations

State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. Title 24 of the California Code of Regulations, also known as the California Building Standards Code, establishes building standards applicable to all occupancies throughout the state. The code provides acoustical regulations for both exterior-to-interior sound insulation, as well as sound and impact isolation between adjacent spaces of various occupied units.

Local Regulations

City of Cathedral City Standards

The City of Cathedral City General Plan Noise Element provides standards that are intended to guide location of future noise generators. The City utilizes guidelines to gauge the compatibility of land uses relative to existing and future noise levels. These are shown in Table 14, *Land Use Compatibility for Community Noise Exposure Guidelines*. Based on these guidelines, single-family detached residential dwelling units are considered to be normally acceptable in noise environments of up to 60 dBA CNEL and conditionally acceptable in noise environments that reach up to 70 dBA CNEL. New construction projects in areas where future noise levels are expected to range between 55-70 dBA CNEL should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design.

Table 14 Land Use Compatibility for Community Noise Exposure Guidelines

Land Use Category	Community Noise Exposure Ldn or CNEL dB			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential-Low Density, Single-Family, Duplex, Mobile Homes	50-60	60-65	65-75	75-85
Residential-Multiple Family	50-60	60-65	65-75	75-85
Transient Lodging-Motel, Hotels	50-65	65-70	70-80	80-85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-60	60-65	65-80	80-85
Auditoriums, Concert Halls, Amphitheaters	NA	50-65	NA	65-85
Sports Arenas, Outdoor Spectator Sports	NA	50-70	NA	75-85
Playgrounds, Neighborhood Parks	50-70	NA	70-75	75-85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-70	NA	70-80	80-85
Office Buildings, Businesses, Commercial and Professional	50-67.5	67.5-77.5	75-85	NA
Industrial, Manufacturing, Utilities, Agriculture	50-70	70-75	75-85	NA

Source: Office of Planning and Research, California, General Plan Guidelines, October 2003.

NORMALLY ACCEPTABLE - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

CONDITIONALLY ACCEPTABLE - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

NORMALLY UNACCEPTABLE - New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

CLEARLY UNACCEPTABLE - New construction or development should generally not be undertaken. NA: Not Applicable

Source: Kunzman Associates Inc., Ramon 19 Cultivation Noise Impact Analysis, Table 4, May 1, 2017.

The City's noise ordinance (Chapter 11.96 of the Municipal Code) establishes community-wide noise standards that apply to noise generating land uses including business park zones and a wide range of industrial land uses as well as hours of operation for landscape and maintenance equipment, street and parking lot sweeper, and domestic power tools. Section 11.96.070 regulates disturbances from construction activity and restricts construction noise to the following the hours as shown in Table 15, *Cathedral City Noise Standards*.

Table 15 Cathedral City Noise Standards

October 1st through April 30th	
Monday-Friday	7:30 AM to 5:30 PM
Saturday	8:00 AM to 5:00 PM
Sunday	No Permissible Hours
State Holidays	No Permissible Hours
May 1st through September 30th	
Monday-Friday	6:00 AM to 7:00 PM
Saturday	8:00 AM to 5:00 PM
Sunday	No Permissible Hours
State Holidays	No Permissible Hours

Source: Cathedral City Municipal Code, Section 11.96.070.

Vibration Standards

The City of Cathedral City does not have a published vibration impact criteria. Caltrans provides guidance for the analysis of groundborne noise and vibration relating to transportation- and construction-induced vibrations and although the project is not subject to Caltrans oversight, the guidance serves as a useful tool to evaluate vibration impacts. The Caltrans Transportation and Vibration Guidance Manual recommends a maximum vibration level standard of 0.2 in/sec PPV for the prevention of structural damage to typical residential buildings.

Noise Modeling

Road Construction Noise Model (RCNM)

A worst-case construction noise scenario was modeled using the Federal Highway Administration's RCNM. RCNM utilizes standard noise emission levels for many different types of equipment and includes utilization percentage, impact, and shielding parameters.

Federal Highway Administration (FHWA) Traffic Noise Prediction Model

The FHWA Traffic Noise Prediction Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). Adjustments are then made to the REMEL to account for: total average daily trips (ADT), roadway classification, width, speed and truck mix, roadway grade and site.

Existing and Existing Plus Project vehicle mix were obtained from the project's traffic impact analysis (Kunzman, 2017). The City of Cathedral City does not have published vehicle/truck mixes or Day/Evening/Night (D/E/N) for use in acoustical studies. Vehicle/truck mixes and D/E/N splits for use in acoustical studies published by the Riverside County Department of Industrial Hygiene were utilized for noise modeling. Existing Plus Project vehicle mixes were calculated by adding the proposed project trips to existing conditions.

SoundPLAN

SoundPLAN (SP) acoustical modeling software was utilized to model project operational worst-case stationary noise impacts from the proposed project to adjacent sensitive uses (e.g., residences).

The future worst-case noise level projections have been modeled using reference sound level data for the various stationary on-site sources. The loading/unloading area was modeled as an area source with noise levels reaching up to 80 dBA. The parking lot was modeled with 370 parking stalls with an approximate turnover rate of 25 percent during peak hour. Noise levels associated with parking lots can reach peak levels of 80 dBA. Parking lot noise sources may include but are not limited to idling cars, doors closing, and starting engine noise.

3.12.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.12 NOISE – Would the project result in:				
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?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a. Less Than Significant Impact with Mitigation Incorporated. The project has the potential to generate noise due to construction and traffic noise. The Noise Impact Analysis prepared by Kunzman Associates, Inc. evaluated potential impacts from development of the proposed project.

Construction Impacts

The proposed project has the potential to cause short-term impacts to the adjacent land uses during the construction phase of the project. The grading/site preparation phase is widely recognized to be the loudest part of construction. Scrapers, backhoes, excavators, dozers, and trucks are all usually utilized during this phase. A typical cycle for these machines includes between 1 and 2 minutes of full power operation followed by 3 to 4 minutes of lower power. Table 16, *Typical Construction Equipment Noise Levels,* shows noise levels of equipment typically used during the construction phase.

Table 16 Typical Construction Equipment Noise Levels

Type of Equipment	Range of Maximum Sound Levels Measured (dBA at 50 feet)	Suggested Maximum Sound Levels for Analysis (dBA at 50 feet)
Rock Drills	83-99	96
Jack Hammers	75-85	82
Pneumatic Tools	78-88	85
Pumps	74-84	80
Dozers	77-90	85
Scrappers	83-91	87
Haul Trucks	83-94	88
Cranes	79-86	82
Portable Generators	71-87	80
Rollers	75-82	80
Tractors	77-82	80
Front-End Loaders	77-90	86
Hydraulic Excavators	81-90	86
Graders	79-89	86
Air Compressors	76-89	86
Trucks	81-87	86

Source: Kunzman Associates Inc., Ramon 19 Cultivation Noise Impact Analysis, Table 5, May 1, 2017.

The initial phase of construction would involve mass grading of the site, along with site development activities. Following site preparation activities, the project would include construction of buildings. Construction of the buildings would require the following phases: site development (fine grading, trenching, and paving), building construction, architectural coatings application, and paving associated with buildings. Mass site grading is expected to produce the highest construction noise levels. Grading of the site is estimated to require a grader, dozer, excavator, scraper, and water truck.

A worst case noise scenario was modeled utilizing the Road Construction Noise Model (RCNM) provided by the FHWA. All of the equipment was assumed to be operating within 200 feet of the property line (ranging from 25 to 200 feet from the property line). Assuming a use factor

of 40 percent for each piece of equipment, unmitigated noise levels could reach 87.4 dBA Leq and 91.0 dBA Lmax at the property line.

As stated previously, construction noise is exempt from City of Cathedral City Municipal Code Chapter 11.96 as long as it does not occur between the hours of 5:30 PM and 7:30 AM during the months of October through April or between the hours of 7:00 PM and 6:00 AM during the months of May through September.

Nonetheless, the applicant shall implement Mitigation Measures NOI-1 through NOI-5, as suggested in the Noise Impact Analysis (Appendix G), to ensure that noise associated with short-term construction of the project will not cause substantial impacts to adjacent sensitive (i.e. residential) land uses.

Traffic Noise Impacts

Cathedral City's land use compatibility guidelines set forth noise/land use compatibility criteria for various land use types. The guidelines state that the proposed project would be "normally acceptable" in areas with noise levels up to 75 dBA CNEL, as shown in Table 14.

Acoustically significant roadways located adjacent to the project site include Ramon Road. In the vicinity of the proposed project site, Ramon Road is classified as an Arterial Highway in Cathedral City's General Plan. In order to evaluate if vehicle traffic noise associated with Ramon Road Buildout may impact the project, the FHWA Traffic Noise Prediction Model - FHWA-RD-77-108 was utilized to model buildout/future noise levels at the site. Buildout Year 2018 (with Project) conditions were utilized to model the nosiest scenario.

Buildout worst-case traffic noise levels are expected to reach up to 75 dBA CNEL at 100 feet from the centerline of the road. Table 17, *Buildout Noise Contours*, shows the build-out noise contours based on distance from Ramon Road.

Table 17 Buildout Noise Contours

Roadway	Segment	CNEL at 100 feet (dBA)[1]	Distance to Contour (feet)			
			70 dBA CNEL[1]	65 dBA CNEL[1]	60 dBA CNEL[1]	55 dBA CNEL[1]
Ramon Road	Date Palm Drive to El Toro Road	75.5	358	1,133	3,583	11,331

Source: Kunzman Associates Inc., Ramon 19 Cultivation Noise Impact Analysis, Table 10, May 1, 2017.

Notes:

1. Exterior noise levels calculated 5-feet above pad elevation, perpendicular to subject roadway.

The proposed project is consistent with City noise/land use compatibility criteria as no on-site buildings are located within 100 feet of the centerline. Therefore, impacts associated with traffic noise will be less than significant.

Operational Impacts

The worst-case stationary noise was modeled utilizing the SoundPLAN model. Noise sources associated with the proposed parking areas, and loading and unloading activities were included in the model. The future worst-case noise level projections have been modeled using reference sound level data for the various stationary on-site sources. The loading dock was modeled as an area source with noise levels reaching up to 80 dBA. Noise levels associated with the parking lots were determined based on a 25 percent turnover during peak hour. [AN4] The parking lot was modeled with 370 parking spaces. Noise associated with parking lots include, but are not limited to idling cars/trucks, trucks diesel engines, exhaust systems, trailer coupling, air brakes, warning signal, doors closing, and starting engine noise. Noise associated with the evaporative cooling facilities include the fan exhaust noise when in operation. Implemented through Mitigation Measure NOI-2, the project applicant shall incorporate Whisper Quiet Fan Systems into the project design.

Project stationary noise sources at the nearest sensitive receptor may result in noise levels ranging between 41.7 to 52.3 dBA CNEL. Exhibit 23, *Project Operational Noise Levels,* illustrates the project's worst case stationary noise impacts that were derived from SoundPLAN, an acoustical modeling software capable of evaluating stationary noise sources (e.g., parking lots, loading/unloading, etc.). Based on the worst-case stationary modeling prepared for the project, the proposed project is not expected to exceed the City's 60 dBA CNEL "normally acceptable" level at the nearest sensitive receptors and therefore the project is consistent with the City's Noise Element. Furthermore, project operational noise will not cause interior noise levels to exceed 45 dBA Leq at any sensitive receptors. Therefore, the project is consistent with applicable Municipal Ordinance and General Plan standards. [AN5]

Construction and Operational impacts have potential to negatively affect adjacent residential uses. With implementation of Mitigation Measures NOI-1 through NOI-5 and RR-7, noise impacts will be less than significant.

b. **Less Than Significant Impact With Mitigation Incorporated.** Vibration levels in the project area may be influenced by construction. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels. The nearest structure to the project site is located approximately 10 feet east of the project site within the RV Resort. The nearest existing residential structure to the project site is located approximately 10 feet to the south of the project site. RVs and single family dwelling units were analyzed equally, as RVs are not anticipated to be impacted greater by vibration than single-family dwelling units. Ultimately, vibration impacts on RVs would be less because the rubber wheels on the RV would mitigate vibration.

Primary sources of vibration during construction would be bulldozers. As shown in Table 13, a large bulldozer could produce up to 0.089 PPV at 25 feet, which is readily perceptible without mitigation. At a distance of 50 feet, a bulldozer would yield a worst-case 0.015 PPV (in/sec), which is slightly within the threshold of perception and below any risk or architectural damage. A vibration impact would generally be considered significant if it involves any construction-related or operations-related impacts in excess of 0.2 +inches per second (in/sec) PPV.

Annoyance-related impacts associated with the project would be short-term and would only occur during site grading and construction activities. Construction equipment is anticipated to be located at least 50 feet or more from any existing sensitive receptor. To ensure that groundborne vibration associated with the intermittent use of construction equipment is kept to a minimum, mitigation measures NOI-1 and NOI-2 must be implemented during construction activities. This will require construction equipment staging areas are set up to create the greatest distance between construction equipment and sensitive receptors and require equipment to be set up so noise is emitted away from sensitive receptors. The project is anticipated to have a maximum vibration of 0.089 PPV without mitigation within 25 feet from a sensitive receptor. The required mitigation will ensure that equipment operating within 25 feet of a sensitive receptor will be below 0.2 PPV, which will result in short-term annoyance-related impacts but no risk of architectural damage. Annoyance-related impacts would be short-term and would only occur during site grading and construction activities. Therefore, temporary vibration levels associated with project construction would be less than significant.

c. **Less Than Significant Impact.** During project operations, noise associated with traffic in the area is the main source of noise associated with the project. A worst-case project generated traffic noise level was modeled utilizing the FHWA Traffic Noise Prediction Model - FHWA-RD-77-108. Roadway input parameters including average daily traffic volumes (ADTs), and speeds is shown in Table 18, *Project Average Daily Traffic Volumes and Roadway Parameters*.

