	INITIAL STUDY/NEGATIVE DECLARATION

Project Title:	Socanna Corporation Palm Springs
Case No.	5.1519—CUP
Assessor's Parcel No.	666-402-002
Lead Agency Name and Address:	City of Palm Springs 3200 E. Tahquitz Canyon Way Palm Springs, California 92262
Project Location:	19021 Newhall Street, Palm Springs, CA 92262
Project Sponsor's Name and Address:	Socanna Corporation 19021 Newhall Street Palm Springs, CA 92262
General Plan Designation(s):	RBC (Regional Business Center) with Wind Energy Overlay
Zoning:	M-2 (Manufacturing)
Contact Person:	Edward Robertson City of Palm Springs 3200 E. Tahquitz Canyon Way Palm Springs, California 92262
Phone Number:	760-323-8245
Date Prepared	June, 2021

Table of Contents

CHAPTER 1: INTRODUCTION AND PROJECT DESCRIPTION

Description of the Project

The Socanna Corporation Palm Springs Project consists of a Conditional Use Permit for proposed cannabis cultivation and manufacturing uses. The Conditional Use Permit will be processed pursuant to Palm Springs Zoning Code (PSZC) Section 94.02.00. The Project proposes the reuse of an existing one-story building on a 0.4-acre± parcel at the southwest corner of 19th Avenue and Newhall Street (Exhibits 1-4). The site is fully developed with a 4,777-square-foot building and associated landscaping and parking lot. The Project site shares an access off 19th Avenue with the parcel to the west through a 24-foot easement (Exhibit 4).

The existing building onsite was constructed in 2006, and was occupied by a fire sprinkler contractor until 2010. From 2013 to 2018, it was occupied by a wind power plant company for office use. The building is currently vacant. The Project proposes the reuse of the building as a low-density cannabis cultivation facility, with accessory manufacturing and distribution uses. The grow tables will be single tier only, and manufacturing will be limited to cutting, trimming, drying, sealing and packaging of cannabis plant materials.

The Project will require minor interior renovation to the existing building, including installing security bars on the windows, and painting and caulking the existing rooms. No ground disturbance or other site improvement is proposed.

Utilities and Service Providers:
The following agencies and companies will provide service to the Project site:

1. Sanitary Sewer: Private septic tanks
2. Water: Mission Springs Water District (MSWD)
3. Electricity: Southern California Edison
4. Gas: The Gas Company
5. Telephone: Frontier
6. Cable: Spectrum
7. Solid Waste: Palm Springs Disposal Service (PSDS)

Environmental Setting and Surrounding Land Uses:

North: 19th Avenue and vacant
South: Vacant and Lloyd Pest & Termite Control (commercial)
East: Newhall Street and vacant land
West: Sante Botanica (industrial) and Ruppert Street

Other public agencies whose approval is required.

Bureau of Cannabis Control.
Regional Water Quality Control Board.

RIVERSIDE COUNTY

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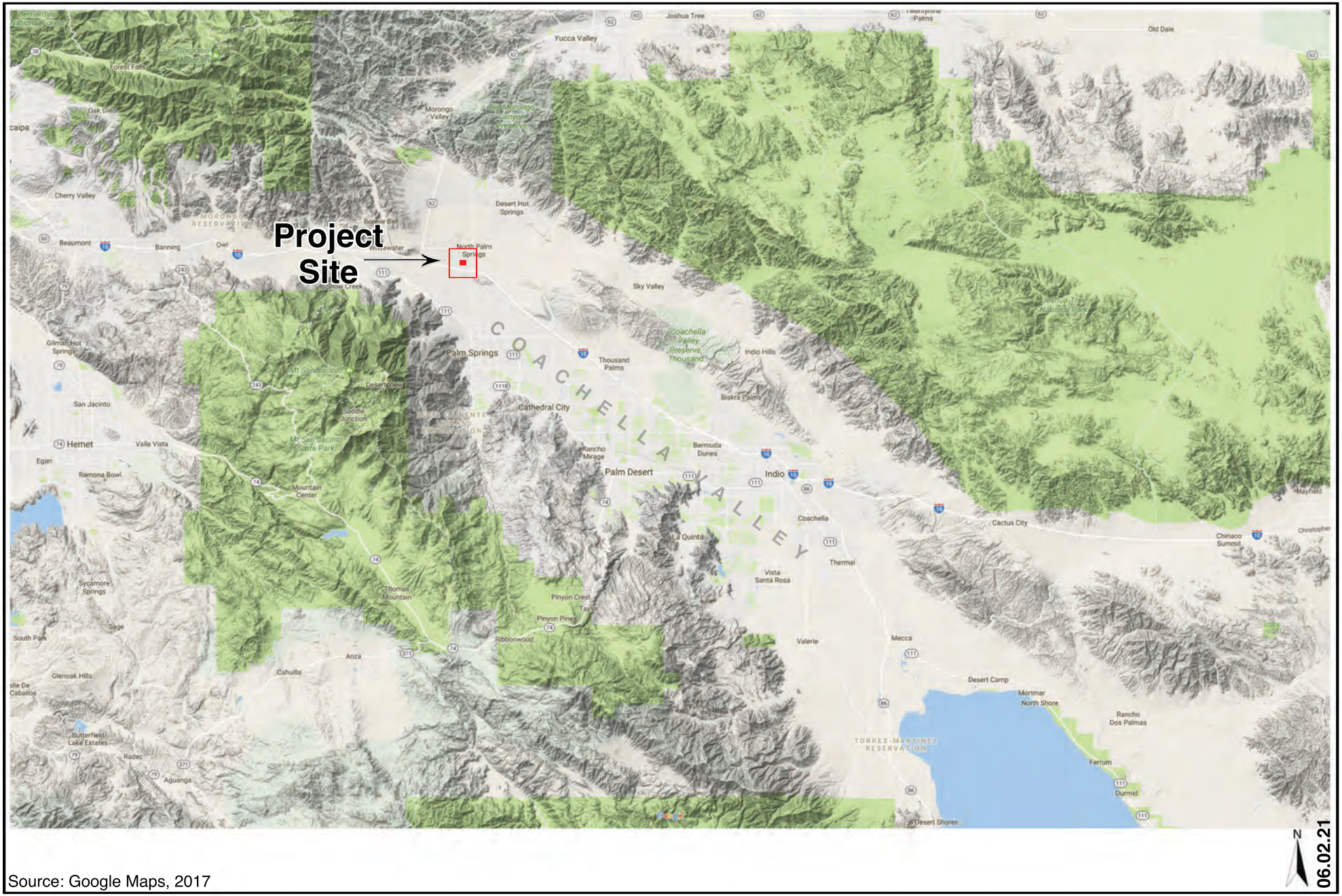
Socanna Corporation Palm Springs
Regional Location Map
Palm Springs, California

Exhibit

1



Source: Google Maps, 2017

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Socanna Corporation Palm Springs
Area Location Map
Palm Springs, California

Exhibit

2

Source: Google Earth, 2019

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Socanna Corporation Palm Springs
Vicinity Map
Palm Springs, California

Exhibit
3

Source: Google Earth, 2019

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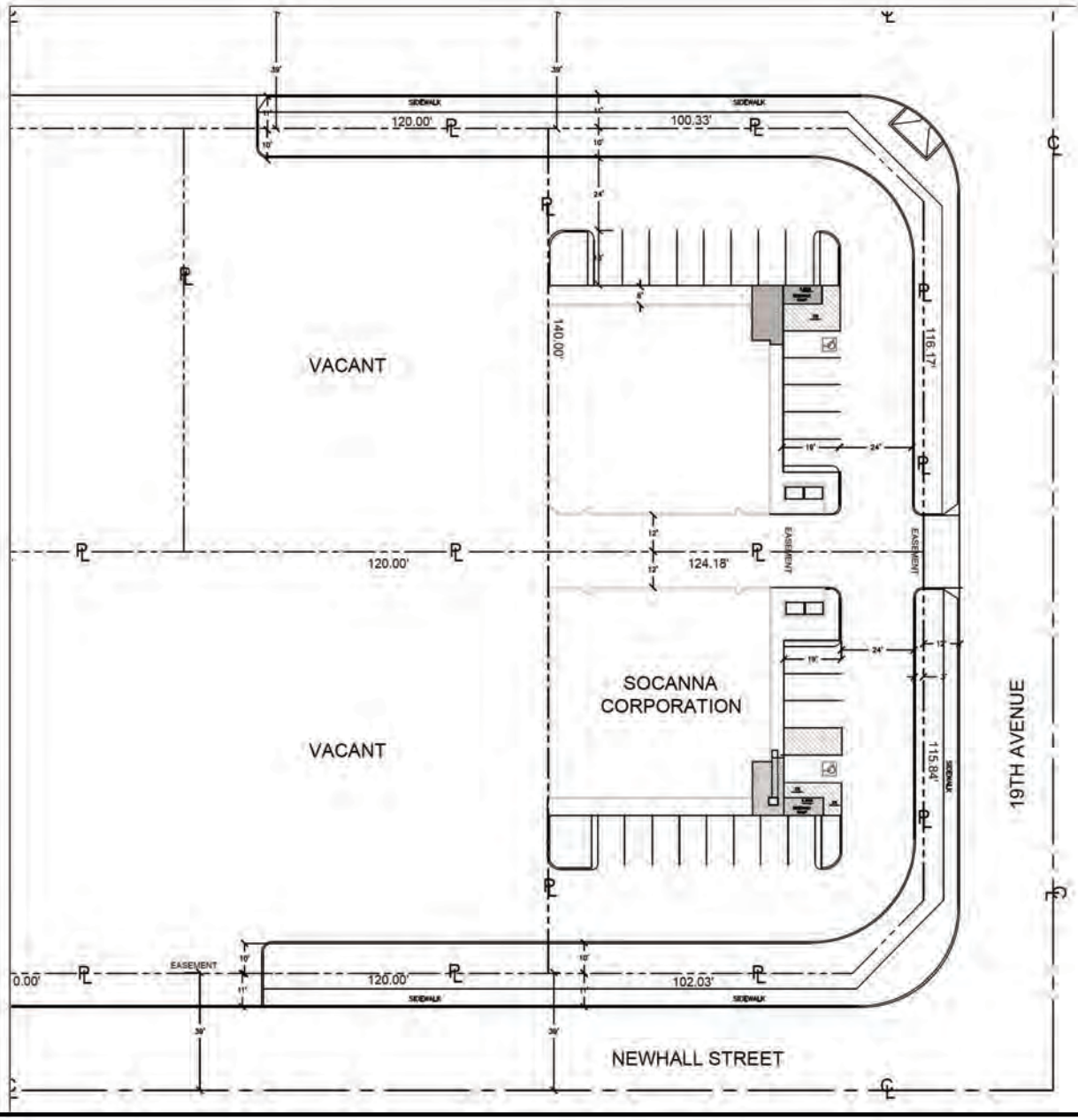
Socanna Corporation Palm Springs
Project Location Map
Palm Springs, California

Exhibit
4



Source: Desert Engineers, 2021

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Socanna Corporation Palm Springs
Project Site Plan
Palm Springs, California

