

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

**GSC HOLDING GROUP, LLC
4400 TEMPLE CITY BOULEVARD**

**DEVELOPMENT AGREEMENT No. 02-18
MEDICINAL CANNABIS CONDITIONAL USE PERMIT No. 07-18;
MEDICINAL CANNABIS CONDITIONAL USE PERMIT No. 08-18;
MEDICINAL CANNABIS CONDITIONAL USE PERMIT No. 09-18**



LEAD AGENCY:

**CITY OF EL MONTE
COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT
PLANNING DIVISION
11333 VALLEY BOULEVARD
EL MONTE, CALIFORNIA 91731**

REPORT PREPARED BY:

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NOVEMBER 9, 2018

ELMT 023

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: GSC Holding Group, LLC – 4400 Temple City Boulevard

PROJECT ADDRESS: 4400 Temple City Boulevard, El Monte, California

APPLICANT: GSC Holding Group, LLC

CITY AND COUNTY: El Monte, Los Angeles County

DESCRIPTION: The City of El Monte, in its capacity as Lead Agency, is considering an application to conduct commercial medicinal cannabis activities pursuant to El Monte City Ordinance No. 2924 within an existing 71,658 square foot industrial building located in the M-2 General Manufacturing zone. The proposed project will be located on a 4.4 acre site with frontage along the east side of Ellis Lane/Temple City Boulevard. The proposal includes medicinal-only cannabis cultivation, manufacturing, and distribution operations. No retail cannabis or cannabis product retail sales or activities will be permitted. The existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. Security features, including but not limited to, onsite security cameras, will be provided. A total of 93 parking spaces are proposed. Access to the project site is provided via two (2) existing driveways located on the east side of Ellis Lane/Temple City Boulevard. Discretionary approvals required as part of the proposed project's implementation include the following:

- Development Agreement No. 02-18;
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 07-18 for medicinal cannabis cultivation;
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 08-18 for medicinal cannabis manufacturing;
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 09-18 for medicinal cannabis distribution; and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

Other permits will also be required, including building permits for the interior tenant improvements, new utility connections, and building occupancy. The project Applicant intends to obtain TYPE 3A Cultivation License, TYPE 7 Manufacture with Volatile Solvents License, and TYPE 11 Distribution License in order to effectuate commercial medicinal cannabis cultivation, manufacturing, and distribution. The project Applicant will also be required to obtain additional licenses from the State, City, and County.

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

- The proposed project *will not* have the potential to degrade the quality of the environment.
- The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the City.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.

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



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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

The City of El Monte, in its capacity as Lead Agency, is considering an application to conduct commercial medicinal cannabis activities pursuant to El Monte City Ordinance No. 2924 within an existing 71,658 square foot industrial building in the M-2 General Manufacturing zone. The proposed project will be located on a 4.4 acre site with frontage along the east side of Ellis Lane/Temple City Boulevard. The proposal includes medicinal-only cannabis cultivation, manufacturing, and distribution operations. No retail cannabis or cannabis product retail sales or activities will be permitted. The existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. The project will require the approval of a Development Agreement and Conditional Use Permits. In addition, the Applicant intends to obtain TYPE 3A Cultivation License, TYPE 7 Manufacture with Volatile Solvents License, and TYPE 11 Distribution License in order to effectuate commercial medicinal cannabis cultivation, manufacturing, and distribution¹. The project proponent is GSC Holding Group, LLC.

As part of the proposed project's environmental review, the City of El Monte authorized the preparation of this Initial Study.² Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City of El Monte, in its capacity as the Lead Agency. The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental impacts of the proposed project and that decision-makers have considered such impacts before considering approval of the project. Pursuant to the CEQA Guidelines, purposes of this Initial Study include the following:

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

The City also determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the project's environmental review pursuant to CEQA. This Initial Study and the *Notice of Intent to Adopt a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. A 20-day public review period will be provided to allow these agencies and other interested parties to comment on the proposed project and the findings of this Initial Study.³

¹ Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018

² (CEQA Guidelines) § 15050.

³ California, State of. *California Public Resources Code. Section 21091 (b)*.

Questions and/or comments should be submitted to the following individual:

Betty Donavanik, Director of Community & Economic Development
City of El Monte, Economic Development Department
11333 Valley Boulevard
El Monte, California 91731
626-580-2056

1.2 INITIAL STUDY'S ORGANIZATION

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

- *Section 1 Introduction*, provides the procedural context surrounding this Initial Study's preparation and insight into its composition. This section also includes a checklist that summarizes the findings of this Initial Study.
- *Section 2 Project Description*, provides an overview of the existing environment as it relates to the project site and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis*, includes an analysis of potential impacts associated with the proposed project's construction and the subsequent operation.
- *Section 4 Findings*, indicates the conclusions of the environmental analysis and the Mandatory Findings of Significance. In addition, this section includes the Mitigation Monitoring and Reporting Program (MMRP).
- *Section 5 References*, identifies the sources used in the preparation of this Initial Study.

1.3 INITIAL STUDY CHECKLIST

The environmental analysis provided in Section 3 identified the scope and extent of the proposed project's environmental effects. The analysis indicated that for the environmental issues analyzed, one of the following outcomes would be possible:

- *No Impact* applies where a project does not create an impact in that category. A "No Impact" answer indicates that an impact simply does not apply to proposed project.
- *Less Than Significant Impact* applies where the project creates no significant impacts, only Less Than Significant impacts.
- *Less than Significant Impact with Mitigation* applies where mitigation measures will be required to reduce potential impacts to levels that are less than significant.
- *Potentially Significant Impact* is appropriate if there is substantial evidence that an effect may be significant.

The findings of this Initial Study are summarized in Table 1-1 provided on the following pages.

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
SECTION 3.1 AESTHETICS				
3.1.A. Would the project have a substantial adverse effect on a scenic vista?				X
3.1.B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				X
3.1.C. Would the project substantially degrade the existing visual character or quality of public view of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
3.1.D. Would the project create a new source of substantial light or glare which would adversely affect day- or night-time views in the area?			X	
SECTION 3.2 AGRICULTURE AND FORESTRY RESOURCES				
3.2.A. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
3.2.B. Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?				X
3.2.C. Would the project conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code section §12220(g)), timberland (as defined by Public Resources Code section §4526), or timberland zoned Timberland Production (as defined by Government Code section §51104(g))?				X
3.2.D. Would the project result in the loss of forest land or the conversion of forest land to a non-forest use?				X
3.2.E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or the conversion of forest land to a non-forest use?				X
SECTION 3.3 AIR QUALITY				
3.2.A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				X
3.2.B. Would the project violate any air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation?			X	
3.3.C. Would the project expose sensitive receptors to substantial pollutant concentrations?			X	
3.3.D. Would the project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?		X		

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
SECTION 3.4 BIOLOGICAL RESOURCES				
3.4.A. Would the project, either directly or through habitat modifications, have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?				X
3.4.B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
3.4.C. Would the project have a substantial adverse effect on State or Federally protected wetlands as defined (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
3.4.D. Would the project interfere substantially with the movement of any native resident or migratory fish, wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				X
3.4.E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
3.4.F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans?				X
SECTION 3.5 CULTURAL RESOURCES				
3.5.A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				X
3.5.B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?			X	
3.5.C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?				X
SECTION 3.6 ENERGY				
3.6.A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy, resources, during project construction or operation?		X		
3.6.B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			X	
SECTION 3.7 GEOLOGY AND SOILS				
3.7.A. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?			X	

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.7.B. Would the project result in substantial soil erosion or the loss of topsoil?			X	
3.7.C Would the project be located on a soil or geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
3.7.D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012) creating substantial direct or indirect risks to life or property?			X	
3.7.E. Would the project be located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
3.7.F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?				X
SECTION 3.8 GREENHOUSE GAS EMISSIONS				
3.8.A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
3.8.B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?			X	
SECTION 3.9 HAZARDS & HAZARDOUS MATERIALS				
3.9.A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X		
3.9.B. Would the project create a significant hazard to the public or the environment or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
3.9.C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X
3.9.D. Would the project be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code §65962.5, and as a result, would it create a significant hazard to the public or the environment?				X
3.9.E. For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
3.9.F. Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.9.G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				X
SECTION 3.10 HYDROLOGY & WATER QUALITY				
3.10.A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
3.10.B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
3.10.C. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows?			X	
3.10.D. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
3.10.E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
SECTION 3.11 LAND USE & PLANNING				
3.11.A. Would the project physically divide an established community?				X
3.11.B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	
SECTION 3.12 MINERAL RESOURCES				
3.12.A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				X
3.12.B. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X
SECTION 3.13 NOISE				
3.13.A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
3.13.B. Would the project result in generation of excessive ground-borne vibration or ground borne noise levels?			X	

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
SECTION 3.14 POPULATION & HOUSING				
3.14.A. Would the project induce substantial unplanned population growth in an area, either directly or indirectly?				X
3.14.B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
SECTION 3.15 PUBLIC SERVICES				
3.15.A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>fire protection services</i> ?			X	
3.15.B. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>police protection services</i> ?			X	
3.15.C. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>school services</i> ?			X	
3.15.D. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>other public facilities</i> ?			X	
SECTION 3.16 RECREATION				
3.16.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?			X	
3.16.B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
SECTION 3.17 TRANSPORTATION				
3.17.A. Would the project conflict with a plan, ordinance, or policy establishing measures addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?			X	
3.17.B. For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)?			X	

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.17.C. For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(2)?				X
3.17.D. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
3.17.E. Would the project result in inadequate emergency access?				X
SECTION 3.18 TRIBAL CULTURAL RESOURCES				
3.18.A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?			X	
3.18.B. 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 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.?			X	
SECTION 3.19 UTILITIES AND SERVICE SYSTEMS				
3.19.A. Would the project require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental impacts?			X	
3.19.B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			X	
3.19.C. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
3.19.D. Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?			X	
3.19.E. Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?				X
3.19.F. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				X

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
SECTION 3.20 WILDFIRE				
3.20.A. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project impair an adopted emergency response plan or emergency evacuation plan?				X
3.20.B. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
3.20.C. Would the project require the installation of 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?			X	
3.20.D. Would the project expose people or structure to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X
SECTION 3.21 MANDATORY FINDINGS OF SIGNIFICANCE				
3.21.A. The approval and subsequent implementation of the proposed project <i>will not</i> 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?				X
3.21.B. The approval and subsequent implementation of the proposed project <i>will not</i> 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 other effects or probable future projects)?				X
3.21.C. The approval and subsequent implementation of the proposed project <i>will not</i> have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.				X



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SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The City of El Monte, in its capacity as Lead Agency, is considering an application to conduct commercial medicinal cannabis activities pursuant to El Monte City Ordinance No. 2924 within an existing 71,658 square foot industrial building in the M-2 General Manufacturing zone. The proposed project will be located on a 4.4 acre site with frontage along the east side of Ellis Lane/Temple City Boulevard. The proposal includes medicinal-only cannabis cultivation, manufacturing, and distribution operations. No retail cannabis or cannabis product retail sales or activities will be permitted. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use.⁴ The project will require the approval of three (3) separate Conditional Use Permits, a separate approval for each proposed use of cultivation, manufacturing, and distribution. In addition, the Applicant intends to obtain TYPE 3A Cultivation License, TYPE 7 Manufacture with Volatile Solvents License, and TYPE 11 Distribution License in order to effectuate commercial medicinal cannabis cultivation, manufacturing, and distribution⁵. The project is described in greater detail in Section 2.4.

2.2 PROJECT LOCATION

The project site is located within the northwest corner of the City of El Monte and occupies frontage along the east side of Temple City Boulevard. The City is located in the San Gabriel Valley, which is located approximately 13.0 miles east of Downtown Los Angeles. El Monte is bounded on the north by Arcadia and Temple City; on the west by Rosemead; on the east by Irwindale, Baldwin Park, Industry, and unincorporated areas of Los Angeles County; and on the south by South El Monte. Major physiographic features located in the vicinity of the City include the Eaton Wash (located 550 feet southwest of the project site), the Rio Hondo River (located approximately one mile to the east), the San Gabriel River (located three miles to the east), the Puente Hills (located 4.43 miles to the southeast), and the San Gabriel Mountains (located 5.21 miles to the north).⁶

Regional access to El Monte is possible from three (3) area freeways: the San Bernardino Freeway (I-10), which traverses the City in an east-west orientation; the San Gabriel River Freeway (I-605), which extends along the City's east side in a north-south orientation; and the Pomona Freeway (SR-60), which extends along the City's south side in an east-west orientation. The location of El Monte in a regional context is shown in Exhibit 2-1. A citywide map is provided in Exhibit 2-2 and a local map is provided in Exhibit 2-3. The project site's legal address is 4400 Temple City Boulevard. The site's corresponding Assessor Parcel Number (APN) is: 8577-001-043. Major roadways in the vicinity of the project site include: Lower Azusa Road, located 750 feet to the north of the project site; Valley Boulevard, located 0.40 miles to the south; Baldwin Avenue, located 972 feet to the southeast; and, Rosemead Boulevard, located one mile to the west of the project site.

⁴ Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018.

⁵ GSC Holding Group LLC. *Business Operations Plan*.

⁶ Google Earth. Website accessed September 26, 2018.

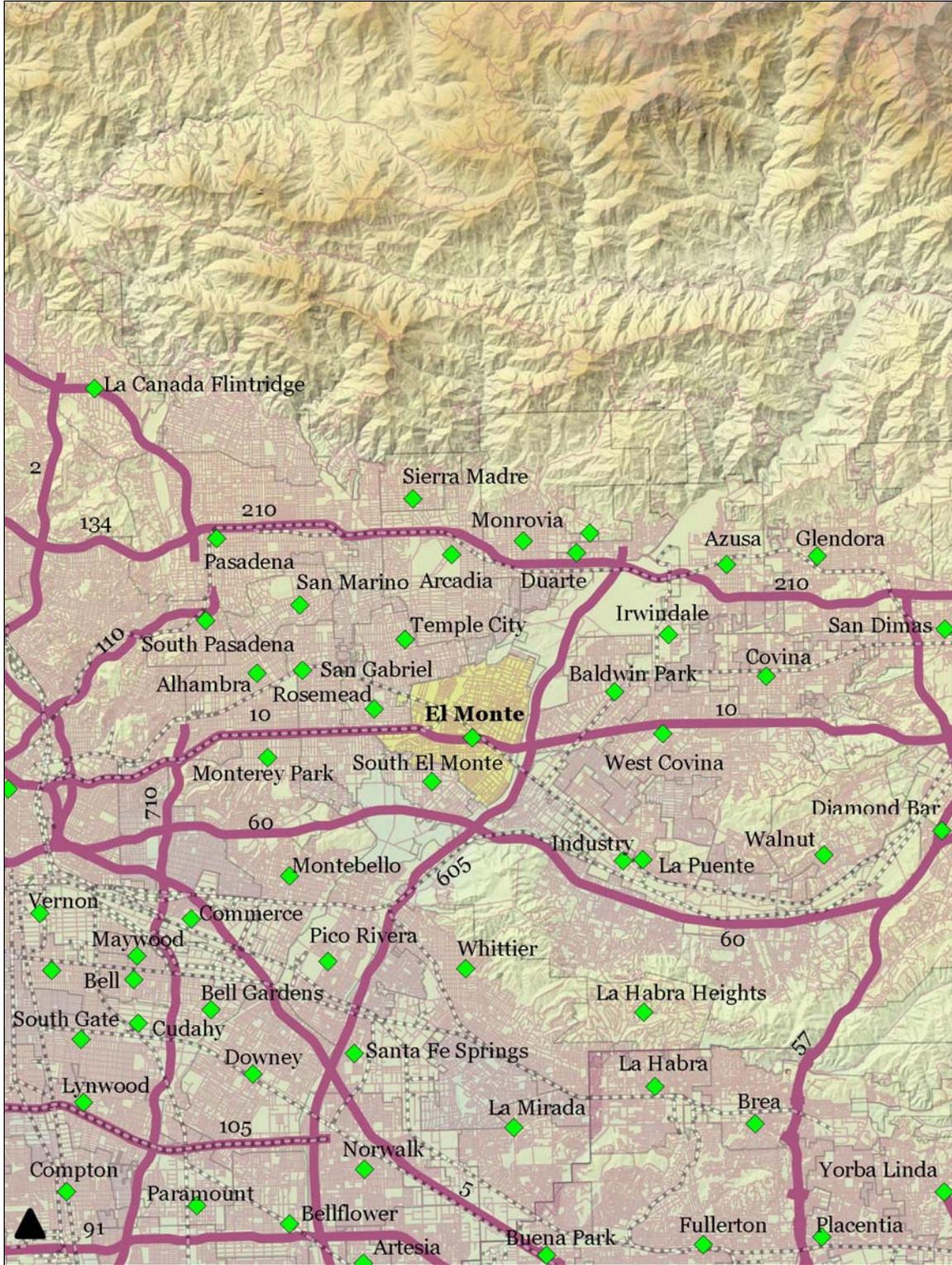


EXHIBIT 2-1
REGIONAL MAP

SOURCE: QUANTUM GIS

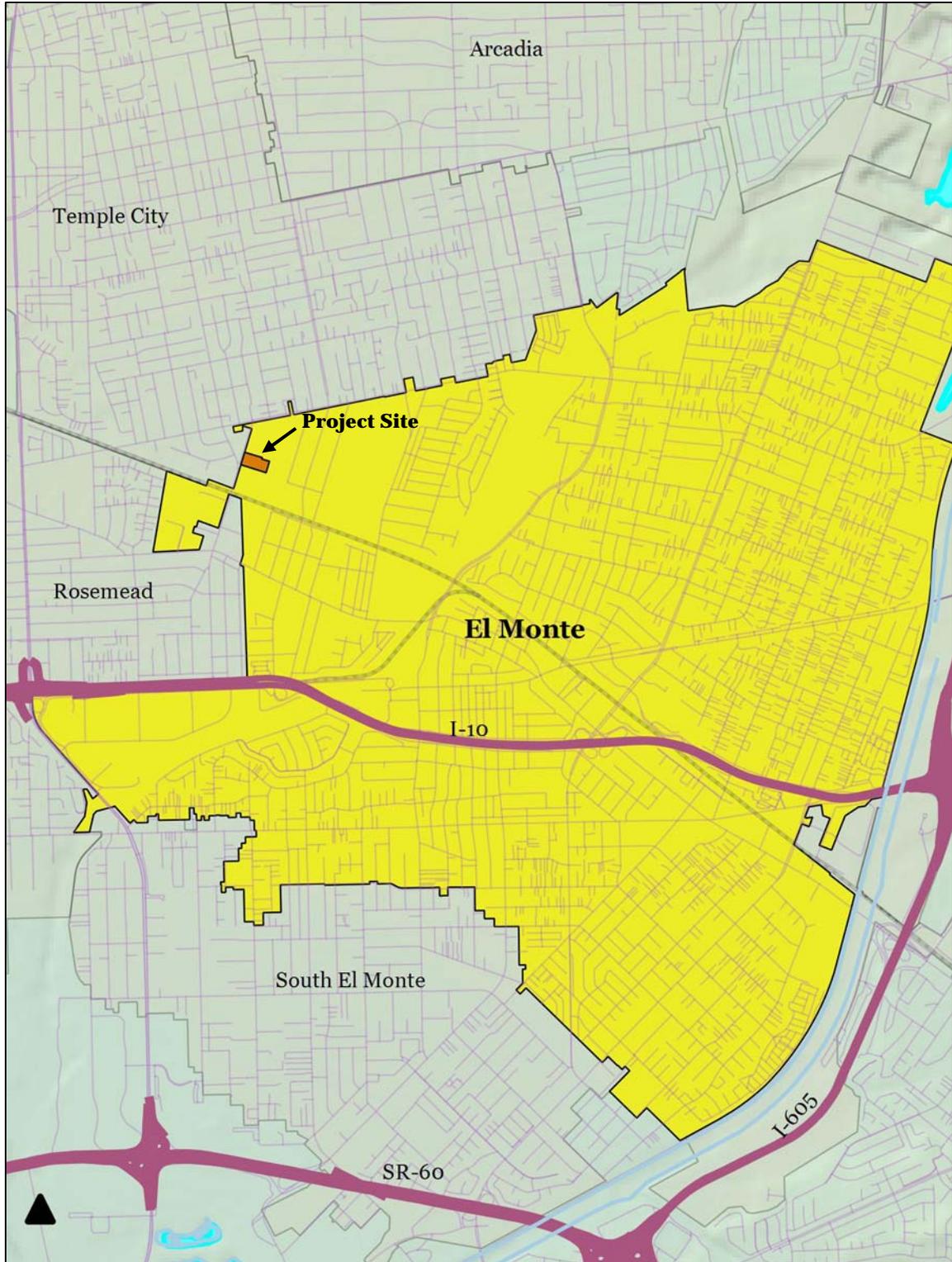


EXHIBIT 2-2
CITYWIDE MAP
SOURCE: QUANTUM GIS

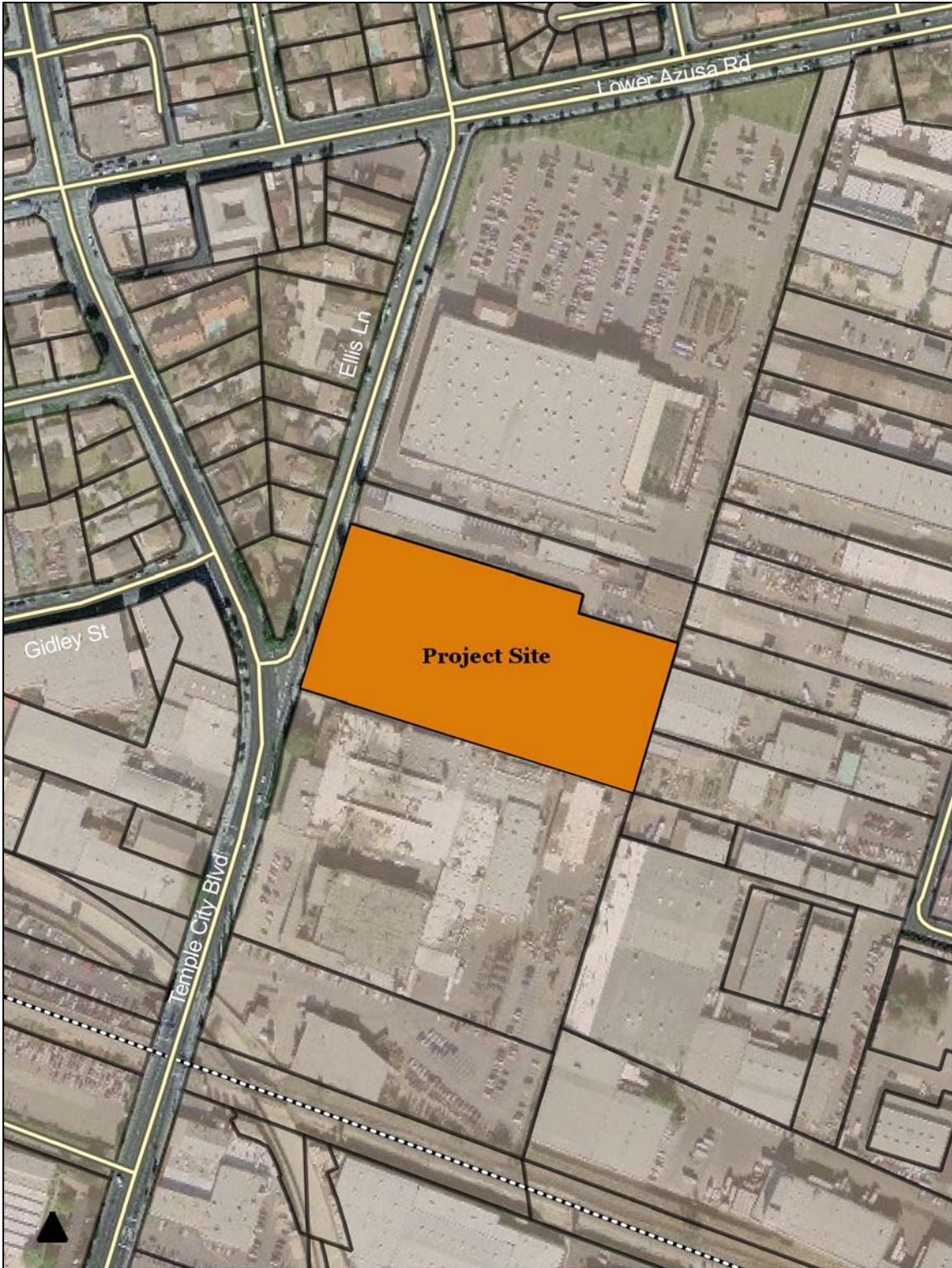


EXHIBIT 2-3
VICINITY MAP
SOURCE: QUANTUM GIS

2.3 ENVIRONMENTAL SETTING

2.3.1 PHYSICAL SETTING

The project site is located within an urbanized area. An aerial photograph depicting the project site and the immediate area is provided in Exhibit 2-4. Existing uses found in the vicinity of the project site are summarized below:

- *North of the project site.* Valley TV, an electronics store, abuts the project site to the north. The site address for this business is 4410 Ellis Lane. A Home Depot store is located further north along the south side of Lower Azusa Road.⁷ The address for the Home Depot is 9700 Lower Azusa Road.
- *South of the project site.* A vacant industrial building abuts the project site to the south.⁸ This building's address is 4350 Temple City Boulevard.
- *East of the project site.* An industrial building occupied by Selective Stone, Inc, a countertop retailer, abuts the project site to the east. This building occupies frontage along the west side of Rowland Avenue, which is located approximately 545 feet further east of the site.⁹ The legal address for this building is 4323 Temple City Boulevard.
- *West of the project site.* Temple City Boulevard/Ellis Lane is located along the site's western property line. Temple City Boulevard extends in a southwest to northeast orientation throughout the City. Ellis Lane separates from Temple City Boulevard around the site's southern driveway. Ellis Lane continues to extend in a southwest to northeast orientation. From there, Temple City Boulevard extends in a southwest to northeast orientation. Temple City's corporate boundaries extend along the west side of Ellis Lane. In addition, residential development occupies frontage along the west side of Ellis Lane, opposite the project site.¹⁰

The project site is presently occupied by Flat Fair, a furniture store and by Turnaround Communication, a telecommunications company. Landscaping is provided along the site's frontage with Ellis Lane. However, a majority of the project site is occupied by hardscape surfaces (concrete and asphalt). The existing business will vacate the premises so as to accommodate the proposed project. Other notable uses in the vicinity of the project site include: Gidley Elementary School, 0.53 miles to the northeast; Rosemead Park, located 0.70 miles to the west; Gibson Mariposa Park, located 0.40 miles to the southeast of the project site; and, Shirpsier Elementary School, located one-half mile to the southeast of the site.

⁷ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on September 3, 2018.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.



EXHIBIT 2-4
AERIAL PHOTOGRAPH
SOURCE: GOOGLE MAPS

2.3.2 REGULATORY SETTING

California Regulations

In 1996, the California Legislature approved Proposition 215, also known as the Compassionate Use Act (the “CUA”), which was codified under Health and Safety Code Section 11262.5 et sec. and was intended to enable persons in need of medical marijuana for specified medical purposes, such as cancer, anorexia, AIDS, chronic pain, glaucoma and arthritis, to obtain and use marijuana under limited circumstances and where recommended by a physician. The CUA provides that “nothing in this section shall be construed or supersede legislation prohibiting persons from engaging in conduct that endangers others, or to condone the diversion of marijuana for non-medical purposes.” In 2004, the California Legislature enacted the Medical Marijuana Program Act (Health & Saf. Code, § 11362.7 et seq.)(the “MMP”), which clarified the scope of the CUA, created a state-approved voluntary medical marijuana identification card program, and authorized cities to adopt and enforce rules and regulations consistent with the MMP. Assembly Bill 2650 (2010) and Assembly Bill 1300 (2011) amended the MMP to expressly recognize the authority of counties and cities to “[a]dopt local ordinances that regulate the location, operation, or establishment of a medical marijuana cooperative or collective” and to civilly and criminally enforce such ordinances.

In September 2015, the California State Legislature enacted, and Governor Brown signed into law three bills – Assembly Bill 243, Assembly Bill 266, and Senate Bill 643 – which together comprise the Medical Marijuana Regulation and Safety Act (the “MMRSA”). The MMRSA created a comprehensive dual state licensing system for the cultivation, manufacture, retail, sale, transport, distribution, delivery, and testing of medical cannabis. On July 19, 2016, the City Council of the City of El Monte (the “City Council” of the “City”) adopted Interim Urgency Ordinance No. 2889 to establish a temporary moratorium on medical “commercial cannabis activities,” as defined under the MMRSA, for a period of 45 days and extended such moratorium for an additional period of 22 months and 15 days under Interim Urgency Ordinance No. 2894, on August 16, 2016. The MMRSA was renamed the Medical Cannabis Regulation and Safety Act (the “MCRSA”), under Senate Bill 837 in June 2016, which also made included substantive changes to the applicable state laws, which affect the various state agencies involved in regulating cannabis businesses as well as potential licensees. On November 8, 2016, the Control, Regulate, and Tax Adult Use of Marijuana Act (“AUMA”) was approved California voters as Proposition 64 and became effective on November 9, 2016, pursuant to the California Constitution (Cal. Const., art. II, § 10(a).). Proposition 64 legalized the nonmedical use of cannabis by persons 21 years of age and over, and the personal cultivation of up to six (6) cannabis plants. AUMA also created a state regulatory and licensing system governing the commercial cultivation, testing, and distribution of nonmedical cannabis, and the manufacturing of nonmedical cannabis products.

On June 27, 2017, Governor Brown signed the Legislature-approved Senate Bill 94. SB 94 combined elements of the MCRSA and AUMA to establish a streamlined singular regulatory and licensing structure for both medical and nonmedical cannabis activities given that there were discrepancies between the MCRSA and AUMA. The new consolidated provisions under SB 94 is now known as the Medicinal and Adult-Use Cannabis Regulation and Safety Act (“MAUCRSA”) to be governed by the California Bureau of Cannabis Control. MAUCRSA refers to medical cannabis as “medicinal cannabis” and nonmedical/recreational cannabis as “adult-use cannabis.” On September 16, 2017, Governor Brown

signed Assembly Bill 133 into law, which provided cleanup and substantive to MAUCRSA. The Bureau of Cannabis Control was established under MAUCRSA. Title 16, Division 42, Bureau of Cannabis Control, of the California Code of Regulations contains State drafted regulations governing the use and possession of medical and recreational cannabis. Title 16, Division 42 of the California Code of Regulations outlines procedures for handling cannabis waste (refer to Section 3.9.2.A); the transport, cultivation, production, and sale of cannabis products; security; licensing; and banking. The project Applicant will be required to obtain an Annual License pursuant to Section 5002 of Title 16, Division 42.

Los Angeles County Regulations

The Los Angeles County Department of Public Health, Environmental Health Division (DPH-EH) Cannabis Compliance and Enforcement Program regulate cannabis businesses within Los Angeles County. The DPH-EH Cannabis Compliance and Enforcement Program contains construction and remodel guidelines that are mandatory for all cannabis businesses within the County. In addition, any commercial buildings or tenant space that handles cannabis products will need to submit detailed plans to the Los Angeles County Fire Department (Department) Special Occupancy Inspection Unit for review.

City of El Monte Regulations

Title 5 Business Licenses and Regulations, Chapter 5.18 Commercial Cannabis Activities of the City of El Monte's Municipal Code governs commercial cannabis regulations within the City. Title 17 Zoning, Chapter 17.24 Conditional Use Permits and Chapter 17.84 Development Agreements details conditional use permits and development agreements required for commercial cannabis uses within the City.

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed project is an application to operate a comprehensive commercial medicinal-only cannabis use within an existing 71,658 square foot industrial building. The proposed project will consist of the following elements:

- *Project Site.* The project site has a total land area of 4.4 acres (191,644 square feet). The site has a lot depth (east to west) of 635 feet and a maximum lot width (north to south) of 320 feet. The project site is currently occupied by an existing 71,658 square-foot industrial building. This building will be remodeled to accommodate the proposed use.¹¹
- *Building Layout.* The building will contain five (5) distinct sections catering to the various activities that will be performed within the facility. The project will feature two (2) cultivation areas (referred to herein as the north cultivation area and south cultivation area); an office area; manufacturing space; and a distribution area.¹²

¹¹ Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018.

¹² Ibid

- *Office Space.* Office space totaling 4,493 square-feet will be located within the western portion of the building. A total of eight (8) individual offices will be provided. Other features include a classroom, video back-up room, restrooms, vault, and security room.¹³
- *Extraction Area.* An 8,674 square-foot extraction area will be provided. The production of vaporizer oil will occur within this area. Elements include a kitchen and product bottling area; a distillation room; a distillation freezer; a concentrate packaging room; a nitrogen packing room; a humidity closet; a live resin freezer; three manufacturing rooms; a purging room; trim room; file room; cleaning room; janitor's closet; manager's office; and storage room. In addition, a loading door will be provided in this area. Remnants of harvested cannabis will be converted into cannabis oil, packaged, and stored in this area.¹⁴
- *Distribution Area.* A distribution area consisting of 8,338 square-feet will be provided. This area will include a packing room; two flower drying rooms; 23 shelves; 12 unspecified rooms; an airlock room; and a distribution room. This area will also include one truck door.¹⁵
- *Common Area.* A 6,271 square-foot common area will be provided. This common area will consist of a work place rest area, which will be used by employees for a break.¹⁶
- *Cultivation Area.* A 43,882 square-foot cultivation area will be provided. This area will be divided into two sections: the north cultivation area and the south cultivation area. The north cultivation area will contain ten bloom rooms; four vegetation rooms; a clone room; mother room; airlock; dry room; a reservoir room; an employee room; and two restrooms. The south cultivation area will feature four vegetation rooms; a mother/clone room; seven bloom rooms; a reservoir room; and an airlock room.¹⁷ The total cultivation canopy area will be 12,555 square feet.
- *Security Features.* Access to the proposed project will be controlled and enforcement will be strict. Individuals will only be allowed to enter the facility with a permitted escort. Access to the site will be controlled by a manned security station and access to the facility will require the use of key cards to unlock the doors. Individual employees will also be equipped with panic software that could be uploaded onto their phones for use in case of an emergency. Other security features include onsite security, interior and exterior security cameras, motion sensitive outdoor lighting, and blacked-out windows.¹⁸
- *Miscellaneous Features.* The project will include numerous features designed to control the interior environment. These features consist of cooling systems to maintain interior temperatures and humidity that will optimize plant growth; water collection systems to re-use water and capture

¹³ Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

rainwater; intelligent lighting systems to replicate the sunlight spectrum and light deprivation mechanisms; air filtration and circulation systems to control heat buildup from lighting systems and eliminate exhaust odors; and a computer controlled environment management by room. This will be designed to maintain the specific nutrients, lights, air circulation, humidity, and temperature requirements for the different cultivation chambers.¹⁹

- *Parking and Access.* A total 93 parking spaces will be provided. In addition, the two (2) existing loading doors will continue to be used. Access to the project site will be provided by two (2) existing driveways located along the west side of the project site.²⁰

The site plan is shown in Exhibit 2-5. Conceptual elevations for the project are shown in Exhibit 2-6. A summary table is shown in Table 2-1. Photographs of similar cannabis operations are provided in Exhibit 2-7.

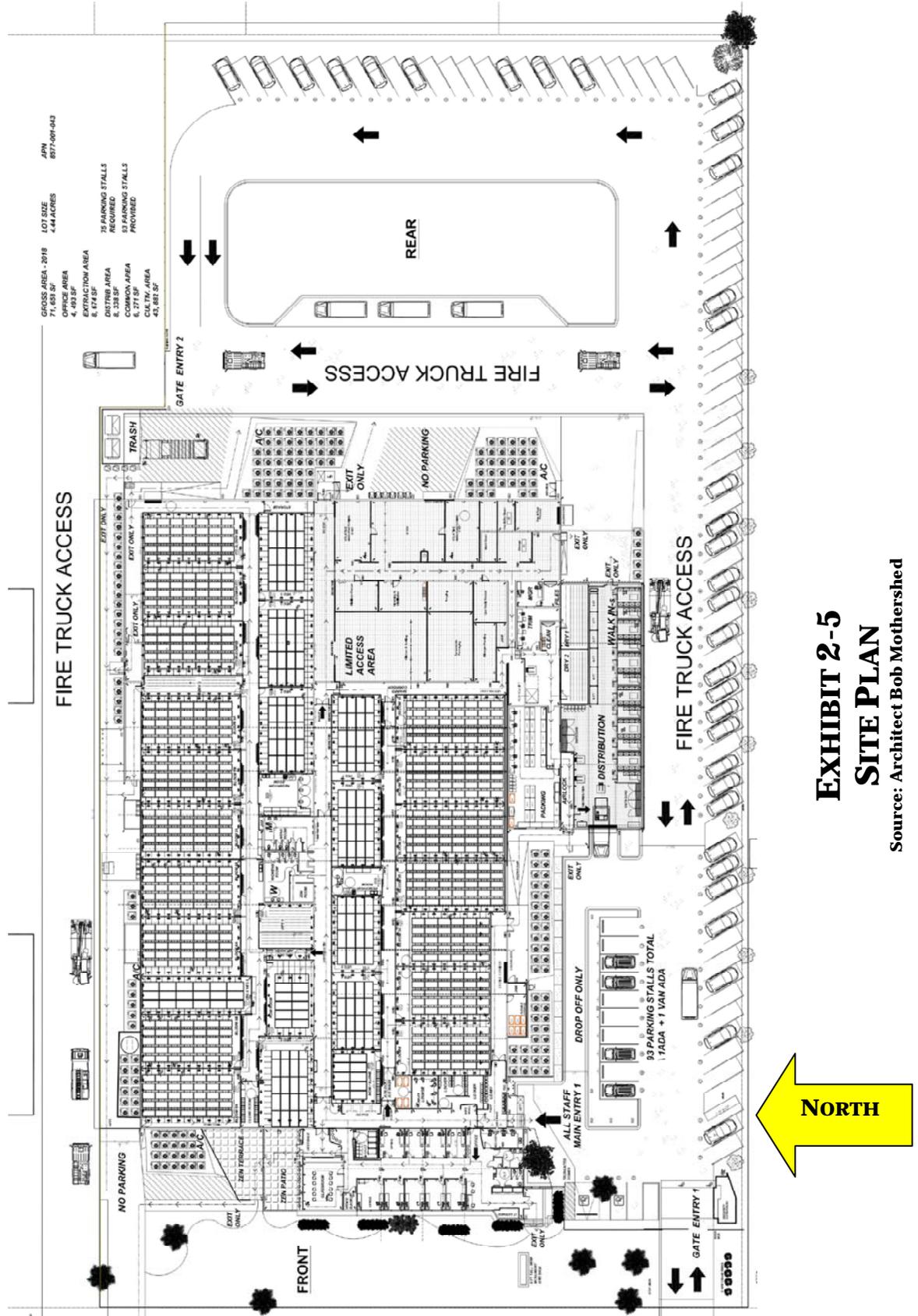
**Table 2-1
 Project Summary Table**

Project Element	Description
Total Site Area	191,644 sq. ft. (4.4 acres)
Total Floor Area	71,658 sq. ft.
Office Space	4,493 sq. ft.
Extraction Area	8,674 sq. ft.
Distribution Area	8,338 sq. ft.
Common Area	6,271 sq. ft.
Cultivation Area	43,882 sq. ft.
Cultivation Canopy Area	12,555 sq. ft.
Parking	93 parking spaces and two loading doors

Source: Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018

¹⁹ Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018. .

²⁰ Ibid.



**EXHIBIT 2-5
 SITE PLAN**

Source: Architect Bob Mothershed

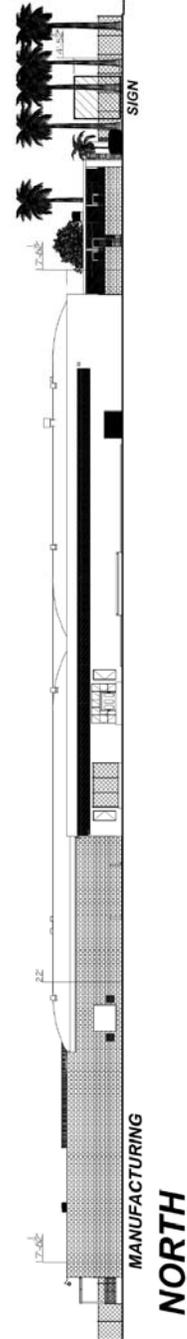
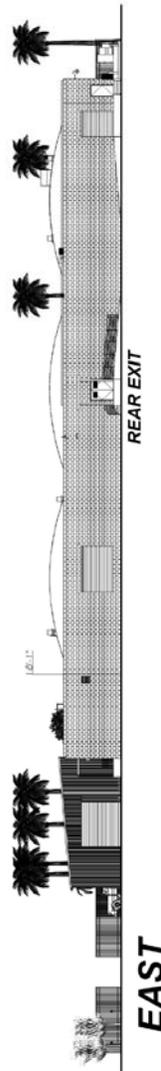
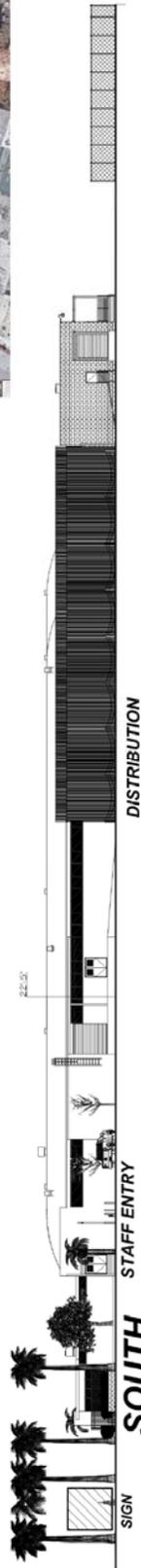
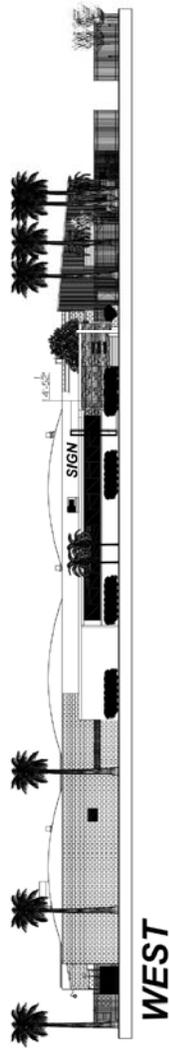
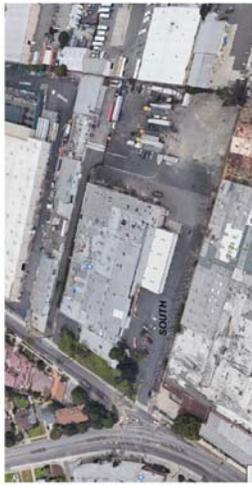


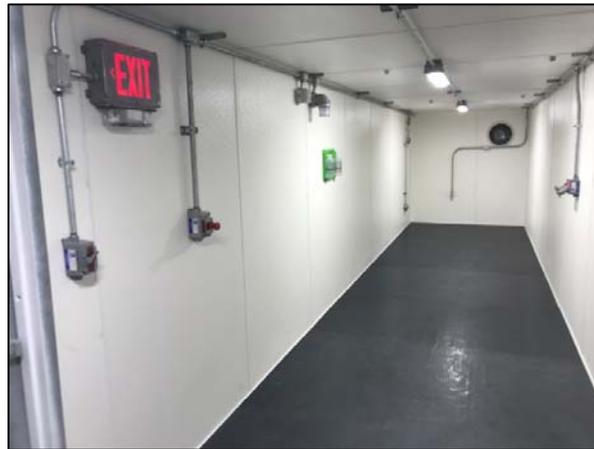
EXHIBIT 2-6
CONCEPTUAL ELEVATIONS
Source: Architect Bob Mothershed



Example of a vegetation room



Example of a bloom room



Example of an airlock

EXHIBIT 2-7
EXAMPLE PHOTOGRAPHS

Source: GSC Holding Group LLC

2.4.2 OPERATIONAL CHARACTERISTICS

Hours of Operation and Employment

The proposed project will operate the manufacturing and cultivation facilities seven (7) days a week between the hours of 9:00 AM to 7:00 PM. The facility will be closed to the public 24 hours a day, seven (7) days a week. Non-employees will only be allowed to enter the facility with a permitted escort. Delivery hours will occur from 9:00 AM to 7:00 PM, Monday through Friday. The delivery vehicles will consist of commercial vans with tinted windows. The project is anticipated to employ up to 46 people. Of the total number of jobs that will be created, five (5) to six (6) employees per shift will be allocated to the manufacturing facility (with a tentative maximum of two (2) shifts depending on demand); between eight (8) to 10 employees will be allocated per shift for the cultivation facility (two (2) shifts needed); between three (3) to (5) five employees will be allocated employees per shift for the distribution facility (with a tentative maximum of two shifts depending on demand). Finally, another three (3) to four (4) support employees (office/ administration).