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Source: Kunzman Associates, Inc., 2017

The Altum Group

Project Operations Noise Study
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 23

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Table 18 Project Average Daily Traffic Volumes and Roadway Parameters

Roadway	Segment	Average Daily Traffic Volume[1]		Posted Travel Speeds (MPH)	Site Conditions
		Existing	Existing Plus Project		
Date Palm Drive	north of Ramon Drive	23,300	23,500	45	Hard
	south of Ramon Drive	24,300	24,500	45	Hard
Ramon Road	Date Palm Drive to El Toro Road	26,600	27,200	50	Hard
	El Toro Road to De Vall Drive	24,300	25,000	50	Hard
De Vall Drive	north of Ramon Drive	8,700	8,800	45	Hard
	south of Ramon Drive	8,600	8,800	45	Hard

Source: Kunzman Associates Inc., Ramon 19 Cultivation Noise Impact Analysis, Table 6, May 1, 2017.

Notes:

1. Average daily traffic volumes obtained from the Ramon 19 Cultivation Traffic Impact Analysis prepared by Kunzman Associates, Inc. (April 2017).

A project is considered to have a significant noise impact where it causes an adopted noise standard to be exceeded at the project site or for adjacent sensitive receptors. General considerations for community noise environments are that a change of over 5 dBA is readily noticeable when the existing noise level is less than 60 dBA and, therefore, is considered a significant impact. Increases in the ambient noise level between 3 dBA and 5 dBA are noticed when existing noise levels are between 60 dBA and 65 dBA, therefore a significant impact would occur under these conditions. Changes in community noise levels greater than 1.5 dBA are noticeable when the existing noise level is greater than 65 dBA; therefore a significant impact would occur.

The potential off-site noise impacts caused by an increase of traffic generated by operation of the proposed project on the nearby roadways were calculated for the following scenarios: Existing Year (without Project) and Existing Year (with Project). Table 19, *Change in Existing Noise Levels Along Roadways as a Result of Project (dBA CNEL),* compares the Existing and the Existing Plus Project scenario and shows the change in traffic noise levels as a result of the proposed project. The project is anticipated to change the noise level a nominal amount (approximately 0.0 to 0.1 dBA CNEL) along the analyzed roadway.

Table 19 Change in Existing Noise Levels Along Roadways as a Result of Project (dBA CNEL)

Roadway	Segment	CNEL at 100 Feet dBA[1]			
		Existing Without Project	Existing Plus Project	Change in Noise Level	Potential Significant Impact
Date Palm Drive	north of Ramon Drive	73.5	73.5	0.0	No
	south of Ramon Drive	73.7	73.7	0.0	No
Ramon Road	Date Palm Drive to El Toro Road	74.8	74.8	0.1	No
	El Toro Road to De Vall Drive	74.4	74.4	0.1	No
De Vall Drive	north of Ramon Drive	69.2	69.2	0.0	No
	south of Ramon Drive	69.2	69.2	0.0	No

Source: Kunzman Associates Inc., Ramon 19 Cultivation Noise Impact Analysis, Table 9,May 1, 2017.

Notes:

1. Exterior noise levels calculated 5-feet above pad elevation, perpendicular to subject roadway.

The 0.1 dBA CNEL increase along the subject roadways where the level is above 65 dBA CNEL is considered not significant as an increase of 1.5 or more would need to occur before the impact would be considered significant.

d. **Less Than Significant Impact With Mitigation Incorporated.** As discussed in response a. above, construction noise associated with the project may result in a significant impact from a temporary or periodic increase in ambient noise levels in the project vicinity. However, with the implementation of NOI-1 through NOI-5 and RR-7, the project will not result in a significant noise impact due to a temporary increase in ambient noise levels.

e. **No Impact.** The project is approximately 2.3 miles east of the Palm Springs International Airport and is located within the ALUCP. The project site is not located within the 60 dBA CNEL noise contour of the ALUCP (Riverside County ALUCP 2005). Therefore, there will be no impact related to location within the ALUCP.

f. **No Impact.** The project is not located within the vicinity of a private airstrip and would not expose persons to excessive noise levels. The project would have no impact related to location near a private air strip.

3.12.4 Mitigation Measures

NOI-1 During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.

NOI-2 The project applicant shall incorporate Whisper Quiet Fan Systems into the project design.

NOI-3 The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the project site during all project construction.

NOI-4 The construction contractor shall prohibit the use of music or sound amplification on the project site during construction.

NOI-5 The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.

3.12.5 Regulatory Requirements

RR-7 All construction activities shall adhere to the hours presented below as required by Section 11.96.070 of the Cathedral City Noise Ordinance.

October 1st through April 30th	
Monday-Friday	7:30 AM to 5:30 PM
Saturday	8:00 AM to 5:00 PM
Sunday	No Permissible Hours
State Holidays	No Permissible Hours
May 1st through September 30th	
Monday-Friday	6:00 AM to 7:00 PM
Saturday	8:00 AM to 5:00 PM
Sunday	No Permissible Hours
State Holidays	No Permissible Hours

3.12.6 Level of Significance After Mitigation

With implementation of Mitigation Measures NOI-1 through NOI-5 and Regulatory Requirement RR-7, noise impacts associated with project construction and operation would be less than significant.

3.13 Population and Housing

3.13.1 Sources

- California Department of Finance, Report E-5 City/County Population and Housing Estimates 1/1/2016, accessed December 13, 2016, http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.
- Cathedral City Comprehensive General Plan, 2013-2021 *Housing Element Update,* February 19, 2015.

3.13.2 Environmental Setting

The California Department of Finance (Report E-S) estimated Cathedral City's population to be 51,200 by 2010 and 54,040 by 2016, which represents an average annual growth of 1.1 percent over the 5-year period between 2010 and 2016.

The project site is currently vacant except for an existing building and parking lot in the northern portion of the site that are no longer in use. Surrounding land uses include Outdoor Resort Palm Springs to the east, Cathedral Village Self Storage to the west, residential development to the south, and commercial development across Ramon Road to the north. There is a parcel of vacant land adjacent to northwest portion of the project site that is zoned for commercial use.

Housing

According to the 2000 Census, there were a total of 17,813 total housing units in Cathedral City as shown in Table 20, *Housing Characteristics – 2000 vs. 2016*. It should be noted that approximately 49.3 percent of all dwelling units were single-family homes, and 14.7 percent were mobile homes, RVs or trailers. Based on the 2016 Department of Finance E-5 Report, there were a total of 21,080 total housing units in Cathedral City, and the majority of homes were single-family homes. The total number of housing units in Cathedral City increased by approximately 15.5 percent between 2000 and 2016.

Table 20 Housing Characteristics – 2000 Vs. 2016

	2000		2016[1]	
Unit Type	**Number of Units**	**% Total Units**	**Number of Units**	**% Total Units**
Single-Family Detached	8,785	49.3%	11,748	55.7%
Single-family Attached	2,575	14.5%	2,845	13.5%
Multi-family, 2-4 Units	2,270	12.7%	2,268	10.8%
Multi-family, 5 or more Units	1,559	8.7%	1,744	8.3%
Mobile Home, RV, Trailer, Other	2,624	14.7%	2,475	11.7%
TOTAL	**17,813**	**100.0%**	**21,080**	**100.0%**

Source: City of Cathedral City General Plan/Housing Element, Table III-7, 2014.
Notes:
1. Updated information from Department of Finance E-5 Report, 2016.

Regional Housing Needs Assessment (RHNA)

SCAG is responsible for allocating housing needs to each jurisdiction in its region, including Cathedral City. A local jurisdiction's "fair share" of regional housing need is the number of additional housing units that will need to be constructed in the jurisdiction to accommodate the forecast growth in the number of households, to replace expected demolitions and conversion of housing units to non-housing uses, and to achieve a vacancy rate that allows for healthy functioning of the housing market. The RHNA Allocation for Cathedral City between 2014 and 2021 is 600 housing units. The allocation is divided into five income categories. The allocation is further adjusted to avoid an over-concentration of lower-income households in any one jurisdiction. Cities must also plan for the needs

of extremely low-income households. Table 21, *Cathedral City RHNA Allocation 2014-2021,* shows the Regional Housing Needs Allocation (RHNA) for the City of Cathedral City by each income category.

Table 21 Cathedral City RHNA Allocation 2014-2021

Income Category	Number of Units
Above Moderate	254
Moderate	110
Low	95
Very Low	70
Extremely Low*	71
TOTAL	600

Source: City of Cathedral City General Plan/Housing Element, Table III-19, 2014.

Notes:

1. *50 percent of the Very Low income category pursuant to State law.

3.13.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.13 POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Less Than Significant Impact. The project consists of a Conditional Use Permit (CUP) and Lot Merger to allow for the development of two buildings, totaling 489,099 square-feet for the purpose of medical cannabis cultivation and dispensary, and ancillary uses, on the 19.14-acre site. The proposed project has the potential to generate 325 employees upon completion in 2020. Using the State's factor of 3.09 persons per household, the project has a worst-case scenario potential to generate 1,005 new residents in the City.

The project site is an infill project in an area where existing residential and commercial development already exists. The potential 1,005 new residents would represent 1.85 percent of the City's 2016 population. The City has a vacancy rate of 17.2 percent as of January 2016 (Department of Finance E-5 Report, 2016), which translates to approximately 3,600 vacant

households. At the State's factor of 3.09 persons per household, the potential new residents associated with the project would require approximately 325 households. Therefore, the City would have enough housing for new residents. Additionally, the 2014-2021 RHNA allocated 600 new households to accommodate the forecast growth, which will increase overall available housing in the City by 2021. Most of the project's workforce is predicted to come from the City or the surrounding area and would not be moving into the City, resulting in less new residents than the worst-case scenario. As an infill site, the project site is served by existing infrastructure (i.e. roads and utilities). The proposed project would not induce substantial population growth in the area either by building a large number of new homes, or by extending infrastructure into an area not previously served. Therefore, the project will result in a less than significant impact, either directly or indirectly, on population growth.

b-c. **No Impact.** The project is proposed to be located on a vacant parcel within the City. Therefore, development of the project would not displace any homes or persons.

3.13.4 Mitigation Measures

No potentially significant impacts regarding Population and Housing were identified for the proposed project. Therefore, no mitigation measures are required.

3.13.5 Regulatory Requirements

No Regulatory Requirements are necessary to reduce project impacts on Population and Housing.

3.13.6 Level of Significance After Mitigation

Not Applicable.

3.14 Public Services

3.14.1 Sources

- Cathedral City Comprehensive General Plan, Fire and Police Protection Element, 2009.
- Cathedral City Comprehensive General Plan, Schools and Libraries Element, 2009.
- Palm Springs Unified School District, *School Facilities Needs Analysis,* March 7, 2014, https://www.psusd.us/sites/default/files/SFNA%202014%20FINAL.pdf.
- City of Cathedral City Website, *Estimated Development Fees,* Accessed December 22, 2016, http://www.cathedralcity.gov/index.aspx?page=458.
- Discover Cathedral City Website, Measure HH and P, Accessed December 22, 2016, http://www.discovercathedralcity.com/measures-hh-and-p-cathedral-city/.

3.14.2 Environmental Setting

Fire Protection

Cathedral City operates its own fire and emergency services from three stations located within the City. These stations contain: three front-line engines, two reserve engines, one state Office of Emergency Services (OES) vehicle, one water tender, four ambulances, and one hazardous materials (HAZMAT) vehicle. The closest fire station to the site is located at 32-100 Desert Vista Road, approximately 0.5 miles from the project site.

Police Protection

The Cathedral City Police Department is located at 68-700 Ave Lalo Guerrero, approximately 2.25 miles southwest of the project site. The department currently employs 47 sworn officers and 26 non-sworn support staff.

Schools

The Palm Springs Unified School District (PSUSD) provides kindergarten through 12th grade educational services and facilities to Cathedral City. Schools that serve the area where the project site is located are Sunny Sands Elementary School, James Workman Middle School, and Rancho Mirage High School. PSUSD currently charges School (developer) fees to offset impacts on influx of students from new developments. The Level 1 residential development fee is $3.48 per square foot and the commercial development fee is $0.56 per square foot, effective June 2016 (PSUSD Website).

Parks

See Section 3.15, *Recreation* for discussion on parks.

Other Public Facilities

The Riverside County Library System provides library services to Cathedral City. Participation in the Riverside County Library System enables library users to access all libraries within the system, which includes 34 libraries and 2 bookmobiles. The Cathedral City Library is the only library within the City limits and is located at 33-520 Date Palm Drive, just over half a mile from the proposed project site.

3.14.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.14 PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
new or physically altered governmental facilities, need for new of 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?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities:

Fire Protection

Less Than Significant Impact. The nearest fire station to the project site is at 32-100 Desert Vista Road, approximately 0.5 miles west of the site. The City's General Plan states that because the City is a low fire risk, its ratio of firefighters to population is 1 firefighter per 1,000 residents. The fire department is currently operating within that ratio. The proposed project could increase the population in the City by approximately 1,005 people. This increase in population, as well as the addition of structures to a vacant site, could increase the need for additional firemen, but not additional facilities. The developer will be required to pay a City Facilities Impact Fee (RR-8) to help fund any additional resources necessary for public services, including fire protection. Additionally, Measure P was passed in 2016 to apply an additional tax of $25.00 per square foot of cultivation space and $1.00 for every gram of cannabis concentrate and every unit of cannabis-infused product (RR-9). The additional tax money will be used to help fund municipal services, including police protection and crime suppression services, fire prevention and suppression services, emergency medical services, park, recreation, and library facilities. With payment of City Facilities Impact Fees and the additional taxes from Measure P, the City can fund additional fire protection services if necessary. Therefore, the proposed project will have a less than significant impact on the fire department's ability to provide fire protection services to the City.

Police Protection

Less Than Significant Impact. As indicated by the Cathedral City Police Department, the desirable ratio of officers to population is 1.5 officers per 1,000 residents. According to the City's General Plan, the current ratio is 1.4 officers per 1,000 residents. The proposed project

has potential to increase the population in the City by approximately 1,005. If all these residents represent new residents to the City rather than people moving around the City from one type of housing to another or residing in an adjacent City, this may represent an increase in the need for police protection services, but not additional facilities. The developer will be required to pay a City Facilities Impact Fee (RR-8) to help fund additional resources necessary for public services, including police protection. Additionally, Measure P (RR-9), imposing an additional tax of $25.00 per square foot of cultivation space and $1.00 for every gram of cannabis concentrate and every unit of cannabis-infused product will help fund municipal services, including police protection and crime suppression services, fire prevention and suppression services, emergency medical services, park, recreation, and library facilities. With payment of City Facilities Impact Fees and the additional taxes from Measure P, that City can fund additional police protection services if necessary, so the proposed project will have no significant impact on the department's ability to provide law enforcement services to the City.