Exhibit
5

NORTH ELEVATION

WEST ELEVATION

EAST ELEVATION

SOUTH ELEVATION

Source: Desert Engineers, 2021

06.02.21

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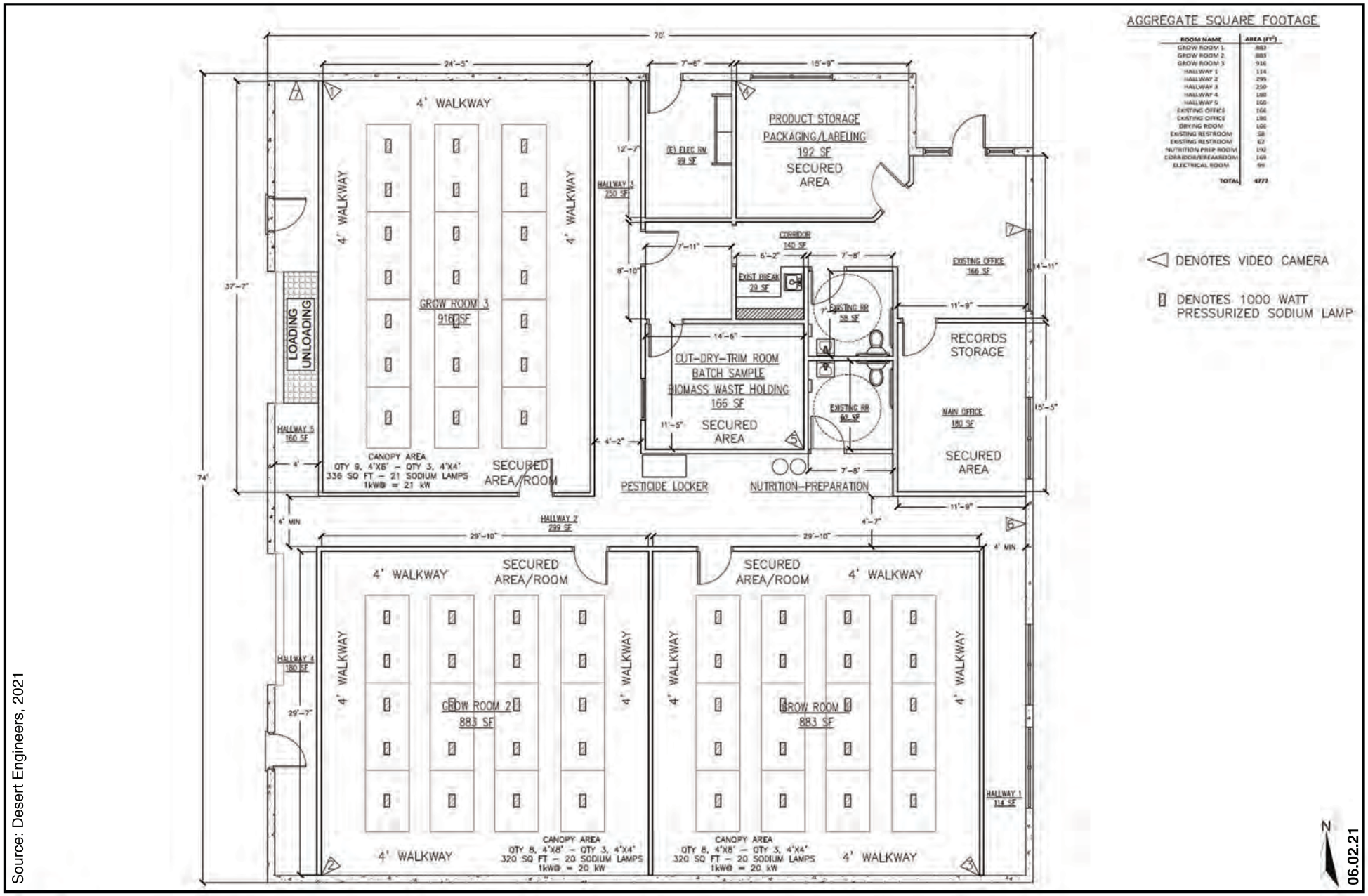
Socanna Corporation Palm Springs
Building Elevations
Palm Springs, California

Exhibit
6



Source: Desert Engineers, 2021

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Socanna Corporation Palm Springs
Building Floor Plan
Palm Springs, California

Exhibit
7

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

CHAPTER 2: ENVIRONMENTAL ANALYSIS AND DETERMINATION

DETERMINATION: The City of Palm Springs Planning Department

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 described 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.

Edward Robertson
Principal City Planner

Jo. 15.21
Date

PURPOSE OF THIS INITIAL STUDY

This Initial Study has been prepared consistent with CEQA Guidelines Section 15063, to determine if the project, as proposed, may have a significant effect upon the environment. Based upon the findings contained within this report, the Initial Study will be used in support of the preparation of a Mitigated Negative Declaration.

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross referenced).

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

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impacts to less than significance.

I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Setting

The Project site is in the northern suburban area of the City of Palm Springs in the Coachella Valley. The Project area enjoys views of the San Jacinto Mountains to the west, San Gorgonio Mountains to the northwest, San Bernardino mountains to the north and Santa Rosa Mountains to the south. The San Bernardino, Santa Rosa and San Jacinto Mountains rise significantly above the valley floor with elevations of 11,489 feet (3,502 meters(m)), 8,716 feet (2,657 m), and 10,834 feet (3,302 m), respectively.

The Project site consists of an existing one-story building (4,777 SF) and associated parking and landscaped areas. The Project proposes reusing the building for a cannabis cultivation facility with accessory manufacturing and distribution. The building is currently vacant, and the Project will require minor interior renovation including installing security bars on windows, and painting and caulking the existing rooms.

Discussion of Impacts

a) **No Impact.** Scenic vistas in the Project area mainly consist of mountain views and windmills. The Project area is semi-developed with small clusters of industrial and commercial uses, and will continue such types of development. There are and will be no permanent viewers in the area, but mainly travelers on the public streets and employees. The existing building is 12 feet tall at roof, and the rooftop AC units and exhaust fan do not exceed 24 feet in height in total.

Viewers on 19th Avenue looking south past the Project can barely see the mountains west and east of the site. Viewers on Newhall Street looking past the Project site to the west can see windmills and mid- to top ranges of the mountains north and south of the site. Viewers south of the Project site would be at/near the Lloyd Pest Control. Looking past the Project site to the north, existing views consist of vacant land in the near view, and windmills and mountains farther north on both sides of the building. Viewers near the adjacent business (Sante Botanica) and Ruppert Street looking east past the Project site can see top ranges of mountains north of the site. Overall, existing development on the Project site and surrounding area partially block views of the windmills and mountains, especially the lower and mid-ranges. The Project does not propose any change to the building exterior and appearance of the site, and thus would not impact views or alter any scenic vistas in the Project area. No impact would occur.

b) **No Impact**. The Project is not located near a state scenic highway. Interstate-10 is located approximately 0.3 miles to the south, and is designated a scenic corridor in the General Plan (Figure 9-4). There are no trees, rock outcroppings, or historic buildings on the Project site. The Project proposes the reuse of the existing building onsite, and does not propose any change to the building exterior and site appearance. No impact will occur.

c) **No Impact.** The Project proposes only interior renovation to the existing building. The building was designed in a modern/industrial style with variegated brick and stone surfaces that blend into the surrounding environment. The building was constructed in conformance with the zoning standards for height, area, and setbacks in the M-2 zone. The building area coverage is 27.8%, well below the 60% maximum allowance in the zone. Because the Project would not alter the building exterior and visual character of the site, there will be no impact on the visual character and scenic quality in the Project area.

d) **Less Than Significant Impact**. On the Project site, there is existing light from the existing building, the neighbor business (Sante Botanica), and streetlights and traffic headlights on 19th Avenue and Newhall Street. Future development in the area under the zoning and General Plan land use designations is expected to be industrial in nature, similar to the current conditions. The Project will require minor interior renovation only, which will not increase light or glare onsite. The Project will operate as an indoor cannabis cultivation facility with accessory manufacturing and distribution uses. The building will not serve any clients, patrons or shoppers directly, and will only have onsite staff and occasional shipping trucks. As discussed in Section XVII, the Project will generate fewer trips than the previous office use and will not result in an increase in glare from traffic headlights. Overall, impacts on light and glare in the area will be less than significant.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Project materials; Palm Springs Municipal Code (PSMC); Palm Springs 2007 General Plan.

II. AGRICULTURAL AND FORESTRY RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Setting

While agriculture has played a vital role in the Coachella Valley economy, the region is now a tourism and hospitality destination. Commercial agriculture still exists in the east valley. There is no agricultural activity in the City of Palm Springs, nor is there forestland or timberland in the City.

According to the Farmland Mapping and Monitoring Program (FMMP) by the California Department of Conservation, the Project site consists of Urban and Built-up Land, and is surrounded by the same type of land and Other Land.

Discussion of Impacts

a-e) **No Impact.** The Project site is zoned as Manufacturing (M-2) and designated as Regional Business Center and Wind Energy Overlay in the General Plan. The Project area is semi-developed with commercial and industrial uses.

Prime Farmland: No prime or unique farmland, or farmland of statewide importance exists within the Project site or vicinity. The Project site is not located on or near any property zoned or otherwise intended for agricultural uses. Therefore, no direct or indirect impact to state-designated agricultural land would occur.

Williamson Act: The Project site and surrounding area is not under a Williamson Act contract. The proposed Project will not conflict with zoning for agricultural uses or a Williamson Act contract. No impact would occur.

Forest Land: The Project site is located on the Coachella Valley floor, and miles away from the nearest San Jacinto Mountains. The subject site does not contain forest land, timberland, or timberland zoned as Timberland Production. The proposed Project will not result in the loss or conversion of forestland to non-forest use. No direct or indirect impact would occur.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Farmland Mapping and Monitoring Program, 1984-2018, CA Dept. of Conservation; Palm Springs 2007 General Plan.

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

The City of Palm Springs, including the Project site, lies in the Salton Sea Air Basin (SSAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). All development in the SSAB, including the proposed Project, is subject to the 2016 SCAQMD Air Quality Management Plan (AQMP) and 2003 PM_{10} Coachella Valley State Implementation Plan (SIP). The SCAQMD operates and maintains regional air quality monitoring stations at numerous locations throughout its jurisdiction. The Project site is located within Source Receptor Area (SRA) 30 (Coachella Valley), which includes monitoring stations in Palm Springs, Indio, and Mecca.

Criteria air pollutants are contaminants for which state and federal air quality standards have been established. The Salton Sea Air Basin exceeds state and federal standards for fugitive dust (PM_{10}) and ozone (O_3), and is in attainment for $PM_{2.5}$, except the City of Calexico. Ambient air quality in the SSAB, including the Project site, does not exceed state and federal standards for carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, sulfates, hydrogen sulfide, or vinyl chloride.

Discussion of Impacts

a) No Impact. A project is considered to be in conformity with adopted air quality plans if it adheres to the requirements of the SCAQMD Rule Book[1], 2016 AQMP, adopted and forthcoming control measures, and is consistent with growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that a project is consistent with the land use plan that was used

[1] "South Coast Air Quality Management District Rules and Regulations," adopted February 4, 1977 and last updated April 2, 2021.

to generate the growth forecast. A non-conforming project would be one that increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area relative to the applicable land use plan.

The 2016 AQMP is a comprehensive plan that establishes control strategies and guidance on regional emission reductions for air pollutants. The 2016 AQMP is based, in part, on the land use plans of the jurisdictions in the region, including the City of Palm Springs General Plan.

The Southern California Association of Governments (SCAG) adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) to comply with metropolitan planning organization (MPO) requirements under the Sustainable Communities and Climate Protection Act. The RTP/SCS Growth Management chapter forms the basis of land use and transportation controls of the AQMP. Projects that are consistent with the population forecasts are considered consistent with the AQMP. SCAG forecasts that the City of Palm Springs's population will be 61,600 in 2045. [2]

The Project site is designated as "Regional Business Center" in the General Plan, which allows industrial developments up to 0.5 FAR (floor-area ratio), and 60% building coverage in the M-2 zone. The proposed Project is consistent with the allowed uses and density of the land use designation. Therefore, the Project will be consistent with the 2016 AQMP, and no conflict will occur. The Project will be part of anticipated growth. It does not propose residential development and will not induce population growth. The Project will generate limited new job opportunities; these new jobs are expected to be filled by local residents and any potential attraction of new employees to the City will be minimal. The Project will not result in population growth that exceeds RTP/SCS forecasts. Therefore, the proposed Project is expected to result in emissions consistent with those anticipated in the 2016 AQMP. No impact will occur.

b) **Less than Significant Impact.** A project is considered to have significant impacts if there is a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. As noted, the SSAB (except City of Calexico) is currently in non-attainment for PM_{10} and ozone only. Therefore, if a project's construction and operational emissions exceed SCAQMD thresholds for PM_{10} and ozone precursors, which include carbon monoxide (CO), nitrous oxides (NO_x), and volatile/reactive organic compounds/gases (VOC or ROG), impacts would be cumulatively considerable and significant.