Plant Growth and Production

As indicated previously, the project is a comprehensive medicinal cannabis facility. Cannabis will be grown, harvested, dried, packaged, stored, and shipped from this facility. In addition, harvested cannabis will be processed into cannabis oil and concentrated cannabis and will be packaged into vaporizer cartridges. The psychoactive compounds will be extracted from the cannabis flowers using volatile solvents. According to Title 17 Division 1 Chapter 13 - Manufactured Cannabis Safety Subchapter of the California Code of Regulations, "Volatile solvents" include any solvent that is or produces a flammable gas or vapor that, when present in the air in sufficient quantities, will create explosive or ignitable mixtures. Examples of volatile solvents include, but are not limited to, butane, hexane, and propane.

The two (2) main components of the cultivation operation include water delivery and lighting. The plants will be watered using a drip system which recycles condensation water from the air conditioning units. A total of 1,900 grow lights will be installed. Of the total number of grow lights that will be used, 1,200 lights will be used for flowering and 700 lights will be used for the vegetation phase. Each light will be 1,000 watts and the continuous load for the cultivation will be 1.68 million watts, with approximately 60% of the lights operating at one time.²¹

2.4.3 CONSTRUCTION CHARACTERISTICS

The construction phase for the proposed project would take approximately five (5) months to complete. The key construction phases are outlined below:

- *Site Preparation.* The project site will be readied for the construction of the proposed project. This phase will take approximately one (1) month to complete.

²¹ Email communication with Mr. Robert C of GSC Holding Group LLC. Email dated September 26, 2018.

- *Remodel.* The existing building will be remodeled to accommodate the proposed use. This phase will take approximately two (2) months to complete.
- *Paving.* The parking areas and internal drive aisles will be paved during this phase. Equipment used on-site during this phase would include cement and motor mixers, pavers, rollers, and other paving equipment. This phase will take approximately one (1) month to complete.
- *Landscaping and Finishing.* This phase will involve the planting of landscaping, painting of the warehouses, and the completion of the on-site improvements. This phase will last approximately one (1) month.

2.5 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of El Monte) that calls for an exercise of judgment in deciding whether to approve a project. The proposed project will require the approval of the following discretionary actions:

- Development Agreement No. 02-18;
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 07-18 for medicinal cannabis cultivation;
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 08-18 for medicinal cannabis manufacturing;
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 09-18 for medicinal cannabis distribution; and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).



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SECTION 3 ENVIRONMENTAL ANALYSIS

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

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

Under each issue area, a description of the thresholds of significance is provided. These thresholds will assist in making a determination as to whether there is a potential for significant impacts on the environment. The analysis considers both the short-term (construction-related) and long-term (operational) impacts associated with the proposed project's implementation, and where appropriate, the cumulative impacts. To each question, there are four possible responses:

- *No Impact.* The proposed project will not result in any adverse environmental impacts.
- *Less than Significant Impact.* The proposed project may have the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of El Monte or other responsible agencies consider to be significant.
- *Less than Significant Impact with Mitigation.* The proposed project may have the potential to generate a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of the recommended mitigation measures.
- *Potentially Significant Impact.* The proposed project may result in environmental impacts that are significant. This finding will require the preparation of an environmental impact report (EIR).

3.1 AESTHETICS

3.1.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant aesthetic impact if it results in any of the following:

- A substantial adverse effect on a scenic vista;
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- Substantial degrading of the existing visual character or quality of public views of the site and its surroundings; If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or,
- A new source of substantial light and glare that would adversely affect day-time or night-time views in the area.

3.1.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The commercial medicinal cannabis use will involve cultivation, manufacturing, and distribution operations. The project will utilize an existing 71,658 square foot industrial building. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. The project's implementation will not result in a loss of scenic views.²² The predominant view-sheds in the area include the Puente Hills (located 4.43 miles to the southeast) and the San Gabriel Mountains (located 5.21 miles to the north).²³ The existing streetscape and development presently obstructs views of these features. This conclusion is supported by the field survey that was conducted for the project. The proposed project will utilize the existing building, though improvements in terms of security, utilities, and building design will be made to accommodate the proposed use. In addition, new landscaping will be installed and the building's exterior will be painted. No changes to the building's height will occur and the existing building size (floor area) will remain unchanged. All of the proposed tenant improvements will be interior tenant improvements. As a result, no impacts will occur.

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

According to the California Department of Transportation (Caltrans), Temple City Boulevard, Lower Azusa Road, and Ellis Lane are not designated as scenic highways.²⁴ Furthermore, the City of El Monte

²² Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on September 3, 2018.

²³ Google Earth. Website accessed September 26, 2018.

²⁴ California Department of Transportation. *Official Designated Scenic Highways*. www.dot.ca.gov.

General Plan does not include any scenic highways designations. However, Lower Azusa Road is identified in the City's Community Design Element as an Enhanced Corridor.²⁵ The project site is not readily visible from this latter roadway. In addition, the vegetation present on-site consists of ornamental species and the project site does not contain any scenic rock outcroppings.²⁶ Lastly, the project site does not contain any buildings listed in the State or National registrar (refer to Section 3.5). As a result, no impacts will occur.

C. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? • No Impact.

The site is presently developed and is occupied by an existing industrial building. Once complete, the project will represent a visual improvement over the existing conditions due to the proposed cosmetic improvements to the site that will include repainting the building exterior, the installation of the new landscaping, and the repaving of the parking and circulation areas. Lastly, the size and mass of the proposed development will be consistent with the other commercial and industrial buildings located in the site's vicinity. As a result, no impacts will occur.

D. Would the project create a new source of substantial light or glare that would adversely affect day- or night-time views in the area? • Less than Significant Impact.

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as *light trespass* which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. The closest light sensitive receptors to the project site are the residential units located 118 feet to the west along the west side of Ellis Lane.²⁷ The predominant source of light impacts will be related to light emanating from vehicular headlights, parking area lighting, security lighting, and bollard lighting. All new lighting will be installed in accordance with City and Part 11 of the California Title 24 Green Building standards. In addition, a total of 1,900 grow lights will be installed. Light emanating from these grow lights will not be visible from the building's exterior. The Applicant will black out the windows and the cannabis will be grown in separate rooms, thus providing additional light attenuation. Moreover, evening lighting will not affect the nearby sensitive receptors.

The proposed project will operate the manufacturing and cultivation facilities seven (7) days a week between the hours of 9:00 AM to 7:00 PM. Delivery hours will occur from 9:00 AM to 7:00 PM, Monday through Friday. As indicated in the previous paragraph, outdoor light sources will be installed in accordance with Part 11 of the California Title 24 Green Building standards.²⁸

²⁵ City of El Monte. *Community Design Element* Page CD-7.

²⁶ Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was conducted on May 3, 2018.

²⁷ Google Earth. Site accessed September 27, 2018.

²⁸ Part 11 of Title 24.

Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land use or driver's vision. The exterior façade would consist of non-reflective materials, such as concrete. In addition, the windows would be blacked out.²⁹ As a result, no daytime glare-related impacts are anticipated. In conclusion, the project will not introduce new sources of light and/or glare since all outdoor lighting will be required to be aimed away from nearby sensitive receptors pursuant to City and State requirements. As a result, no mitigation is required since the potential impacts are considered to be less than significant.

3.1.3 MITIGATION MEASURES

The preceding analysis indicated that the proposed project will not result in any significant impacts with respect to aesthetics.

3.2 AGRICULTURE & FORESTRY RESOURCES

3.2.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant impact on agriculture and forestry resources if it results in any of the following:

- The conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance;
- A conflict with existing zoning for agricultural use or a Williamson Act Contract;
- A 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)*);
- The loss of forest land or the conversion of forest land to a non-forest use; or,
- Changes to the existing environment that due to their location or nature may result in the conversion of farmland to non-agricultural use or the conversion of forestland to a non-forest use.

²⁹ Email communication with Mr. Robert C of GSC Holding Group LLC. Email dated September 26, 2018.

3.2.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

According to the California Department of Conservation, the City of El Monte does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.³⁰ The entire City is urban and there are no areas within the City that are classified as “Prime Farmland.” Since the implementation of the proposed project will not involve the conversion of prime farmland, unique farmland, or farmland of statewide importance to urban uses, no impacts will occur.

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

For purposes of this analysis, the term “agriculture” refers to the cultivation of land and breeding of animals and plants to provide food, fiber, medicinal plants, and other products to sustain and enhance life. The proposed project will involve the cultivation, manufacturing, and distribution of medicinal cannabis which meets the aforementioned definition. In the context of this CEQA analysis, the concern is with the loss of productive land and soils that are considered to be “prime farmland.”

The project site and the adjacent properties do not contain any agricultural land. Furthermore, no agriculture zones exist within the City’s zoning code nor do any other zoning designations in the City’s zoning code permit agricultural uses.³¹ In addition, according to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.³² As a result, no impacts on existing Williamson Act Contracts will result from the proposed project’s implementation.

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

The City of El Monte and the project site are located in the midst of a larger urban area and no forest lands are located within the City. As a result, no impacts on forest land or timber resources will result from the proposed project’s implementation.

³⁰ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *Los Angeles County Important Farmland.* <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>

³¹ City of El Monte. *Zoning Ordinance.* Section 17.30.010.

³² California Department of Conservation. *State of California Williamson Act Contract Land.* ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf

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

No forest lands are located within or in the vicinity of the project site. The project site is currently occupied by an existing industrial building. As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation and no impacts will occur.

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

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

3.2.3 MITIGATION MEASURES

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

3.3 AIR QUALITY

3.3.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on air quality, if it results in any of the following:

- A conflict with the obstruction of the implementation of the applicable air quality plan;
- A violation of an air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation;
- The exposure of sensitive receptors to substantial pollutant concentrations; or,
- The result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people.

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants:

- *Ozone (O₃)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).

- *Carbon monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust.
- *Nitrogen dioxide (NO₂)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO₂ is formed when nitric oxide combines with oxygen.
- *Sulfur dioxide (SO₂)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- *PM₁₀ and PM_{2.5}* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation.

Projects in the South Coast Air Basin (SCAB) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

A project would have a significant effect on air quality if any of the following operational emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

3.3.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with or obstruct the implementation of the applicable air quality plan?*

- *No Impact.*

The project site and the City of El Monte are located within the South Coast Air Basin, which covers a 6,600 square-mile area within Los Angeles, the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County.³³ Measures to improve regional air quality are outlined in the

³³ South Coast Air Quality Management District, *Final 2016 Air Quality Plan*. Adopted March 2017.

SCAQMD's Air Quality Management Plan (AQMP).³⁴ The most recent AQMP was adopted in 2017 and was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG).³⁵ The AQMP will help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth.

Key elements of the 2016 AQMP include enhancements to existing programs to meet the 24-hour PM_{2.5} Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include PM_{2.5} and ozone.

Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP: *Consistency Criteria 1* refers to a proposed project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation and *Consistency Criteria 2* refers to a proposed project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.³⁶

In terms of Criteria 1, the proposed project's long-term (operational) airborne emissions will be below levels that the SCAQMD considers to be a significant impact (refer to the analysis included in the next section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 3-2). In addition, the project's operational emissions will be well within the emissions projections identified in the most recent AQMP. As shown in Table 3-5 of the Final 2016 AQMP, the future 2031 daily operational emissions *with* the estimated population, employment, and VMT growth projections are estimated to be: 345 tons per day of VOCs; 214 tons per day of NOx; 1,188 tons per day of CO; 18 tons per day of SOx; and 65 tons per day of PM_{2.5}. The project's operational emissions will be well within the emissions projections estimated in the AQMP.

The proposed project will also conform to Consistency Criteria 2 since it will not significantly affect any regional population, housing, and employment projections prepared for the City of El Monte. Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the AQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP, the City of El Monte is projected to add a total of 7,700 new jobs through the year 2040.³⁷ The project is anticipated to employ up to 46 people.³⁸ The projected number of new jobs is well within SCAG's employment projections for the City of El Monte.

³⁴ South Coast Air Quality Management District, *Final 2016 Air Quality Plan*. Adopted March 2017.

³⁵ Ibid.

³⁶ South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

³⁷ Southern California Association of Governments. *Demographics & Growth Forecast. Regional Transportation Plan 2016-2040*. April 2016.

³⁸ Email communication with Mr. Robert C of GSC Holding Group LLC. Email dated September 26, 2018.

The City's General Plan includes Air Quality sections within the Public Health and Safety Element, and the Health and Wellness Element. In these sections, the following policies related to air quality are identified:³⁹

- *Goal PHS-3 (Public Health and Safety):* Clean and healthful air through the implementation of responsive land use practices, enhancement to the natural landscape, pollution reduction strategies, and cooperation with regional agencies.
 - *PHS-3.1, Land Use:* As a condition for siting or expanding operations in El Monte, require air pollution emitters to evaluate and fully mitigate the impacts of their operations on schools, homes, medical facilities, child care centers, and other sensitive receptors.
 - *PHS-3.2, Sensitive Receptors:* Utilize CARB recommendations to evaluate the siting of dry cleaners, chrome platers, large gas stations, freeways, and other high pollutant sources near residences, health care facilities, schools, and other sensitive land uses.
 - *PHS-3.3, Community Forest:* As prescribed in the Parks and Recreation Element, enhance the City's community forest by planting trees along all roadways as a means to help filter air pollutants, clean the air, and provide other health benefits to the community.
 - *PHS-3.4, Transportation:* Encourage alternative modes of travel to work and school by maximizing transit service, purchasing alternative fuel vehicles, completing all sidewalks, and creating a network of multiuse trails and bicycle paths.
 - *PHS-3.6, Health Risk Assessment:* Require that projects for new industries or expansion of industries that produce air pollutants conduct a health risk assessment and establish appropriate mitigation prior to approval of new construction, rehabilitation, or expansion permits.
- *Goal HW-12 (Health and Wellness):* Land use patterns reduce driving, enhance air quality, and improve respiratory health.
 - *HW-12.1, Walking, Cycling, and Transit Use:* Promote land use patterns that reduce driving rates and promote walking, cycling, and transit use.
 - *HW-12.2, Truck Routes:* Discourage locating truck routes on primarily residential streets.
 - *HW-12.5, Air Pollution Mitigation:* Use landscaping, ventilation systems, double paned windows, or other mitigation measures to achieve healthy indoor air quality and noise levels in sensitive land uses.
 - *HW-12.8, Air Quality Policies:* Support policies that reduce emissions of pollutants from stationary and mobile sources such as industrial facilities, motor vehicles, and trains.

³⁹ City of El Monte. *Vision El Monte General Plan*.
<http://elmonteca.gov/LinkClick.aspx?fileticket=lynl7WlS6f4%3d&tabid=101>. June 2011.

The proposed project will not restrict or otherwise preclude the policies outlined above relating to air quality and greenhouse gas emissions. Based on the findings made above, no impacts related to an air quality plan will occur.

B. Would the project violate any air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation? • Less than Significant Impact.

The proposed project will involve commercial medicinal cannabis cultivation, manufacturing, and distribution operations. The project will utilize an existing 71,658 square foot industrial building. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. The entire construction period for the proposed project is expected to last for approximately five (5) months (refer to Section 2.4.3) and would include interior and exterior remodeling, the planting of new landscaping, resurfacing of the pavement, and the application of new exterior coatings. The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2). The assumptions regarding the construction phases and the length of construction followed those identified herein in Section 2.4.3. As shown in Table 3-1, daily construction emissions are not anticipated to exceed the SCAQMD’s significance thresholds.

**Table 3-1
 Estimated Daily Construction Emissions**

Construction Phase	ROG	NO₂	CO	SO₂	PM₁₀	PM_{2.5}
Site Preparation (on-site)	1.75	21.53	11.91	0.02	1.06	0.80
Site Preparation (off-site)	0.03	0.02	0.35	--	0.09	0.02
Total Site Preparation	1.78	21.55	12.26	0.02	1.15	0.82
Building Construction (on-site)	2.55	18.91	15.25	0.02	1.09	1.04
Building Construction (off-site)	0.29	2.21	2.56	0.01	0.64	0.18
Total Building Construction	2.84	21.12	17.81	0.03	1.73	1.22
Paving	1.35	12.56	11.85	0.01	0.73	0.67
Paving	0.07	0.05	0.67	--	0.16	0.04
Total Paving	1.42	12.61	12.52	0.01	0.89	0.71
Architectural Coatings (on-site)	29.59	1.83	1.84	--	0.12	0.12
Architectural Coatings (off-site)	0.04	0.03	0.40	--	0.10	0.02
Total Architectural Coatings	29.63	1.86	2.24	--	0.22	0.14
Maximum Daily Emissions	29.64	21.56	17.81	0.03	1.73	1.23
Daily Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Source: California Air Resources Board CalEEMod [computer program].

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two (2) main sources of operational emissions include mobile emissions and area emissions related to cleaning products and landscaping equipment. Table 3-2 (shown below) depicts the estimated project operational emissions related to the project’s operation during the summer months.

**Table 3-2
 Estimated Operational Emissions in lbs/day (Summer)**

Emission Source	ROG	NO₂	CO	SO₂	PM₁₀	PM_{2.5}
Area-wide (lbs/day)	1.61	--	0.01	--	--	--
Energy (lbs/day)	0.03	0.34	0.29	--	0.02	0.02
Mobile (lbs/day)	1.14	6.02	17.06	0.05	4.76	1.31
Total (lbs/day)	2.79	6.36	17.37	0.06	4.78	1.33
Daily Thresholds	55	55	55o	15o	15o	55
Significant Impact?	No	No	No	No	No	No

Source: California Air Resources Board CalEEMod [computer program].

As indicated in Table 3-2, the projected long-term emissions are below thresholds considered to represent a significant impact, and, as a result, less than significant impacts are anticipated to occur.

C. Would the project expose sensitive receptors to substantial pollutant concentrations? • Less than Significant Impact.

Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions and high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards and are referred to as *hot-spots*. Three (3) variables influence the creation of a CO hot-spot: traffic volumes, traffic congestion, and the background CO concentrations for the source receptor area. Typically, a CO hot-spot may occur near a street intersection that is experiencing severe congestion (a LOS E or LOS F) where idling vehicles result in ground level concentrations of carbon monoxide. However, within the last decade, decreasing background levels of pollutant concentrations and more effective vehicle emission controls have significantly reduced the potential for the creation of hot-spots. The SCAQMD stated in its CEQA Handbook that a CO hot-spot would not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the SCAB. These new automobile emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions. The proposed use will not involve a doubling in the number of vehicle trips (refer herein to Section 3.18). This volume of traffic will not result in a decline of any intersection's Level of Service (LOS) beyond a LOS of E. Therefore, the project's impacts would be less than significant with respect to CO hot-spots.

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate.⁴⁰ These population groups are generally more sensitive to poor air quality. The closest sensitive receptors to the project site include the residential units located 118 feet to the west along the west side of Ellis Lane. These nearby sensitive receptors are shown in Exhibit 3-1.

⁴⁰ South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. As amended 2017.