In addition, pursuant to Municipal Code Section 9.108.050, the applicant is required to prepare a security plan and install security measures for the project that protects employees and patients. The required security plan will ensure security at the project site, further reducing the need for police protection.

Schools

Less Than Significant Impact. The project would involve the construction of a cannabis cultivation facility and a dispensary, whose work force has the potential to increase the student population. These students may or may not be new to the district, as the majority of the employees for the proposed project are anticipated to be local Coachella Valley residents. The PSUSD requires the payment of a developer fee (RR-10) to offset impacts from new development on schools. The current PSUSD developer fee for commercial/industrial development is $0.56/square foot. The developer would be responsible for paying the developer fee to the school district in order to offset the impacts of an increased population and the project would result in a less significant impact on schools.

Parks

Less Than Significant Impact. See Section 3.15, *Recreation* for discussion of parks.

Other Public Facilities

Less Than Significant Impact. The Cathedral City Public Library is located at 33-520 Date Palm Drive, just over half a mile from the proposed project site. The project is not anticipated to impact libraries or other facilities of benefit to the community because the potential increase in the population represents about 1.85 percent of the City's 2016 population. The payment of the City Facilities Impact Fee (RR-8) will be used towards any additional resources necessary due to the increase in population, including public City facilities. Additionally, Measure P tax (RR-9) money would be generated by this project and would be used for various municipal

services such as police protection, fire protection, parks and library facilities. Therefore, the project will have a less than significant impact on public services in the City.

3.14.4 Mitigation Measures

No potentially significant impacts regarding Public Services were identified for the proposed project. Therefore, no mitigation measures were required.

3.14.5 Regulatory Requirements

RR-8 The applicant must pay the Facilities Impact Fees prior to issuance of building permits.

RR-9 The applicant must pay the Measure P tax for cannabis cultivation during operation of the project.

RR-10 The applicant must pay the Level developer fee to PSUSD prior to issuance of grading permits.

3.14.6 Level of Significance After Mitigation

With payment of required fees and taxes to be used to improve public services within the City, the project will have a less than significant impact on Public Services.

3.15 Recreation

3.15.1 Sources

- Cathedral City Comprehensive General Plan, *Parks and Recreation Element*, 2009.

3.15.2 Environmental Setting

Cathedral City operates eight public parks throughout the City. The nearest park to the site is Patriot Park, located approximately 0.75 miles south of the project site at Date Palm Drive and Dinah Shore Drive. This park is adjacent to the Cathedral City Library and the Big League Dreams Sports Parks. The six-acre park is a grass area with scattered trees, two shade structures, two barbeque stands, and two sculptures. The City's largest park is Dennis Keat Soccer Park, located approximately one mile north of the project site. This 17-acre park is a large open grass area that can accommodate multiple full-sized soccer fields, picnic tables under a shade structure, a restroom facility, five exercise stations, and a wellness fitness track along the perimeter.

3.15.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.15 RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☒	☐

a. **Less Than Significant Impact.** Although the majority of the employees for the proposed project are anticipated to be local from within the Coachella Valley, the proposed project does have potential to increase the population of Cathedral City, thereby increasing impacts on local parks and recreation facilities. Based on a family of 3.09 persons per household (State Department of Finance E-5 Report, 2016), the proposed cannabis cultivation and dispensary facility has the worst-case scenario potential to increase the population of the City by approximately 1,005 residents. The construction of the project could increase demands on nearby recreation facilities. Other than City parks, there are large regional parks in the area including the Santa Rosa and San Jacinto Mountain National Monument and the Mount San Jacinto State Park that fringe the south side of East Palm Canyon Drive, which provide recreational opportunities to residents as well. Although the project could result in a minor increase in the use of the nearby recreational sites, it would not cause substantial deterioration of these facilities. Additionally, the project applicant would be required to pay the appropriate Park and Recreational Facility Fees to the City that provide funding for maintenance and additional development of parks with population increase. Therefore, with payment of Park and Recreational Facility Fees, the project will result in a less than significant impact on nearby recreational facilities.

b. **Less Than Significant Impact.** The project involves the construction of a medical cannabis cultivation and dispensary facility in two buildings, totaling 489,099 square-feet. Additional development on the project site will include a large retention basin in the southeastern corner of the property and internal circulation and parking for the development. The project includes a walking path and passive recreation area for employees within the proposed retention basin to be located in the southeast corner of the project site. Environmental impacts resulting from the construction and long-term use of the walking path and recreation area as well as landscape and hardscape areas would be minor in nature and the retention basin is within the

area already analyzed throughout this Initial Study. Therefore, the project will result in a less than significant impact resulting from construction of recreational facilities.

3.15.4 Mitigation Measures

No potentially significant impacts regarding Recreation Facilities were identified for the proposed project. Therefore, no mitigation measures were required.

3.15.5 Regulatory Requirements

No Regulatory Requirements are necessary to reduce impacts associated with Recreational Resources.

3.15.6 Level of Significance After Mitigation

Not Applicable.

3.16 Transportation/Traffic

3.16.1 Sources

- Kunzman Associates, Inc., *Ramon 19 Cultivation Traffic Impact Analysis,* April 20, 2017. (Appendix H)

3.16.2 Environmental Setting

The project site is located south of Ramon Road between Date Palm Drive and Via Campanile/Outdoor Resorts in Cathedral City. During the scoping of the traffic analysis, the City staff recommended that the following intersections be studied:

Date Palm Drive (NS) at:
Ramon Road (EW) - #1

Cathedral Village (NS) at:
Ramon Road (EW) - #2

El Toro Road (NS) at:
Ramon Road (EW) - #3

Project Access (NS) at:
Ramon Road (EW) - #4

Via Campanile/Outdoor Resorts (NS) at:
Ramon Road (EW) - #5

Da Vall Drive (NS) at:
Ramon Road (EW) - #6

Exhibit 24, *Study Area Intersections*, shows the locations of these intersections.

Analysis Methodology

The trip generation rates for the cultivation facility were based on the maximum number of employees, trailer deliveries per week, and cube trucks/vans as supplied by the project applicant. To provide for a "worst-case" analysis, the traffic engineer assumed that all employees would arrive during the morning peak hour and depart during the evening peak hour. All weekly trailer deliveries and cube truck/vans were assumed to occur daily with all trucks arriving during the morning peak hour and departing during the evening peak hour. A passenger car equivalent factor of 3.0 was applied to the trailer deliveries and a factor of 1.5 was applied to the cube truck/van deliveries.

As shown in Table 22, *Project Trip Generation*, the proposed development with a maximum of 325 employees, plus visitor trips to the dispensary, plus deliveries is projected to generate a total of approximately 1,814 daily vehicle trips, 404 morning peak hour, and 509 of which will occur during the evening peak hour. Note: The Traffic Impact Analysis (TIA) studied the project with a clinic, which has now been removed from the project. However, since those trips were considered to be minimal, the TIA did not require revision.

The analysis of traffic impacts from the proposed project was based on an evaluation of the existing and forecasted traffic conditions in the vicinity of the site "with" and "without" the project. The following analysis years are considered in this report:

- Existing Conditions
- Existing Plus Project Conditions
- Opening Year (2018) Conditions
- Horizon Year (2035) Conditions

The roadway elements analyzed were dependent on both the analysis year (either the project Opening Year or Horizon Year) and project generated trips. The identification of the study area and the intersections and roadway segments requiring analysis were based on an estimate of the two-way traffic volumes on the roadway segments near the project site.

Delay

Delay refers to the time consumed while traffic is impeded in its movement by some element over which it has no control, usually expressed in seconds per vehicle. To calculate delay, the volume of traffic using the intersection is compared with the capacity of the intersection. The technique used to assess the capacity needs of an intersection is known as the Intersection Delay Method.

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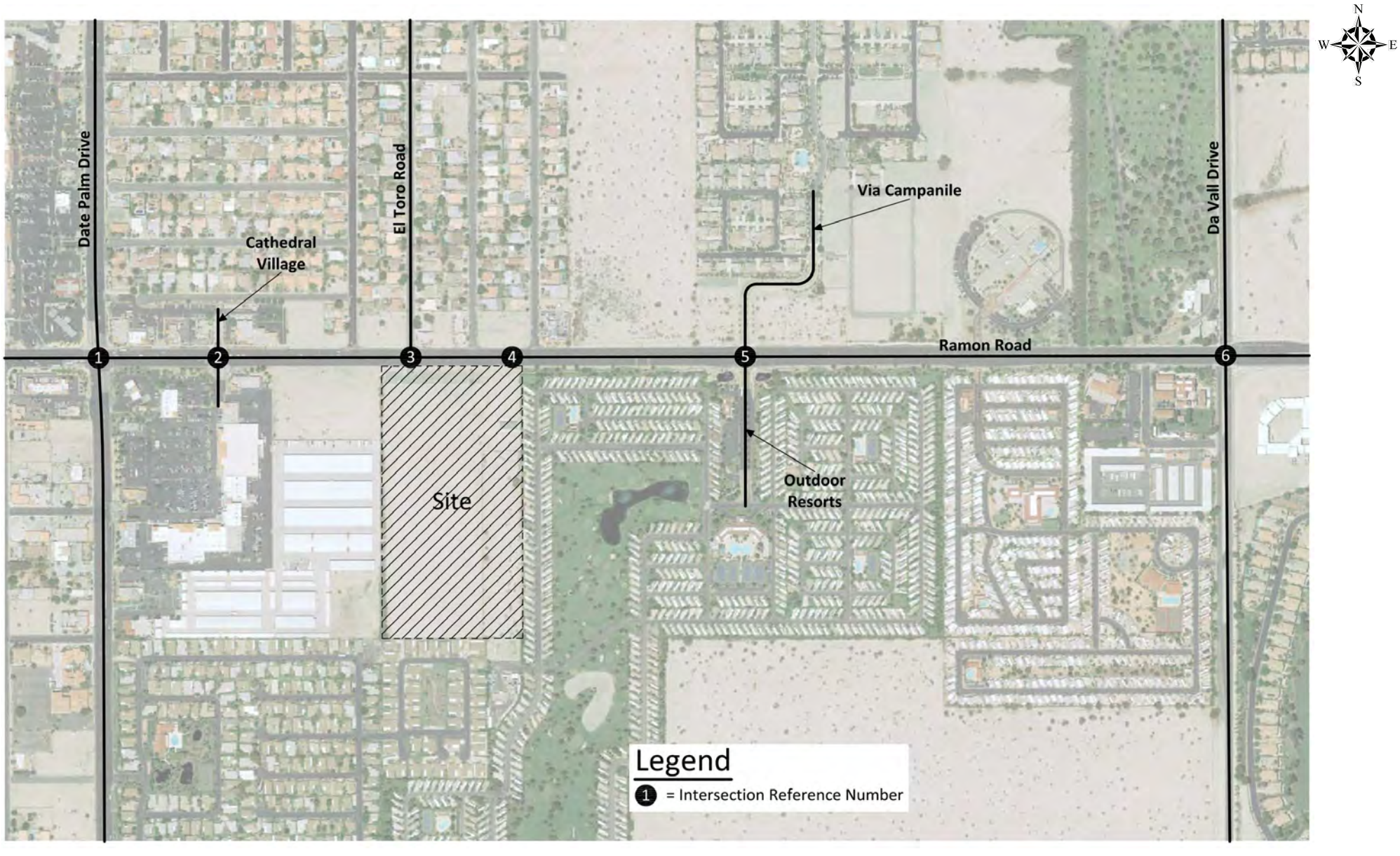

Source: Kunzman Associates, Inc., 2017

The Altum Group

Study Area Intersections
Ramon 19 Cultivation and Dispensary Initial Study

Exhibit 24

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Table 22 Project Trip Generation

Land Use	Quantity	Units[1]	Morning Peak	Evening Peak	Daily
Trip Generation Rates					
Dispensary[2]	3.340	TSF	12.52	44.26	324.36
Clinic	1.336	TSF	2.39	3.57	36.13
Employees[3]	325	EMP	1.05	1.05	2.00
Trailer Deliveries[4]	3	TR	3.00	3.00	6.00
Cube Trucks[5]	5	TR	1.5	1.5	3.00
Trips Generated					
Dispensary	3.340	TSF	42	147	1,083
Clinic	1.336		4	4	48
Employees	325	EMP	341	341	650
Trailer Deliveries	3	TR	9	9	18
Cube Trucks	5	TR	8	8	15
		TOTAL	**404**	**509**	**1,814**

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 3, April 2017.
Notes:

1. TSF = Thousand Square Feet; EMP = Employees; TR = Trucks
2. Source: Marijuana Store Trip Generation and Parking Demand Rate Study prepared by Fox Tuttle Hernandez Transportation Group (March 1, 2016) and New Trip Generation Data on Marijuana Dispensaries prepared by Mike on Traffic (September 23, 2016).
   Dispensary trip generation rates in thousand square feet derived from the weighted average of the two aforementioned analyses:
   - Morning: ((0.3846 x 5.58) + (0.6154 x 16.86)) = 12.52
   - Morning Inbound split: (((0.3846 x 0.59) + (0.6154 x 0.65)) x 12.52) = 7.85 Morning Outbound split: (((0.3846 x 0.41) + (0.6154 x 0.35)) x 12.52) = 4.67
   - Evening: ((0.3846 x 27.64) + (0.6154 x 54.64)) = 44.26
   - Evening Inbound split: (((0.3846 x 0.49) + (0.6154 x 0.49)) x 44.26) = 21.69 Evening Outbound split: (((0.3846 x 0.51) + (0.6154 x 0.51)) x 44.26) = 22.57
   - Daily: ((0.3846 x 199.69) + (0.6154 x 402.27)) = 324.36
3. The maximum employees for cultivation is 325 employees. This includes all personnel on site including security. To provide for a "worst-case" analysis, it has been assumed that every employee will enter the site during the morning peak hour and exit the site during the evening peak hour. A buffer of 0.05 was added for morning outbound and evening inbound to account for any drop-off or pick-up trips, etc.
4. The project site is expecting two to three 53' trailer deliveries per week. To provide for a "worst-case" analysis, it has been assumed that the delivery trucks will enter the project during the morning peak hour and exit during the evening peak hour, daily. A passenger car equivalent of 3.0 was used.
5. The project site is expecting two to three 53-foot cube truck deliveries per week. Cube trucks or vans per week. To provide for a "worst-case" analysis, it has been assumed that five cube trucks or vans will enter the project during the morning peak hour and exit during the evening peak hour, daily. A passenger car equivalent of 1.5 was used.
6. The Traffic Analysis includes a Medical Clinic which has been subsequently removed from the project and remains in the Traffic Analysis. The area will be used for Cultivation and will not impact the conclusions of the Traffic Study since the Medical Clinic would be a more intensive use.