The following air quality analysis for the proposed Project is based on the Project description and application materials, and projected trip generation based on the Institute of Transportation Engineers (ITE) 9th Edition.

Criteria air pollutants will be released during both construction and operation phases of the proposed Project, as shown in Tables 1 and 2. Table 1 summarizes short-term construction-related emissions, and Table 2 summarizes ongoing emissions generated during operation. CalEEMod input data and output tables are provided in Appendix A of this Initial Study.

[2] 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Demographics and Growth Forecast Technical Report, Southern California Association of Governments, adopted September 3, 2020.

Construction Emissions:
For analysis purposes, it is assumed that construction will occur over a 1-month period with buildout in 2021. Construction is limited to minor interior renovation only, and will not require any heavy equipment or ground disturbance. The construction analysis assumes primarily worker trips for the interior renovation, and use of paints associated with interior improvements.

As shown in Table 1, emissions generated by construction activities will not exceed SCAQMD thresholds for any criteria pollutant during construction. The data reflect average daily unmitigated emissions over the 1-month construction period, including summer and winter weather conditions.

Table 1
Maximum Daily Construction-Related Emissions Summary (pounds per day)

Construction Emissions[1]	CO	NO_x	ROG	SO_2	PM_{10}	$PM_{2.5}$
Daily Maximum	3.07	4.48	5.00	0.01	0.30	0.23
SCAQMD Thresholds	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds?	**No**	**No**	**No**	**No**	**No**	**No**

[1] Average of winter and summer emissions.
See Appendix A for modeling outputs.

Operational Emissions:
Operational emissions are ongoing emissions that will occur over the life of the Project. They include area source emissions, emissions from energy demand, and mobile source (vehicle) emissions.

According to the Institute of Transportation Engineers (ITE), the proposed Project will generate approximately 8 daily trips (see Section XVII). Table 2 provides a summary of projected emissions during operation of the proposed Project. As shown below, operational emissions will not exceed SCAQMD thresholds of significance for any criteria pollutants for operations.

Table 2
Maximum Daily Operational-Related Emissions Summary (pounds per day)

Operational Emissions[1]	CO	NO_x	ROG	SO_2	PM_{10}	$PM_{2.5}$
Daily Maximum	0.08	0.07	0.13	0.00038	0.02	0.01
SCAQMD Thresholds	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds?	**No**	**No**	**No**	**No**	**No**	**No**

[1] Average of winter and summer emissions.
See Appendix A for modeling outputs.

It is important to note that the emissions from the proposed Project are not additive, insofar as the building has existed and operated as a business in the past. In addition, as described in Section XVII, the proposed Project will result in reduced trips when compared to the uses that have occurred in the building in the past. Therefore, it is expected that emissions from the proposed Project will be equal to or less than emissions generated by past users of the Project site.

Cumulative Contribution:
A significant impact could occur if the Project would make a considerable cumulative contribution to federal or state non-attainment pollutants. The Coachella Valley portion of the SSAB is classified as a "non-attainment" area for PM_{10} and ozone. Cumulative air quality analysis is evaluated on a regional scale (rather than a neighborhood or city scale, for example), given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM_{10}, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM_{10}.

The SCAQMD does not currently recommend quantified analyses of construction and/or operational emissions from multiple development projects, nor does it provide methodologies or thresholds of significance for assessing the significance of cumulative emissions generated by multiple cumulative projects. However, it is recommended that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As shown in the tables above, Project-related PM_{10}, CO, NO_x, and ROG emissions are projected to be well below established SCAQMD thresholds. In addition, emissions are expected to be equal to or less than emissions associated with previous tenants of the building. Therefore, the proposed Project will not result in either incremental or cumulatively considerable impacts on regional PM_{10} or ozone levels.

Summary:
As shown above, both construction and operation of the proposed Project will result in criteria emissions below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Overall, Project impacts during construction and operation will be less than significant and are not cumulatively considerable from a nonattainment standpoint.

c) Less than Significant Impact. According to SCAQMD[3], sensitive receptors include residences, schools, playgrounds, childcare centers, retirement homes, hospitals, long-term health care facilities, rehabilitation centers, and convalescent centers. The nearest sensitive receptor to the Project site is single-family homes located at least 0.83 miles to the northeast.

To determine if the Project has the potential to generate significant adverse localized air quality impacts, the mass rate Localized Significance Threshold (LST) Look-Up Table was used. The mass rate Localized Significance Threshold (LST) Look-Up Table allows quantification of localized emissions at a distance of up to 500 meters (0.31 miles). Based on the Project size (0.4-acre site) and distance to the nearest sensitive receptor (0.83 miles), the 1-acre tables at a distance of 500 meters were used to provide a conservative analysis.

3 Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

Table 3 Localized Significance Thresholds Emissions (pounds per day)				
Construction/Operational	**CO**	**NO_x**	**PM_{10}**	**$PM_{2.5}$**
Maximum Emissions[1]	3.07	4.48	0.30	0.23
LST Threshold	24,417	733	52	26
Exceeds Threshold?	**No**	**No**	**No**	**No**
Emission Source: CalEEMod, version 2016.3.2 LST Threshold Source: Source Receptor Area 30, LST Mass Rate Look-up Table, SCAQMD [1] Operational emissions that affect sensitive receptors are limited to on-site area emissions. Energy and mobile emissions occur off-site.				

Table 3 shows on-site emission concentrations during Project construction and operational phases are projected to be well under LST thresholds. Overall, the impacts will be less than significant.

d) **Less than Significant Impact.** A project is considered to have a significant impact if it generates odors that adversely impact a substantial number of people. The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. The Project proposes the reuse of an existing building as a cannabis cultivation facility, and may have the potential to generate odors associated with cannabis cultivation and accessory manufacturing.

Cannabis cultivation facilities are known to have a stronger odor than average manufacturing uses. The Project will implement an odor control plan to ensure that odors are not detected off-site, as required by Municipal Code Section 5.55.200 (Adult-Use Cannabis Operating Requirements). The Project proposes indoor cultivation only, and all plants will be grown and stored indoors. During interior renovation of the existing building, any cracks in the existing walls of future cultivation rooms will be sealed with silicon caulk before latex paint is applied to further seal the entire walls. The cultivation and trim rooms will have recirculation filtration, and any exhaust will go through two rounds of filtration through ultraviolet and a carbon matrix with HEPA filter. The resulting exhaust air is anticipated to be minimal, equivalent to two residential bathroom exhaust fans in magnitude. All filters will be routinely inspected and replaced when needed. Compliance with the City's standard requirements will ensure that Project impacts related to cannabis plant odors will remain less than significant.

Mitigation Measures: None required.

Monitoring: None required.

Sources: "Final 2016 Air Quality Management Plan," prepared by South Coast Air Quality Management District, March 2017; South Coast AQMD Air Quality Significance Thresholds, April 2019; "2003 Coachella Valley PM_{10} State Implementation Plan," August 1, 2003; "Final Localized Significance Threshold Methodology," prepared by the South Coast Air Quality Management District, Revised October 2009; CalEEMod Version 2016.3.2; 2020-2045 RTP/SCS Demographics and Growth Forecast by Southern California Association of Governments; Odor Control Plan Socanna Corporation 19021 Newhall Street Palm Springs, CA, prepared by Dennis Hurvitz, May 2020.

IV. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Setting

The Coachella Valley is located within the Sonoran Desert subunit of the Colorado Desert. The Sonoran Desert hosts a wide range of biological resources that are highly specialized and endemic to the region. The proposed Project is within the boundaries of and subject to the provisions of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP; Figure 8-3). The CVMSHCP is a comprehensive regional plan that balances growth in the Coachella Valley with the requirements of federal and State endangered species laws. The Project site is not located within or adjacent to a CVMSHCP Conservation Area.

Discussion of Impacts

a) **No Impact.** The Project proposes the reuse of an existing building located in a small industrial park. The Project site consists of an existing building, ornamental trees and shrubs, and a parking lot. The Project will require minor interior renovations to the building, such as adding security bars to the windows and room preparation (painting, caulking, etc.). The Project does not propose any changes to the building exteriors or site improvements. No work will occur outside the building.

The Project site is surrounded by Newhall Street and 19th Avenue on the east and north, vacant land on the south, and a cannabis use building on the west. The Project area is semi-developed with commercial and industrial uses. The Project site is mapped as urban developed areas in the CVMSHCP Natural Communities and Development map (Figure 3-1). No special status species are known to occur on the site.

Given the scope of work required for the Project, it would not impact the ornamental plants nor cause new impacts on sensitive or special status species. No impact is anticipated.

b,c) **No Impact.** The Project site and vicinity do not contain any streams, riparian habitat, marshes, protected wetlands, vernal pools or sensitive natural communities protected by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No Project-related impacts would occur.

d) **No Impact.** The Project site is surrounded by roadways and existing development on three sides. Although there are vacant lands near the Project site, they would have minimal potential to serve as a wildlife movement corridor for any native resident or migratory species, or as a native wildlife nursery site, given the disturbance and habitat fragmentation due to the existing development in the area. The Project site may offer limited nesting sites for birds protected by the Migratory Bird Treaty Act (MBTA). Under the MBTA, nesting birds are protected from disturbance until all birds have fledged. Because the Project would only require limited interior renovation, no vegetation would be removed or impacted. The Project would not impact nesting birds.

According to the City's General Plan, wildlife corridors in the City are limited to the northwestern area located in the San Gorgonio Pass, Santa Rosa and San Jacinto Mountains, and the Whitewater River. The Project is located in a semi-developed area in Northern Palm Springs and not near any of the identified wildlife corridors. No impact would occur.

e,f) **No Impact.** The subject property is located within the boundaries of the CVMSHCP. Per CVMSHCP Section 5.2.1.1, the Local Development Mitigation Fee is only assessed on new development occurring on vacant land. The Project proposes the reuse of an existing building on a fully developed parcel, and therefore is not subject to the fee payment. The site is not within or adjacent to a CVMSHCP-designated Conservation Area, and thus will not be subject to additional mitigation measures or provisions.

During operation, the Project will maintain the existing landscaping to meet City standards. The Project will not conflict with any policies or ordinances that protect biological species, or any habitat conservation plans or natural community conservation plans. No Project-related impacts will occur.

Mitigation Measures:

None required.

Monitoring:

None required.

Sources: "Coachella Valley Multiple Species Habitat Conservation Plan," 2007; Palm Springs General Plan, 2007.

V. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Setting

The City of Palm Springs is located in the Coachella Valley, which has been home to the Cahuilla Indians since 8,000 to 12,000 years ago. The Cahuilla Indians were a Takic-speaking people consisting of hunters and gatherers. Among them were separate groups including the Pass Cahuilla, who occupied the modern-day San Gorgonio Pass and Palm Springs area, the Mountain Cahuilla, who occupied the San Jacinto and Santa Rosa Mountains, and the Desert Cahuilla, who occupied the eastern Coachella Valley. The Cahuilla people built villages along the shores of ancient Lake Cahuilla, and dispersed to the canyons and alluvial fans in the mountains as the lake dried up.

The Cahuilla population prior to European contact is estimated to range from 3,600 to as high as 10,000 persons spanning over 2,400 square miles of territory. In the 19th century, the population was decimated due to European diseases for which the Native peoples had no immunity. Native Americans of Pass and Desert Cahuilla lineages lived on in the Coachella Valley and are mostly affiliated with the nearby Indian reservations such as Agua Caliente, Morongo, Cabazon, Torres Martinez, and Augustine.

The Agua Caliente managed hundreds of plant resources and developed complex communities in Palm, Murray, Andreas, Tahquitz, and Chino Canyons. The Agua Caliente interacted with other tribes in southern California through a network of trailways.