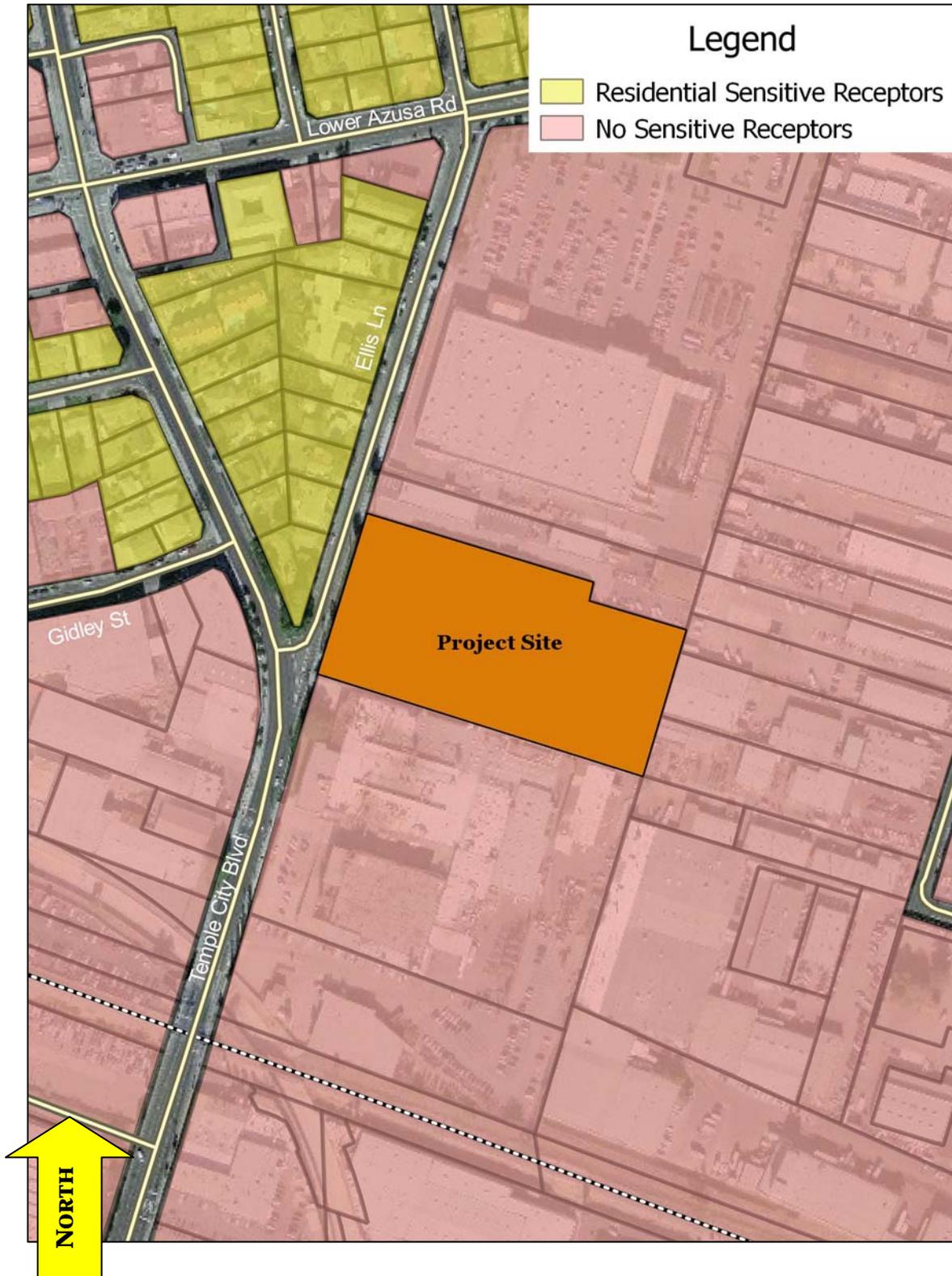


EXHIBIT 3-1
SENSITIVE RECEPTORS MAP
SOURCE: QGIS

The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project will result in an exceedance of *localized emissions thresholds* or localized standard thresholds (LSTs). LSTs apply to long-term (operational) emissions at a fixed location and do not include off-site or area-wide emissions. The pollutants that are the focus of the LST analysis include the conversion of NO_x to NO₂; carbon monoxide (CO) emissions from construction; PM₁₀ emissions from construction; and PM_{2.5} emissions from construction. For purposes of the LST analysis, the receptor distance used was 25 meters. The thresholds for five (5) acres were selected for the project even though the project site encompasses 4.4 acres.

The emissions generated by the construction of the proposed project will not exceed the LSTs identified in Table 3-3. Only minor revisions to the building's interior, exterior, and infrastructure will be required to accommodate the project. As a result, the potential impacts are considered to be less than significant.

**Table 3-3
 Local Significance Thresholds Exceedance SRA 9 for 5 Acres of Disturbance**

Emissions	Emissions (lbs/day)	Type	Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)				
			25	50	100	200	500
NO _x	21.56	Construction	203	227	286	368	584
CO	17.81	Construction	1,733	2,299	3,680	7,600	25,558
PM ₁₀	1.73	Construction	14	43	63	105	229
PM _{2.5}	1.23	Construction	8	11	17	35	116

Source: CalEEMod Version 2016.3.2.

D. Would the project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people? • Less than Significant Impact with Mitigation.

Cannabis cultivation directly impacts air quality in two (2) predominant operations; plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by the generation of strong odors. The majority of the odors of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants and vary widely between plants.⁴¹ Cannabis produces over 140 different terpenes and these chemicals are found in varying concentrations in different cannabis varieties. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis' psychoactivity, has no odor whatsoever. The type and potency of cannabis odors range widely from variety to variety, as do receptors' opinions regarding whether the odor is pleasant or objectionable.⁴²

⁴¹ Terpenes are responsible for the fragrance of nearly all flowers.

⁴² Cannabis Environmental Best Management Practices Draft Section for Review: Air Quality August 9, 2018.

The natural growth of the cannabis plants, and other processes at cultivation facilities, emit terpenes. Terpenes, known for their strong odor, are volatile organic compounds (VOCs). At facilities such as that being considered, the evaporation of solvents, and other processes in the production cycle also result in VOC emissions. The project Applicant will employ new technologies that will be beneficial to the odor control plan as time progresses including the following:

- *Carbon Filters.* Also known as carbon scrubbers, carbon filters are historically one of the best methods for odor control. This type of filter use pellets of charcoal to trap the terpenes. Carbon filters are simple to install, effective, and reliable. Carbon filters will be installed at key locations in the facility and will be monitored and replaced by staff on a regular basis.⁴³
- *Air Filters.* Standard air filters, also referred to as air purifiers, are typically made of densely woven fiber screens. These filters trap particles as air circulates through the filter, which can either be a stand-alone unit or incorporated into a ventilation system depending on the exact specifications.⁴⁴
- *Negative Ion Generators.* The machines will use a negative charge to attract positively charged particles in the air. This equipment will be installed in areas that do not interfere with the production activities but instead can proactively treat the air in order to meet regulations.⁴⁵
- *Air-tight Seals.* The proposed facility will utilize air-tight seals throughout the facility. Predominately used in the exhaust system, these air tight seals will be used in order to keep the exhaust system efficient and effective.⁴⁶
- *Negative Air Pressure.* The Applicant will make use of negative air pressure in order to retain odor for treatment. This will help to serve as a safeguard of odor escaping into the ambient air until it can be treated using the techniques above. GSC Holding Group, LLC. will seal the facility, except for the intake and exhaust, which creates suction when exhaust fans are turned off. The proper use of both negative air and negative ion generators will efficiently expunge odor before leaving the facilities.⁴⁷
- *Staff Training.* The facility's employees will be trained regarding compliance with industry best standards and facility regulations in order to achieve successful odor control. Employees will be trained in the use of odor control methods as well as any new techniques and technologies that may be added in the future.⁴⁸

⁴³ GSC Holding Group, LLC *Application for Medical Commercial Application for Medical Commercial Cannabis Business License in the City of El Monte, CA.* (Odor Control Plan) No date.

⁴⁴ Ibid.

⁴⁵ Ibid.

⁴⁶ Ibid.

⁴⁷ Ibid.

⁴⁸ Ibid.

The project Applicant will be required to prepare an Odor Management Plan pursuant to Los Angeles County Department of Public Health construction guidelines. In addition, the entire cultivation process will occur in separate rooms. Airlock rooms are provided throughout the facility. These rooms provide additional odor suppression. The following mitigation measures will be required to control odors and to ensure that the indoor air is safe for the workers:

- The Applicant will be required to prepare an Odor Management Plan that must be approved by the City and Los Angeles County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.
- Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

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

3.3.3 MITIGATION MEASURES

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

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

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

3.4 BIOLOGICAL RESOURCES

3.4.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- A substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service;
- A substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

- A substantial adverse effect on State or federally protected wetlands as defined (including, but not limited to, marsh, vernal, pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- A substantial interference with the movement of any native resident or migratory fish, or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites;
- A conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or,
- A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans.

3.4.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project is an application to operate a comprehensive commercial medicinal within an existing 71,658 square foot industrial building in the M-2 General Manufacturing zone. The proposed project will be located on a site that encompasses 4.4 acres and occupies frontage along the east side of Temple City Boulevard and Ellis Lane. The proposed use will include cultivation, manufacturing, and distribution operations. The existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use.⁴⁹ A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDB) Bios Viewer for the El Monte Quadrangle indicated that there are 11 federally- or State-recognized threatened or endangered species located within the El Monte Quadrangle.⁵⁰ The majority of these threatened or endangered species are not likely to be found on-site due to the lack suitable habitat. These species include:

- The *coastal California gnatcatcher* is a bird species not likely to be found on-site due to the lack of coastal sage scrub, the species primary habitat.⁵¹
- The *least Bell's vireo* is not likely to be found on-site due to the lack of riparian habitat. Furthermore, the majority of the bird species live in San Diego County.⁵²

⁴⁹ Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018

⁵⁰ California Department of Fish and Wildlife. *Bios Viewer*. <https://map.dfg.ca.gov/bios/?tool=cnddbQuick>.

⁵¹ Center for Biological Diversity. *Coastal California Gnatcatcher*. http://www.biologicaldiversity.org/species/birds/coastal_California_gnatcatcher/.

⁵² California Partners in Flight Riparian Bird Conservation Plan. *Least Bell's Vireo (Vireo bellii pusillus)*. http://www.prbo.org/calpif/htmldocs/species/riparian/least_bell_vireo.htm.

- The *Santa Ana sucker* is a fish species that will not be found on-site because there are no bodies of water located on-site.⁵³
- The *bank swallow* is a bird species not likely to be found on-site due to the lack of riparian habitat.⁵⁴
- The *willow flycatcher* is a bird species not likely to be found on-site due to the lack of marsh, brushy fields, and willow thickets.⁵⁵
- The *Southwestern Willow flycatcher* is a bird species not likely to be found on-site due to the lack of dense riparian habitat.⁵⁶
- The *Western yellow-billed cuckoo* is an insect-eating bird not likely to be found on-site due to the lack of riparian woodland habitat.⁵⁷
- The *Nevin's barberry* is a flowering shrub bird species not likely to be found on-site due to the lack of chaparral habitat that exists among inland canyons and foothills.⁵⁸
- The *Swainson's hawk* is not likely to be found on-site due to the lack of plains and farmland.⁵⁹
- The *tricolored blackbird* is a bird species not likely to be found on-site due to the lack of marshes, fields, and farms.⁶⁰
- The *light-footed Ridgway's rail* is a bird species not likely to be found on-site due to the lack of salt marshes and lagoons.⁶¹

The project site and surrounding areas are not conducive to the survival of the aforementioned species due to the lack of suitable habitat. An additional search was conducted using the California Native Plant Society's Inventory of Rare and Endangered Plants to ascertain any rare or endangered plant species which may occur in the El Monte Quadrangle. The following eight plants have been identified in the El Monte Quadrangle: Nevin's barberry; intermediate mariposa lily; southern tarplant; many-

⁵³ Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was completed on September 3, 2018.

⁵⁴ Audubon. *Bank Swallow (Riparia riparia)*. <https://www.audubon.org/guia-de-aves/ave/bank-swallow>.

⁵⁵ Audubon. *Willow Flycatcher (Empidonax traillii)*. <http://birds.audubon.org/birds/willow-flycatcher>.

⁵⁶ United State Geological Survey. *Southwestern Willow Flycatcher Habitat*. <http://sbsc.wr.usgs.gov/cprs/research/projects/swwf/wiflhab.asp>.

⁵⁷ US Fish and Wildlife Service. *Sacramento Fish and Wildlife Office, Public Advisory*. http://www.fws.gov/sacramento/outreach/Public-Advisories/WesternYellow-BilledCuckoo/outreach_PA_Western-Yellow-Billed-Cuckoo.htm.

⁵⁸ California Native Plant Society. *Nevin's Barberry (Berberis nevinii)*. [http://calscape.org/Berberis-nevinii-\(Nevin's-Barberry\)](http://calscape.org/Berberis-nevinii-(Nevin's-Barberry)).

⁵⁹ Audubon. *Swainson's Hawk (Buteo swainsoni)*. <http://www.audubon.org/field-guide/bird/swainsons-hawk>.

⁶⁰ Audobon Guide to North American Birds. *Tricolored Blackbird*. <http://www.audubon.org/field-guide/bird/tricolored-blackbird>.

⁶¹ U.S. Fish & Wildlife Service. *Light-footed Ridgway's Rail*. https://www.fws.gov/refuge/san_diego_bay/wildlife_and_habitat/Light-footed_Ridgways_Rail.html.

stemmed Dudley; mesa horkelia; Brand's star phacelia; Parish's gooseberry; Southern mountains skullcap.⁶² None of these plants were encountered during the site survey. As indicated previously, the only vegetation that is present on-site consists of non-native introduced species typically used as ornamental landscaping. As a result, no impacts on any candidate, sensitive, or special status species will result.

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

The field survey that was conducted for this project indicated that there are no wetlands or riparian habitat present on-site or in the surrounding areas. This conclusion is also supported by a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper.⁶³ In addition, there are no designated "blue line streams" located within the project site. As a result, no impacts on natural or riparian habitats will result from the proposed project's implementation.

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

As indicated in the previous subsection, the project site and adjacent developed properties do not contain any natural wetland and/or riparian habitat.⁶⁴ As a result, the proposed project will not impact any protected wetland area or designated blue-line stream and no impacts will occur.

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

The site is surrounded by development and lacks suitable habitat for wildlife habitat.⁶⁵ Furthermore, the site contains no natural hydrological features. Constant disturbance (noise and vibration) from vehicles travelling on the adjacent roadways limit the site's utility as a migration corridor. Since the site is surrounded by development on all sides and lacks suitable habitat, the site's utility as a migration corridor is restricted. Therefore, no impacts will result from the implementation of the proposed project.

⁶² California Native Plant Society, Rare Plant Program. 2018. *Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39)*. Website <http://www.rareplants.cnps.org> [accessed 27 September 2018].

⁶³ United States Fish and Wildlife Service. *National Wetlands Inventory*. <https://www.fws.gov/Wetlands/data/Mapper.html>

⁶⁴ Ibid.

⁶⁵ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted September 3, 2018.

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

Title 14 (Sustainable Development) Chapter 14.03 (Tree Protection and Preservation) of the City of El Monte municipal code serves as the City's "Tree Ordinance."⁶⁶ The tree ordinance establishes strict guidelines regarding the removal or tampering of trees located within any public right-of-way (such as streets and alleys).

There are no trees located within the public right-of-way adjacent to the project site. Nevertheless, the project's implementation will require the removal of all of the vegetation on-site, including the mature trees located within the western portion of the site and within the parking areas. Over 50 trees and shrubs will be planted. The proposed project's landscaping plan is illustrated in Exhibit 3-2. This new landscaping will be drought tolerant. As a result, no impacts will occur.

F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans? • No Impact.

The City is located within an urbanized setting, and no natural habitat is located within the project site.⁶⁷ The proposed project site is located approximately 2.72 miles north of the Whittier Nature Center and the Whittier Narrows Dam County Recreation Area Significant Ecological Area (SEA) No. 42, as designated by the Los Angeles Department of Recreation and Parks. As a result, no impacts on local, regional, or State habitat conservation plans would result from the implementation of the proposed project.

3.4.3 MITIGATION MEASURES

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

3.5 CULTURAL RESOURCES

3.5.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may have a significant adverse impact on cultural resources if it results in any of the following:

- A substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the State CEQA Guidelines;
- A substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines; or,

⁶⁶ El Monte, City of, Municipal Code. *Title 14 Sustainable Development, Chapter 14.03 Tree Protection and Preservation.*

⁶⁷ U.S. Fish and Wildlife Service. National Wetlands Inventory. *Wetlands Mapper.* <http://www.fws.gov/>.



- The disturbance of any human remains, including those interred outside of dedicated cemeteries.

3.5.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a local general plan or historic preservation ordinance. A site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance.

The State, through the State Historic Preservation Office (SHPO), maintains an inventory of those sites and structures that are considered to be historically significant. Finally, the U.S. Department of Interior has established specific Federal guidelines and criteria that indicate the manner in which a site, structure, or district is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places.⁶⁸

State historic preservation regulations include the statutes and guidelines contained in the California Environmental Quality Act (CEQA) and the Public Resources Code (PRC). A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, that is historically or archaeologically significant. The State regulations that govern historic resources and structures include Public Resources Code (PRC) Section 5024.1 and CEQA Guidelines Sections 15064.5(a) and 15064.5(b). According to Section 5024.1(c) of the State Public Resources Code: Specific criteria include the following:

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

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

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

⁶⁸ U.S. Department of the Interior, National Park Service. *National Register of Historic Places*. <http://nrhp.focus.nps.gov>. 2010.

- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.⁶⁹

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* have a similar definition, except they are deemed of local significance. A search of the California Office of Historic Preservation online list of California Historical Landmarks yielded the following State-designated landmarks in the City:⁷⁰

- *California Register of Historical Resources No. 975 - El Monte First Southern California Settlement by Immigrants from the United States.* This settlement was located on the banks of the San Gabriel River and played a significant role in California's early pioneer history. The settlement was initially an encampment along the Old Spanish Trail and was an extension of the trail from Missouri to Santa Fe. This historical site is located at Santa Fe Trail Historical Park, near the southwest corner of Valley Boulevard and Santa Anita Avenue.
- *California Point of Historical Interest No. LAN-047 – Old El Monte Jail, Pioneer Park.* The El Monte Jail was constructed by William Dodson and donated to the town in 1880. The original jail was a one room wooden structure and was utilized as a jail until 1922. This historical site is located at Pioneer Park, also near the southwest corner of Valley Boulevard and Santa Anita Avenue.

⁶⁹ U. S. Department of the Interior, National Park Service. *National Register of Historic Places.* <http://focus.nps.gov/nrhp>. Website accessed May 16, 2016.

⁷⁰ California Department of Parks and Recreation. *California Historical Resources.* <http://ohp.parks.ca.gov/ListedResources>. Website accessed September 28, 2018.

The project site does not contain any historic structures listed in the National or California Registrar.⁷¹ Furthermore, the building that occupies the site does not meet any of the criteria of a historic structure identified above. The building is currently used by FlatFair and no historical events have occurred the building. No persons of significance currently reside within the property, or have resided within the property. Furthermore, the proposed project will be restricted to the designated property and the project's construction will not affect the two local landmarks. As a result, no impacts to historic resources will occur.

B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? • Less than Significant Impact.

The proposed project is an application to operate a comprehensive commercial medicinal-only cannabis use within an existing 71,658 square foot industrial building. The proposed use will include cultivation, manufacturing, and distribution operations. The existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use.⁷² The El Monte area was previously inhabited by the Gabrieleño people, named after the San Gabriel Mission. The Gabrieleño tribe has lived in this region for around 7,000 years.⁷³ Prior to Spanish contact, approximately 5,000 Gabrieleño people lived in villages throughout the Los Angeles Basin.⁷⁴ Villages were typically located near major rivers such as the San Gabriel, Rio Hondo, or Los Angeles Rivers. As indicated previously, the project will utilize the existing the industrial building. The minor improvements will require shallow excavations at most since no new building construction will occur; thereby, limiting the possibility of encountering significant archaeological resources.

Nevertheless, in the unlikely event that remains are uncovered by construction crews, all construction activities shall be halted, and the City of El Monte Police Department will be contacted (the Department will then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA and California Health and Safety Code Section 7050.5(b) will apply in terms of the identification of significant archaeological resources and their salvage. Adherence to the abovementioned mitigation will reduce potential impacts to levels that are less than significant.

C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries? • No Impact.

No dedicated cemeteries are located within the project site or in the vicinity of the project site. The nearest cemetery to the site is Savannah Cemetery and it is located 0.71 miles southwest of the project site in the City of Rosemead.⁷⁵ The proposed project will be restricted to the designated project site and will not affect the aforementioned cemetery. In addition, the proposed construction is anticipated to

⁷¹California Department of Parks and Recreation. *California Historical Resources*. <http://ohp.parks.ca.gov/ListedResources>. Website accessed September 28, 2018.

⁷² Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018

⁷³ Tongva People of Sunland-Tujunga. *Introduction*. http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html.

⁷⁴ Rancho Santa Ana Botanical Garden. *Tongva Village Site*. <http://www.rsabg.org/component/k2/item/453-tongva-village-site>.

⁷⁵ Google Earth. Website accessed September 27, 2018.

neither discover nor disturb any on-site burials due to past disturbance of the project site that was needed to accommodate the previous development. Furthermore, the project's implementation will require minor alterations to the existing building and project site. The minor improvements will require shallow excavations at most since no new building construction will occur; thereby, limiting the possibility of encountering significant archaeological resources. As a result, no impacts are expected.

3.5.3 MITIGATION MEASURES

The preceding analysis indicated that the proposed project will not result in significant impacts to cultural resources that would require any mitigation.

3.6 ENERGY

3.6.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on the environment if it results in the following:

- A potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation; and,
- A conflict with or obstruction of a State or local plan for renewable energy or energy efficiency.

3.6.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Cultivation of cannabis is an agricultural production process where space conditions, temperature, and humidity are tightly controlled to optimize the quality of the cannabis plants and to reduce crop loss. The quality and amount of light provided is the primary variable affecting crop yield and quality once air temperature and humidity needs are met. In commercial operations, growers clone mother plants by taking small cuttings. The seedlings are then grown in racks stacked vertically with fluorescent lighting (T5HO) until they are mature enough to be repotted and placed in grow rooms with high-intensity discharge (HID) fixtures. The plants are then grown in a vegetative state for 18 to 24 hours per day until the photoperiod is shortened, which induces the plant to begin flowering. A full cycle from clone to harvested plant takes three to four months but can vary depending on the particular strain of cannabis.⁷⁶

⁷⁶ Jesse Remillard, PE, and Nick Collins, PE, ERS *Trends and Observations of Energy Use in the Cannabis Industry*. ACEEE Summer Study on Energy Efficiency in Industry. 2017

As indicated in the Project Description (Section 2), a total of 1,900 grow lights will be installed. Each light will be 1,000 watts and the continuous load for the cultivation will be 1.68 million watts, with approximately 60% of the lights operating at one time.⁷⁷ This translates into 1,680 kilowatts per day, which further translates into an estimated annual consumption of 613,200 kilowatts.