Level of Service

Level of Service (LOS) is a qualitative measure of several factors which include 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 23, *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 23 Roadway Level of Service Descriptions

Level of Service	Quality of Traffic Flow
A	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	Reasonably unimpeded operations at average travel speeds 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.
C	Traffic operations are stable. However, mid-block maneuverability may be more restricted than in LOS B. Longer queues, adverse signal coordination, or both may contribute to lower average travel speeds of about 50% of the average free-flow speed for the arterial classification. Motorists will experience some appreciable tension while driving.
D	Borders on a range where small increases 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, high volumes, or some combination of these factors. Average travel speeds are about 40% of the free-flow speed. For planning purposes, this level-of-serve is the lowest that is considered acceptable.
E	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.
F	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: Cathedral City General Plan, Circulation Element, Table III-4, June 2009.

Opening Year (2018) Methodology

The Opening Year (2018) forecasts have been developed from the CVAG Traffic Model, which is currently used in the City for long range planning. The Opening Year (2018) traffic volumes have been interpolated from the Year 2035 traffic volumes based upon a portion of the future growth increment.

The average daily traffic volumes, particularly on the regional facilities, reflect the area-wide growth anticipated between now and Year 2035. The Opening Year (2018) and Year 2035 peak hour forecasts were refined using the daily forecasts, along with existing peak hour traffic count data collected at each analysis location.

To assess Opening Year (2018) Without Project traffic conditions, Opening Year (2018) forecasted turning movement traffic and average daily traffic volumes were combined with other development. Project traffic was then added to the Opening Year (2018) traffic conditions. The traffic analysis analyzed the project in one phase, opening in 2018, which is the worst-case scenario. Building one is anticipated to be completed and in operation by 2018 and building two operational by 2020.

Year 2035 Methodology

The Year 2035 Without Project traffic volumes were interpolated from the CVAG Traffic Model, which is currently used by Cathedral City for long range planning. The average daily traffic volumes, particularly on the regional facilities, reflect the areawide growth anticipated between now and Year 2035. The Year 2035 peak hour forecasts were refined using the daily forecasts, along with existing peak hour traffic count data collected at each analysis location.

To assess the Year 2035 With Project traffic conditions, Year 2035 daily traffic volumes were combined with other development. Project traffic was then added to the Year 2035 traffic conditions.

Existing Conditions

The existing average daily traffic volumes were obtained from CVAG's 2015 Traffic Census Report. Existing conditions for intersections in the vicinity of the project are shown in Table 24, *Existing Intersection Delay and Level of Service*. Existing delay is based on manual morning and evening peak hour intersection turning movement counts obtained in December 2016. For existing traffic conditions, the study area intersections are currently operating at acceptable Levels of Service during the peak hours.

Table 24 Existing Intersection Delay and Level of Service

Intersection	Jurisdiction	Traffic Control[2]	Peak Hour Delay-LOS[1]	
			Morning	Evening
Date Palm Drive (NS) at: Ramon Road (EW) - #1	Cathedral City	TS	24.5-C	27.3-C
Cathedral Village (NS) at: Ramon Road (EW) - #2	Cathedral City	TS	14.8-B	15.9-B
El Toro Road (NS) at: Ramon Road (EW) - #3	Cathedral City	CSS	17.3-C	15.4-C
Via Campanile/Outdoor Resorts (NS) at: Ramon Road (EW) - #5	Cathedral City	TS	6.8-A	7.0-A
Da Vall Drive (NS) at: Ramon Road (EW) - #6	Cathedral City/ Rancho Mirage	TS	24.1-C	19.9-B

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 1, April 2017.

Notes:

1. Delay and level of service was calculated using the following analysis software: Vistro, Version 4.00-00. Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
2. TS = Traffic Signal; CSS = Cross Street Stop

Alternative Transportation

Existing Transit Service

The project area is currently served by the SunLine Transit Agency, the transit provider for the Riverside County Transportation Commission in the Coachella Valley. The project area is currently served by the SunLine Transit Agency Routes 30 and 32 along Date Palm Drive and Ramon Road.

Existing Pedestrian Facilities

There is an existing sidewalk along Ramon Road on the north end of the project site that allows access to commercial development west of the project site at Date Palm and Ramon.

3.16.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.16 TRANSPORTATION/TRAFFIC – Would the project:				
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?	☐	☒	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☒	☐	☐
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?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e) Result in inadequate emergency access?	☐	☒	☐	☐
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?	☐	☐	☐	☒

a. Less Than Significant Impact with Mitigation Incorporated. Traffic impacts from the proposed Ramon 19 project were based on the existing and forecast traffic conditions in the vicinity of the site with, and without, the project.

Existing Plus Project Conditions

The delay and Level of Service for Existing Plus Project traffic conditions have been calculated and are shown in Table 25, *Existing Plus Project Intersection Delay and Level of Service.* Study area intersections are projected to operate at acceptable Levels of Service during the peak hours for Existing Plus Project traffic conditions.

A traffic signal is projected to be warranted at the following study area intersection for Existing Plus Project traffic conditions:

El Toro Road (NS) at:
Ramon Road (EW) - #3

Table 25 Existing Plus Project Intersection Delay and Level of Service

Intersection	Jurisdiction	Traffic Control[2]	Peak Hour Delay-LOS[1]	
			Morning	Evening
Date Palm Drive (NS) at: Ramon Road (EW) - #1	Cathedral City	TS	24.9-C	29.4-C
Cathedral Village (NS) at: Ramon Road (EW) - #2	Cathedral City	TS	14.9-B	16.3-B
El Toro Road (NS) at: Ramon Road (EW) - #3	Cathedral City	**TS**	10.0-A	11.4-B
Project Access (NS) at: Ramon Road (EW) - #4	Cathedral City	**CSS**	13.8-B	16.3-C
Via Campanile/Outdoor Resorts (NS) at: Ramon Road (EW) - #5	Cathedral City	TS	7.1-A	7.2-A
Da Vall Drive (NS) at: Ramon Road (EW) - #6	Cathedral City/ Rancho Mirage	TS	24.8-C	21.5-C

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 4, April 2017.
Notes:

1. Delay and level of service was calculated using the following analysis software: Vistro, Version 4.00-00. Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
2. TS = Traffic Signal; CSS = Cross Street Stop; BOLD = Improvement

Other Development

Table 26, *Other Development Trip Generation*, shows the daily and peak hour vehicle trips generated by proposed development projects within the study area obtained from the cities of Cathedral City, Palm Springs, and Rancho Mirage. The trip generation for these projects is included in the traffic analysis for Opening Year (2018) and Year 2035 conditions.

Table 26 Other Development Trip Generation

Project	Land Use	Quantity	Units[1]	Peak Hour		Daily
				Morning	Evening	
Desert Bloom Villas	SFR- Detached	98	DU	73	98	933
Staybridge at Lantana	Hotel	200	RM	106	120	1,634
Residential	SFR - Detached	122	DU	92	122	1,161
Plaza Rio Vista	Bank	5.000	TSF	32	64	741
	Commercial Retail	13.013	TSF	29	100	1,804
	Subtotal			61	164	2,545
Escena	SFR - Detached	550	DU	412	551	5,236
Jul Palm Springs	SFR Detached	70	DU	52	70	666
	Six-Plex Homes	120	DU	53	63	697
	Subtotal			105	133	1,363
Sofia Condos	Condominium	9	DU	4	5	52
Vibrante	SFR - Detached	41	DU	31	41	390
Dairy Queen	Fast-Food Restaurant With Drive-Thru	2.612	TSF	119	85	1,296
Northgate Church	Church	15.48	TSF	8	8	141
Aaron's Rental Store	Specialty Retail	7	TSF	48	19	310
DaVall Place, LLC	SFR - Detached	27	DU	20	27	257
Rancho Mirage Rehabilitation Hospital	Hospital	70	BD	93	100	906
Total				**1,172**	**1,473**	**16,224**

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 5, December 2016.

Notes:

2. TSF = Thousand Square Feet; RM = Rooms; DU = Dwelling Units; BD = Beds

Opening Year (2018) Without Project Conditions

The Opening Year (2018) conditions for the study area roadway network without the proposed project are shown in Table 27, *Opening Year (2018) Without Project Intersection Delay and Level of Service.* The study area intersections are projected to operate at acceptable Levels of Service during the peak hours for this scenario.

Opening Year (2018) With Project Conditions

The Opening Year (2018) conditions for the study area roadway network with the project are shown in Table 28, *Opening Year (2018) With Project Intersection Delay and Level of Service.* The study area intersections are projected to operate at acceptable Levels of Service during the peak hours for Opening Year (2018) With Project traffic conditions.

Table 27 Opening Year (2018) Without Project Intersection Delay and Level of Service

Intersection	Jurisdiction	Traffic Control[2]	Peak Hour Delay-LOS[1]	
			Morning	Evening
Date Palm Drive (NS) at: Ramon Road (EW) - #1	Cathedral City	TS	29.8-C	36.9-D
Cathedral Village (NS) at: Ramon Road (EW) - #2	Cathedral City	TS	15.5-B	17.1-B
El Toro Road (NS) at: Ramon Road (EW) - #3	Cathedral City	CSS	20.5-C	18.9-C
Via Campanile/Outdoor Resorts (NS) at: Ramon Road (EW) - #5	Cathedral City	TS	6.8-A	7.1-A
Da Vall Drive (NS) at: Ramon Road (EW) - #6	Cathedral City/ Rancho Mirage	TS	31.7-C	26.4-C

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 6, April 2017.

Notes:

1. Delay and level of service was calculated using the following analysis software: Vistro, Version 4.00-00. Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
2. TS = Traffic Signal; CSS = Cross Street Stop

Table 28 Opening Year (2018) With Project Intersection Delay and Level of Service

Intersection	Jurisdiction	Traffic Control[2]	Peak Hour Delay-LOS[1]	
			Morning	Evening
Date Palm Drive (NS) at: Ramon Road (EW) - #1	Cathedral City	TS	30.6-C	40.6-D
Cathedral Village (NS) at: Ramon Road (EW) - #2	Cathedral City	TS	15.5-B	17.6-B
El Toro Road (NS) at: Ramon Road (EW) - #3	Cathedral City	**TS**	10.0-B	11.5-B
Project Access (NS) at: Ramon Road (EW) - #4	Cathedral City	**CSS**	15.5-C	18.9-C
Via Campanile/Outdoor Resorts (NS) at: Ramon Road (EW) - #5	Cathedral City	TS	7.1-A	7.4-A
Da Vall Drive (NS) at: Ramon Road (EW) - #6	Cathedral City/ Rancho Mirage	TS	33.2-C	28.6-C

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 7, April 2017.

Notes:

1. Delay and level of service was calculated using the following analysis software: Vistro, Version 4.00-00. Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
2. TS = Traffic Signal; CSS = Cross Street Stop; BOLD = Improvement

Year 2035 Without Project Conditions

Year 2035 conditions for the study area roadway network without the project are shown in Table 29, *Year 2035 Without Project Intersection Delay and Level of Service* based on the geometrics at the study area intersections, without and with General Plan improvements. For Year 2035 without project traffic conditions, the following study area intersections are projected to operate at unacceptable Levels of Service during the peak hours, without improvements:

Date Palm Drive (NS) at:
Ramon Road (EW) - #1

Da Vall Drive (NS) at:
Ramon Road (EW) - #6

For Year 2035 without project traffic conditions and with General Plan improvements the study area intersections are projected to operate at acceptable Levels of Service during the peak hours. Improvements consist of the construction of additional right or left turn lanes: One additional southbound left turn lane; and one additional eastbound left turn lane.

Table 29 Year 2035 Without Project Intersection Delay and Level of Service

Intersection	Jurisdiction	Traffic Control[2]	Peak Hour Delay-LOS[1]	
			Morning	Evening
Date Palm Drive (NS) at:				
Ramon Road (EW) - #1	Cathedral City			
-Without Improvements		TS	36.7-D	74.1-E
-With Improvements		TS	35.9-D	43.8-D
Cathedral Village (NS) at:				
Ramon Road (EW) - #2	Cathedral City	TS	16.3-B	20.2-C
El Toro Road (NS) at:				
Ramon Road (EW) - #3	Cathedral City	CSS	29.5-D	30.2-D
Via Campanile/Outdoor Resorts (NS) at:				
Ramon Road (EW) - #5	Cathedral City	TS	6.9-A	7.5-A
Da Vall Drive (NS) at:				
Ramon Road (EW) - #6	Cathedral City/			
-Without Improvements	Rancho Mirage	TS	99.9-F[3]	99.9-F[3]
-With Improvements			51.3-D	48.4-D

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 8, April 2017.

Notes:

1. Delay and level of service was calculated using the following analysis software: Vistro, Version 4.00-00. Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
2. TS = Traffic Signal; CSS = Cross Street Stop
3. 99.9-F = Delay High, Intersection Unstable, Level of Service F.