The Coachella Valley saw the first noted European explorations in the 1820's. By the 1870's non-native settlements began to occur across the Coachella Valley, as new federal laws opened lands for new settlers. In 1853, United States Topographical Survey Engineers described the combination of palm trees and warm springs they encountered as 'Palm Springs', which became a common name several years later. Palm Springs evolved into a modern city since the postwar period and became a renowned resort and vacation destination.

Discussion of Impacts

a) **No Impact**. The City of Palm Springs contains properties that are listed by the federal government, State of California, and City of Palm Springs as historically significant. Two prehistoric archaeological districts are listed on the National Register of Historic Places: Andreas Canyon and Tahquitz Canyon. Frances Stevens School is listed on the California

Register of Historic Resources. Four sites are designated as Points of Historic Interest: original Palm Springs, Desert Inn, Palmdale railroad, and El Mirador Hotel and Tower. The City also designates historic resources as Class 1, 2 or 3 for at least 50 resources per Municipal Code Chapter 8.05 Historic Preservation. None of these occur in or near the Project area.

The Project area is sparsely developed with commercial/industrial uses. The Project site is fully developed with a one-story building, associated landscaping and a parking lot. The Project site and vicinity do not contain any listed or potential historic resources, nor is it in a designated historic district. No impact is expected.

b) **No Impact.** The General Plan identified areas likely to contain prehistoric village sites, including Whitewater, Chino, Tahquitz, and Palm Canyons and the areas around the foot of the San Jacinto Mountains. The Project is not located within or near an area of known archaeological sites identified in the General Plan (Figure 5-6). The Project site is also located out of, and far from any area identified as containing sensitivity for cultural resources such as rock shelters, lithic workshops, milling features, prehistoric village sites, and pottery and lithic scatters (General Plan Figure 5-5).

The Project site is fully developed and covered by an existing building, landscaping area and parking lot. The Project requires only interior renovation for the existing building, and will not involve any ground disturbance. Therefore, no impact will occur on archaeological resources on the Project site.

c) **No Impact**. No cemeteries or human remains are known to occur onsite. As noted above, the Project site is fully developed and covered by existing development. The Project will involve indoor work only during construction and operation and would not cause any ground disturbance. Therefore, no impact would occur to cemeteries or human remains.

Mitigation Measures:

None required.

Monitoring:

None required.

Source: Palm Springs General Plan, 2007.

VI. ENERGY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting

Electricity
Southern California Edison (SCE) provides electricity to the City of Palm Springs, including the Project area. Currently, SCE serves approximately 4.4 million residential service accounts and 520,000 commercial service accounts which use up to 69 percent of total electricity in SCE's service area.[4] SCE is mandated to include alternative energy sources to conserve energy resources. There are high-voltage transmission lines of up to 500 kilovolts crossing the Coachella Valley on an east-west trending utility corridor generally located north of Interstate-10.

Natural Gas
Southern California Gas Company (SoCal Gas) provides natural gas services to the City of Palm Springs. Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the valley near and parallel to Interstate-10 and continue west to Los Angeles. The pipelines include one 30-inch line and two 24-inch lines, with pressures of 2,000 pounds per square inch (psi).

Renewable Energy and Energy Efficiency
Palm Springs encourages and supports the use and production of clean energy sources that benefit the environment and local economy. The four primary forms of alternative energy produced and used in the City include wind energy, solar energy, cogeneration, and hydrogen fuel cells.

The City participates in the Southern California Local Government Initiative and SCE's Community Energy Efficiency Program, which gives builders incentives to exceed state energy-efficiency standards by 15%. Both SCE and SoCalGas offer various programs and incentives for all users to help reduce energy consumption.

Discussion of Impacts

a,b) Less than Significant Impact. The proposed Project will require energy resources during construction (minor interior renovation only) and operation. Construction related energy demand comes from equipment operation and manufacturing of construction materials. The building was in office use since it was built in 2006 until 2018 (vacant from 2010 to 2013). At buildout, the Project will operate as a cultivation facility and generate energy demand from

[4] Pages 42 and 43, Errata to Southern California Edison Company's Amended Energy Efficiency Rolling Portfolio Business Plan For 2018-2025, SCE, May 15, 2017.

building/site lighting, HVAC systems, and cultivation activities that require highly regulated lighting, irrigation, and temperature control. Based on an average electricity demand of 150 kWh/year/SF for cannabis cultivation[5] and 9.52 kWh/year/SF for general office use (CalEEMod version 2016.3.2, see Appendix A), the Project will result in an approximately 427,059 kWh increase in annual electricity demand for the 3,040 SF converted to cultivation activities from office use. The Project will require sealing the existing interior walls with caulk and paint, which will help with temperature control and reduce energy waste due to leaking. In addition, the structure is built of masonry, which provides excellent insulation. It is not expected that the Project will utilize natural gas. The Project will not consume energy in a wasteful, inefficient, or unnecessary manner.

Adherence to the applicable state standards enforced by SCE and SoCalGas will ensure the Project is consistent with current energy standards and conservation goals laid out in the City's Sustainability Plan (2016). Impacts related to energy are expected to be less than significant.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Palm Springs 2007 General Plan; City of Palm Springs Sustainability Plan.

[5] Energy Consumption Model for Indoor Cannabis Cultivation Facility, Mehboob et al., June 2020, IEEE Open Access Journal of Power and Energy.

VII. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
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 direct or indirect 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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Setting

The Coachella Valley lies within the Salton Trough, a northwest-southeast trending tectonic depression extending from the San Gorgonio Pass to the Gulf of Mexico. The Salton Trough is dominated by several northwest trending faults, most notably the San Andreas Fault system. The Salton Trough is bounded by Santa Rosa and San Jacinto Mountains on the southwest, San Bernardino Mountains on the north, and Little San Bernardino – Chocolate – Orocopia Mountains on the east.

The Coachella Valley's geologic composition and seismicity are heavily influenced by the nearby San Andreas Fault system, which passes through the northeastern portion of the valley, and other active faults. The region is susceptible to various geologic hazards based on specific location and soil composition, such as ground rupture, major ground shaking, slope instability, and collapsible and expansive soils.

Episodic flooding of major drainages, including the Whitewater River, results in the deposition of sand and gravel on the valley floor. Strong sustained winds emanating from the San Gorgonio Pass cause wind erosion and transport and deposit dry, finely granulated, sandy soils on the central valley floor. Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream deposited) and aeolian (wind deposited) sediments on the central valley floor.

Discussion of Impacts

a)

i) No Impact. According to the General Plan Seismic Hazards Map (Figure 6-1), the Project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Fault Zone is associated with the Banning Pass Fault and runs approximately 0.6 miles north of the site. Therefore, no fault rupture is expected onsite, and no impact would occur.

ii) Less Than Significant Impact. The Project site is near several active faults, including the Banning Pass Fault to the north, and Garnet Hill Fault, South Pass Fault and Palm Canyon Fault to the south and southwest. The closest is the Banning Pass Fault, located approximately 0.6 miles north of the Project site. These faults are capable of producing earthquakes and severe ground shaking in the City. Studies have shown the Coachella Valley has been subject to a major quake up to Richter magnitude 7.9 every 150 years, on average, although no major quake occurred in the last 300 years.

The existing building on the Project site was constructed in 2007, in accordance with the California Building Code (CBC) and Palm Springs Municipal Code Chapter 8.04 to provide collapse-resistant design. According to the General Plan, the entire City is located within Seismic Zone 4 and is potentially subject to the highest acceleration due to seismic shaking. The Project proposes only minor interior renovation to the existing building, and does not propose any structural modification. Therefore, the Project will not increase seismic hazards compared to existing conditions. Impacts from ground shaking will remain less than significant.

iii) No Impact. Liquefaction occurs when loose, soft, unconsolidated, or sandy soils become saturated with water during an earthquake, causing the soil to lose strength and potential structural damage. Liquefaction requires coexistence of three conditions: liquefaction-susceptible soils; groundwater within 50 feet or less below ground surface; and strong seismic shaking. According to the General Plan Seismic Hazards Map (Figure 6-1), the Project site is classified as "Low Liquefaction Susceptibility – Fine-grained granular sediments susceptible to liquefaction, but with groundwater depths greater than 50 feet."

According to the United States Department of Agriculture Web Soil Survey, underlying soils at the Project site consist of 100% ChC (Carsitas cobbly sand, 2 to 9 percent slopes). Because the depth of groundwater is greater than 50 feet below ground surface in the Project area, liquefaction is not expected to occur onsite. The sands would not be prone to consolidation under the existing building load and during ground shaking. No impact is expected.

iv) **No Impact.** The Project site lies on the desert floor and is surrounded by generally flat terrain. The nearest foothill slope of Garnet Hill is located approximately 0.8 miles to the southeast. Therefore, no impact regarding landslides would occur on the Project site.

b) **No Impact.** The Project proposes the reuse of an existing building and will require interior renovation only. No grading or excavation would occur, nor does the Project involve any other site disturbance. Therefore, the Project will not increase erosion or loss of topsoil on the Project site. No impact would occur.

c) **No Impact.** As discussed above in subsections (a) iii-iv), the Project site is not subject to landslide or liquefaction hazards. Lateral spreading is often associated with liquefaction when soils move laterally during seismic shaking. Given the low risk associated with liquefaction and its related hazards in the Project vicinity and generally flat site topography, there is low likelihood of lateral spreading onsite.

Ground subsidence is considered a regional issue, mainly associated with groundwater extraction in the Coachella Valley. The General Plan Action SA2.4 calls for a groundwater monitoring program to combat ground subsidence. The water agencies have implemented programs to conserve water and replenish groundwater to reverse the overdraft situation in the valley, which will also help mitigate subsidence.

The existing building on the Project site was built in accordance with City requirements. Compliance with City standards for site-specific soil and geotechnical analysis was implemented prior to issuance of building permits, which would prevent soil instability issues including collapse. The Project will require interior renovation only and will not modify the building structure. No impact is anticipated.

d) **No Impact.** Expansive soils are those that can retain moisture and have shrink/swell potential, and in the Valley are generally associated with clay deposits. As noted, the site soil consists of ChC (Carsitas cobbly sand), which have a texture of cobbly or gravelly sand. According to the USDA Official Soil Series Descriptions, the clay content ranges from 0 to 5 percent for ChC. The site soil is not considered expansive. No impact would occur.

e) **No Impact.** Mission Springs Water District (MSWD) provides water and sewer services to Desert Hot Springs, West Garnet, and North Palm Springs, including the Project site. Currently, about half of MSWD's service area has sewer service, with 6,116 wastewater connections mainly to residents and non-residential customers in central Desert Hot Springs. In areas without sewer lines or a wastewater collection system, customers are required to use septic tanks. There is no sanitary sewer service or infrastructure in the Project area. MSWD is currently developing a second wastewater treatment plant, to be located east of North Indian Canyon, east of the Project site, to serve the southern portion of its service area. The Project will have access to that plant when the plant and conveyance system are constructed. Until MSWD extends sewer lines in the Project area, the Project will continue to use on-site septic tanks installed for the existing building.

The Project will generate minimal wastewater from cannabis cultivation, which will be captured and stored for haul away by a licensed cannabis waste removal company. The Project's activities will be monitored by the Regional Water Quality Control Board, which has permitting requirements for both septic tanks and cannabis facilities. The onsite underlying soils consist of cobbly or gravelly sands that are excessively drained and feature free percolation. These soils are generally considered suitable for septic tanks. Because the Project will not route

cannabis waste to the onsite septic tank and operation would generate minimal wastewater that can be handled by the existing septic tank onsite, no additional facilities would be required. No Project-related impact is anticipated.

f) **No Impact.** The site is underlain by recently deposited alluvium, and is unlikely to contain paleontological resources. The Project site is fully developed and covered by the existing building, landscaping and parking lot. The Project will require minor renovation within the building only, and no ground disturbance will occur at any stage of the Project. No impact will occur to paleontological resources.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Palm Springs General Plan, 2007; Soil Map—Riverside County, Coachella Valley Area, California," U.S. Department of Agriculture Natural Resources Conservation Service, accessed May 18, 2021.