Because plants release water vapor through transpiration, indoor grow facilities also require substantial dehumidification to maintain approximately 50% to 60% relative humidity. If excess humidity is left unregulated, it can cause mold or mildew, potentially ruining a crop. Dehumidification is generally achieved mechanically by sub-cooling the air to remove water and then reheating the air to the desired supply air temperature through traditional dehumidification units or by absorbing moisture in the air through a desiccant dehumidifier. The indoor air conditioning will also require electrical consumption. The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as State law provides methods for local enhancements. The project Applicant will be required to closely work with the Southern California Edison Company to identify existing and future strategies that will be effective in reducing energy consumption. The following mitigations will also be required:

- The use of lighting equipment that will be energy efficient such as LED light fixtures;
- Installing solar panels to reduce energy consumption; and,
- All appliances and indoor climate control equipment must be required to meet “Energy Star” ratings.

The aforementioned mitigations will be effective in reducing energy consumption and the environmental impacts to levels that are less than significant.

B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency? • Less than Significant Impact.

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The 2016 version of the standards became effective as of January 1, 2017. The 2016 version addresses additional items such as clean air vehicles, increased requirements for electric vehicle charging infrastructure, organic waste, and water efficiency and conservation. The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as state law provides methods for local enhancements.

⁷⁷ Email communication with Mr. Robert C of GSC Holding Group LLC. Email dated September 26, 2018.

As indicated previously, the proposed project will be in accordance with the City's Building Code requirements and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. The project will include new light standards and fixtures that will be used as operational and security lighting. This lighting will conform to all state and local building code and lighting regulations. As a result, the potential impacts are considered to be less than significant.

3.6.3 MITIGATION MEASURES

The project Applicant will be required to closely work with the Southern California Edison Company to identify existing and future strategies that will be effective in reducing energy consumption. The following mitigation will also be required:

Mitigation Measure No. 3 (Energy Impacts). The facility must use of lighting equipment that will be energy efficient such as LED light fixtures.

Mitigation Measure No. 4 (Energy Impacts). The installation of solar panels will be required as a means to reduce energy consumption.

Mitigation Measure No. 5 (Energy Impacts). All appliances and indoor climate control equipment must be required to meet "Energy Star" ratings.

3.7 GEOLOGY & SOILS

3.7.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant impact on the environment if it results in the following:

- Direct or indirect cause of potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault), strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides;
- Substantial soil erosion resulting in the loss of topsoil;
- The exposure of people or structures to potential substantial adverse effects, including location on a geologic unit or a 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;
- Locating a project on an expansive soil, as defined in the California Building Code, creating substantial direct or indirect risks to life or property;

- Locating a project in, or exposing people to potential impacts, including soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or,
- Direct or indirect destruction of a unique paleontological resource or site or unique geological feature.

3.7.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The City of El Monte is located in the seismically active region of Southern California. Many major and minor local faults traverse the entire Southern California region, posing a threat to millions of residents, including those who reside in the City of El Monte. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake.⁷⁸ The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.⁷⁹ A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of El Monte is not on the list.⁸⁰ Nevertheless, the site is within a seismically active region prone to occasional damaging earthquakes. The City of El Monte is not on the list.⁸¹ However, the project site is located between the Whittier Fault and the Sierra Madre Fault.

The commercial medicinal-only cannabis use will involve cultivation, manufacturing, and distribution operations. The project will utilize an existing 71,658 square foot industrial building. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. The potential impacts from fault rupture are considered no greater for the project site than for the surrounding areas. The potential impacts in regards to ground shaking would also be considered to be less than significant. The intensity of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault.

⁷⁸ California Department of Conservation. *What is the Alquist-Priolo Act.* <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx>.

⁷⁹ Ibid.

⁸⁰ California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.* <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx>

⁸¹ Ibid.

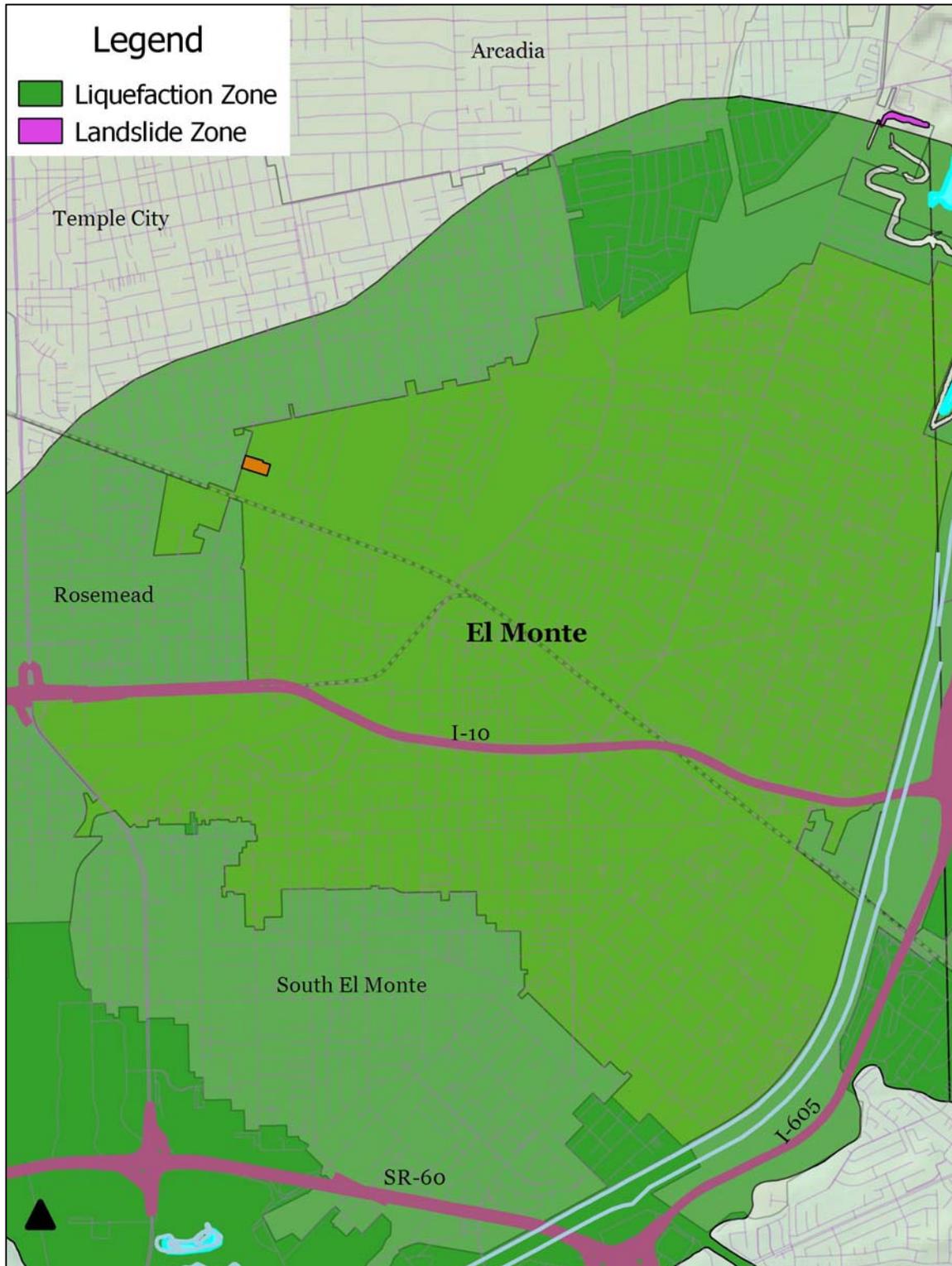


EXHIBIT 3-3
SEISMIC HAZARDS MAP
SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

Other potential seismic issues include ground failure, liquefaction, and lateral spreading. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is located in an area that is subject to liquefaction (refer to Exhibit 3-3). According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. The potential impacts in regards to liquefaction are considered to be less than significant since the project will utilize the existing building. Lastly, the project site is not subject to the risk of landslides (refer to Exhibit 3-2). Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils.

Liquefaction induced lateral spreading would not affect the proposed development since the project will utilize the existing facility. The underlying soils are not prone to shrinking and swelling (refer to Section 3.6.2.D). As a result, the potential impacts in regards to liquefaction and landslides are less than significant.

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

The United States Department of Agriculture's (USDA) Web Soil Survey was consulted to determine the nature of the soils that underlie the project site. According to the USDA Web Soil Survey, the site is underlain by Urban Land-Pico Metz complex soils.⁸² The site is, and will continue to be level and no slope failure or landslide impacts are anticipated to occur. Once operational, the project site will continue to be paved over and landscaped, which will minimize soil erosion.

The project Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to Federal NPDES regulations since the project would connect to the City's Municipal Separate Storm Sewer System (MS4) Permit. The SWPPP is required to apply for an NPDES General Industrial Activities Storm Water Permit (GIASP). The SWPPP will contain construction best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains. In addition, the project's contractors must adhere to any construction BMPs identified in the City's development construction program. As a result, the impacts will be less than significant.

C. Would the project expose people or structures to potential substantial adverse effects, including location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? • Less than Significant Impact.

The commercial medicinal cannabis use will involve cultivation, manufacturing, and distribution operations. The project will utilize an existing 71,658 square foot industrial building. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. The proposed project will not destabilize the underlying soils since the project will utilize the existing

⁸² United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

industrial facility. The minor improvements that will take place will require shallow excavations at most since no new building construction will occur; thereby, limiting the possibility of destabilizing the underlying soils. The surrounding area is relatively level and is at no risk for landslides (refer to Exhibit 3-2). Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed project since the project will utilize the existing industrial building. Therefore, lateral spreading caused by liquefaction will not affect the project.

The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. In addition, the project will not result in the direct extraction of groundwater located below ground surface (BGS) since the project will continue to be connected to the City's water system.

The soils that underlie the project site are not prone to subsidence. Subsidence occurs via soil shrinkage and is triggered by a significant reduction in an underlying groundwater table, thus causing the earth on top to sink.⁸³ As stated previously, the underlying soils possess a low shrink swell potential. No groundwater will be drained to accommodate the construction of the proposed project. Moreover, the project will not result in the direct extraction of groundwater located below ground surface (BGS). Lastly, the proposed project will not expose future employees to seismic risks involving collapsible soils. Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading.⁸⁴ The proposed project will utilize the existing building. The soils have and will continue to support the proposed project. As a result, the potential impacts are considered to be less than significant.

D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial direct or indirect risks to life or property? • Less than Significant Impact.

The commercial medicinal cannabis use will involve cultivation, manufacturing, and distribution operations. The project will utilize an existing 71,658 square foot industrial building. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. The underlying soils consist of Urban Land-Pico Metz complex soils.⁸⁵ The urban land component consists of non-native fill materials, while the Pico and Metz complex soils consist of sandy loam. According to the U.S. Department of Agriculture, the components of the Urban Land-Pico Metz complex soils

⁸³ Subsidence Support. *What Causes House Subsidence?* <http://www.subsidence-support.co.uk/what-causes-subsidence.html>

⁸⁴ Association of Environmental & Engineering Geologists. *Expansive and Collapsible Soils.* <http://www.aegweb.org/>.

⁸⁵ UC Davis. *SoilWeb: Soil Survey Browser.* <https://casoilresource.lawr.ucdavis.edu/gmap/>. And UC Davis. *SoilWeb: Soil Survey Browser.* <https://casoilresource.lawr.ucdavis.edu/gmap/>.

possess a low shrink swell potential.⁸⁶ The shrinking and swelling of soils is influenced by the amount of clay present in the underlying soils.⁸⁷ If soils consist of expansive clay, damage to foundations and structures may occur. A minimal amount of clay is present in Urban Land-Pico Metz complex soils. As a result, the potential impacts are considered to be less than significant.

E. Would the project be located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? • No Impact.

No septic tanks will be used as part of proposed project. The project will continue to be connected to the existing sanitary sewer system. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature? • No Impact.

The underlying soils are alluvial in nature and are classified as Older Sandy Alluvium (Qos).⁸⁸ Alluvial deposits are typically quaternary in age (from two million years ago to the present day) and span the two most recent geologic epochs, the Pleistocene and the Holocene.⁸⁹ Older Sandy Alluvium (Qos) Deposits are Pleistocene aged.⁹⁰ The commercial medicinal-only cannabis use will involve cultivation, manufacturing, and distribution operations. The project will utilize an existing 71,658 square foot industrial building. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use.

The proposed project's implementation is not anticipated to result in the discovery or disturbance of any paleontological resources. Furthermore, the project's implementation will require minor alterations to the existing building and project site. The minor improvements will require shallow excavations at most since no new building construction will occur; thereby, limiting the possibility of encountering significant archaeological resources. As a result, no impacts are expected.

3.7.3 MITIGATION MEASURES

The preceding analysis indicated that the proposed project will not result in any significant impacts that would require mitigation.

⁸⁶ United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.

⁸⁷ Natural Resources Conservation Service Arizona. *Soil Properties Shrink/Swell Potential*. http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/az/soils/?cid=nrcs144p2_065083

⁸⁸ California Department of Transportation. *SR-710 North Study Paleontological Identification and Evaluation Report, Figure 6-3 BRT Alternative Project Area Geology*. Report prepared March 14, 2014.

⁸⁹ United States Geological Survey. *What is the Quaternary?* http://geomaps.wr.usgs.gov/sfgeo/quaternary/stories/what_is.html

⁹⁰ California State University, Northridge. *Dibblee Wall Map Legend*. <http://www.csun.edu/~met23704/dibblee%20map%20legend.pdf>

3.8 GREENHOUSE GAS EMISSIONS

3.8.1 THRESHOLDS OF SIGNIFICANCE

A project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and,
- The potential for conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases.

3.8.2 ENVIRONMENTAL ANALYSIS

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

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The SCAQMD has established multiple draft thresholds of significance. These thresholds include 1,400 metric tons of CO₂E (MTCO₂E) per year for commercial projects, 3,500 MTCO₂E per year for residential projects, 3,000 MTCO₂E per year for mixed-use projects, and 7,000 MTCO₂E per year for industrial projects.

The commercial medicinal-only cannabis use will involve cultivation, manufacturing, and distribution operations. The project will utilize an existing 71,658 square foot industrial building. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouse gases in a common and collective unit. As indicated in Table 3-4, the CO₂E total for the project is 6,485 pounds per day or 2.94 MTCO₂E per day. This translates into an annual emission of 1,073 MTCO₂E, which is below the aforementioned thresholds. The GHG emissions estimates reflect what an industrial cannabis facility of the same location and description would generate once fully operational. The type of activities that may be undertaken once the project is operational have been predicted and accounted for in the model for the selected land use type. It is important to note that the project is an “infill” development, which is seen as an important strategy in combating the release of GHG emissions. The project will require minor alterations to the existing facility’s exterior, interior, and infrastructure. These renovations will release a nominal amount of GHG. Most of the operational GHG emissions will be related to emissions from VOCs used in the manufacturing process.

**Table 3-4
 Greenhouse Gas Emissions Inventory**

Source	GHG Emissions (lbs/day)			
	CO ₂	CH ₄	N ₂ O	CO ₂ E
Long-Term – Area Emissions	0.03	--	--	0.03
Long-Term - Energy Emissions	418.05	--	--	420.53
Long-Term - Mobile Emissions	6,058.02	0.29	--	6,065.30
Long-Term - Total Emissions	6,476.11	0.29	--	6,485.88
Total Construction Emissions	3,352.59	0.77	--	3,365.86
Construction Emissions Amortized Over 30 Years				18.49 MTCO₂E
Total Operational Emissions with Amortized Construction Emissions				1,091 MTCO₂E
Significance Threshold				7,000 MTCO₂E

Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC).⁹¹ Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities. As a result, the potential impacts are considered to be less than significant.

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

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country’s most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.⁹² The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. The City of El Monte does not have an adopted Climate Action Plan. However, the City’s General Plan includes Air Quality sections within the Public Health and Safety Element, and the Health and Wellness Element.⁹³

⁹¹ California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council’s member agencies.

⁹² Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030*. <http://gov.ca.gov/news.php?id=18938>

⁹³ City of El Monte. *Vision El Monte General Plan*. <http://elmonteca.gov/LinkClick.aspx?fileticket=lyvL7WlS6f4%3d&tabid=101>. June 2011.

The policies are listed within Section 3.3.2.A herein and the proposed project is consistent with those aforementioned policies. The proposed project will not involve or require any variance from the aforementioned policies. Furthermore, the proposed project will not involve or require any other variance from the adopted plan, policy, or regulation governing GHG emissions. As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.

3.8.3 MITIGATION MEASURES

The preceding analysis concluded that no mitigation will be required.

3.9 HAZARDS & HAZARDOUS MATERIALS

3.9.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact regarding hazards or hazardous materials if it results in any of the following:

- The creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- The creation of 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;
- The generation of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Locating the project on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section §65962.5 resulting in a significant hazard to the public or the environment;
- Locating the project within an area governed by an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport that would result in a safety hazard or excessive noise for people residing or working in the project area;
- The impairment of the implementation of, or physical interference with, an adopted emergency response plan or emergency evacuation plan; or,
- The exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild land fire.

3.9.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The proposed project involves the operation of a commercial medicinal-only cannabis use within an existing 71,658 square foot industrial building. The proposed project will include the cultivation, manufacturing, and distribution of medical cannabis. No retail cannabis or cannabis product retail sales or activities will be permitted. The existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. Security features such as onsite security, blacked out windows and security cameras, among others, will also be provided. One Cortese site is located in the City of El Monte and it is the San Gabriel Groundwater Basin.⁹⁴ The San Gabriel Valley has been under environmental investigation since 1979 when groundwater contaminated with volatile organic compounds (VOCs) was first identified. The groundwater contamination resulted from the historic use and improper handling and disposal of chlorinated solvents (such as tetrachloroethene (PCE) and trichloroethene (TCE)) and other chemicals (other VOCs, 1,4-dioxane, perchlorate, NDMA). USEPA believes that the contamination initially stemmed from an increase in industrial activity during World War II, followed by rapid post-war industrialization.

In May 1984, USEPA listed four broad areas of regional-scale groundwater contamination within the Basin on the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Since listing the San Gabriel Valley Superfund Sites, the United States Environmental Protection Agency (USEPA) has been working to address the groundwater contamination on a regional scale through installation and operation of groundwater extraction systems that control the contaminant migration. Extracted groundwater is treated to safe levels and, if feasible, is reused for drinking water supply. Although the groundwater cleanup activities started in the 1990's, and progress has been made, the groundwater contamination in the San Gabriel Valley is extensive and will require multiple decades to remediate.

The project site is currently occupied by an existing industrial building that will be “repurposed” to accommodate the proposed use. Due to the age of the on-site improvements, construction related activities related to the requisite tenant improvements could reveal lead and/or asbestos-containing materials. As a result, the following mitigation is required:

- The Applicant and the contractors must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, and other hazardous substances and materials that may be encountered during tenant improvement activities. Documentation as to the amount, type, and evidence of disposal of materials at an appropriate hazardous material landfill site shall be provided to the Chief Building Official prior to the issuance of the Building Permit for the interior improvements. Any contamination encountered must be removed and disposed of in accordance with applicable laws prior to the issuance of the Building Permit.

⁹⁴ CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*.
http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

The aforementioned mitigation would reduce the potential impact to levels that are considered to be less than significant. Furthermore, the mitigation measures outlined in Section 3.9 (Hydrology & Water Quality) will ensure that construction activities do not lead to any contamination of surface water runoff.

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

The proposed project involves the operation of a commercial medicinal-only cannabis use within an existing 71,658 square foot industrial building. The proposed project will include the cultivation manufacturing, and distribution of medical cannabis. The potentially hazardous materials that are often associated with medical cannabis facilities are outlined below.

- *Mold.* Cannabis production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold. Previous studies of illegal indoor cultivation operations have reported elevated levels of airborne mold spores, especially during activities such as plant removal by law enforcement personnel. Physiological effects include allergic reactions, hypersensitivity, and anaphylaxis to cannabis.
- *Skin Sensitivity.* Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes. As with most sensitizers, initial exposure results in a normal response, but over time, repeated exposures can lead to progressively strong and abnormal responses.
- *Carbon dioxide (CO₂).* CO₂ is used in the cannabis industry to increase plant growth and to produce concentrates. In addition to the liquid gas form, solid carbon dioxide or dry ice can be used for extraction processes. Compressed gases can present a physical hazard and has additional safety regulations that must be adhered to.
- *Carbon monoxide (CO).* CO is a colorless, odorless, toxic gas which interferes with the oxygen-carrying capacity of blood. At elevated concentrations, CO can overcome persons without warning. Sources of carbon monoxide exposure include furnaces, hot water heaters, portable generators/generators in buildings; concrete cutting saws, compressors; forklifts, power trowels, floor buffers, space heaters, welding, and gasoline powered pumps.
- *Indoor Air Quality.* Workers may encounter ozone as a product of the chemical reaction of nitrogen oxides and volatile organic compounds (e.g., terpenes emitted from the cannabis plant) present inside a cultivation facility. Terpenes and nitric oxides are associated with eye, skin, and mucous irritation. Ozone generators may also be found in facilities for odor control. Ozone can cause decreased lung function and/or exacerbate pre-existing health effects, especially in workers with asthma or other respiratory complications.