Year 2035 With Project Conditions

Analysis for Year 2035 with project traffic conditions was analyzed and shown in Table 30, *Year 2035 with Project Intersection Delay and Level of Service.*

For Year 2035 with project traffic conditions, the following study area intersections are projected to operate at unacceptable Levels of Service during the peak hours, without improvements:

Date Palm Drive (NS) at:
Ramon Road (EW) - #1

Da Vall Drive (NS) at:
Ramon Road (EW) - #6

For Year 2035 with project traffic conditions and with improvements, the study area intersections are projected to operate at acceptable Levels of Service during the peak hours. Improvements consist of: an additional southbound left turn lane at Date Palm and Ramon Road; and an additional left turn lane and an additional eastbound left turn lane at Da Vall Drive and Ramon Road.

Table 30 Year 2035 with Project Intersection Delay and Level of Service

Intersection	Jurisdiction	Traffic Control[2]	Peak Hour Delay-LOS[1]	
			Morning	Evening
Date Palm Drive (NS) at:				
Ramon Road (EW) - #1	Cathedral City			
-Without Improvements		TS	37.6-D	96.5-F
-With Improvements		TS	36.5-D	45.5-D
Cathedral Village (NS) at:				
Ramon Road (EW) - #2	Cathedral City	TS	16.3-B	20.9-C
El Toro Road (NS) at:				
Ramon Road (EW) - #3	Cathedral City	**TS**	11.6-B	12.9-B
Project Access (NS) at:				
Ramon Road (EW) - #4	Cathedral City	**CSS**	19.9-C	29.2-D
Via Campanile/Outdoor Resorts (NS) at:				
Ramon Road (EW) - #5	Cathedral City	TS	9.0-A	7.8-A
Da Vall Drive (NS) at:				
Ramon Road (EW) - #6	Cathedral City/			
-Without Improvements	Rancho Mirage	TS	99.9-F[3]	99.9-F[3]
-With Improvements			51.9-D	51.0-D

Source: Kunzman and Associates Inc., Ramon 19 Cultivation Traffic Impact Analysis, Table 10, April 2017.
Notes:

1. Delay and level of service was calculated using the following analysis software: Vistro, Version 4.00-00. Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
2. TS = Traffic Signal; CSS = Cross Street Stop; BOLD = Improvement
3. 99.9-F = Delay High, Intersection Unstable, Level of Service F.

With installation of a traffic signal at Ramon Road and El Toro Road and a controlled street stop at the site access on the east end of the site, implemented through Mitigation Measures TIA-1 and TIA-2, the project will operate at an acceptable LOS at build-out and impacts will be less than significant.

b. **Less Than Significant Impact with Mitigation Incorporated.** According to the Cathedral City General Plan, Ramon Road's status as a Congestion Management Plan (CMP) roadway means that intersections along Ramon Road must operate at a minimum LOS E. According to the TIA, the Date Palm Drive and Ramon Road intersection would operate at LOS F by 2035 without improvements, as shown in Tables 29 and 30.

With implementation of Mitigation Measure TIA-1, requiring all improvements recommended in the TIA be constructed for the proposed project, the project will operate at LOS D, which is within the guidelines of the CMP. Therefore, impacts in regard to conflicting with an applicable congestion management program, level of service standards and travel demand measures will be reduced to less than significant.

c. **No Impact.** The project is located approximately 2.5 miles east of the Palm Springs International Airport. The proposed project will not induce substantial population growth or include construction of any structures that would negatively impact air traffic patterns. Therefore, the proposed project will not result in a change in the air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

d. **Less Than Significant Impact with Mitigation Incorporated.** The project does not include any hazardous design features, but to ensure a safe, compatible roadway design within the project boundaries and vicinity, the project applicant will be required to construct onsite improvements as recommended in the TIA. With the implementation of Mitigation Measure TIA-3, the project will result in a less than significant impact associated with hazardous design.

e. **Less Than Significant Impact with Mitigation Incorporated.** The Ramon 19 project will have two access points from Ramon Road. The main access point will be located on the west side of the property, with a 26-foot wide entrance roadway and 24-foot wide exit roadway. Construction of the main access for the project site will include traffic signal improvements to allow easy access to the site in all directions, and an east-bound deceleration lane with a right turn at the project entrance. The second access point will be located near the eastern property boundary, with a 12-foot entrance lane and 12-foot exit lane. The second access point will only be accessible through right-in right-out turn movements due to roadway infrastructure on Ramon Road.

In addition to intersection improvements implemented through Mitigation Measures TIA-1 and TIA-2, the following roadway improvements are required during development of the proposed project, implemented with Mitigation Measure TIA-3:

- Ramon Road, from the west project boundary to the east project boundary, shall be constructed as an Arterial Highway (126 foot right-of-way) at its ultimate half-section width, including landscaping and parkway improvements in conjunction with development.
- A deceleration lane shall be constructed at the Project Access and Ramon Road intersection.
- On-site traffic signing/striping should be implemented in conjunction with detailed construction plans for the project site.
- Sight distance at the project accesses shall comply with standard California Department of Transportation and City of Cathedral City sight distance standards. The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met. Such plans must be reviewed by the City and approved as consistent with this measure prior to issue of grading permits.

Project circulation improvements, implemented with Mitigation Measures TIA-1 through TIA-3, will ensure that sufficient access is provided for the project. Therefore, impacts associated with project access will be less than significant with implementation of mitigation.

f. **No Impact.** The existing Sunline Transit Agency routes are within close proximity to the project site and could potentially serve future employees and customers associate with the project. The closest bus stop is located at the Date Palm Drive and Ramon Road intersection for Route 30 (0.31 mile west) and Route 32 (0.18 mile west). Additionally, a sidewalk will connect the project to Ramon Road on one side of the primary access road and sidewalks will run throughout the project site. No impacts regarding public transit, bike or pedestrian facilities will occur.

3.16.4 Mitigation Measures

TIA-1 The applicant shall construct a traffic signal at the intersection of Ramon Road and El Toro Road prior to operation of the project.

TIA-2 The applicant shall construct a controlled street stop at the project access point on the east end of the site and Ramon Road prior to operation of the project.

TIA-3 The project applicant shall follow all recommendations for onsite and offsite roadway improvements, as outlined in Section VII of the TIA prepared for the project.

- Ramon Road, from the west project boundary to the east project boundary, shall be constructed as an Arterial Highway (126 foot right-of-way) at its ultimate half-section daily vehicle tripswidth, including landscaping and parkway improvements in conjunction with development.
- A deceleration lane shall be constructed at the Project Access and Ramon Road intersection.

- On-site traffic signing/striping should be implemented in conjunction with detailed construction plans for the project site.
- Sight distance at the project accesses shall comply with standard California Department of Transportation and City of Cathedral City sight distance standards. The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met. Such plans must be reviewed by the City and approved as consistent with this measure prior to issue of grading permits.

3.16.5 Regulatory Requirements

No Regulatory Requirements are necessary to reduce project impacts on Traffic and Circulation.

3.16.6 Level of Significance After Mitigation

Implementation of Mitigation Measures TIA-1 through TIA-3 will ensure that the project's impacts on Transportation/Traffic would be less than significant.

3.17 Tribal Cultural Resources

3.17.1 Sources

The following sources were utilized to support the conclusions made in this section:

- CRM Tech, July 2015, *Historical/Archaeological Resources Survey Report, Ramon 14 Project, City of Cathedral City, Riverside County, California*. (Appendix C.1)
- CRM Tech, December 2016, *Addendum to Historical/Archaeological Resources Survey, Ramon 19 Project, City of Cathedral City, California*. (Appendix C.2)

3.17.2 Environmental Setting

Native American Consultation

The Historical/Archaeological Resources Survey Report for Parcel 5 included a requested search of the Sacred Lands File from the Native American Heritage Commission (NAHC) and found that no Native American cultural resources are known to exist in the immediate project area. Nonetheless, CRM Tech contacted representatives from six Native American groups in the region and as listed by the NAHC, by letter on June 29, 2015.

Prior to the study by CRM Tech, Katie Askew of the Agua Caliente Tribal Historic Preservation Office (THPO) sent a letter to the City of Cathedral City, stating that the Agua Caliente registry indicated no prior surveys on the subject property and requested a systematic survey to be completed by a qualified archaeologist and that copies of any resulting cultural resource documentation be submitted to Agua Caliente THPO for review.

Regulatory Setting

Assembly Bill 52 (AB 52)

In addition to Native American Consultation that occurs as part of the Cultural Resources Assessment, AB 52, which went into effect on July 1, 2015 requires a lead agency to consider a project's impacts on Tribal Cultural Resources (TCRs). TCRs as defined in Public Resources Code § 21074 are as follows:

(a) "Tribal cultural resources" are either of the following:
  (1) *Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
    (A) *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
    (B) *Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*
  (2) *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 of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe*.

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

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

Under AB 52, the CEQA Lead Agency is required to begin consultation with a California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. Tribal consultation can be initiated once a project application is deemed complete. Once the Lead Agency has contacted necessary tribal governments, tribes have 30 days to respond with comments or request for consultation. "Consultation" is the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes must be conducted in a way that is mutually respectful of each party's sovereignty. Consultation must also recognize the tribes' potential needs for confidentiality with respect to places that have traditional tribal cultural significance. Consultation concludes when either: the parties agree on measures to mitigate or avoid significant impacts to TCRs or a party, in good faith and after reasonable effort, concludes that a mutual agreement cannot be reached.

3.17.3 Impacts

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

a.i/ii. Less Than Significant Impact. CRM TECH contacted six tribal representatives in the region in writing to solicit local Native American input regarding any potential cultural resources concerns over the proposed project. The correspondence between CRM TECH and the Native American representatives is attached to the *Historical/Archaeological Resources Assessment* (Appendix C.1).

Two of the tribal representatives responded in writing. In letters dated June 30 and July 2, 2016, respectively, Raymond Huaute of the Morongo Band and Judy Stapp, Director of Cultural Affairs for the Cabazon Band of Mission Indians, both stated that their respective tribes had no comments regarding the project or specific information about cultural resources in the project area. Mr. Huaute recommended contacting "the appropriate tribes who have cultural affiliation to the project area," while Ms. Stapp deferred further consultation to the Agua Caliente Band of Cahuilla Indians (Appendix C.1).

The revised Conditional Use Permit application for the proposed project was submitted on April 18, 2017. The City initiated AB 52 consultation and sent out seven letters to Native American tribes that requested to be included in AB 52 consultations. One tribe responded,

requesting a copy of the Cultural Resources Report. The Cultural Resources Report was mailed and the tribe received it. No further correspondence was received. [AN6]

During Public Review of the Initial Study, the City received a comment letter from the Katie Croft, the archaeologist with the Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office. The tribe requested that an approved Agua Caliente Native American Cultural Resources Monitor be present during any ground disturbing activities. To ensure that any potential unknown Tribal Cultural Resources uncovered are properly investigated and preserved, a Native American Cultural Resources Monitor will be present during ground disturbing activities, through implementation of Mitigation Measure TCR-1.

Neither the Cultural Resources Assessment, nor consultation, showed Tribal Cultural Resources in the area. Nonetheless, a Native American Cultural Resources Monitor must be present during ground disturbing activities. With implemented through Mitigation Measure TCR-1, ~~Therefore,~~ the project would result in a less than significant impact on Tribal Cultural Resources.

3.17.4 Mitigation Measures

TCR-1 An approved Agua Caliente Native American Cultural Resource Monitor(s) must be present during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

~~No potentially significant impacts regarding Tribal Cultural Resources were identified for the proposed project. Therefore, no mitigation measures are required.~~

3.17.5 Level of Significance After Mitigation

Not Applicable.

3.18 Utilities and Service Systems

3.18.1 Sources

- Coachella Valley Water District, *2015 Urban Water Management Plan*, July 1, 2016.
- Cathedral City, *Environmental Impact Report for Cathedral City Comprehensive General Plan Zoning Map Amendment and Downtown Precise Plan Amendment, Public Services and Facilities*, April 2002.

- Cathedral City, *Comprehensive General Plan, Water Sewer and Utilities Element,* June 2009.
- County of Riverside Website, *Department of Environmental Health, Water Use/Wells,* Accessed April 27, 2017, http://www.rivcoeh.org/Programs/water.

3.18.2 Environmental Setting

Water and Wastewater

The Coachella Valley Water District (CVWD) is a multifaceted agency that delivers irrigation and domestic (drinking) water, collects and recycles wastewater, provides regional storm water protection, replenishes the groundwater basin, and promotes water conservation. CVWD maintains over 1,000 miles of sewer pipelines and more than 30 lift stations that collect and transport wastewater to the nearest water reclamation facility. The district operates six reclamation plants in the Valley, and three of those plants are equipped to treat wastewater to meet state standards for non-potable water for irrigation, which reduces the amount of groundwater utilized. CVWD's service area covers approximately 1,000 square miles from the San Gorgonio Pass to the Salton Sea. CVWD will supply wastewater services for the proposed project. CVWD will also supply domestic water services for the service areas of the proposed project, such as the dispensary, processing, sanitary facilities, and employee common areas. Since CVWD receives water from the Colorado River through federal agreements, CVWD has decided not to supply domestic water for cannabis cultivation activities, as cannabis is currently federally illegal, designated a Schedule I drug. Therefore, the applicant proposes construction of two private wells on the project site to supply water for cannabis cultivation and outdoor irrigation.

Private Domestic Wells

The Riverside County Department of Environmental Health is the Local Primacy Agency, delegated regulatory oversite by the State, responsible for permitting the construction and/or abandonment of all water wells within the County. Permitted wells are inspected during different stages of construction to help verify standards are being met. Currently this program permits about 200 systems.

Solid Waste Service

Burrtec provides the City with solid waste collection services. Burrtec provides curbside pickup for regular trash, green waste, and recyclables. According to the Burrtec website, they also offer bulky item pick-up, Christmas tree recycling, electronic waste, and used motor oil collection upon request. Solid waste that is collected from the City is routed to the Copper Mountain Landfill, which has a remaining capacity of 50 years.

Electrical Service

Southern California Edison will supply electrical power to the proposed project. Within the City, SCE's facilities include four substations, major transmission lines, (particularly along Date Palm Drive,

Landau Boulevard, Dinah Shore Drive and north of Interstate 10 diagonally from southeast to northwest) and distribution lines which carry electricity to homes and businesses.