VIII. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate 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?	☐	☐	☒	☐

Setting

Greenhouse gases (GHG) play a critical role in determining the earth's surface temperature due to their shared characteristic of trapping heat. Natural and anthropogenic processes release GHGs into the atmosphere such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds (hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride). Anthropogenic GHG emissions in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to an overall trend of unnatural warming of the earth's climate, known as global climate change or global warming.

State laws, such as Assembly Bill 32 (AB 32) and Senate Bill 32 (SB 32), require all cities to reduce greenhouse gas emissions to 1990 levels by the year 2020. SB 32 is the extension of AB 32 which requires the state to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030. The City of Palm Springs prepared a Climate Action Plan in 2013 and updated its Sustainability Plan in 2016 to achieve goals identified in state laws.

GHG Thresholds

On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 $MTCO_2e$/yr that only applies to industrial uses' stationary sources where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document that also recommended a threshold for all projects using a tiered approach.

It was recommended by SCAQMD staff that a project's greenhouse gas emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the project below an absolute threshold (10,000 $MTCO_2e$/year for industrial projects; 3,000 $MTCO_2e$/year for residential and commercial projects)?
- Tier 4: Is the project below a (yet to be set) performance threshold?
- Tier 5: Would the project achieve a screening level with off-site mitigation?

The analysis provided below is based on this tiered approach.

Discussion of Impacts

a, b) Less Than Significant Impact. The proposed Project will generate GHG emissions during both construction and operation. As described above in Section III, Air Quality, the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to quantify air quality emission projections, including greenhouse gas emissions (Appendix A).

Construction

Construction activities will result in short-term GHG emissions associated with equipment operation and construction worker commute. Construction emissions are projected to be 3.40 $MTCO_2e$ in 2021 over the estimated 1-month construction period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, the construction emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 4, below).

Operation

There are five emission source categories that will contribute either directly or indirectly to operational GHG emissions, including energy usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing associated with periodic maintenance on the existing building and parking area), and mobile sources. Cannabis cultivation is considered more energy and water intensive than general light industrial uses assumed in the CalEEMod. For analysis purposes, the average electricity demand of 150 kWh/year/SF for cannabis cultivation is used.[6] Water demand is adjusted to the projections detailed in Section X (indoor use of 1.82 acre-feet per year plus outdoor use of 0.33 acre-feet per year). Operational emissions are projected to be 166.65 $MTCO_2e$/year, with energy emissions representing about 94% of all operational emissions. The combined total of (amortized) construction and operational emissions is projected to be 166.76 $MTCO_2e$/year. The proposed Project is an industrial use and thus under SCAQMD's Tier 3 industrial threshold of 10,000 $MTCO_2e$/yr. Table 4 provides a summary of the projected renovation and annual operational GHG generation associated with the proposed Project.

Table 4
Projected GHG Emissions Summary (Metric Tons)

Phase	CO_2e (MT/YR)
Construction	3.40
Operational + 30 year amortized [1]	166.76
SCAQMD Threshold (Industrial)	**10,000.00**

1. Buildout construction GHG emissions were amortized over 30-years then added to buildout operational GHG emissions. 3.40/30 =0.11

The Project will also meet the Tier 2 criterion. The City of Palms Springs has achieved reductions in GHG emissions since the adoption of the 2009 Sustainability Master Plan, 2013 Climate Action Plan, and 2013 Energy Action Plan. The Sustainability Plan was updated in 2016, which provides guiding principles and specific action items to achieve the AB 32 goals. The Project is

6 Energy Consumption Model for Indoor Cannabis Cultivation Facility, Mehboob et al., June 2020, IEEE Open Access Journal of Power and Energy.

consistent with the Sustainability Plan by maintaining the existing desert-scaping and sealing existing rooms with caulk and paint which will help conserve energy. All components of the renovation, including equipment, materials, and management practices, would be subject to current and future SCAQMD rules and regulations related to greenhouse gases such as low-VOC paint and coatings (Rule 1113).

Overall, through compliance with the Sustainability Plan and SCAQMD regulations, the Project will be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. The proposed Project's generation of GHG emissions would not make a cumulatively considerable contribution to or conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Palm Springs Climate Action Plan (2013); Palm Springs Sustainability Plan (2016); CalEEMod Version 2016.3.2; Palm Springs General Plan, 2007.

IX. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) 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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Setting

Hazardous materials include daily-used products such as paint, household cleaning products, and industrial products such as gasoline, solvents, refrigerants, and radioactive substances. The proper management of hazardous materials is a common concern for all communities including the City of Palm Springs. Beginning in the 1970s, governments at the federal, state, and local levels became increasingly concerned about the effects of hazardous materials on human health and the environment. Laws and regulations at different levels were developed to investigate and mitigate these effects. As a result, the storage, use, generation, transport, and disposal of hazardous materials are highly regulated by federal, state, and local laws and regulations.

The City of Palm Springs has many businesses that manufacture, transport, store, use, and dispose of hazardous materials; most are centered in the urban core area. The City can be affected by hazardous materials and waste in general or a major hazardous material emergency. Most of the hazardous materials generators within the City are located within five miles of the Garnet Hill and Banning faults, which have a relatively high probability of generating an earthquake in the next 30 years. Fourteen hazardous materials facilities have been identified as being located between the 100- and 500-year floodplain for the Whitewater River. Hazardous materials are transported through the City on Highway 111, Interstate 10, and the Southern Pacific Railroad.

According to the State Water Resources Control Board's GeoTracker and Department of Toxic Substances Control's EnviroStor data management systems, no sites at or near the Project site have previously experienced state or federal regulation. No sites within the Project vicinity were identified in these database searches, and no impact relating to existing hazardous materials is expected to occur on the Project site.

The Project proposes the reuse of an existing building for a cannabis cultivation facility with accessory manufacturing and distribution. Cleaners, solvents, fertilizers and pesticides may be used on-site for routine cleaning and cultivation.

Discussion of Impacts

a,b) **Less Than Significant Impact.** The Project will require minor interior renovation to the existing building, including installing security bars on windows, and painting and caulking the existing rooms. No other site improvements are proposed, and no heavy equipment would be involved. During the renovation, small amounts of paint and caulk will be used on site which are potentially flammable and could lead to spills without proper management. The Project contractor will be required to comply with laws and regulations regarding the handling, storage, and use of hazardous materials during building renovation, including those implemented by the California Occupational Health and Safety Administration (CalOSHA), Riverside County Department of Environmental Health, and Regional Water Quality Control Board.

The Project operation includes cultivation activities, accessory manufacturing and distribution of cannabis products, and routine cleaning. Manufacturing is limited to cutting, drying, trimming, packaging, and sealing of cannabis plant materials. The Project will use organic products only for cultivation activities. Because quantities of chemicals involved in cultivation and routine cleaning will be limited to those for immediate use, and no large storage area is proposed, none of these materials will be used in sufficient quantities to pose a threat to humans or cause a foreseeable chemical release into the environment.

The Project is in the process of obtaining licenses from three cannabis regulatory agencies—CalCannabis, Bureau of Cannabis Control, and the Manufactured Cannabis Safety Branch, and will be subject to various cannabis waste management requirements imposed by these agencies. The biomass waste from cultivation and manufacturing will be held in a secured area/separate room for haul away by a licensed cannabis waste removal company. The Project waste will be stored, recycled, and disposed of per applicable state and license-specific regulations.

Overall, given the limited amount of potential hazardous materials expected to be on the site and implementation of regulations on cannabis waste, Project impacts regarding hazardous materials will be less than significant.

c) **No Impact.** The nearest school to the Project site is Vista Del Monte Elementary School, located approximately 3.8 miles to the southeast. There is no school within ¼ mile of the Project site. As discussed above, the Project will have less than significant impacts regarding hazardous materials. Given the distance between the Project site and schools, no impact is expected on schools.

d) **No Impact**. Based on records review on the State of California GeoTracker and EnviroStor systems, the Project site is not included in any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The proposed Project will not create a significant hazard to the public or environment. No impact would occur.

e) **No Impact.** The nearest airport to the Project site is the Palm Springs International Airport, located approximately 5.1 miles to the southeast. The Project site is well outside the boundaries of the airport's land use compatibility plan. There will be no safety or noise hazards for people working in the area as a result of the proposed Project. No impact would occur.

f) **No Impact**. The existing building on the Project site takes access from 19th Avenue, which is shared with the cannabis business (Sante Botanica) to the west. Other than minor interior renovation of the existing building, the Project does not propose any change to the site and access. 19th Avenue is designated as a Secondary Thoroughfare (4–lane undivided) in the City's Circulation Element (Figure 4-1). In addition to local streets in the Project vicinity including Newhall Street and Ruppert Street, 20th Avenue to the south of the Project site is designated as a Collector (2-lane undivided), and Indian Canyon Drive is designated as a Major Thoroughfare (6-lane divided) to the east. These roadways, along with Interstate 10, will serve as local and regional emergency routes to and from the City. The Project will not interfere with the existing circulation pattern, as no change in the existing street grid is proposed.

The Project site had been reviewed by the City Fire and Police Departments at the time of development to ensure adequate driveways and access are provided for emergency vehicles. The site can be accessed from 19th Avenue and Newhall Street in an emergency event. The Project would have no impact on emergency response.

g) **No Impact**. According to the Fire Hazard Severity Zone maps by CalFire, the Project site is not located within or near any fire hazard zone. The Project is located miles away from mountainous areas with potential wildfire hazards. No impact is anticipated.

Mitigation Measures: None required.

Monitoring: None required.

Sources: CalRecyle website: https://www.calrecycle.ca.gov/swfacilities/compostables/cannabis; Palm Springs General Plan, 2007; California Department of Toxic Substances Control EnviroStor Database, accessed May 21, 2021; State Water Resources Board GeoTracker, accessed May 21, 2021; "Riverside County Airport Land Use Compatibility Plan Policy Document," March 2005; Fire and Resources Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection.

X. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☐
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting

Domestic Water:

The Project site is located within the service area of Mission Springs Water District (MSWD). MSWD provides domestic water service to the City of Desert Hot Springs, northern Palm Springs, and ten small communities in Riverside County, which total 135 square miles of service area and a service population of 37,600.

The District's water supply source is 100 percent groundwater extracted from District-owned wells. The service area is underlain by the Coachella Valley Groundwater Basin. MSWD produces water primarily from the Mission Creek Subbasin via ten active wells, from the San Gorgonio Pass Subbasin via four active wells, and from the Garnet Hill Subbasin via one active well. Total storage capacities of these basins are approximately 2.6, 2.2, and 1.0 million-acre feet, respectively.

The current MSWD distribution system consists of three independent water systems: 1) Desert Hot Springs and surrounding area system, 2) Palm Springs Crest System, and 3) West Palm Springs Village System. MSWD constructed numerous storage tanks at varying elevations to provide adequate pressure to its service area. The entire MSWD system has approximately 1.26 million linear feet of pipeline with a total storage capacity of 19.65 million gallons (MG).

Wastewater:
The Project site is within the MSWD boundaries for sewer services. The District provides sewer service to approximately 26,000 people in Desert Hot Springs, Desert Crest Country Club and Dillon Mobile Home Park. The Horton Wastewater Treatment Plant (HWWTP) serves the City of Desert Hot Springs and adjacent unincorporated areas. The small Desert Crest Wastewater Treatment Plant (DCWWTP) serves the Desert Crest community and some surrounding areas.

MSWD is working to develop a new Regional Wastewater Treatment Plant (RWWTP) near I-10 in the City of Desert Hot Springs. The RWWTP will treat excess flow from the existing systems and additional projected flows in the area. The DCWWTP is scheduled to be decommissioned upon completion of the RWWTP. The RWWTP will also provide close access to wastewater treatment for the I-10/Indian Canyon commercial corridor which includes properties in the cities of Palm Springs and Desert Hot Springs, including the Project site.