- *Pesticides.* Cannabis cultivation facilities may have insecticides and fungicides used within the facility. Some pesticides, including pyrethrins and neem oil are non-persistent and have low volatility. However, these pesticides have been associated with dermal and respiratory toxicity for the workers who apply them. Depending on the pesticide, requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.
- *Nutrients and Corrosive Chemicals.* Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Corrosives are materials that can attack and chemically destroy exposed body tissues. Corrosive materials can severely irritate, or in some cases, burn the eyes. Skin can become badly burned or even blister on contact with corrosive chemicals. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

The following mitigation will ensure that the operators of the facility must comply with all pertinent requirements concerning worker safety and the storage, use, and handling of hazardous chemicals.

- The Applicant will provide a comprehensive listing of those products and/or activities that will require the use of hazardous materials or will result in the generation of hazardous materials and/or wastes. The manner in which these materials are to be stored, handled, or disposed of must also be described. The Applicant will also be required to prepare a plan that indicates those protocols that must be adhered to in the event of an accident. This plan must be reviewed and approved by the County of Los Angeles Fire Department prior to the issuance of the Occupancy Permit.

The former occupant of the existing building was Miller Dial Corporation that was engaged in the manufacturing of nameplates, panels, product identification, membrane switches, dials, and instruments. The business opened in 1953. The manufacturing processes included photo lab, anodizing, etching, and painting among others. The operation were conducted in an 85,000 square-foot, one story concrete block building. The facility was equipped with degreasers in the metal decoration area, paint storage inside north end of building, and chemical storage area outside to the east of building. A Sump was located southwest of the chemical storage area. In February 1995, several potential source areas, such as, a clarifier, paint room, former vapor degreaser, storage and fotofoil areas were identified. The processes known to use solvents are silk screening, spray coating, roller coating, resist stripping, handwipe cleaning, equipment cleaning, and equipment lubrication.

The DTSC required the use of vapor extraction wells to remove the volatile organic contaminants (VOCs) from the groundwater. The Applicant has prepared an interior improvement plan and site plan that maintains the integrity of the existing wells while indicating the location and extent of new wells. As a result, the impacts will be less than significant.

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

There are no schools located within ¼ mile of the project site. The closest schools are Gidley Elementary School, 0.53 miles to the northeast and Shirpser Elementary School, located one-half mile to the southeast of the site. As a result, no impacts will result.

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

The *Cortese List*, also referred to as the Hazardous Waste and Substances Sites List or the California Superfund List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. California Government Code section 65962.5 requires the California Environmental Protection Agency to develop and update the Cortese List on annually basis. The list is maintained as part of the DTSC's Brownfields and Environmental Restoration Program referred to as EnviroStor.

One Cortese site is located in the City of El Monte and it is the San Gabriel Groundwater Basin. The San Gabriel Valley has been under environmental investigation since 1979 when groundwater contaminated with volatile organic compounds (VOCs) was first identified. The groundwater contamination resulted from the historic use and improper handling and disposal of chlorinated solvents (such as tetrachloroethene (PCE) and trichloroethene (TCE)) and other chemicals (other VOCs, 1,4-dioxane, perchlorate, NDMA). USEPA believes that the contamination initially stemmed from an increase in industrial activity during World War II, followed by rapid post-war industrialization. The proposed project will not impede the ongoing remediation of this existing Superfund site and no impacts will occur.

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

The project site is located approximately one mile west of the San Gabriel Valley Airport.⁹⁵ However, the site is not located within the designated Runway Protection Zone and the existing industrial building does not penetrate the airport's 20-1 slope.⁹⁶ The 20-1 ratio refers to the slope of an airplane's descent as it approaches the runway. The Federal Aviation Administration (FAA) regulations require a clear approach path with no penetrating obstructions within a maximum of 10,000 feet, depending on the length of the runway. The industrial building currently has a maximum height of 25 feet, which is

⁹⁵ Google Earth. Website accessed October 1, 2018.

⁹⁶ Los Angeles County Department of Regional Planning. *Los Angeles County Airport Land Use Commission (ALUC), Airport Layout Plan.* http://planning.lacounty.gov/assets/upl/project/aluc_elmon-te-plan.pdf

not a sufficient height to penetrate this 20-1 (five percent) slope. Furthermore, the project site is not located within any 65, 70, or 75 Community Noise Equivalent Level (CNEL) boundaries.⁹⁷

The proposed project will utilize the existing industrial building, which is exempt from Federal Aviation Administration (FAA) lighting requirements per FAA AC 70/7460-1L – Obstruction Marking and Lighting with Change. According to Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) tower lighting requirements, all structures exceeding 200 feet above ground level (AGL) must be appropriately marked with tower lights or tower paint. In addition, the Federal Communications Commission governs monitoring requirements. As a result, the proposed project will not present a safety or noise hazard related to aircraft or airport operations at a public use airport to people residing or working in the project area and no impacts will occur.

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

At no time will Ellis Lane or Temple City Boulevard be completely closed to traffic since the project will require minor alterations to the site and existing industrial building. As a result, no impacts are associated with the proposed project's implementation.

G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild land fire? • No Impact.

As indicated previously, the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project site. There is no chaparral present on-site or within the adjacent properties that would result in a heightened wild land fire risk. The project site is located outside of any wildfire risk designation area.⁹⁸ As a result, no risk from wildfire is anticipated with the approval and subsequent occupation of the proposed project.

3.9.3 MITIGATION MEASURES

The project site is currently occupied by an existing industrial building that will be “repurposed” to accommodate the proposed use. Due to the age of the on-site improvements, construction related activities related to the requisite tenant improvements could reveal lead and/or asbestos-containing materials. As a result, the following mitigation is required:

Mitigation Measure No. 6 (Hazardous Materials Impacts). The Applicant and the contractors must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, and other hazardous substances and materials that may be encountered during tenant improvement activities. Documentation as to the amount, type, and evidence of disposal of materials at an appropriate hazardous material landfill site shall be provided to the Chief Building Official prior to the issuance of the Building Permit for the interior

⁹⁷ Los Angeles County Department of Regional Planning. *Los Angeles County Airport Land Use Commission (ALUC), Airport Layout Plan.* http://planning.lacounty.gov/assets/upl/project/aluc_elmonte-plan.pdf

⁹⁸ Cal Fire. *Fire Hazard Severity Zone in SRA for Los Angeles County.* http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf

improvements. Any contamination encountered must be removed and disposed of in accordance with applicable laws prior to the issuance of the Building Permit.

The following mitigation will ensure that the operators of the facility must comply with all pertinent requirements concerning worker safety and the storage, use, and handling of hazardous chemicals.

Mitigation Measure No. 7 (Hazardous Materials Impacts). The Applicant will provide a comprehensive listing of those products and/or activities that will require the use of hazardous materials or will result in the generation of hazardous materials and/or wastes. The manner in which these materials are to be stored, handled, or disposed of must also be described. The Applicant will also be required to prepare a plan that indicates those protocols that must be adhered to in the event of an accident. This plan must be reviewed and approved by the County of Los Angeles Fire Department prior to the issuance of the Occupancy Permit.

3.10 HYDROLOGY & WATER QUALITY

3.10.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on hydrology and water quality if it results in any of the following:

- A violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
- A substantial decrease of groundwater supplies or interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- A substantial alteration of the existing drainage pattern of the site or area through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner that would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows;
- Flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation; or,
- Conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan.

3.10.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Chapter 13.16 (Stormwater Management and Discharge Control and Chapter 13.20 – Stormwater and Urban Runoff Control) of the City of El Monte Municipal Code regulates construction and post-construction stormwater runoff for all land uses throughout the City. The construction and subsequent occupation of the proposed project will not result in a violation of water quality standards or waste discharge requirements, nor will the project degrade surface or ground water quality. The project Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to Federal NPDES regulations since the project would connect to the City's MS4. The SWPPP is required to apply for an NPDES General Industrial Activities Storm Water Permit (GIASP). The SWPPP will contain construction best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains. Thus, the project's construction will not result in the generation and discharge of contaminated runoff since the project Applicant will be required to implement the construction BMPs identified in the SWPPP. The preparation of the SWPPP is required in order to comply with the City's NPDES requirements.

In addition, the project Applicant will be required to prepare a Low Impact Development report pursuant to Section 13.20.020 of the City's Municipal Code. The LID report must demonstrate compliance with the City's Low Impact Development (LID) requirements. The mandatory SUSMP will identify post-construction Best Management Practices (BMPs) that would both reduce the volume of water discharged into the local storm drains and filter out any contaminants present in the stormwater runoff. Adherence to the aforementioned City mandated requirements would ensure that all potential impacts remain at a level that is less than significant.

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

The minimal amount of grading that will be done will not extend to depths required to encounter groundwater. Therefore no direct construction related impacts to groundwater supplies, or groundwater recharge activities will occur. The project will continue to be connected to the City's water lines and will not result in a direct decrease in underlying groundwater supplies. Furthermore, the project Applicant will be required to install the post-construction BMPs identified in the LID in order to obtain a Certificate of Occupancy. These post-construction BMPs may facilitate the filtration and percolation of runoff into the local groundwater system. Therefore, the project's implementation may be beneficial in terms of promoting groundwater recharge. As a result, the impacts are anticipated to be less than significant.

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

The site's drainage characteristics will remain unchanged following the completion of the proposed project. Water will continue to drain off-site into the existing storm drain located along Ellis Lane. Residual runoff may also percolate into the ground or be discharged into the local storm drains in a controlled manner. The project site is located Eaton Wash (located 550 feet southwest of the project site), the Rio Hondo River (located approximately one mile to the east), and the San Gabriel River (located three miles to the east).⁹⁹ Construction activities will be restricted to the project site and will not alter the course of the three concrete-lined waterways.

As indicated previously, the project Applicant will be required to install various stormwater controls identified in the mandatory LID report. These BMPs will either promote the percolation of excess runoff into the ground, or will facilitate the control discharge of excess runoff into the local storm drains. Therefore, the risk of off-site erosion and/or siltation will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site. Thus, the project's implementation will not substantially increase the rate or amount of surface runoff; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; or provide additional sources of polluted runoff. As a result, the potential impacts are considered to be less than significant.

D. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? • No Impact.

According to the Federal Emergency Management Agency (FEMA) flood insurance map obtained from the Los Angeles County Department of Public Works, the proposed project site is located in Zone X.¹⁰⁰ This flood zone has an annual probability of flooding of less than 0.2% and represents areas outside the 500-year flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain.¹⁰¹ The project site is not located in an area that is subject to inundation by seiche or tsunami. A seiche in the concrete-lined Eaton Wash is not likely to happen due to the current level of channelization and volume of water present. In addition, the project site is not located within the tsunami risk zones identified by the California Department of Conservations.¹⁰² As a result, no impacts with regards to flooding, tsunamis, seiches, or dam inundation will occur.

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

The proposed project will be in compliance with Chapter 13.16 – Stormwater Management and Discharge Control and Chapter 13.20 – Stormwater and Urban Runoff Control the City of El Monte Municipal Code. Chapters 13.16 and 13.20 regulate construction and post-construction stormwater runoff for all land uses throughout the City. These two chapters of the City of El Monte Municipal Code are responsible for implementing the NPDES and MS4 stormwater runoff requirements. In

⁹⁹ Google Earth. Website accessed September 27, 2018.

¹⁰⁰ Los Angeles County Department of Public Works. *Flood Zone Determination Website*. <http://dpw.lacounty.gov/wmd/floodzone/>

¹⁰¹ FEMA. *Flood Zones, Definition/Description*. <http://www.fema.gov/floodplain-management/flood-zones>

¹⁰² California Department of Conservation.

addition, the project's construction and operation will not interfere with any groundwater management or recharge plan. As a result, no impacts are anticipated.

3.10.3 MITIGATION MEASURES

The analysis indicated that the proposed project would not result in any hydrological, stormwater runoff, or water quality impacts. As a result, no mitigation is required.

3.11 LAND USE & PLANNING

3.11.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant impact on land use and planning if it results in any of the following:

- The physical division of an established community; or,
- Causing 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.

3.11.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The project site is located within a built-up area. Existing uses found in the vicinity of the project site are summarized below:

- *North of the project site.* Valley TV, an electronics store, abuts the project site to the north. The site address for this business is 4410 Ellis Lane. A Home Depot store is located further north along the south side of Lower Azusa Road.¹⁰³ The address for the Home Depot is 9700 Lower Azusa Road.
- *South of the project site.* A vacant industrial building abuts the project site to the south.¹⁰⁴ This building's address is 4350 Temple City Boulevard.
- *East of the project site.* An industrial building occupied by Selective Stone, Inc., a countertop retailer, abuts the project site to the east. This building occupies frontage along the west side of Rowland Avenue, which is located approximately 545 feet further east of the site.¹⁰⁵ The legal address for this building is 4323 Temple City Boulevard.

¹⁰³ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on September 3, 2018.

¹⁰⁴ Ibid.

¹⁰⁵ Ibid.

- *West of the project site.* Temple City Boulevard/Ellis Lane is located along the site’s western property line. Temple City Boulevard extends in a southwest to northeast orientation throughout the City. Ellis Lane separates from Temple City Boulevard around the site’s southern driveway. Ellis Lane continues to extend in a southwest to northeast orientation. From there, Temple City Boulevard extends in a southwest to northeast orientation. The City of Temple City’s corporate boundaries extend along the west side of Ellis Lane. In addition, residential development occupies frontage along the west side of Ellis Lane, opposite the project site.¹⁰⁶

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of the adjacent neighborhood and no impacts will occur.

B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? • Less than Significant Impact.

The project site is currently zoned as *General Manufacturing (M-2)* (refer to Exhibit 3-4 for the zoning map). The project site’s General Plan land use designation is *Industrial/Business Park* (refer to Exhibit 3-5 for the General Plan land use map). The project site is located within the “Northwest Area Medicinal-only Commercial Cannabis” area under EL Monte City Ordinance No. 2924. Discretionary approvals required as part of the proposed project’s implementation include the following:

- Development Agreement No. 02-18
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 07-18 for medicinal cannabis cultivation;
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 08-18 for medicinal cannabis manufacturing; and,
- Medicinal Cannabis Conditional Use Permit (MCCUP) No. 09-18 for medicinal cannabis distribution.

The proposed project will utilize the existing building and no additional floor area will be added. The project’s implementation will require remodeling the building and improving the existing utilities to accommodate the cultivation and manufacturing activities. Cannabis operations are governed by Chapter 5.18 Commercial Cannabis Activities and Section 17.24.040.37 – Conditionally Permitted Uses. Chapter 5.18 primarily focuses on regulating operations, while Section 17.24.040.37 contains a specific land use regulation outlined below:

“No such activity shall occur on a premises located within an eight hundred (800) foot radius of a public or private school (kindergarten through grade 12), day care center, or youth center that is in existence at the time the permit is issued.”

¹⁰⁶Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on September 3, 2018.

The closest schools are Gidley Elementary School, 0.53 miles to the northeast and Shirpser Elementary School, located one-half mile to the southeast of the site. In addition, the proposed project conforms to the requirements outlined in Chapter 5.18 of the City's Municipal Code. As a result, the potential impacts are considered to be less than significant.

3.11.3 MITIGATION MEASURES

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

3.12 MINERAL RESOURCES

3.12.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The loss of availability of a known mineral resource that would be of value to the region and the residents of the State; or,
- 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.

3.12.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located on-site.¹⁰⁷ According to SMARA, study area maps prepared by the California Geological Survey, the City of El Monte is located within the larger San Gabriel Valley SMARA (identified as the Portland cement concrete-grade aggregate).¹⁰⁸ However, as indicated in the San Gabriel Valley P-C region MRZ-2 map, the project site is not located in an area where there are significant aggregate resources present.¹⁰⁹ As a result, no impacts to mineral resources will occur.

¹⁰⁷ California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*. <https://maps.conservation.ca.gov/doggr/wellfinder/#close>

¹⁰⁸ California Department of Conservation. *San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations*. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/Plate%201.pdf

¹⁰⁹ Ibid.

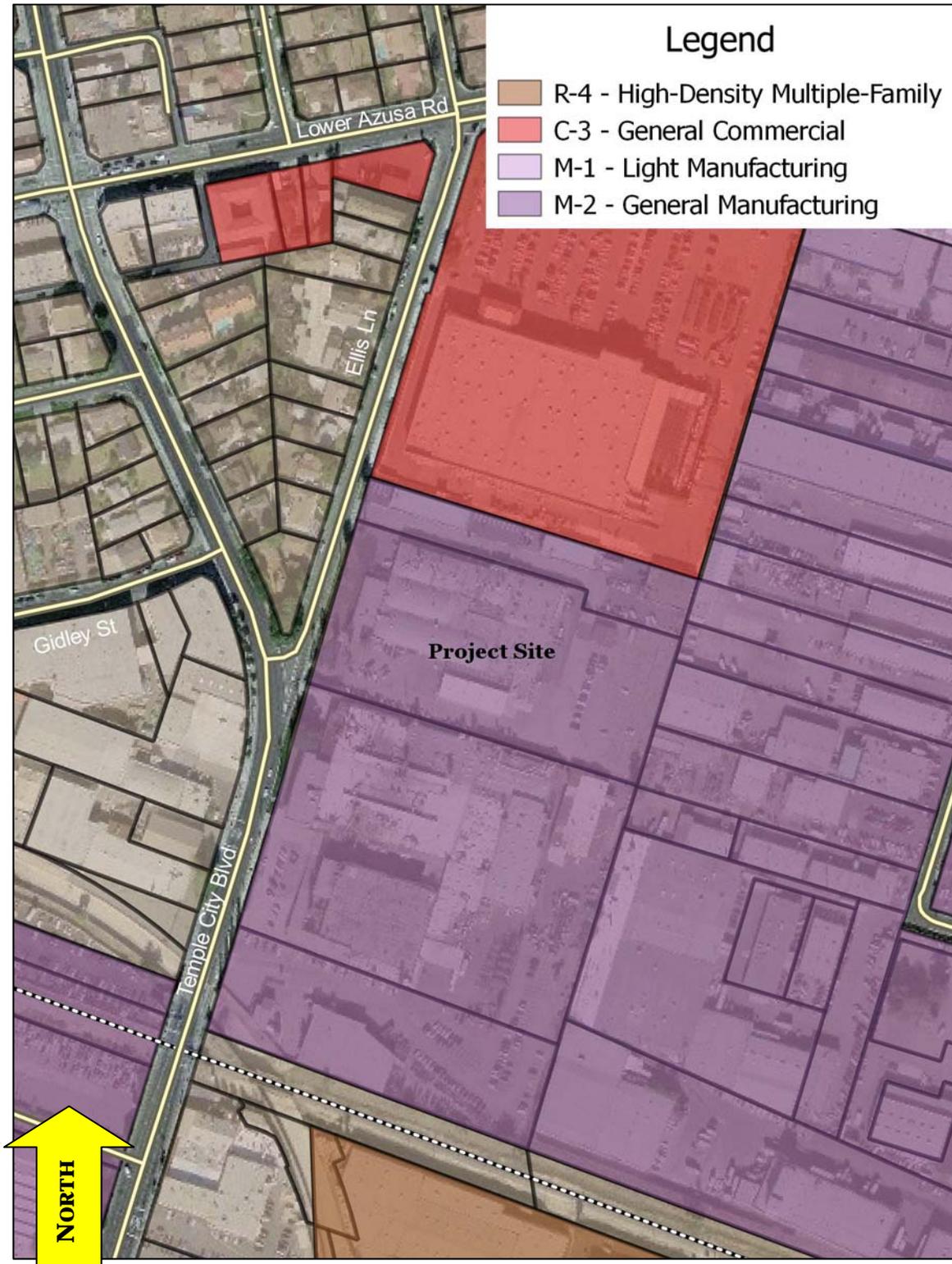


EXHIBIT 3-4
ZONING MAP
SOURCE: CITY OF EL MONTE

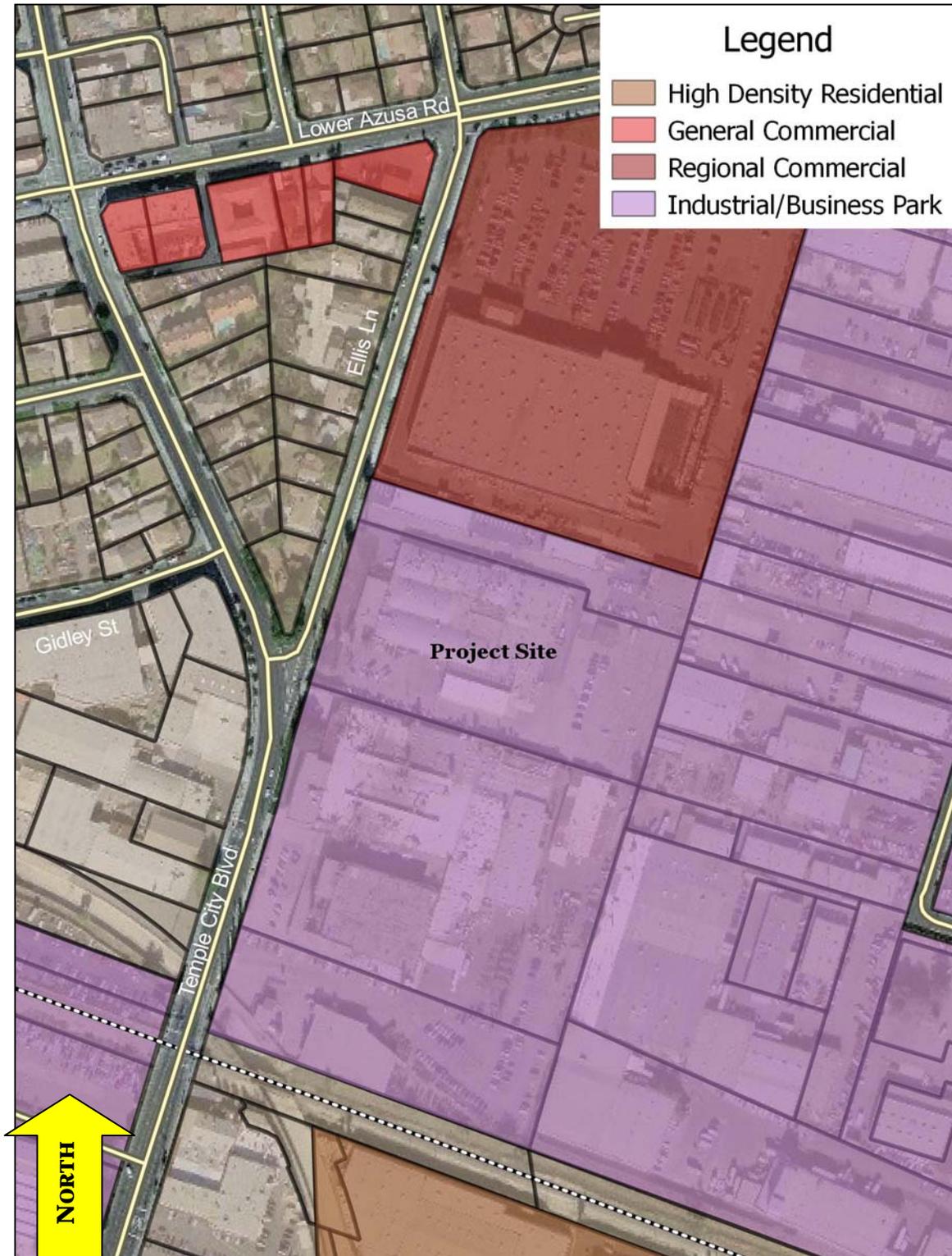


EXHIBIT 3-5
GENERAL PLAN MAP
SOURCE: CITY OF EL MONTE

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

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

3.12.3 MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no impacts would result from the proposed project and no mitigation measures are required.