SCE has indicated that it will be capable of serving future development in the planning area. Planning for future electricity infrastructure involves determining the need for additional facilities, assessing potential environmental impacts, preparing applications for necessary regulatory permits, and regulatory review and approval. SCE performs annual five-year and ten-year growth and service forecasts to assure that its electrical transmission system will be adequate to serve future populations.

3.18.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.17 UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☒	☐	☐
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 project's projected demand in addition to the provider's existing commitments?	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes, and regulations related to solid waste?	☐	☐	☒	☐
Due to the nature of the project, we concluded that electrical energy should be analyzed as follows:				
h) Have a substantial impact on energy resources, or require or result in the construction of new electrical energy facilities?	☐	☐	☒	☐

a. **Less Than Significant Impact.** The project will not exceed wastewater treatment requirements applicable by the Colorado River Basin Regional Water Quality Control Board (CRWQCB) for the regional wastewater treatment plant operated by the Coachella Valley Water District (CVWD). The three main sources that will generate wastewater during operation of the proposed project are cannabis irrigation, employee showers and sanitary facilities.

Irrigation water for cannabis cultivation will likely exceed water quality requirements of the CRWQCB for cultivation due to the addition of fertilizers. The cannabis irrigation water will be recaptured and treated onsite via reverse osmosis. The treated water will continue to be recycled for cannabis irrigation until reverse osmosis fails to remove a sufficient amount of fertilizer contaminants. Once the cannabis irrigation water is no longer usable, it will be stored in a separate storage tank and hauled away by a third party licensed hazardous waste removal company. Therefore, any agricultural waste water onsite will not enter the sewer system.

With adherence to RWQCB requirements and documentation of any TDS from wastewater recycling activities, impacts in regard to the project in violating waste discharge requirements will be reduced to less than significant.

b. **Less Than Significant Impact with Mitigation Incorporated.** The project will connect to the CVWD sewer and water lines (for non-cannabis water use) in Ramon Road, directly north of the project site. Domestic water supplied by CVWD will be used for the service areas of both buildings 1 and 2, including: sanitary facilities, kitchen, dispensary, etc. Water for cultivation purposes and onsite landscaping will be supplied by two wells that the applicant proposes to drill onsite.

Wastewater

Wastewater treatment is provided by CVWD at its Cook Street Wastewater Reclamation Plant (WRP-10) in Palm Desert. The design capacity of the tertiary treatment system at WRP-10 is 15 million gallons/day (MGD), or 16,802.2 acre-feet/year. In 2015, WRP-10 treated an annual flow of 10,627 acre-feet, which is approximately 63.2 percent of the total plant capacity. Wastewater for the proposed project would be generated from cultivation, employee showers and sanitary facilities. Wastewater from cultivation will be treated and reused at the site until it becomes too saturated with fertilizers to reuse. At that point, wastewater will be hauled away by a licensed hazardous waste hauler; and thus will not be put into the sewer system. Wastewater that will enter the sewer system to be treated at WRP-10 will be primarily limited to service areas in each building, which are estimated to generate approximately 4.60 acre-feet per year of wastewater. This represents approximately 0.03 percent of the total capacity of WRP-10. Therefore, the proposed project will be adequately served by existing wastewater treatment plants and construction or expansion of additional wastewater treatment facilities will not be required.

Domestic Water

Domestic water supply for the service areas of Building One and Two will be provided by the CVWD. Based on the water demand assumptions from the Applicant, included below in discussion 3.18.3(d), CVWD's existing domestic water infrastructure will adequately serve the proposed project and no new domestic water infrastructure will be required to supply water to the project site. Impacts will be less than significant.

Private Wells

The applicant proposes to install two wells on the project site that will be utilized for all cannabis cultivation activities. During site reconnaissance performed for the Phase I ESA (Appendix E.2), a water supply well was observed in the southeastern portion of Parcel 4, a few feet north of three existing concrete pads. The existing well on the site will be decommissioned prior to construction (it is located under the greenhouse making it un-usable), implemented through Mitigation Measure HAZ-2. The applicant proposes to drill two new wells for cannabis cultivation use on the project site. Both proposed wells on the site will be set up with the capability to serve both Building One and Building Two to ensure water supply for indoor cultivation in the event that either well fails. The applicant will be required to obtain a well permit with the Riverside County Department of Environmental Health (DEH) for the new wells that will be drilled onsite. Once permitted, the wells will be inspected during different stages of construction to verify all standards are being met. This will ensure that construction of the wells will cause no significant impacts with implementation of mitigation.

c. **Less Than Significant Impact.** The site is not subject to offsite flows and generally slopes from the northwest to the southeast. After the site is graded, storm flow will follow the historic path via surface flow to a proposed retention basin designed to capture runoff from a 100-year three-hour storm event to be located at the south end of the project (see Exhibit 6 for the location). The retention basin, drywells and perforated pipe will be used to infiltrate stored runoff volume that exceeds the capacity of the retention basin. Flows in excess of a 100-year three-hour storm event will exit toward the southeast portion of the project site via an established emergency overflow corridor and leave the project site via a non-obstructed gated opening located on the southerly project boundary continuing in a southerly direction over surface streets within the Outdoor Resort. Site design and the development of the retention basin will address potential flooding issues and therefore, would result in a less than significant impact.

d. **Less Than Significant Impact with Mitigation Incorporated.** Domestic Water Supply for the service areas of the project will be provided by CVWD and cannabis cultivation water will be supplied by two private wells. The proposed medical cannabis cultivation and dispensary facilities will create additional water demand. The main water use will be from cannabis cultivation, mandatory employee showers, and from onsite landscaping. The total estimated

water demand for the proposed project is approximately 71.68 acre-feet per year. The estimated CVWD water demand for the project will be approximately 5.7 acre-feet per year and well water demand will be approximately 65.98 acre-feet per year. Ultimately, the well water used for the proposed project will be supplied by the underlying groundwater at the project site which is within the Whitewater subbasin of the Coachella Valley groundwater basin.

Domestic Water

According to the 2015 CVWD Urban Water Management Plan, CVWD has a current groundwater demand of 101,723 acre-feet per year. Therefore, the estimated domestic water demand for the service areas of the project (71.68 acre-feet per year) will be approximately 0.005 percent of the current CVWD groundwater supply. Therefore, due to the minimal increase in domestic water demand from the proposed project, CVWD will have sufficient water supplies to support to project and impacts will be less than significant.

Private Wells

The majority of water demand for the proposed project will be supplied by two private wells to be developed on the project site. The wells will supply water for indoor cannabis cultivation and outdoor landscaping. The applicant estimates a total well water demand to be 65.98 acre-feet per year. Private well water is not included in the UWMP prepared by CVWD, but use of private wells can contribute to overdraft of groundwater basins in the area. Overdrafting a groundwater basin causes water levels to drop and can have serious consequences, including subsidence and increased pumping costs for all water users. CVWD developed a Replenishment Assessment Charge (RAC) that requires entities that use a well or multiple wells that collectively pump more than 25 acre-feet of water from the aquifer annually to pay an assessment charge to contribute to CVWD groundwater replenishment efforts. Since the project is anticipated to demand greater than 25 acre-feet annually for cultivation and landscape irrigation uses, the applicant must pay the RAC to contribute to CVWD's groundwater replenishment program, which will assist in reducing impacts associated with overdraft as implemented with Mitigation Measure HWQ-1. Therefore, impacts in regard to overdraft will be reduced to less than significant with implementation of mitigation.

e. **Less Than Significant Impact with Mitigation Incorporated.** See discussion in 3.18.3(b) above.

f. **Less Than Significant Impact.** According to the Disposal Reporting System from the California Department of Resources Recycling and Recover, 39,476 tons of solid waste were hauled to County landfills from Cathedral City in 2015. Jurisdictions from the County of Riverside contributed approximately 2 million tons of solid waste to County Landfills in 2015. Cathedral City contributes approximately 1.9 percent of solid waste compared to the overall County total. The project applicant anticipates approximately 348 pounds per day of solid waste for the proposed project, which would be approximately 63.51 tons per year. Solid waste

generated by the project would increase the Cathedral City's total solid waste disposal rate by 0.16 percent, and therefore, would not significantly impact County Landfills.

g. **Less Than Significant Impact.** The proposed project will comply with federal, State, and local statutes, and regulations in regard to solid waste. As adopted by Cathedral City, AB 939 requires that all California jurisdictions prepare a Source Reduction Recycling Element (SRRE) that demonstrates how the City will divert 50 percent of their jurisdiction's waste stream from disposal into landfills each year. The penalty for not diverting 50 percent each year is a $10,000 a day fine until the diversion goal is obtained.

According to the requirements of Cathedral City's SRRE the following components need to be implemented in order to reach the 50 percent diversion goal for each year:

- Source Reduction Component
- Recycling Component
- Composting Component
- Special Waste Component
- Public Education and Information Component
- Disposal Facility Capacity Component
- Funding Component
- Integration Component

AB 939 is funded by grant funds and by the waste management franchise agreement. The funds earned from this are set aside in a separate account only to be used for the development and implementation of the above listed component programs. Since 2000, the City has continued to surpass the 50 percent diversion goal. The following programs have been created and implemented with an on-going basis to accomplish this goal annually:

- Backyard and On-Site Composting/Mulching
- Business Waste Reduction Program
- Commercial Self-Haul
- Commercial On-Site Pick-Up
- Commercial Self-Haul Greenwaste
- Concrete/Asphalt/Rubble
- Government Recycling Programs
- Government Source Reduction Programs
- Material Exchange/Thrift Shops
- Mobile or Periodic Collection
- Permanent Hazardous Facility
- Print (brochures, flyers, guides, news articles)
- Procurement
- Residential Curbside

- Residential Curbside Greenwaste Collection
- Residential Buy-Back
- School Source Reduction Programs
- Schools (Education and Curriculum)
- Scrap Metal
- Special Collection Events
- Special Collection Seasonal (Regular)
- Tire
- White Goods
- Xeriscape/Grasscycling

The above listed programs specific to the project's land use will be implemented upon the project construction and post construction activities and will be monitored by the City for compliance. Therefore, with the project's adherence to AB 939 waste diversion goals and compliance with the City's SRRE, impacts in regard to compliance with federal, State, and local statutes will be reduced to less than significant.

h. **Less Than Significant Impact.** The proposed project consists of cultivation and dispensary uses which would require electrical energy to operate, using fans, lighting, evaporative cooling, and regular commercial energy use. Phase 1 of the project is projected to use approximately 12,882,000 kWh per year. Phase 2 of the project is projected to use approximately 6,720,000 kWh per year. The total project energy demand is anticipate to be approximately 19,601,000 kWh per year. Based on the Cathedral City General Plan EIR, the total energy demand of Cathedral City is anticipated to be 550,160,383 kWh per year at build out. Therefore the proposed project will require approximately 3.5 percent of the City's General Plan build out electricity consumption. This is a relatively small amount of the City's electricity consumption; however, given that electricity demand is high in California, the project will be required to be as energy efficient as possible. Regulatory Requirement RR-11 will be implemented to reduce impacts to less than significant.

3.18.4 Mitigation Measures

The following mitigation from Section 3.8, Hazards and Hazardous Materials, is required to ensure lighting impacts are less than significant:

HAZ-2 The project applicant ~~shall ensure that the existing water supply well in Parcel 4 is properly destroyed/abandoned in accordance with State and County regulations. The applicant~~ shall submit a Permit to the City from Riverside County Department of Environmental Health for an Abandoned Well Site prior to the issuance of a Grading Permit <u>to ensure that the existing water supply well in Parcel 4 is properly destroyed/abandoned in accordance with State and County regulations.</u>

HWQ-1 Since the proposed private wells onsite are anticipated to pump more than 25 acre-feet per year from the aquifer, before issuance of a certificate of occupancy, the project applicant will be required to pay the Replenishment Assessment Charge (RAC) to CVWD to contribute to groundwater replenishment efforts. The applicant shall provide proof of payment of the RAC to the City before issuance of a certificate of occupancy and before start of project operations.

Regulatory Requirements

RR-11 The project must be designed to comply with the requirements of the California Building Code and Title 24 of the California Administrative Code in order to attain the highest level of energy conservation available.

3.18.5 Level of Significance After Mitigation

With implementation of mitigation measures and regulatory requirements project-related impacts would be less than significant.

3.19 Mandatory Findings of Significance

3.19.1 Sources

All sources previously listed were used to support the conclusion made in this sections.

3.19.2 Environmental Setting

The environmental setting for the project site is summarized within Sections 3.1 through 3.18 of the Initial Study for each environmental issue.

3.19.3 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3.19 FINDINGS OF SIGNIFICANCE				
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?	☐	☒	☐	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a. Less Than Significant Impact with Mitigation Incorporated.

Biological Resources

The Biological Resources Assessment performed for the proposed project revealed that there were no sensitive species encountered on the project site, but there is suitable foraging and nesting habitat for the Burrowing Owl (sp. *Athene cunicularia*), a State of California Species of Concern. Therefore Mitigation Measure BIO-1 shall be implemented prior to any future site disturbance associated with grading or construction.

Cultural Resources

The Cultural Resources Assessments performed for the proposed project concluded that no historical resources would be substantially impacted due to development of the project. No archaeological or Tribal Cultural resources were recorded on or near the project site, but since the project area is within the Agua Caliente Reservation, Mitigation Measures CR-1 through CR-3 shall be implemented to ensure that no unknown archaeological artifacts are impacted during ground disturbing activities such as grading.

The City's General Plan does not identify any paleontological resources in the vicinity of the project site. However, if any paleontological resources are discovered, implementation of Mitigation Measure CR-3 will reduce impacts to less than significant.