Currently, there is no sanitary sewer service in the Project area. The proposed Project will continue to use septic tanks until the RWWTP and supporting conveyance systems are available.

MSWD currently does not have recycled water use within its service area; however, there are plans to use recycled water for the irrigation of golf courses, parks, medians and greenbelts in the future.

Flood Control:
Palm Springs is susceptible to flash flooding, due to a combination of desert climate and unpredictable seasonal rainfall, steep terrain in the surrounding mountains with impervious rocks, and scarcity of vegetation. Portions of the City face the hazard of storm-induced flooding of the Whitewater River and other manmade and natural channels. Sheet flow can also cause flooding on alluvial fans in part of the City. The Riverside County Flood Control and Water Conservation District (RCFCWCD) has built and maintains flood control structures which help reduce flood damage in the City. The City implements a master drainage plan prepared in conjunction with RCFCWCD. The City requires on-site detention and/or retention basins for all new development to manage surface water flows and reduce runoff from sources such as stormwater and landscape irrigation (Municipal Code Section 8.70.100).

Surface Water Quality:
Land uses can heavily influence the water quality of regional surface waters, especially agriculture, industrial, and urban land uses. Runoff from storm water and irrigation can collect and transport pollutants on the ground surface and affect water quality of receiving streams, rivers, and channels. Several local and regional flood control facilities within the City drain into the Whitewater River and ultimately the Salton Sea.

Discussion of Impacts

a) **Less Than Significant Impact.** The Project proposes the reuse of an existing building for a small cannabis cultivation facility with accessory manufacturing and distribution. The Project will require minor interior renovation to the building, but no grading or other ground disturbance would occur.

There is no sanitary sewer in the Project area. MSWD has plans to extend sewer services through a future wastewater treatment plant and pipelines; the Project would have the opportunity to connect to the public sewer system once it is available. Until then, the Project will rely on the existing on-site septic tank. The Project will operate as a small size (4,777 SF), low density (single tier grow tables only) indoor cannabis cultivation facility, and will not discharge cannabis waste into the onsite septic tank or the public sewer system. Wastewater from cultivation is anticipated to be minimal, if any, and will be captured and stored for haul away by a licensed cannabis waste removal company. Therefore, the Project will not require any modification to the onsite septic tank. However, the Project is subject to the Cannabis Cultivation General Order implemented by the State Water Board, and will need to apply for a conditional exemption for indoor cultivation.

While exempt from the California Department of Public Health and Regional Water Quality Control Board reviews and approvals, the Project will still be subject to the City's and Regional Water Quality Control Board discharge standards. The Project will also be required to comply with National Pollutant Discharge Elimination System (NPDES) regulations including best management practices (BMPs) established for the Project site when it was constructed, that control, manage, and/or eliminate pollution in surface waters. Compliance with local, state and federal laws and regulations will assure that the proposed Project will not violate any water quality standards or waste discharge requirements. Less than significant impact is anticipated on surface and ground water quality.

b) **Less Than Significant Impact.** The Project will generate water demand primarily from cultivation and landscape irrigation during operation. Because the Project will require only minor interior renovation to the 4,777 SF building, water demand related to such improvement will be temporary and minimal. Recently approved water supply assessments for cannabis cultivation projects in the MSWD service area have applied a water demand factor of 4.55 acre-feet per year per acre (AFY/acre)[7]. Based on this factor and site acreage (0.4-acre±), the Project has the potential to generate a demand of 1.82 AFY. In addition, the Project is projected to generate a demand of 0.33 acre-feet per year for landscaping water demand, based on the MSWD's drought tolerant landscaping formula.[8] Total water demand for the Project would be 2.15 acre-feet per year.

As discussed in detail below in Section XI, the Project is consistent with the General Plan land use designation. MSWD works with the City of Palm Springs and other jurisdictions and regularly updates its Urban Water Management Plan (UWMP) partly based on land use plans. According to the latest 2015 UWMP, MSWD has sufficient supply to serve existing and future development in the northern Palm Springs area, including the Project site, now and in the future, with the implementation of conservation strategies.

7 Per total site acreage.

8 MSWD's Maximum Applied Water Allowance (MAWA) Formula = (93.9 inches) x (0.5) x (Landscaped Area in sq.ft.) x (0.62) = gallons per year. The existing landscaped area on the Project site is approximately 3,750 square feet.

The total water demand in 2040 is projected at 18,986 acre feet in the MSWD service area. Per the 2015 UWMP, MSWD has sufficient supplies to meet water demand in the area in an average, single-dry, and multiple-dry years. The Project water demand will represent less than 0.002% of the 2040 total water demand. The Project will be required to comply with MSWD's water efficiency requirements, including limited irrigation on the existing desert-scape landscaping areas. Therefore, the Project will have less than significant impacts on groundwater supply and recharge.

c) **No Impact.** The Project proposes the reuse of an existing building, and will require only minor interior renovation. The Project does not require any exterior site improvement and will not result in any ground disturbance. Therefore, the Project will not alter the existing drainage pattern of the site or area. No impact would occur regarding erosion/siltation, polluted runoff and flood flows.

d) **No Impact.** The Project site is located in Zone X, an area defined as having 0.2% annual chance of flooding on FEMA's Flood Insurance Rate Maps. The site is not located in a Special Flood Hazard Area designated by FEMA. There is no water body or dam within or near the Project area. No hazard from dam failure, tsunami, or seiche would occur in the Project area. No impact is anticipated.

e) **No Impact**. The Project will be required to comply with all applicable water quality standards and implement BMPs set forth at the time of original construction. Because the Project will continue to use the onsite septic tank in accordance with applicable standards and cannabis related wastewater will be hauled away and treated by a certified contractor, the Project will have no impact on a water quality control plan. Given the minimal increase in water demand attributed to the proposed Project (less than 0.002% of the 2040 total water demand in MSWD), the Project will have negligible impacts on a groundwater management plan.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Mission Springs Water District 2015 Urban Water Management Plan, June 20, 2016; Comprehensive Wastewater Facilities Strategic Plan for Mission Springs Water District, prepared by TETRA TECH, Inc. September 17, 2008.

XI. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Setting

The Project site is fully developed with a one-story building and associated landscaping and parking lot. The site is designated as Regional Business Center (RBC) with Wind Energy Overlay on the General Plan land use map. The RBC designation allows industrial and commercial uses at up to 0.5 floor-area-ratio (FAR) and office use at up to 0.35 FAR. The Wind Energy Overlay permits clean energy uses up to 15 percent of the total acreage within the industrial and RBC land uses. The subject property is zoned as Manufacturing (M-2) on the City's zoning map. The M-2 zone allows cannabis manufacturing and cultivation facilities with a conditional use permit (CUP).

Discussion of Impacts

a) **No Impact**. The Project will not physically divide an established community. The Project site is surrounded by 19th Avenue on the north, vacant parcels on the south, a cannabis business (Sante Botanica) on the west across an easement, and Newhall Street on the east. The Sante Botanica company is not related to, and operates independently of the Project facility. The Project proposes reusing the currently vacant building for small-scale cannabis cultivation, manufacturing, and distribution. No impact would occur.

b) **No Impact**. The existing 4,777 square foot building covers 27.8% of the 0.4-acre± Project site, which is under the maximum allowed coverage (60%) for the M-2 zone. The Project has been built out at 0.28 FAR, consistent with the General Plan land use designation provisions (0.5 FAR). The Project is also consistent with other zoning requirements, including building height (maximum of 40 feet). The existing building is 12-foot tall, and with the rooftop AC units and exhaust fan will still be well under the 40-foot maximum. The Project applicant will acquire a Conditional Use Permit for the cultivation and manufacturing portions of the Project; the distribution portion is allowed under the M-2 zone. No impact would occur regarding conflict with any land use plan, policy or regulation.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Project materials; Palm Springs Municipal Code (PSMC); Palm Springs 2007 General Plan.

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

Setting

The primary mineral resources in the Coachella Valley and the City of Palm Springs are sand and gravel, collectively referred to as aggregate. There is one active sand-and-gravel mining operation within the City's incorporated boundaries, southeast of the Project site on the east side of North Indian Canyon Drive, south of I-10. Two smaller mines are located just beyond the northern boundary of the City. These mines specialize in providing boulders and other crushed rock.

The State of California Geological Survey Mineral Resources Project provides the most recent and accurate information about mineral resources and assigns different Mineral Resource Zones (MRZs) designations. These include:

MRZ 1: Areas where adequate information indicates that no significant mineral deposits are present or likely to be present.
MRZ 2: Areas where significant mineral deposits are present or likely to be present and development should be controlled.
MRZ 3: Areas where the significance of mineral deposits cannot be determined from the available data.

The Project proposes the reuse of an existing building in an industrial park. The Project requires minor interior renovation only and does not involve any ground disturbance or other construction activity.

Discussion of Impacts

a, b) No Impact. The Project area is designated as MRZ 3, which means the significance of mineral deposits cannot be determined. There are no known mineral resources in the Project area.

The Project site is fully developed and designated for industrial/commercial development. The surrounding area consists of industrial and commercial development in an urban setting. There is no land designated for mining or related uses in the Project vicinity. Therefore, the Project would have no impact on loss of known mineral resources or mineral resource recovery sites.

The nearest active mining facility is located approximately 1.2 miles to the southeast of the Project site. The mining facility operates independently on its own land, and will not be impacted by the proposed Project. No impact associated with mineral resources would occur as a result of implementation of the proposed Project.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Project materials; Palm Springs 2007 General Plan; Mineral Land Classification: Aggregate Materials in the Palm Springs Production-Consumption Region, A Special Report by California Department of Conservation Division of Mines and Geology (1988).

XIII. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting

Two major types of noise sources exist in the City of Palm Springs: mobile noise sources such as motor vehicle, truck, aircraft, and rail activity; and stationary sources including commercial, industrial, manufacturing, community, and residential activities.

The City has established land use noise standards and restrictions on private activities through its Noise Ordinance (Municipal Code Chapter 11.74). The Project site is located in a semi-developed area with commercial and industrial uses. 19th Avenue and Newhall Street border the Project on the north and east, respectively. Based on the future (2025) roadway noise contours, the Project site will fall within the 60-65 dBA CNEL range (General Plan Figure 8-4; Future Roadway Noise Contours Detail (Northern Area)).

Discussion of Impacts

a) **Less Than Significant Impact.** The Project site is fully developed with an existing building and associated landscaping and parking. The Project proposes the reuse of the building for a cannabis cultivation facility with accessory manufacturing and distribution. The surrounding area consists of vacant land, roadways, and commercial/industrial uses. There are no residential uses or schools, churches, or nursing homes within at least a half mile radius of the Project site. The nearest sensitive receptor is the motel (Motel 6 North Palm Springs) located approximately 1/4 -mile southeast of the site.

City's Noise Standards

The City's General Plan Noise Element adopted the land use compatibility chart for community noise prepared by the California Office of Noise Control (Figure 8-2). For industrial, manufacturing, utilities, and agriculture land uses, the normally acceptable community noise levels range from 50 to 75 dBA. For motels and hotels, the normally acceptable community noise levels range from 50 to 65 dBA.

The City's Municipal Code Section 8.04.220 limits construction activity to between 7 a.m. to 7 p.m. on weekdays and 8 a.m. to 5 p.m. on Saturdays. No construction activity is permitted on Sundays and holidays.

Impacts of the Proposed Project on Surrounding Development

The Project will require only minor interior renovation to the existing building, including installing security bars on windows and caulking and painting the existing rooms. No ground disturbance or site improvement is needed. Construction-related noise will be limited since no heavy equipment will be used. While construction activities are exempt from the noise level limits, they are limited to the less sensitive daytime hours, as specified above. The only sensitive receptor in the Project area is a motel located just north of Interstate 10 and approximately ¼-mile southeast of the Project site. Given the distance between the motel and the Project site, and the limited interior construction work required for the Project, the motel will not be impacted from construction noise associated with the interior renovation.