3.13 NOISE

3.13.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant impact on the environment if it results in any of the following:

- The generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies; or,
- The generation of excessive vibration or ground-borne noise levels.

3.13.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.¹¹⁰ Noise levels that are associated with common, everyday activities are illustrated in Exhibit 3-6. Composite construction noise is best characterized in a study prepared by Bolt, Beranek, and Newman. In the study, the noisiest phases of construction are anticipated to be 89 dBA as measured at a distance of 50 feet from the construction activity. Noise levels associated with various types of construction equipment are summarized in Exhibit 3-7.

¹¹⁰ Bugliarello, et. al., *The Impact of Noise Pollution*, Chapter 127, 1975.

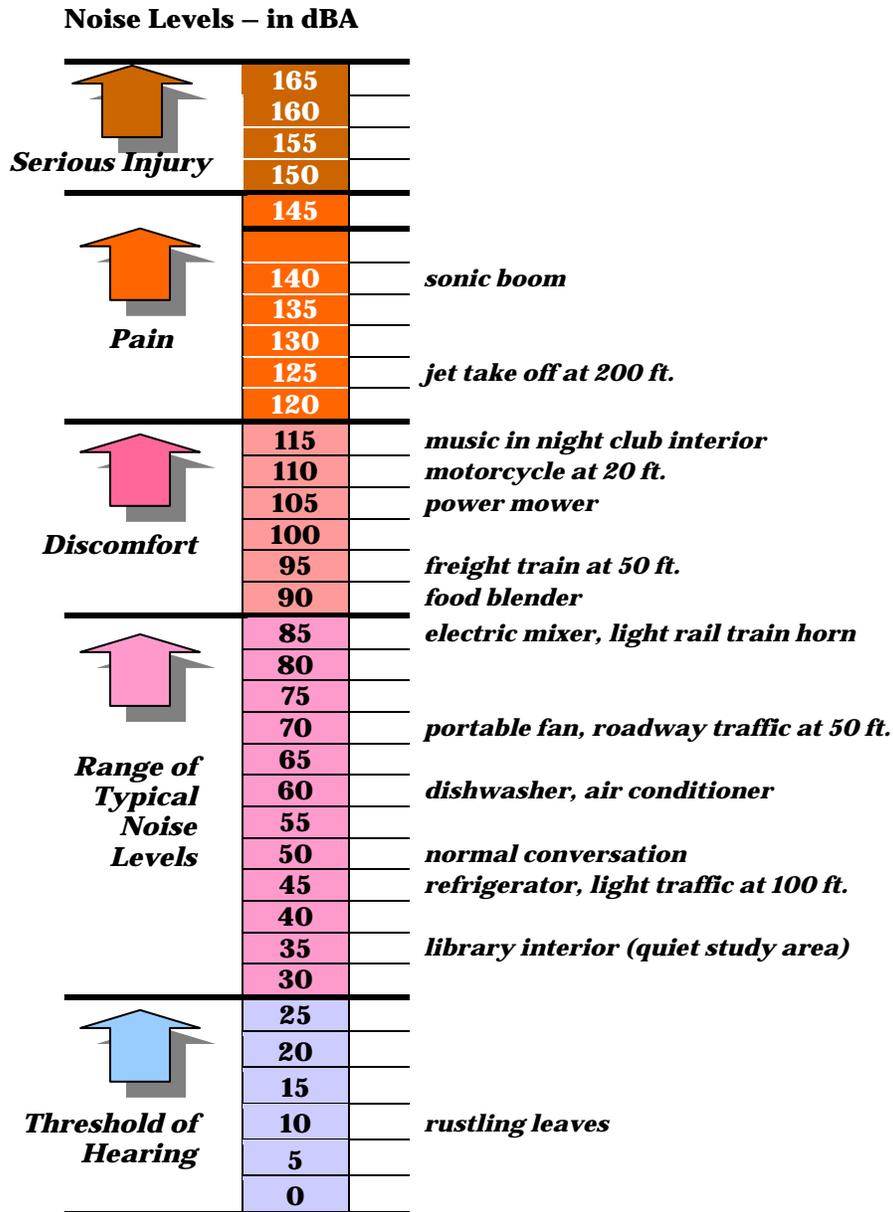


EXHIBIT 3-6 TYPICAL NOISE SOURCES AND LOUDNESS SCALE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

Typical noise levels in dBA 50 ft. from source

			70	80	90	100
<i>Equipment Powered by Internal Combustion Engines</i>	<i>Earth Moving Equipment</i>	Compactors (Rollers)				
		Front Loaders				
		Backhoes				
		Tractors				
		Scrapers, Graders				
		Pavers				
		Trucks				
	<i>Materials Handling Equipment</i>	Concrete Mixers				
		Concrete Pumps				
		Cranes (Movable)				
		Cranes (Derrick)				
	<i>Stationary Equipment</i>	Pumps				
		Generators				
Compressors						
<i>Impact Equipment</i>	Pneumatic Wrenches					
	Jack Hammers					
	Pile Drivers					
<i>Other Equipment</i>	Vibrators					
	Saws					

EXHIBIT 3-7
TYPICAL CONSTRUCTION NOISE LEVELS
 SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

The noise levels are those that would be expected at a distance of 50 feet from the noise source. The nearest noise sensitive receptors are the residential units located 118 feet to the west along the west side of Ellis Lane.¹¹¹ As indicated previously, the proposed project will utilize the existing building and no additional floor area will be added. The project's implementation will require remodeling the building and improving the existing utilities to accommodate the cultivation and manufacturing activities. The construction is anticipated to last for four months since these alterations are minor in scope. The project's construction noise levels were estimated using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model Version 1.1. The pieces and number of equipment that will be utilized was taken from the CalEEMod worksheets prepared for this project. The distance used between the construction activity and the nearest sensitive receptors varied depending on the individual equipment. As indicated by the model, the project's construction will result in ambient noise levels of up to 78.1 dBA at the nearest sensitive receptor. The model accounted for the distance between the site's western property line and the nearest sensitive receptors and the distance between the existing facility and the nearest sensitive receptors. The model also reflects the limited number of equipment that will be required to accommodate the proposed use. The project Applicant will be required to adhere to all pertinent noise control regulations outlined by the City. As a result, construction noise is anticipated to generate impacts that are considered to be less than significant.

The California Occupational Noise Control Standards contained in the California Code of Regulations, Title 8, Industrial Relations, Chapter 4, outline permissible noise exposure at a workplace which include a maximum noise exposure level of 90 dBA for more than eight hours in any workday. Finally, the project Applicant must comply with all Occupation Health and Safety Administration (OSHA) requirements regarding noise control. Adherence to the above-mentioned operational regulations will protect employees from excessive noise levels.

Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms and other equipment. All of the cultivation and manufacture of cannabis products will occur indoors. The operation of the proposed project will not expose future employees to excessive noise levels because the project is not considered to be a noise sensitive land use. In addition, the operation of the facility will not expose the nearby sensitive receptors along the west side of Ellis Lane to excessive noise since interior noise will be further attenuated by the building's exterior shell. Additionally, the distance between the building and the nearby sensitive receptors will naturally aid the reduction of noise levels since noise levels decrease with distance. As a result, the proposed project will not expose sensitive receptors to excessive noise levels and the potential impacts are considered to be less than significant.

B. Would the project result in the generation of excessive ground-borne vibration or ground-borne noise levels? • Less than Significant Impact.

As indicated previously, the proposed project will require minor alterations to the existing facility. These alterations will generate noise and vibration. Nevertheless, the distance between the nearby sensitive receptors will aid in the reduction of noise and vibration levels due to the principles of

¹¹¹ Google Earth. Site accessed September 27, 2018.

spreading loss. In addition, many of the alterations will occur indoors and will last no longer than five months. Furthermore, the traffic associated with the proposed project will not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). As a result, the traffic noise impacts resulting from the proposed project's occupancy are deemed to be less than significant.

3.13.3 MITIGATION MEASURES

The preceding analysis concluded that the proposed project will not require any mitigation.

3.14 POPULATION & HOUSING

3.14.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant impact on housing and population if it results in any of the following:

- A substantial growth in the unplanned population within an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of new homes or infrastructure) related to a project; or,
- The displacement of a substantial number of existing people or housing units, necessitating the construction of replacement housing.

3.14.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

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

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently occupied by an existing industrial building.
- *Extension of roadways and other transportation facilities.* The project will utilize the existing roadways, driveways, and sidewalks.
- *Extension of infrastructure and other improvements.* The project will utilize the existing infrastructure, though new utility lines will be installed. The installation of these new utility lines will not lead to subsequent development.

- *Major off-site public projects (treatment plants, etc.).* The project is a proposal to operate a cannabis cultivation and manufacture. The project's increase in demand for utility services can be accommodated without the construction or expansion of public infrastructure.
- *The removal of housing requiring replacement housing elsewhere.* The site is occupied by an existing industrial building and there are no housing units located on-site.
- *Additional population growth leading to increased demand for goods and services.* The project will not lead to any direct increase in the City's population since no housing will be provided.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The proposed project is an infill development that will utilize an existing building, roadway, and infrastructure. The new utility lines that will be provided will not extend into undeveloped areas and will not result in unplanned growth. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP, the City of El Monte is projected to add a total of 7,700 new jobs through the year 2040.¹¹² The project is anticipated to employ up to 46 people.¹¹³ The number of new jobs that will be created is within the employment generation estimated by SCAG. As a result, no impacts will occur.

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

No housing units will be displaced as a result of the proposed project's implementation. The site is occupied by an existing industrial building and there are no housing units located on-site. Therefore, no impacts will result.

3.14.3 MITIGATION MEASURES

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

3.15 PUBLIC SERVICES

3.15.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- A substantial adverse physical impact associated with the provision of new or physically altered

¹¹² Southern California Association of Governments. *Demographics & Growth Forecast. Regional Transportation Plan 2016-2040.* April 2016.

¹¹³ Email communication with Mr. Robert C of GSC Holding Group LLC. Email dated September 26, 2018.

governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to *fire protection services*;

- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to *police protection services*;
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to *school services*; or,
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to other *public facilities*.

3.15.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to fire protection services? • Less than Significant Impact.*

The Los Angeles County Fire Department (LACFD) provides fire protection services in the City of El Monte. The City is located within the service boundaries of Battalion 10. The first response station to the project site is Station No. 166 located at 3615 Santa Anita Avenue in the City of El Monte, approximately 1.04 miles southeast of the project site.¹¹⁴ This station has one fire engine/ladder truck, a utility truck, and one paramedic squad and a total daily staff of six firefighters.

The proposed project involves the operation of a commercial medicinal-only cannabis use within an existing 71,658 square foot industrial building. The proposed project will include the cultivation, manufacturing, and distribution of medical cannabis. The two largest threats to fire safety include the concentration of flammable plants in individual grow rooms as well as the use of VOCs as part of the extraction/oil production process.

The Los Angeles County Fire Department requires multiple fire safety features including sprinklers, gas detection alarms, ventilation systems, and specific signage. The entire building will be equipped with new or upgraded sprinklers. In addition, the Department restricts the location of where tanks filled with compressed gas may be placed. The proposed project's implementation will result in an

¹¹⁴ Google Earth. Site accessed October 1, 2018.

incremental increase in the demand for police and fire service calls. However, the Development Agreement will ensure any cost to the Fire Department will be provided by the Applicant. The proposed project will also be required to adhere to all pertinent site and building design regulations. As a result, the impacts to fire protection service will be less than significant.

B. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to police protection services? • Less than Significant Impact.

Law enforcement services within the City are provided by the El Monte Police Department which serves the community from one police station. The station is located at 11333 Valley Boulevard.¹¹⁵ Access to the proposed project will be controlled and enforcement will be strict. Individuals will only be allowed to enter the facility with a permitted escort. Access to the site will be controlled by a manned security station and access to the facility will require the use of key cards to unlock the doors. Individual employees will also be equipped with panic software that could be uploaded onto their phones for use in case of an emergency. Other security features include onsite security, interior and exterior security cameras, motion sensitive outdoor lighting, and blacked-out windows.¹¹⁶ Furthermore, no retail cannabis or cannabis product retail sales or activities will be permitted within the facility.

The Police Department will review the development plan to ensure the proposed project conforms to the Department's security regulations. However, the Development Agreement will ensure any cost to the Fire Department will be provided by the Applicant. In addition, the Applicant will be required to prepare a security plan pursuant to local and State regulations. As a result, the proposed project's law enforcement service impacts are less than significant.

C. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives relative to school services? • Less than Significant Impact.

Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. Any potential population growth that would lead to an increase in demand for school services will be indirect and will result from permanent employment growth. As a result, less than significant school-related impacts are anticipated to occur.

¹¹⁵ City of El Monte. *Police*. <http://www.ci.el-monte.ca.us/209/Police>.

¹¹⁶ Architect Rob Mothershed. *Site Plan Package*. Plans dated September 24, 2018.

D. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in other governmental services? • Less than Significant Impact.

No new governmental services will be needed, and the proposed project is not expected to have any impact on existing governmental services. The proposed project will not directly increase demand for governmental services. As a result, less than significant impacts are anticipated.

3.15.3 MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impact on public services. As a result, no mitigation is required.

3.16 RECREATION

3.16.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on the environment if it results in any of the following:

- 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; or,
- The construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

3.16.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? • Less than Significant Impact.

The City of El Monte's Parks and Recreation Division is responsible for recreational services in the City. There are 12 City facilities available to City residents.¹¹⁷ Due to the industrial nature of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. The nearest park to the project site is Gibson Mariposa Park, located 0.40 miles to the southeast of the project site.¹¹⁸ The proposed project would not result in any development that would potentially significantly physically alter any public park facilities and services. As a result, the impacts anticipated are less than significant.

¹¹⁷ City of El Monte. *Community Park Information*. <http://www.ci-el-monte.ca.us/Government/ParksandRecreation/ParksRecreation.aspx>.

¹¹⁸ Google Earth. Website accessed October 1, 2018.

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

The proposed project will not result in a direct demand for park facilities. In addition, the project will not provide any recreational facilities. As a result, no changes in the demand for local parks and recreation facilities are anticipated and no impacts are anticipated.

3.16.3 MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impact on recreational facilities and services. As a result, no mitigation is required.

3.17 TRANSPORTATION & CIRCULATION

3.17.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may have a significant adverse impact on traffic and circulation if it results in any of the following:

- A conflict with a plan, ordinance, or policy establishing measures for addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths;
- A conflict or inconsistency with CEQA Guidelines §15064.3 subdivision (b)(1) for a land use project;
- A conflict with or inconsistency with CEQA Guidelines §15064.3 subdivision (b)(2) for a transportation project;
- Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or,
- Results in inadequate emergency access.

LOS is a qualitative measure used to describe the condition of traffic flow on the street system, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. Two of three study intersections are signalized, and one is unsignalized. The following analyses were used based on the requirements for the jurisdiction of each intersection location. LOS definitions for all methodologies are provided in Table 3-5, Table 3-6, and Table 3-7. Table 3-5 provides the definitions for signalized intersections using ICU.

**Table 3-5
 Level of Service Definitions For Signalized Intersections - ICU**

Level of Service	Intersection Capacity Utilization	Definition
A	0.000-0.600	EXCELLENT. No vehicle waits longer than one light and no approach phase is fully used.
B	0.601-0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701-0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801-0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume period occur to permit clearing of developing lines, preventing excessive backups.
E	0.901-1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long line of waiting vehicles through several signal cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths

Table 3-7 on the following page provides the definitions for signalized intersections using HCM.

**Table 3-6
 Level of Service Definitions
 For Signalized Intersections - HCM**

Level of Service	Average Total Delay (seconds/vehicle)
A	≤ 10.0
B	> 10.0 and ≤ 20.0
C	> 20.0 and ≤ 35.0
D	> 35.0 and ≤ 55.0
E	> 55.0 and ≤ 80.0
F	> 80.0

Finally, Table 3-7 provides the definitions for un-signalized intersections using HCM.

**Table 3-7
 Level of Service Definitions
 For Un-Signalized Intersections - HCM**

Level of Service	Average Total Delay (seconds/vehicle)
A	≤10.0
B	> 10.0 and ≤15.0
C	> 15.0 and ≤25.0
D	> 25.0 and ≤35.0
E	> 35.0 and ≤50.0
F	> 50.0

3.17.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a conflict with a plan, ordinance, or policy establishing measures of effectiveness addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?* • *Less than Significant Impact.*

The project site is presently occupied by a furniture outlet. The project as proposed will utilize the existing 71,658 square foot facility. No additional floor area will be added or removed. Even though the project will not increase the size of the building’s footprint, the project’s operational characteristics will result in different trip generation and distribution. As shown in Table 3-8, the existing land use currently generates 274 trips per day (refer to Table 3-8). Multiple service vehicles were noted during the field survey that was conducted for the project site.

**Table 3-8
 Trip Generation for the Former Use**

ITE Land Use/Project Scenario	ITE Code	Unit	Daily	AM Peak Hour	PM Peak Hour
				Total	Total
Trip Rates					
Manufacturing	140	KSF	3.82	0.73	0.73
Trip Generation					
Manufacturing	71,658	KSF	274	52	52

Source: ITE 9th Edition Trip Generation Rates

The proposed project will operate the manufacturing and cultivation facilities seven days a week between the hours of 9:00 AM to 7:00 PM. Delivery hours will occur from 9:00 AM to 7:00 PM, Monday through Friday. The delivery vehicles will consist of commercial vans with tinted windows. The project is anticipated to employ up to 46 people. Assuming an estimated two trips per employee,

the project will result in a minimum of 92 daily trips. It is important to note that the project does not include retail sales, which typically generate 402 trips per 1,000 square feet.¹¹⁹ As a result, the impacts will be less than significant.

B. For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)? • Less than Significant Impact.

According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

The proposed project is a request to operate a commercial medicinal-only cannabis use within an existing industrial building. It is important to note that the project is an “infill” development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC).¹²⁰ As a result, the potential impacts are considered to be less than significant.

C. For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)? • No Impact.

According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact. The proposed project is a request to operate a commercial medicinal-only cannabis use and no transportation infrastructure will be constructed. The existing street has capacity to accommodate the proposed traffic. As a result, no impacts will occur.

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

Access to the project site will be provided by two existing driveways located along the west side of the project site.¹²¹ The southernmost driveway provides both ingress and egress. However, a pork chop precludes vehicles from making left turns into the project site from southbound Ellis Lane. This pork

¹¹⁹ ITE 9th Edition Trip Generation Rates.

¹²⁰ California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>.

¹²¹ Iblid

chop also precludes vehicles from executing left-turns from the southern driveway. Access via the northern driveway is un-obstructed. The proposed project will not expose future workers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. The delivery vehicles will consist of vans and not trucks. As a result, the potential impacts are considered to be less than significant.

E. Would the project result in inadequate emergency access? • No Impact.

The project would not affect emergency access to any adjacent parcels. At no time will any local streets or parcels be closed to traffic. As a result, the proposed project's implementation will not result in any impacts.

3.17.3 MITIGATION MEASURES

The analysis indicated the proposed project would not result in any significant traffic and circulation impacts. As a result, no mitigation is required.

3.18 TRIBAL CULTURAL RESOURCES

3.18.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- A substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,
- A substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is 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.

3.18.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? • Less than Significant Impact.*

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. The project site is located within the cultural area that was formerly occupied by the Gabrieleño-Kizh. Nevertheless, the project will utilize the existing building and will require minor alterations to the site and facility. These minor improvements will not require grading that extends more than three (3) feet into the underlying soil. As a result, adherence to the standard condition presented in Section 3.5.2.B will minimize potential impacts to levels that are less than significant.

B. Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is 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? • Less than Significant Impact.

AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. The project site is located within the cultural area that was formerly occupied by the Gabrieleño-Kizh. Nevertheless, the project will utilize the existing building and will require minor alterations to the site and facility. These minor improvements will not require grading that extends more than three (3) feet into the underlying soil. As a result, adherence to the standard condition presented in Section 3.5.2.B will minimize potential impacts to levels that are less than significant.