The proposed site is not located on, or in proximity to a known cemetery and is not expected to disturb human remains. In the event that human remains are discovered, implementation of Regulatory Requirement RR-3 will reduce impacts to less than significant.

b. Less Than Significant Impact with Mitigation Incorporated. The proposed project will result in a number of potentially significant impacts on the environment that can be mitigated to a less than significant level with the implementation of mitigation measures. Based on the Air Quality Report, air quality could be affected in the short-term during construction, but long-term cumulative effects will have a less than significant impact on air quality. For example,

based on the cumulative affects analyzed in the TIA, the project is not expected to have any cumulative impacts on traffic conditions in the vicinity. Adherence to all mitigation measures recommended, the cumulative impacts can be mitigated to less than significant levels.

c. Less Than Significant Impact with Mitigation Incorporated. The proposed project could result in both direct and indirect environmental effects on humans. However, with compliance with regulatory requirements (i.e. air quality, water quality, etc.) and implementation of mitigation measures identified herein, the effects would be reduced to less than significant levels.

3.19.4 Mitigation Measures

BIO-1 Burrowing Owl. No more than five days before land disturbance or issuance of a grading permit by the City, the applicant shall have a biological survey conducted at the project site to determine presence/absence of the species. 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.

CR-1 If during the course of excavation, grading or construction, artifacts or other archaeological resources are discovered, all work in the immediate area of the find shall be halted and the applicant shall immediately notify the City Planner. A qualified archaeologist shall be called to the site by, and at the expense of, the applicant to identify the find and propose mitigation if the resource is culturally significant. Work shall resume after consultation with the City of Cathedral City and implementation of the recommendations of the archaeologist.

CR-2 Copies of any resource documentation (report and site records) generated in connection with the project shall be transmitted to the Agua Caliente Band of Cahuilla Indians (ACBCI) THPO for review and comment.

CR-3 If a paleontological resource is accidentally uncovered during grading or construction activities for the proposed project, the project applicant/developer shall be required to notify the City of Cathedral City Planner immediately and all excavation work within ten

feet of the find shall cease immediately. A qualified paleontologist or archaeologist shall be consulted to determine the necessity for monitoring any excavation and to evaluate any paleontological resource exposed during construction. Construction activity shall resume upon consultation with the City and upon implementation of the recommendations of the paleontologist or archaeologist.

GEO-1 Prior to issuance of each building permit for Phases 1 and 2, the project applicant shall submit plans to the City of Cathedral City for review and approval demonstrating project compliance with the 2013 California Building Standards Code (or most recent version) seismic requirements and the recommendations of the design level geotechnical analysis (Appendix D.1, D.2, and D.3). All soils engineering recommendations and structural foundation recommendations shall be designed by a licensed professional engineer and shall be incorporated into the approved Grading and Building Plans. All onsite soil engineering activities shall be conducted under the supervision of a licensed geotechnical engineer or certified engineering geologist.

GEO-2 As part of the grading plan, any remnant of the former date palm nursery and golf course in Parcel 5 shall be located and identified for proper abandonment. All buried structures which are removed shall have the resultant excavation backfilled with soil compacted as engineered fill with a minimum two-sack sand slurry, or as approved by the project geotechnical engineer. The Grading Plan shall be reviewed and approved by the City Engineer prior to issuance of grading and building permits.

HAZ-1 Prior to commencing operation of the cannabis cultivation facility (Certificate of Occupancy), the applicant will be required to show the City proof of contract with a licensed hazardous waste hauler that will be responsible for removing all hazardous wastewater and solid waste generated at the project site.

HAZ-2 The applicant shall submit a Permit to the City from Riverside County Department of Environmental Health for an Abandoned Well Site prior to the issuance of a Grading Permit to ensure that the existing water supply well in Parcel 4 is properly destroyed/abandoned in accordance with State and County regulations.

HAZ-3 Prior to operation of the project, the applicant shall electronically submit a HBMP to the California Environmental Reporting System, to be reviewed and approved by the Riverside County Fire Department (CUPA).

HAZ-4 Any outdoor lighting installed shall be hooded or shielded to prevent either spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.

HAZ-5 In compliance with the determination letter from Riverside County ALUC, the following uses shall be prohibited:

- Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with the airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at the airport, other than an FAA approved navigational signal light or visual approach slope indicator.
- Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at the airport.
- Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, artificial marshes, trash transfer stations that are open on one or more sites recycling centers containing putrescible wastes, and construction and demolition debris facilities.)
- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

HAZ-6 The "Notice of Airport in Vicinity" sign attached to Appendix E.4 shall be provided to all potential purchasers of the property.

HAZ-7 Any new retention or detention basin on the site shall be designed to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around detention basin(s) that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.

HWQ-1 Since the proposed private wells on site are anticipated to pump more than 25 acre-feet per year from the aquifer, the project applicant will be required to pay the Replenishment Assessment Charge (RAC) to CVWD before issuance of a certificate of occupancy to contribute to groundwater replenishment efforts. The applicant shall provide proof of payment to the City before issuance of proof of occupancy and before start of project operations.

NOI-1 During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.

NOI-2 The project applicant shall incorporate Whisper Quiet Fan Systems into the project design.

NOI-3 The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the project site during all project construction.

NOI-4 The construction contractor shall prohibit the use of music or sound amplification on the project site during construction.

NOI-5 The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.

TIA-1 The applicant shall construct a traffic signal at the intersection of Ramon Road and El Toro Road prior to operation of the project.

TIA-2 The applicant shall construct a controlled street stop at the project access point on the east end of the site and Ramon Road prior to operation of the project.

TIA-3 The project applicant shall follow all recommendations for onsite and offsite roadway improvements, as outlined in Section VII of the TIA prepared for the project.

- Ramon Road, from the west project boundary to the east project boundary, shall be constructed as an Arterial Highway (126 foot right-of-way) at its ultimate half-section width, including landscaping and parkway improvements in conjunction with development.
- A deceleration lane shall be constructed at the Project Access and Ramon Road intersection.
- On-site traffic signing/striping should be implemented in conjunction with detailed construction plans for the project site.
- Sight distance at the project accesses shall comply with standard California Department of Transportation and City of Cathedral City sight distance standards. The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met. Such plans must be reviewed by the City and approved as consistent with this measure prior to issue of grading permits.

TCR-1 An approved Agua Caliente Native American Cultural Resource Monitor(s) must be present during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

3.19.5 Regulatory Requirements

RR-1 Pursuant to City Code Section 8.54.040, the project applicant must prepare and submit a Fugitive Dust Control Plan in accordance with SCAQMD Rule 403.1, prior to issuance of grading permits.

RR-2 The project applicant is required to pay the THCP Valley Floor Planning Area ~~CVMSHCP~~ Mitigation Fee prior to issuance of building permits.

RR-3 If human remains are uncovered during excavation or grading activities on the project site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

A) The Riverside County Coroner has been contacted and determined that no investigation of the cause of death is required, and

B) If the coroner determines the remains to be Native American:

The coroner shall contact the Native American Heritage Commission (NAHC) or the Agua Caliente Tribal Historic Preservation Office (THPO) within 24 hours. The NAHC or THPO shall identify the person or persons it believes to be the Most Likely Descendent (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Sec. 5097.98. The City and developer shall work with the designated MLD to determine the final disposition of the remains.

RR-4 The applicant shall ensure that the project engineer designs the project consistent with the most current version of the California Building Code.

RR-5 A SWPPP must be prepared prior to issuance of construction permits and implemented during all construction activities.

RR-6 A WQMP must be prepared and approved by the City prior to issuance of a grading permit. All BMPs in the WQMP must be implemented during operation of the project.

RR-7 All construction activities shall adhere to the hours presented below as required by Section 11.96.070 of the Cathedral City Noise Ordinance.

October 1st through April 30th	
Monday-Friday	7:30 AM to 5:30 PM
Saturday	8:00 AM to 5:00 PM
Sunday	No Permissible Hours
State Holidays	No Permissible Hours
May 1st through September 30th	
Monday-Friday	6:00 AM to 7:00 PM

Saturday	8:00 AM to 5:00 PM
Sunday	No Permissible Hours
State Holidays	No Permissible Hours

RR-8 The applicant must pay the Facilities Impact Fees prior to issuance of building permits.

RR-9 The applicant must pay the Measure P tax for cannabis cultivation during operation of the project.

RR-10 The applicant must pay the developer fee to PSUSD prior to issuance of grading permits.

RR-11 The project must be designed to comply with the requirements of the California Building Code and Title 24 of the California Administrative Code in order to attain the highest level of energy conservation available.

3.19.6 Level of Significance After Mitigation

With implementation of all mitigation measures and regulatory requirements, project related impacts would be less than significant.

Chapter 4 List of Preparers

The Altum Group

Initial Study
Nancy Ferguson, Environmental Planning Manager
Richard Malacoff, AICP, Project Manager
Audrey Nickerson, Environmental Planner
Tyler Carnevale, Graphic Designer

Preliminary Hydrology Report
James R. Bazua

Prest Vuksic Architects

Line of Site Study
Nicole Cuneo, Architect

Kunzman Associates

Traffic Impact Analysis
Bryan Crawford, P.E.
Carl Ballard, LEED GA
William Kunzman, P.E.,

Air Quality/GHG Assessment
Katie Wilson, Air Quality Specialist

Noise Assessment
Mike Dickerson, Senior Associate

CRM Tech

Cultural Resources Assessment
Michael Hogan, Principal Investigator

JWC Ecological Consultants

Biological Resources Assessment
James W. Cornett, Principal Biologist

Landmark Consultants, Inc.

Geotechnical Engineering Report (Parcels 1-4)
Greg M. Chandra, P.E., M.ASCE, Principal Engineer

Earth Systems Southwest

Geotechnical Engineering Report (Parcel 5)

Kevin L. Paul, Senior Engineer

Mark S. Spykerman, Senior Engineering Geologist

Phase I Report (Parcels 1-5)

Scot A. Stormo, PG 4826, CHG 204, Associate Hydrogeologist

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Aesthetics

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- CRM Tech, *Addendum to Historical/Archaeological Resources Survey, Ramon 19 Project, City of Cathedral City, California,* December 2016. (Appendix C.2)
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Chapter 6 Comments and Responses

This chapter includes the comment letters received on the Draft Initial Study during the public review period. Each comment letter is labeled with a unique number and comments within each letter are numbered consecutively.

The City of Cathedral City received two comment letters during the public review period. The following list provides the name of the commenter along with his/her affiliation, the date the comment was received and the page number where the comment letter begins

Letter No.	Author/Affiliation	Date	Page No.
1	Dan Malcolm, Agua Caliente Band of Cahuilla Indians	August 4, 2017	218
2	Katie Croft, Agua Caliente Band of Cahuilla Indians	August 10, 2017	220

Revisions have been made to the Draft Initial Study based on comments received during the public review period from the Agua Caliente Band of Cahuilla Indians. Revised text is found in three sections of the Initial Study: Section 3.4, *Biological Resources,* Section 3.10, *Land Use and Planning,* and Section 3.17, *Tribal Cultural Resources.* Additionally, Mitigation Measure HAZ-2 was revised in Section 3.18, *Utilities and Service Systems*, to provide consistency with other occurrences of the same mitigation measure. All revisions in the Initial Study are done with new text being double underlined and ~~deleted text stricken through~~.

In accordance with Section 15073.5(c)(2) of the CEQA Guidelines, the revisions made to the Draft Initial Study are in response to comments received on the IS/MND during the public review period, and the revisions do no result in any new significant environmental effects. Therefore, recirculation of the Revised IS/MND is not required.

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Letter 1

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION

03-007-2015-001

August 10, 2017

[VIA EMAIL TO:Rrodriguez@cathedralcity.gov]
City of Cathedral City
Mr. Robert Rodriguez
68-700 Avenida Lalo Guerrero
Cathedral City, CA 92234

Re: Draft Mitigated Declaration Ramon 19

Dear Mr. Robert Rodriguez,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Ramon 19 project. We have reviewed the documents and have the following comments/requests:

> *The presence of an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

1-1

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6829. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Katie Croft

Katie Croft
Archaeologist
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

Letter 1 Agua Caliente Band of Cahuilla Indians, August 4, 2017

Comment 1-1 Include the requirements for an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities.

Response 1-1 Per your request for an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities, Mitigation Measure TCR-1 has been added to Section 3.17, *Tribal Cultural Resources,* as follows:

TCR-1 An approved Agua Caliente Native American Cultural Resource Monitor(s) must be present during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

The following revisions were also made Section 3.17, *Tribal Cultural Resources, regarding the additional mitigation as a result of this comment:*

During Public Review of the Initial Study, the City received a comment letter from the Katie Croft, the archaeologist with the Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office. The tribe requested that an approved Agua Caliente Native American Cultural Resources Monitor be present during any ground disturbing activities. To ensure that any potential unknown Tribal Cultural Resources uncovered are properly investigated and preserved, a Native American Cultural Resources Monitor will be present during ground disturbing activities, through implementation of Mitigation Measure TCR-1.

Neither the Cultural Resources Assessment, nor consultation, showed Tribal Cultural Resources in the area. Nonetheless, a Native American Cultural Resources Monitor must be present during ground disturbing activities. With implemented through Mitigation Measure TCR-1, ~~Therefore,~~ the project would result in a less than significant impact on Tribal Cultural Resources.

Letter 2

From: Malcolm, Dan (TRBL) [mailto:dmalcolm@aguacaliente.net]
Sent: Friday, August 04, 2017 9:29 AM
To: Robert Rodriguez (RRodriguez@cathedralcity.gov) <RRodriguez@cathedralcity.gov>
Cc: nancy.ferguson@thealtumgroup.com; Park, Margaret (TRBL) <mpark@aguacaliente.net>
Subject: Ramon 19 Cannabis Cultivation and Dispensary Project IS/MND Comments

Hi Robert,
Tribal Planning Staff have reviewed the Initial Study/Mitigated Negative Declaration prepared for the Ramon 19 Cannabis Cultivation and Dispensary Project and have the following comments:

1. Section 3.4, Biological Resources, incorrectly identifies the project site as being within the boundaries of the CVMSHCP (see page 99 specifically). Indian Reservations are "(Not a part)" of the CVMSHCP (see Plan Area Map). The Project Site is, however, located on the Agua Caliente Indian Reservation within the Tribal Habitat Conservation Plan (THCP) boundaries. Please update Section 3.4 accordingly. 2-1

2. The Project is not subject to the CVMSHCP Mitigation Fee as it is not located within the CVMSHCP boundaries. This Project is, however, required to pay the THCP Valley Floor Planning Area Fee as required by the THCP. Please update Regulatory Requirement RR-2 and Section 3.4.6 accordingly. 2-2

Thank you and please let me know if you have any questions,
Dan

Dan Malcolm, AICP
Planning Manager
Agua Caliente Band of Cahuilla Indians
5401 Dinah Shore Drive
Palm Springs, CA 92264
Phone: 760-883-1945
Fax: 760-325-6952

Letter 2 Agua Caliente Band of Cahuilla Indians, August 10, 2017

Comment 2-1 The project site is within the Agua Caliente Indian Reservation and Indian Reservations are "(Not a Part)" of the CVMSHCP. The project is within the Tribal Habitat Conservation Plan boundaries. Update Section 3.4 accordingly.