The Project will operate as a cannabis cultivation facility with all activities occurring indoors. During operation, the Project facility will have a similar vehicle mix and land use activities to the surrounding land uses. The Project will not serve any customers or patrons directly, and vehicles accessing the site would be limited to employee commute and freight/delivery. The Project is expected to generate less traffic compared to the previous office use (see Section XVII), and will not increase ambient noise levels beyond the noise level forecast at General Plan buildout. Operational activities would be indoors only, and the associated noise levels would be consistent with those of light industrial uses and would not exceed City standards.

Impacts of Off-Site Noise Sources on the Proposed Project

The future noise contour of the Project site and vicinity is between 60-65 dBA CNEL, which falls within the normally acceptable noise levels of 50-75 dBA identified in the General Plan. The Project area is currently semi-developed, and the Project site will be surrounded by similar industrial/commercial uses as the area is built out. Future development will be subject to City standards for noise generation, and would not cause significant impacts on surrounding properties including the proposed Project.

Overall, impacts associated with ambient noise levels in the Project area would be less than significant.

b) **No Impact.** The Project proposes the reuse of an existing building for a cannabis cultivation facility. Operation of such facility will not generate groundborne vibration or noise. As discussed above, the Project requires minor interior renovation only and will not involve any heavy equipment that could generate groundborne vibration and/or noise. Therefore, no impact would occur regarding generation of groundborne vibration and noise.

c) **No Impact**. The Project site is located approximately 5.1 miles northwest of the Palm Springs International Airport. The Project site is located well outside of the noise contours of the Palm Springs International Airport (General Plan; Figure 8-6). The Project will not expose employees to excessive noise levels generated by the airport. No impact would occur.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Project materials; Palm Springs General Plan, 2007.

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

Setting

The City of Palm Springs has a population of 47,754 as of 2021, with an average household size of 2.00 persons. There are a total of 36,217 housing units in the City, of which 23,658 units are occupied.

Discussion of Impacts

a) **No Impact.** The Project proposes the reuse of an existing building for a small-scale, low-density cannabis cultivation facility with limited manufacturing and distribution as accessory uses. The Project will require minor interior renovation only, including installing security bars on windows, and caulking and painting the rooms. Given the limited size (4,777 square feet) and low intensity activities involved in this Project, it will likely generate a very limited number of new jobs. The minor interior renovation work is expected to be fulfilled by the local labor market, similar for the Project operation given that most cannabis activities are automated. Even if all new positions are filled by people that move into Palm Springs for new employment and housing opportunities, the increase in population would be minimal. The Project does not propose new homes or extension of roads or other infrastructure. The proposed Project will not have a direct or indirect impact on substantial unplanned population growth or housing in the City.

b) **No Impact.** The existing building on the Project site is currently vacant. The nearest residential land use is approximately 0.83-mile away. The Project will not impact or eliminate any housing or residential land use, nor displace any person. No replacement housing would be needed, and no impact would occur.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Project materials; CA Department of Finance Demographic Research Unit, Report E-5: Population and Housing Estimates for Cities, Counties, and the State, January 1, 2021.

XV. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Setting

Fire Protection: The Palm Springs Fire Department provides fire protection, emergency response, and community risk reduction services in the City. To meet fire department and fire prevention bureau requirements for cannabis facilities, the City established "Fire Code Requirements - Cannabis Related Occupancies" which will apply to the proposed Project. The nearest fire station is Fire Station 3, located at 590 E Racquet Club Road and approximately 4 miles southeast of the Project site. Fire Station 3's primary response area is from the western City limit to Gene Autry Trail and northern City limit to Tachevah Drive.

Police Protection: The Palm Springs Police Department provides police protection, community policing, and code compliance services in the City. The police station is located at 200 South Civic Drive, approximately 6.4 miles southeast of the Project site.

Schools: The City of Palm Springs and the Project site are within the boundaries of the Palm Springs Unified School District (PSUSD). Currently, PSUSD is operating sixteen elementary schools, five middle schools, four high schools, and three alternative schools. The nearest school is Vista Del Monte Elementary School at 2744 North Vía Miraleste, approximately 3.8 miles southeast of the Project site.

Parks: The City owns and maintains over 160 acres of developed parkland in 12 parks, approximately 305 acres dedicated to golf courses open to the public, as well as miles of developed greenbelts along major thoroughfares in the City. The nearest parks to the Project site are Mt. San Jacinto State Park and Desert Highland Park. Mt. San Jacinto State Park is located at 1 Tramway Road, approximately 3.1 miles southwest of the site. Desert Highland Park is located at 480 W Tramview Rd, approximately 2.9 miles southwest of the site.

Other public facilities: Other public facilities include the Palm Springs Public Library and the City Hall, located in the center of the City. There are a variety of public arts, museums, as well as cultural facilities associated with the Agua Caliente Band of Cahuilla Indians throughout the City.

Discussion of Impacts

a) i) Less Than Significant Impact. The Project proposes the reuse of an existing building in an industrial park. The Project site is fully developed, and the existing access point on 19th Avenue and emergency access had already been reviewed and approved by the City of Palm Springs Fire Department. The building was constructed in accordance with building codes and Fire Department standards, and the Project will require only minor interior renovation. The reuse of the building as a cannabis cultivation facility with accessory manufacturing and distribution will not increase the demand for fire services onsite. The Project site is already served by the Fire Station 3, which can access the property via the existing public roadway network. The Project will also be required to pay the cannabis cultivation tax, which will create revenue for the City's general fund expenses. The Project would not require the construction or expansion of fire services or facilities, and impacts would be less than significant.

ii) Less Than Significant Impact. The Project proposes reusing an existing building for a cannabis cultivation facility with accessory manufacturing and distribution. The Project site and existing building had been reviewed and approved by the Police Department at the time they were built.

During operation, the Project will be required to comply with all Police Department regulations and procedures. The Project is also subject to Municipal Code Chapter 5.55.210, which imposes security measures for adult-use cannabis businesses including cultivation, such as 24-hour security cameras and lighting and an alarm system. As noted, the Project is required to pay the cannabis cultivation tax which will create revenue for the City's general fund expenses. The Project will not increase demand for police services nor require the construction or expansion of police services or facilities. Impacts will be less than significant.

iii) No Impact. The Project proposes the reuse of an existing building for a small-scale cannabis cultivation facility. Given the small size (4,777 SF) and limited scale of the Project, it will generate few new jobs that are expected to be filled by local residents. The possibility of new student population associated with new residents moving into the area for Project job positions would be remote. The Project would not require the expanded or new school facilities. No impact is anticipated.

iv-v) No Impact. As discussed above, the Project is unlikely to generate or attract new population. Even if there will be new employees from outside the City, the number will be marginal and the impact on parks and other public facilities would be negligible. The Project is not expected to increase the demand for parks and other public facilities. No impact is anticipated.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Project materials; Palm Springs General Plan, 2007; City of Palm Springs Parks and Recreation Master Plan Draft, March 2014.

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

Setting

The City of Palm Springs offers a variety of recreational opportunities from city parks and golf courses to Indian canyons and state parks. The City owns and maintains over 160 acres of developed parkland in 12 parks, approximately 305 acres dedicated to golf courses open to the public, and over 2,630 acres of open space lands. Nearly 60 miles of trails in the urban area and desert wilderness are open to the public for hiking, biking, and alternative transportation. The City also has indoor facilities such as Desert Highland Unity Center, Demuth Community Center, and the Leisure Center and Pavilion that provide indoor recreation and programming space, meeting spaces, and other recreational amenities.

Discussion of Impacts

a,b) No Impact. The Project proposes the reuse of an existing building for a cannabis cultivation facility. As discussed throughout this Initial Study, the Project is unlikely to generate or attract new population. Even if all new jobs were to be filled by residents from outside the City, the number would be marginal and would not change the demand for recreational resources. The proposed Project will not require the construction or expansion of recreational facilities, nor will it result in a noticeable increase of use, if any. No impact is anticipated.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Project materials; Palm Springs General Plan, 2007; City of Palm Springs Parks and Recreation Master Plan Draft, March 2014.

XVII. TRANSPORTATION Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Setting

The City's roadway network consists of a hierarchy of streets that provide access to and throughout Palm Springs. The General Plan Circulation Element provides roadway classifications based on their role in the circulation network and relationship to surrounding uses.

The Project site is located on the southwest corner of 19th Avenue and Newhall Street. Newhall Street is designated a local street in the General Plan (Figure 4-1). 19th Avenue is designated as a Secondary Thoroughfare (4–lane undivided). 19th Avenue connects to Indian Canyon Drive, which is designated as a Major Thoroughfare (6-lane divided) east of the Project site. Indian Canyon Drive and Interstate 10 are designated truck routes in the Project vicinity. 20th Avenue south of the Project site is designated as a Collector (2-lane undivided), and these roadways serve as local and regional emergency routes to and from the City.

The existing building on the Project site takes access from 19th Avenue. The Project does not propose any change to site access and parking.

Discussion of Impacts

a) **No Impact.** The City established an operation threshold of Level of Service (LOS) D or better for roadways and intersections to be consistent with the Riverside County Congestion Management Program.

Existing Traffic Conditions

Project area roadways included in the General Plan Traffic Analysis include 19th Avenue and Indian Canyon Drive. Based on the General Plan EIR (2007), Indian Canyon Drive (formerly Indian Avenue north of 19th Avenue) was operating at LOS F north of 19th Avenue. The General Plan Circulation Element required improvements at critical intersections including Indian Canyon Drive north and south of 19th Avenue. Some of the improvements have been installed, including adding turning lanes and through lanes. Per the General Plan EIR, completion of the

improvements will mitigate the LOS on Indian Canyon Drive to acceptable levels. Indian Canyon Drive south of 19th Avenue is projected to operate at LOS D, with a capacity of 53,900 vehicles per day. 19th Avenue west of Indian Canyon Drive will have a capacity of 25,900 vehicles per day and will operate at LOS A at General Plan buildout.

Project Trip Generation

The Project trip generation was analyzed using vehicle trip rates from the Institute of Transportation Engineers (ITE) 9th Edition Trip Generation, an ITE Informational Report. For analysis purposes, the Nursery (Wholesale) (ITE Land Use Code 818) trip rate was used to define the proposed Project for trip generation, consistent with analysis prepared for cannabis cultivation facilities elsewhere in the City. The Project site was most recently used as an office for a wind power company until 2018. To establish a baseline to compare the Project trip generation, the General Office (ITE Land Use Code 710) trip rate was used to determine the trip generation by the previous use on the site.

Table 5
Trip Generation for Previous and Proposed Uses of the Project Site

Land Use	ITE LU Code	Quantity	Daily Rate	Daily Trips	AM Peak Hour		AM Peak Hour	
					Rate	Trips	Rate	Trips
Nursery (Wholesale)	818	0.4 acre	19.50	**8**	0.26	**NA**	0.45	**NA**
General Office	710	4.777 Thousand SF	11.03	**53**	1.56	**7**	1.49	**7**

The Project is anticipated to generate a total of 8 trips per day, none of which would occur during the AM and PM peak hours. Previous use of the Project site was a wind power company office, which is estimated to have generated a total of 53 trips per day, with 7 trips each during the AM/PM peak hours. The Project will generate fewer daily trips than the previous use on the site. Per the City's Traffic Impact Analysis Guidelines (July 2020), projects that generate less than 100 peak hour trips will not require a TIA with LOS analysis, as trips under 100 typically do not affect LOS significantly once distributed to the local roadway network. Given the limited trip generation of the Project, impacts to local roadways are considered less than significant, and less than the previous use of the property. Roadways in the Project area, including 19th Avenue and Indian Canyon Drive, are projected to operate at acceptable LOS at General Plan buildout. The proposed Project would add fractional traffic to these roadways, and is not expected to exceed the projections for General Plan buildout. The Project will result in no new impact to the roadway network.

Active Transportation Plan

According to the Active Transportation Plan (2016) prepared by the Coachella Valley Association of Governments (CVAG), there are currently no bike lanes or any other multi-modal facilities along Newhall Street, 19th Avenue, and 20th Avenue.