Response 2-1 We have reviewed the Plan Area Map referenced to in the comment letter and the CVMSHCP text to confirm your comment. As the project is "not a part" of the CVMSHCP plan area, we removed all references to the CVMSHCP in Section 3.4, *Biological Resources,* and replaced them with discussion on the THCP as follows:

Agua Caliente Band of Cahuilla Indians Tribal Habitat Conservation Plan

The Agua Caliente Indian Reservation, home of the Agua Caliente Band of Cahuilla Indians, consists of approximately 31,500 acres of land in Riverside County, California. The Reservation lies within the geographical boundaries of three cities (Palm Springs, Cathedral City and Rancho Mirage) and the County of Riverside, and is composed of a checkerboard pattern of landholdings, including Tribal trust land, allotted trust land, and fee land. The Tribal Habitat Conservation Plan (THCP) was established to (1) continue to exercise its long-standing tradition as a land use manager and steward of the natural resources in and around the Reservation and (2) to establish consistency and streamline permitting requirements with respect to protected species for itself, Tribal members, and third parties developing the Reservation and other Tribal Lands.

The THCP covers 36,055 acres of non-federally owned portions of the Reservation and off-Reservation lands owned by or held in trust for the Tribe. The Tribe has identified 19 sensitive wildlife species and 3 sensitive plant species that occur or have potential to occur within the THCP area and are thus covered by the THCP. Eight of these species are listed as threatened or endangered under the Endangered Species Act.

The project site is located within the Valley Floor Plan Area (VFPA), which consists of active or ephemeral sand fields, stabilized or stabilized shielded sand fields, and other habitat types. Portions of the VFPA currently provide habitat for sand-dependent species; however, with the exception of Section 6 (Township 4 South, Range 5 East), which contains active and ephemeral sand fields, the VFPA generally is determined not to be viable habitat for these species over the long term due to their isolation and fragmentation. Therefore, with the exception of the viable habitat remaining in the Section 6 Target Acquisition Area, in which on-site

avoidance, minimization, and mitigation measures will be imposed, on-site mitigation measures are not required of covered projects in the VFPA for the benefit of sand-dependent species; instead, covered project proponents are required to pay a mitigation fee that will fund Tribal acquisition and management of the Habitat Preserve.

~~***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 species covered under the Plan.~~

We also reviewed the species covered under the THCP and compared them to the species discussed in the Biological Resource Assessment performed for the project site. All species that would potentially utilize the site for habitat are also covered under the THCP, so the text was revised clarify that impacts to covered species would be mitigated by the payment of the required THCP Mitigation Fee.

Revisions were also made to Section 3.10, *Land Use and Planning,* with regard to the project's consistency with a habitat conservation plan, as follows:

f. Less than Significant Impact. Although the project is located within the City of Cathedral City, the project site is within the Agua Caliente Indian Reservation, which is "not a part" of the CVMSHCP. The Indian Reservation, including the project site, is within the THCP boundaries, within the Valley Floor Planning Area.

The project site is not within a conservation area for the plan so on-site mitigation measures are not required for the benefit of sand-dependent species that are present in one portion of the VFPA. Instead, the project applicant is required to pay a mitigation fee that will fund Tribal acquisition and management of the THCP Habitat Preserve, implemented with Regulatory Requirement RR-2. The project would, therefore, not conflict with the provisions of the THCP and will result in a less than significant impact to an adopted conservation plan protecting biological resources.

~~Cathedral City is a signatory to the CVMSHCP, which is a regional conservation plan comprising close to 1.14 million acres. The CVMSHCP currently includes a number of permittees including eight 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. The proposed project is not within, nor does it abut, a designated conservation area and thus will not impact conservation areas.~~

~~Since the site is located within the CVMSHCP boundaries, the developer is required to pay a habitat acquisition fee to offset incremental impacts to plants and wildlife protected under the CVMSHCP (RR-2). The project would, therefore, not conflict with the provisions of the CVMSHCP and will result in less than significant impacts to an adopted conservation plan or local policies or ordinances protecting biological resources.~~

Comment 2-2 The project applicant is required to pay the THCP Valley Floor Planning Area Fee as required under the THCP. Update Regulatory Requirement RR-2 and Section 3.4.6 accordingly.

Response 2-2 As discussed in Response 2-1, text throughout this Initial Study that referenced the project's location within the CVMSHCP boundaries has been revised to include the project within the THCP boundaries instead. As such, Regulatory Requirement RR-2 was revised, as follows:

RR-2 The project applicant is required to pay the <u>THCP Valley Floor Planning Area</u> ~~CVMSHCP~~ Mitigation Fee prior to issuance of building permits.

All references to RR-2 within the Initial Study, including Section 3.4.6, have been revised to be consistent with the revisions above.

Chapter 7 Mitigation Monitoring and Reporting Program

Mitigation measures are included within each section of the initial study checklist and are provided below. The Mitigation Monitoring Program outlines the potential impacts and mitigation measures of the proposed project, and assigns responsibility for the oversight of each mitigation measure. This Table shall be included in all bid documents and included as a part of the project development.

Section	Mitigation Measure	Monitoring responsibility	Timing	Impact after Mitigation
Biological	**BIO-1.** Burrowing Owl. No more than five days before land disturbance or issuance of a grading permit by the City, the applicant shall have a biological survey conducted at the project site to determine presence/absence of the species. 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.	Applicant/ Project Proponent Planning Manager Biologist	Not more than five days before start of construction and/or before building permit issuance	Less than significant
Cultural Resources	**CR-1.** If during the course of excavation, grading or construction, artifacts or other archaeological resources are discovered, all work in the immediate area of the find shall be halted and the applicant shall immediately notify the City Planner. A qualified archaeologist shall be called to the site by, and at the expense of, the applicant to identify the find and propose mitigation if the resource is culturally significant.	Planning Manager Archaeologist	During construction activities	Less than significant

Section	Mitigation Measure	Monitoring responsibility	Timing	Impact after Mitigation
	Work shall resume after consultation with the City of Cathedral City and implementation of the recommendations of the archaeologist.			
Cultural Resources	**CR-2.** Copies of any resource documentation (report and site records) generated in connection with the project shall be transmitted to the Agua Caliente Band of Cahuilla Indians (ACBCI) THPO for review and comment.	Planning Manager Archaeologist	During construction activities	Less than significant
Cultural Resources	**CR-3.** If a paleontological resource is accidentally uncovered during grading or construction activities for the proposed project, the project applicant/developer shall be required to notify the City of Cathedral City Planner immediately and all excavation work within ten feet of the find shall cease immediately. A qualified paleontologist or archaeologist shall be consulted to determine the necessity for monitoring any excavation and to evaluate any paleontological resource exposed during construction. Construction activity shall resume upon consultation with the City and upon implementation of the recommendations of the paleontologist or archaeologist.	Applicant/ Project Proponent Planning Manager Paleontologist	During construction activities	Less than significant
Geology and Soils	**GEO-1.** Prior to issuance of each building permit for Phases 1 and 2, the project applicant shall submit plans to the City of Cathedral City for review and approval demonstrating project compliance with the 2013 California Building Standards Code (or most recent version) seismic requirements and the recommendations of the design level geotechnical analysis (Appendix D.1, D.2, and D.3). All soils engineering recommendations and structural foundation recommendations shall be designed by a licensed professional engineer and shall be incorporated into the approved Grading and Building Plans. All onsite soil engineering activities shall be conducted under the supervision of a licensed geotechnical engineer or certified engineering geologist.	Applicant/ Project Proponent City Engineer	Before issuance of building permits	Less than significant
Geology and Soils	**GEO-2.** As part of the grading plan, any remnant of the former date palm nursery and golf course in Parcel 5 shall be located and identified for	City Engineer	Before start of construction	Less than significant

Section	Mitigation Measure	Monitoring responsibility	Timing	Impact after Mitigation
	proper abandonment. All buried structures which are removed shall have the resultant excavation backfilled with soil compacted as engineered fill with a minimum two-sack sand slurry, or as approved by the project geotechnical engineer. The Grading Plan shall be reviewed and approved by the City Engineer prior to issuance of grading and building permits.			
Hazards and Hazardous Materials	**HAZ-1.** Prior to commencing operation of the cannabis cultivation facility (Certificate of Occupancy), the applicant will be required to show the City proof of contract with a licensed hazardous waste hauler that will be responsible for removing all hazardous wastewater and solid waste generated at the project site.	Applicant/ Project Proponent Planning Manager	Prior to the Certificate of Occupancy	Less than significant
Hazards and Hazardous Materials	**HAZ-2.** The applicant shall submit a Permit to the City from Riverside County Department of Environmental Health for an Abandoned Well Site prior to the issuance of a Grading Permit to ensure that the existing water supply well in Parcel 4 is properly destroyed/abandoned in accordance with State and County regulations.	Applicant/ Project Proponent Planning Manager	Prior to the issuance of any Grading Permit	Less than significant
Hazards and Hazardous Materials	**HAZ-3.** Prior to operation of the project, the applicant shall electronically submit a HBMP to the California Environmental Reporting System, to be reviewed and approved by the Riverside County Fire Department (CUPA).	Applicant/ Project Proponent Planning Manager	Prior to the issuance of any a Certificate of Occupancy	Less than significant
Hazards and Hazardous Materials	**HAZ-4**. Any outdoor lighting installed shall be hooded or shielded to prevent either spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.	Planning Manager	Prior to the issuance of a Building Permit and a Certificate of Occupancy	Less than significant
Hazards and Hazardous Materials	**HAZ-5.** In compliance with the determination letter from Riverside County ALUC, the following uses shall be prohibited: • Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with the airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at the airport, other than an FAA approved	Planning Manager	Prior to the issuance of a Building Permit and a Certificate of Occupancy	Less than significant

Section	Mitigation Measure	Monitoring responsibility	Timing	Impact after Mitigation
	navigational signal light or visual approach slope indicator. • Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at the airport. • Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, artificial marshes, trash transfer stations that are open on one or more sites recycling centers containing putrescible wastes, and construction and demolition debris facilities.) • Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.			
Hazards and Hazardous Materials	**HAZ-6.** The "Notice of Airport in Vicinity" sign attached to Appendix E.4 shall be provided to all potential purchasers of the property.	Applicant/ Project Proponent	Prior to Sale of Property	Less than significant
Hazards and Hazardous Materials	**HAZ-7.** Any new retention or detention basin on the site shall be designed to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around detention basin(s) that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.	Applicant/ Project Proponent City Engineer	Prior to issuance of any Grading Permits	Less than significant
Hydrology and Water Quality	**HWQ-1.** Since the proposed private wells on site are anticipated to pump more than 25 acre-feet per year from the aquifer, the project applicant will be required to pay the Replenishment Assessment Charge (RAC) to CVWD before issuance of a certificate of occupancy to contribute to groundwater replenishment	Applicant/ Project Proponent Planning Manager	Prior to the issuance of a Certificate of Occupancy	Less than significant

Section	Mitigation Measure	Monitoring responsibility	Timing	Impact after Mitigation
	efforts. The applicant shall provide proof of payment to the City before issuance of proof of occupancy and before start of project operations.			
Noise	**NOI-1.** During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.	Chief Building Official Code Compliance	Prior to Issuance of a Building Permit and During Construction	Less than significant
Noise	**NOI-2.** The project applicant shall incorporate Whisper Quiet Fan Systems into the project design.	Chief Building Official	Prior to Issuance of a Building Permit and during project operation	Less than significant
Noise	**NOI-3.** The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the project site during all project construction.	Chief Building Official	During project construction	Less than significant
Noise	**NOI-4.** The construction contractor shall prohibit the use of music or sound amplification on the project site during construction.	Applicant/ Project Proponent Code Compliance	During project construction	Less than significant
Noise	**NOI-5.** The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.	Applicant/ Project Proponent Chief Building Official	During project construction	Less than significant
Transportation/ Traffic	**TIA -1.** The applicant shall construct a traffic signal at the intersection of Ramon Road and El Toro Road prior to operation of the project.	Applicant/ Project Proponent City Engineer	Prior to Certificate of Occupancy	Less than significant

Section	Mitigation Measure	Monitoring responsibility	Timing	Impact after Mitigation
Transportation/ Traffic	**TIA-2.** The applicant shall construct a controlled street stop at the project access point on the east end of the site and Ramon Road prior to operation of the project.	Applicant/ Project Proponent City Engineer	Prior to Certificate of Occupancy	Less than significant
Transportation/ Traffic	**TIA-3.** The project applicant shall follow all recommendations for onsite and offsite roadway improvements, as outlined in Section VII of the TIA prepared for the project. • Ramon Road, from the west project boundary to the east project boundary, shall be constructed as an Arterial Highway (126 foot right-of-way) at its ultimate half-section width, including landscaping and parkway improvements in conjunction with development. • A deceleration lane shall be constructed at the Project Access and Ramon Road intersection. • On-site traffic signing/striping should be implemented in conjunction with detailed construction plans for the project site. • Sight distance at the project accesses shall comply with standard California Department of Transportation and City of Cathedral City sight distance standards. The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met. Such plans must be reviewed by the City and approved as consistent with this measure prior to issue of grading permits.	Applicant/ Project Proponent City Engineer	Prior to issuance of a Certificate of Occupancy	Less than significant
Tribal Cultural Resources	**TCR-1.** An approved Agua Caliente Native American Cultural Resource Monitor(s) must be present during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.	Planning Manager Cultural Resource Monitor	During construction activities	Less Than Significant