There are no existing bikeways in the immediate Project vicinity. There is a mixed-use bike route along Indian Canyon Drive to the east of the Project site. A Class II bike lane is identified as a 3rd Priority Project on 20th Avenue south of the Project site in the General Plan (Figure 4-5).

SunLine Transit Agency provides transit services in the Coachella Valley, including six routes in the City of Palm Springs. The northern Palm Springs area, including the Project area, is currently not served by any bus route.

The Project is expected to generate limited demand for multi-modal transportation, given the limited employee base and distance from residential and major commercial areas. The Project will not conflict with adopted policies, plans or programs addressing transit, bicycle and pedestrian facilities. No impact is anticipated.

b) **No Impact.** Under SB 743, CEQA Guidelines Section 15064.3 was amended to require all lead agencies to adopt vehicle miles traveled (VMT) as a replacement for automobile delay-based level of service (LOS) for identifying transportation impacts. A lead agency may use models or other methods to analyze a project's VMT quantitatively or qualitatively. This statewide mandate went into effect on July 1, 2020. The City of Palm Springs updated its Traffic Impact Analysis Guidelines in July 2020 to comply with the new requirements under CEQA.

The City's Traffic Impact Analysis (TIA) Guidelines identifies local serving projects and activities that generally will not require a VMT analysis based on evidence in the OPR Technical Advisory supporting SB 743 implementation. Among those identified, projects generating less than 110 daily vehicle trips meet the screening criteria for VMT analysis. As shown in Table 5, the Project will generate 8 daily trips during operation, which is much lower than the previous use onsite. Therefore, the Project is not required to complete a VMT analysis and is presumed to have less than significant impacts regarding VMT in the area and less than the previous land use. The Project will not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

c,d) **No Impact.** As noted, the Project will continue to use the access driveway on 19th Avenue. The Project proposes minor interior renovation only, and no other change to the site will occur. The Project will continue to have direct access to local and regional evacuation routes. At the time of development (2006), the Project site plan had been reviewed by the Fire Department and the Police Department for compliance with safety requirements, including emergency access and geometric design such as road widths and turning radii. The Project will not result in inadequate emergency access or increase hazards due to a geometric design feature. The Project will be used solely for indoor cannabis cultivation and accessory manufacturing and distribution. No impact will occur regarding incompatible uses.

Mitigation Measures: None required.

Monitoring: None required.

Sources: City of Palm Springs Traffic Impact Analysis Guidelines, July 2020; Project materials; Palm Springs General Plan, 2007; City of Palm Springs General Plan Update Environmental Impact Report, June 2007.

XVIII. TRIBAL CULTURAL RESOURCES 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Setting

The Coachella Valley has been home to the Cahuilla Indians for millennia. The Cahuilla were a Takic-speaking people and generally divided into three groups based on geography: the Pass Cahuilla of the San Gorgonio Pass and Palm Springs area, the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains, and the Desert Cahuilla of the eastern Coachella Valley. Abundant tribal cultural resources occur in the canyons and mountain foothills, and along the ancient Lake Cahuilla shorelines.

Today, Native Americans of Pass or Desert Cahuilla heritage are mostly affiliated with one or more of the Indian reservations in and near the Coachella Valley, including the Cabazon, Augustine, Torres Martinez, Twenty-nine Palms, Agua Caliente, and Morongo.

Given the location of the proposed Project site, no historical or archaeological resources are known or expected on the site, as discussed above in Section V.

Discussion of Impacts

i, ii) **No Impact.** As discussed above in Section V, Cultural Resources, no historical or archaeological resources are known to occur on the subject property, nor are any expected because the property is not located in any area identified to have cultural resource sensitivity, and the site is fully developed. The Project site does not contain any tribal cultural resource 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), as confirmed by the City of Palm Springs as the lead agency.

As discussed in Section V and elsewhere in this document, the Project site is fully developed with an existing building and associated parking and landscaping. The Project will involve only minor interior renovation to the existing building. No site improvement or ground disturbance would occur. Therefore, no impact to tribal cultural resources is expected as a result of the proposed Project.

The City initiated Tribal Consultation in conformance with AB 52 requirements and contacted five tribes in writing in May 2021. As of May 31, 2021, no responses have been received. Furthermore, since the site is fully developed and no ground disturbance is required, no consultation requests are anticipated. However, should one be received, the City will complete the consultation process and include conditions of approval, if necessary, to address Tribal concerns.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Palm Springs General Plan, 2007.

XIX. UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting

Domestic Water: Mission Springs Water District (MSWD) supplies 100 percent groundwater from subbasins of the Coachella Valley Groundwater Basin. MSWD's water distribution system includes storage tanks located at various elevations and approximately 1.26 million linear feet of pipeline. The existing building on the Project site is connected to the water system. There is an existing 12-inch water main within 19th Avenue and an 8-inch water main within Newhall Street.

Wastewater Treatment: MSWD provides sewer service to Desert Hot Springs, Desert Crest Country Club and Dillon Mobile Home Park. In addition to the Horton Wastewater Treatment Plant and Desert Crest Wastewater Treatment Plant serving those areas, MSWD is planning the development of a new Regional Wastewater Treatment Plant (RWWTP) near I-10 in the City of Desert Hot Springs. The RWWTP will provide close access to wastewater treatment for the I-10/Indian Canyon commercial corridor which includes the Project area. There is currently no sewer service in the Project area. The existing building uses an onsite septic system.

Flood Management: The Riverside County Flood Control and Water Conservation District (RCFCWCD) has built and maintains flood control structures in the City. The City implements a master drainage plan prepared in conjunction with RCFCWCD. New development in the City is required to provide on-site detention and/or retention basins to manage surface water flows and reduce runoff from sources such as stormwater and landscape irrigation (Municipal Code Section 8.70.100).

Solid Waste: Palm Springs Disposal Services (PSDS) provides solid waste collection and disposal services to the City. PSDS collects and processes a wide range of products in its recycling program, including green waste. Non-hazardous solid wastes are transported to the Edom Hill Transfer Station (EHTS) in Cathedral City. EHTS is owned and operated by Burrtec Waste Management, and is permitted to receive 3,500 tons of waste per day. Waste is sorted before entering the Riverside County Waste Management waste stream and sent to Lamb Canyon Landfill in Beaumont. Lamb Canyon is permitted to receive 5,000 tons of waste per day, with a remaining capacity of 19,242,950 cubic yards and a projected closing date of 2029.

Electricity: Southern California Edison (SCE) provides electricity to the City of Palm Springs. The Project site and vicinity is served by underground electric facilities.

Natural Gas: The Southern California Gas Company provides natural gas to the City of Palm Springs. There is an existing gas main within 19th Avenue north of the Project site.

Telecommunications: Landline phone and internet services in the City are mainly provided by Frontier Communications Corporation and Charter Spectrum.

Discussion of Impacts

a-c) Less Than Significant Impact.

Water

The Project site is connected to and served by existing domestic water lines in the adjacent public streets for indoor and outdoor uses. As discussed in Section X, Hydrology and Water Quality, total water demand for the Project is projected to be 2.15 acre-feet per year. In its 2015 Urban Water Management Plan (UWMP), MSWD determined that there are sufficient supplies to meet water demand in its service area in an average year, a single dry year, and a multiple dry year. The total water demand in 2040 is projected at 18,986 acre feet in the MSWD service area. The Project water demand will represent less than 0.002% of the 2040 total water demand. Furthermore, the proposed Project will be required to comply with MSWD's water efficiency requirements, including limited irrigation on the proposed desert-scape landscaping areas. The Project would not demand new or expanded water facilities. Impacts on the water system would be less than significant.

Wastewater Treatment

MSWD plans to extend sewer services along 19th Avenue and 20th Avenue. Until then, the Project will continue to use the onsite septic system. As discussed in Section X, the Project will not discharge cannabis waste into the onsite septic tank or the public sewer system. Wastewater from cultivation is anticipated to be minimal, and will be captured and stored for haul away by a licensed cannabis waste removal company. Therefore, the Project will not require any modification to the onsite septic tank.

The onsite septic system will be subject to MSWD's wastewater standards as well as the City's and Regional Water Quality Control Board discharge standards. Compliance with standard requirements and regulations of these agencies will ensure that the Project impacts will be less than significant.

Stormwater Drainage

As discussed in Section X, the Project will not result in any ground disturbance or site improvement. There will be no change to the Project drainage facilities. No impact would occur on stormwater facilities.

Electricity, Natural Gas & Telecommunications

The Project site is served by existing electricity, natural gas, and telecommunications infrastructure in the Project vicinity. Even though the Project may increase the electricity demand compared to the previous office use, such increase is finite and planned, and will not demand the addition or expansion of energy or telecommunications facilities and infrastructure.

d,e) Less Than Significant Impact. Solid waste generated by the Project facility will be collected by Palm Springs Disposal Services (PSDS), sorted for recycling and hauled to the Edom Hill Transfer Station (EHTS). EHTS is permitted to receive 3,500 tons of waste per day. After sorting, waste is sent to Lamb Canyon Landfill, which is permitted to receive 5,000 tons of waste per day with a remaining capacity of 19,242,950 cubic yards.

CalRecycle provides estimated solid waste generation rates; however, there is no specific waste generation factor for cannabis cultivation projects. The most recent (2006) and closely aligned would be industrial source at 5 lb/1000 square feet/day. The Project will have the potential to generate 23.9 pounds of solid waste per day, or 8,718 pounds (4.36 tons) per year. The Project waste generation would constitute approximately 0.0003% of the permitted daily capacity at Edom Hills Transfer Station, and less than 0.0005% of the Lamb Canyon landfill's remaining capacity.[9] These estimates do not take into account the mandated 50 percent waste diversion under current statutes. The Project will store cannabis waste onsite for haul away by a licensed cannabis waste treatment company.

The waste treatment contractor, PSDS, and Riverside County are responsible for meeting the applicable local, state and federal standards for waste handling. Given the limited quantity of waste to be generated by the Project and compliance with standard requirements, Project impacts associated with solid waste disposal will remain less than significant.

Mitigation Measures: None required.

Monitoring: None required.

Sources: CalRecycle Estimated Waste Generation Factors; Palm Springs General Plan 2007; Solid Waste Information System and Estimated Solid Waste Generation Rates, www2.calrecyle.ca.gov, CalRecycle, accessed May 2021; Project materials.

[9] Assumes that 1 CY of solid waste is equivalent to 95 lbs. "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

XX. WILDFIRE **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Setting

The California Department of Forestry and Fire Protection (CalFire) has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These maps place areas of the state into different Fire Hazard Severity Zones (FHSZ) based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. The subject property is designated as a local responsibility area, not located in or near a state responsibility area (SRA) or designated as a very high fire hazard severity zones (VHFHSZ).

Discussion of Impacts

a-d) No Impact. The nearest VHFHSZ is located approximately 4.3 miles to the southwest of the Project site. The nearest SRA is located approximately 3.4 miles to the northwest, which is classified as a moderate fire hazard severity zone. Given the distance from the nearest SRA and VHFHSZ, the Project will have no impact associated with wildfires.

Mitigation Measures: None required.

Monitoring: None required.

Sources: Fire and Resources Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

a) **No Impact.** As discussed above, the Project site is fully developed, and minor interior renovation and reuse of the existing building will not impact biological and cultural resources. No impact is anticipated.

b) **Less than Significant Impact.** The Project's impacts will not be cumulatively considerable because the proposed use of the Project site is consistent with the anticipated uses allowed in the General Plan and analyzed in the General Plan EIR. Employment and/or population growth, if any, from the Project will not exceed those analyzed in the General Plan EIR. The Project's incremental effects are not considerable when viewed in connection with other projects. Impacts will be less than significant.

c) **Less than Significant Impact.** The proposed Project will not result in substantial adverse effects on human beings. Compliance with applicable laws and regulations will ensure impacts to human beings remain less than significant.

Appendix A
CalEEMOD Air Quality and GHG Modeling
(Available for review at City Hall)