3.18.3 MITIGATION MEASURES

The analysis of tribal cultural resources indicated that no significant impacts would result with the implementation of the mitigation measure provided in Section 3.5.2.B. As a result, no additional mitigation is required.

3.19 UTILITIES & SERVICE SYSTEMS

3.19.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental impacts;
- Insufficient water supplies to serve the project and the reasonably foreseeable future development during normal, dry, and multiple dry years;
- A determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand;
- The generation of solid waste in excess of State or local standards or in excess of the capacity of local infrastructure;

- A negative impact on the provision of solid waste services or impair the attainment of solid waste reduction goals; or,
- Compliance with Federal, State, and local management and reduction statutes and regulations related to solid waste.

3.19.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The project site is presently occupied by an industrial building. There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. In addition, the increase in demand for waste disposal, water, and wastewater treatment services can be adequately handled and no expansion of these services is required (refer to the following subsections). As a result, the potential impacts are considered to be less than significant.

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

The project site is located within the service boundaries of California American Water Company.¹²² According to the 2015 Urban Water Management Plan prepared by the City's Water Department, the City is anticipated to have a surplus of 49 million gallons of water during a normal year by the year 2035.¹²³ However, the City would not have enough supplies to meet projected demand during a single dry-year or multiple dry-year scenario.¹²⁴

As stated in Section 2.4, the plants will be watered using a drip system which recycles condensation water from the air conditioning units. The Applicant indicated that similar cannabis activities have an average water consumption of 2,543 gallons per day.¹²⁵ The existing water supply facilities and infrastructure will be able accommodate this additional demand. In addition, the project will be equipped with water efficient fixtures and drought tolerant landscaping will be planted throughout the project site. As a result, the impacts are considered to be less than significant.

¹²² City of El Monte. *Urban Water Management Plan*. Plan dated February 2017.

¹²³ Ibid.

¹²⁴ Ibid.

¹²⁵ Water Bill Provided by the Applicant. Bill received October 9, 2018.

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

Wastewater collection facilities that serve the City are owned, operated, and maintained by the City of El Monte Public Works Department. The City's present wastewater system includes a total of 135 miles of pipeline, six pump stations, and 2,697 manholes. A limited number of residences are also on septic tanks. El Monte is one of 17 jurisdictions that are signatory to the Joint Outfall Agreement. The agreement provides for a regional interconnected system of facilities and an inter-jurisdictional agreement to own, operate, and maintain sewers, pumping plants, treatment plants, and other facilities collectively called the Joint Outfall System. Wastewater treatment is provided to El Monte by the Sanitation Districts of Los Angeles County (LACSD) at three treatment plants.

The future development is projected to generate 3,241 gallons of effluent on a daily basis.¹²⁶ The Whittier Narrows Water Reclamation Plant has a total treatment capacity of 15 million gallons per day (mgd) and a residual capacity of approximately seven MGD. The proposed project's wastewater generation will not result in the remaining capacity being exceeded. In addition, the City's sewer system has sufficient capacity to accommodate the proposed project. As a result, the impacts are anticipated to be less than significant.

D. *Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure? • Less than Significant Impact.*

El Monte is served by four waste management companies through nonexclusive franchise agreements. All four waste haulers—American Reclamation, Phoenix Waste and Recycling, Valley Vista Services, and Waste Management—provide waste collection and recycling services for the commercial sector. Valley Vista and Phoenix Waste provide curbside residential collection and recycling services. American Reclamation and Phoenix Waste collect and recycle trash from the multiple family residential (apartments, town-homes, etc.) developments. Valley Vista and Waste Management provide temporary roll-off services.¹²⁷ In previous years, solid waste generated within the City of El Monte was disposed at the Puente Hills landfill prior to the landfill's closure on October 31, 2013. The Puente Hills Landfill was permanently closed in October 2013 and is only currently accepting clean dirt. Upon the landfill's closure, the Los Angeles County Sanitation District selected the Mesquite Regional Landfill in Imperial County as the new target destination for the County's waste. The Mesquite Regional Landfill in Imperial County has a 100-year capacity at 8,000 tons per day.¹²⁸ In addition, the nearby Puente Hills Transfer Station/Materials Recovery Facility (MRF) is able to accept 4,440 tons per day of solid waste. As indicated in Table 3-9, the future daily solid waste generation is projected to be 430 pounds per day. The proposed project will contribute a limited amount to the waste stream. As a result, less than significant impacts on solid waste generation are anticipated.

¹²⁶ Effluent generation is assumed to be 100% of water consumption rates for industrial uses, according to the City Engineer.

¹²⁷ City of El Monte. Model Water Efficient Landscape Ordinance (MWELO). <http://www.ci-el-monte.ca.us/DocumentCenter/View/1271>.

¹²⁸ City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. Final. May 2011.

**Table 3-9
 Solid Waste Generation (pounds/day)**

Use	Unit	Factor	Generation
Manufacturing	71,658 square feet	6.0 lbs/day/1,000 sq. ft.	430 lbs/day

Source: City of Los Angeles CEQA Thresholds Guide.

The proposed project will generate project specific waste including cannabis waste and residual solvents. All cannabis waste and residual solvents will be secured and disposed of in specially designated waste receptacles. As a result, the potential impacts are considered to be less than significant.

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

The proposed use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project’s implementation and no mitigation is required.

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

AB 341 establishes a policy goal for the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. The proposed use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project’s implementation and no mitigation is required.

3.19.3 MITIGATION MEASURES

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

3.20 WILDFIRE

3.20.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, acting as Lead Agency, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following located in or near State responsibility areas or lands classified as very high fire hazard severity zones:

- Impairment of an adopted emergency response plan or emergency evacuation plan;
- Due to slope, prevailing winds, and other factors, exacerbation of wildfire risks, and thereby

exposure to project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

- The requirement of 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; or,
- Exposure of people or structures to significant risks, including down slope of downstream flooding or landslides, as a result of runoff, post-fire slopes instability or drainage changes.

3.20.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project impair an adopted emergency response plan or emergency evacuation plan? • No Impact.*

The proposed project site is located within an urbanized area and no areas containing natural vegetation is located near the project site. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. As a result, no impacts will occur.

- B. *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? • Less than Significant Impact.*

The project site and the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project area. The Puente Hills (located 4.43 miles to the southeast) and the San Gabriel Mountains (located 5.21 miles to the north) are the closest mountain ranges to the project site. The proposed project may be exposed to criteria pollutant emissions generated by wildland fires due to the project site's proximity to fire hazard severity zones. However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, the potential impacts are considered to be less than significant.

- C. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? • Less than Significant Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. Medical cannabis will be grown and cannabis products will be manufactured on-site. The plants themselves as well as the VOCs that will be used to produce cannabis oil may exacerbate fire risk in the absence of mitigation or standard conditions. Each individual grow room will be fully sprinkled to prevent the risk of a fire breaking out and spreading. The project will require the use of volatile solvents during the manufacturing phase.

The Los Angeles County Fire Department will require the installation of gas detection systems as well as the use of labeled containers. Lastly, the proposed project, like most development in the City, may be subject to pollutant concentrations from industrial, gas line, or chemical fires due to the project site's proximity to active industrial users. Adherence to the Fire Department's conditions will ensure that the project does not create additional fire risk. As a result, the potential impacts are considered to be less than significant.

D. Would the project expose people or structures to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.

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

3.20.3 MITIGATION MEASURES

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

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

- *The approval and subsequent implementation of the proposed project will not have the potential to degrade the quality of the environment.* The proposed project will not have the potential to degrade the quality of the environment with the implementation of the mitigation measures identified throughout Section 3. The project's air quality emissions will be below the thresholds of significance outlined by the SCAQMD. No impacts to protected species or habitat will result with the implementation of the proposed project. Furthermore, the best management practices identified in the preliminary LID will filter out contaminants of concern present in stormwater runoff. The addition of project trips will not negatively impact any local intersection. Lastly, the project will include energy and water efficient appliances and fixtures.
- *The approval and subsequent implementation of the proposed project will not have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.* The proposed project is an infill development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State's Strategic Growth Council (SGC). Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas.

- *The approval and subsequent implementation of the proposed project will not have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.* The project's cumulative air quality emissions will be below the thresholds of significance established by the SCAQMD.
- *The approval and subsequent implementation of the proposed project will not have environmental effects that will adversely affect humans, either directly or indirectly.* Daytime and nighttime light and glare from both the proposed project would not contribute any significant impacts since both projects must comply with City regulations regarding lighting and light trespass. In addition, the project will include blacked out windows. The project's operational air quality impacts would be less than significant. Lastly, the addition of the project's traffic would not result in a deterioration of any intersection's level of service or the creation of a CO hot-spot. As a result, the potential impacts are considered to be less than significant with adherence to the required mitigation measures.



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SECTION 4 CONCLUSIONS

4.1 FINDINGS

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

- The proposed project *will not* have a significant effect on the environment.
- The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.
- A Mitigation Reporting and Monitoring Program *will be* required.

4.2 MITIGATION MONITORING & REPORTING PROGRAM

4.2.1. OVERVIEW OF THE PROJECT

The City of El Monte, in its capacity as Lead Agency, is considering an application to operate a comprehensive commercial medicinal-only cannabis use within an existing 71,658 square foot industrial building that is located in the M-2 General Manufacturing zone. The proposed project will be located on a site that encompasses 4.4 acres and occupies frontage along the east side of Ellis Lane/Temple City Boulevard. The commercial medicinal-only cannabis use will include cultivation, manufacturing, and distribution operations. No retail cannabis or cannabis product retail sales or activities will be permitted. This existing building will be remodeled and the utilities will be upgraded to accommodate the proposed use. Security features, including but not limited to, onsite security, and security cameras, will be provided. A total of 93 parking spaces will be provided. Access to the project site is provided by two (2) existing driveways located on the east side of Ellis Lane/Temple City Boulevard.

4.2.2. FINDINGS RELATED TO MITIGATION MONITORING

Section 21081(a) of the Public Resources Code states that findings must be adopted by the decision-makers coincidental to the approval of a Mitigated Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180. In accordance

with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the following additional findings may be made:

- A mitigation reporting or monitoring program will be required;
- Site plans and/or building plans, submitted for approval by the responsible monitoring agency, shall include the required standard conditions; and,
- An accountable enforcement agency or monitoring agency shall be identified for the mitigations adopted as part of the decision-maker's final determination.

4.2.3. MITIGATION MEASURES

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

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

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

In regards to energy, the following mitigation is required:

Mitigation Measure No. 3 (Energy Impacts). The facility must use of lighting equipment that will be energy efficient such as LED light fixtures.

Mitigation Measure No. 4 (Energy Impacts). The installation of solar panels will be required as a means to reduce energy consumption.

Mitigation Measure No. 5 (Energy Impacts). All appliances and indoor climate control equipment must be required to meet "Energy Star" ratings.

Due to the age of the on-site improvements, construction related activities related to the requisite tenant improvements could reveal lead and/or asbestos-containing materials. As a result, the following mitigation is required:

Mitigation Measure No. 6 (Hazards & Hazardous Materials Impacts). The Applicant and the contractors must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, and other hazardous substances and materials that may

be encountered during tenant improvement activities. Documentation as to the amount, type, and evidence of disposal of materials at an appropriate hazardous material landfill site shall be provided to the Chief Building Official prior to the issuance of the Building Permit for the interior improvements. Any contamination encountered must be removed and disposed of in accordance with applicable laws prior to the issuance of the Building Permit.

The following mitigation will ensure that the operators of the facility must comply with all pertinent requirements concerning worker safety and the storage, use, and handling of hazardous chemicals.

Mitigation Measure No. 7 (Hazards & Hazardous Materials Impacts). The Applicant will provide a comprehensive listing of those products and/or activities that will require the use of hazardous materials or will result in the generation of hazardous materials and/or wastes. The manner in which these materials are to be stored, handled, or disposed of must also be described. The Applicant will also be required to prepare a plan that indicates those protocols that must be adhered to in the event of an accident. This plan must be reviewed and approved by the County of Los Angeles Fire Department prior to the issuance of the Occupancy Permit.

4.2.4. MITIGATION MONITORING

The monitoring and reporting on the implementation of these measures, including the period for implementation, monitoring agency, and the monitoring action, are identified in Table 4-1 provided below and on the following pages.

TABLE 4-1 MITIGATION-MONITORING PROGRAM			
Measure	Enforcement Agency	Monitoring Phase	Verification
<p>Mitigation Measure No. 1 (Air Quality Impacts). The Applicant will be required to prepare an Odor Management Plan that must be approved by the City and Los Angeles County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.</p>	<p>Planning Division and the Los Angeles County Department of Public Health</p> <p style="text-align: center;">•</p> <p><i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of a Certificate of Occupancy.</i></p> <p style="text-align: center;">•</p> <p>Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name & Title:</p>
<p>Mitigation Measure No. 2 (Air Quality Impacts). Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.</p>	<p>Planning Division, Chief Building Official, and the Los Angeles County Department of Public Health</p> <p style="text-align: center;">•</p> <p><i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of a Certificate of Occupancy.</i></p> <p style="text-align: center;">•</p> <p>Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name & Title:</p>

**TABLE 4.1
 MITIGATION-MONITORING PROGRAM**

Measure	Enforcement Agency	Monitoring Phase	Verification
<p>Mitigation Measure No. 3 (Energy Impacts). The facility must use of lighting equipment that will be energy efficient such as LED light fixtures.</p>	<p>Planning Division and Chief Building Official • <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of a Certificate of Occupancy.</i> • Mitigation ends when construction is completed.</p>	<p>Date: Name & Title:</p>
<p>Mitigation Measure No. 4 (Energy Impacts). The installation of solar panels will be required as a means to reduce energy consumption.</p>	<p>Planning Division and Chief Building Official • <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of a Certificate of Occupancy.</i> • Mitigation ends when construction is completed.</p>	<p>Date: Name & Title:</p>
<p>Mitigation Measure No. 5 (Energy Impacts). All appliances and indoor climate control equipment must be required to meet “Energy Star” ratings.</p>	<p>Planning Division and Chief Building Official • <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of a Certificate of Occupancy.</i> • Mitigation ends when construction is completed.</p>	<p>Date: Name & Title:</p>
<p>Mitigation Measure No. 6 (Hazards & Hazardous Materials Impacts). The Applicant and the contractors must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, and other hazardous substances and materials that may be encountered during tenant improvement activities. Documentation as to the amount, type, and evidence of disposal of materials at an appropriate hazardous material landfill site shall be provided to the Chief Building Official prior to the issuance of the Building Permit for the interior improvements. Any contamination encountered must be removed and disposed of in accordance with applicable laws prior to the issuance of the Building Permit.</p>	<p>Planning Division and Chief Building Official • <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of a Building Permit.</i> • Mitigation ends when construction is completed.</p>	<p>Date: Name & Title:</p>
<p>Mitigation Measure No. 7 (Hazards & Hazardous Materials Impacts). The Applicant will provide a comprehensive listing of those products and/or activities that will require the use of hazardous materials or will result in the generation of hazardous materials and/or wastes. The manner in which these materials are to be stored, handled, or disposed of must also be described. The Applicant will also be required to prepare a plan that indicates those protocols that must be adhered to in the event of an accident. This plan must be reviewed and approved by the County of Los Angeles Fire Department prior to the issuance of the Occupancy Permit.</p>	<p>Planning Division and Los Angeles County Fire Department • <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of a Certificate of Occupancy.</i> • Mitigation ends when construction is completed.</p>	<p>Date: Name & Title:</p>

SECTION 5 REFERENCES

5.1 PREPARERS

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5.2 REFERENCES

- Bugliarello, et. al., *The Impact of Noise Pollution*, Chapter 127, 1975.
- California Administrative Code, *Title 24, Energy Conservation*, 1990.
- California Department of Fish and Wildlife, *Natural Diversity Database*, 2011.
- California Division of Mines and Geology, *Seismic Hazards Mapping Program*, 2012.
- California Department of Parks and Recreation, *California Historical Landmarks*, 2011.
- California Department of Water Resources, *Progress Report on Groundwater Geology of the Coastal Plain of Orange County*, 1967.
- California Environmental Protection Agency, *Hazardous Material Users/Generators in Orange County*, 2004.
- California Office of Planning and Research, *California Environmental Quality Act and the CEQA Guidelines*, as amended 2009.
- California, State of California Public Resources Code Division 13, *The California Environmental Quality Act. Chapter 2.5, Section 21067 and Section 21069*.1998.
- Federal Emergency Management Agency, *Flood Insurance Rate Map*, 2010.
- Rand McNally, *Street Finder*, 2009.
- El Monte, City of. *El Monte General Plan*. 2007.
- El Monte, City of. *Zoning Ordinance*.

Southern California Association of Governments, *Population, Housing, and Employment Projections*, 2010.

South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 2000.

South Coast Air Quality Management District, *Air Quality Management Plan*, 2007.

Thomas Brothers Maps, *The Thomas Guide for Los Angeles and Orange Counties*, 2000.

U.S. Bureau of the Census, *2000 U.S. Census*, 2010.

U.S. Geological Survey, *Evaluating Earthquake Hazards in the Los Angeles Region - An Earth Science Perspective*, *USGS Professional Paper 1360*, 1985.



APPENDICES

Air Quality Worksheets

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EI Monte MMJ Park - South Coast AQMD Air District, Summer

EI Monte MMJ Park

South Coast AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	71.66	1000sqft	1.65	71,658.00	0
Parking Lot	93.00	Space	0.84	37,200.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2020

Utility Company Southern California Edison

CO2 Intensity (lb/MW/hr)	702.44	CH4 Intensity (lb/MW/hr)	0.029	N2O Intensity (lb/MW/hr)	0.006
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1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - Construction times are estimated.

Energy Use - A total of 1,900 grow lights will be installed. Each light will be 1,000 watts and the continuous load for the cultivation will be 1.68 million watts, which translates into 1,680 kilowatts per day. The annual consumption from the grow lights is anticipated to be 613,200 kilowatts per year.

Energy Mitigation -

Water Mitigation -

El Monte MMJ Park - South Coast AQMD Air District, Summer

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	23.00
tblConstructionPhase	NumDays	220.00	41.00
tblConstructionPhase	NumDays	10.00	21.00
tblConstructionPhase	NumDays	3.00	23.00
tblConstructionPhase	PhaseEndDate	1/10/2020	10/31/2019
tblConstructionPhase	PhaseEndDate	12/13/2019	3/31/2019
tblConstructionPhase	PhaseEndDate	12/27/2019	9/30/2019
tblConstructionPhase	PhaseStartDate	12/28/2019	10/1/2019
tblConstructionPhase	PhaseStartDate	2/9/2019	2/1/2019
tblConstructionPhase	PhaseStartDate	12/14/2019	9/1/2019
tblConstructionPhase	PhaseStartDate	1/29/2019	1/1/2019
tblEnergyUse	LightingElect	3.10	8.55
tblGrading	AcresOfGrading	34.50	4.50

2.0 Emissions Summary

El Monte MMJ Park - South Coast AQMD Air District, Summer

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

Year	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
2019	29,6416	21,5659	17,8193	0,0351	0,6294	1,1078	1,7372	0,1695	1,0617	1,2312	0,0000	3,352,595 ₉	3,352,595 ₉	0,7707	0,0000	3,365,868 ₁
Maximum	29,6416	21,5659	17,8193	0,0351	0,6294	1,1078	1,7372	0,1695	1,0617	1,2312	0,0000	3,352,595 ₉	3,352,595 ₉	0,7707	0,0000	3,365,868 ₁

Mitigated Construction

Year	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
2019	29,6416	21,5659	17,8193	0,0351	0,6294	1,1078	1,7372	0,1695	1,0617	1,2312	0,0000	3,352,595 ₉	3,352,595 ₉	0,7707	0,0000	3,365,868 ₁
Maximum	29,6416	21,5659	17,8193	0,0351	0,6294	1,1078	1,7372	0,1695	1,0617	1,2312	0,0000	3,352,595 ₉	3,352,595 ₉	0,7707	0,0000	3,365,868 ₁

ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
Percent Reduction															

El Monte MMJ Park - South Coast AQMD Air District, Summer

2.2 Overall Operational
Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Area	1.6184	1.6000e-004	0.0169	0.0000	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004		0.0385
Energy	0.0383	0.3484	0.2926	2.0900e-003	0.0265	0.0265	0.0265	0.0265	0.0265	0.0265		418.0531	418.0531	8.0100e-003	7.6600e-003	420.5374
Mobile	1.1401	6.0213	17.0609	0.0596	4.7028	0.0580	4.7608	1.2584	0.0545	1.3129		6.058.027	6.058.027	0.2911		6.065.305
Total	2.7968	6.3698	17.3704	0.0617	4.7028	0.0646	4.7874	1.2584	0.0810	1.3394		6.476.116	6.476.116	0.2992	7.6600e-003	6.485.881

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Area	1.6184	1.6000e-004	0.0169	0.0000	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004		0.0385
Energy	0.0383	0.3484	0.2926	2.0900e-003	0.0265	0.0265	0.0265	0.0265	0.0265	0.0265		418.0531	418.0531	8.0100e-003	7.6600e-003	420.5374
Mobile	1.1401	6.0213	17.0609	0.0596	4.7028	0.0580	4.7608	1.2584	0.0545	1.3129		6.058.027	6.058.027	0.2911		6.065.305
Total	2.7968	6.3698	17.3704	0.0617	4.7028	0.0646	4.7874	1.2584	0.0810	1.3394		6.476.116	6.476.116	0.2992	7.6600e-003	6.485.881

El Monte MMJ Park - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2019	1/31/2019	5	23	
2	Building Construction	Building Construction	2/1/2019	3/31/2019	5	41	
3	Paving	Paving	9/1/2019	9/30/2019	5	21	
4	Architectural Coating	Architectural Coating	10/1/2019	10/31/2019	5	23	

Acres of Grading (Site Preparation Phase): 4.5

Acres of Grading (Grading Phase): 0

Acres of Paving: 0.84

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 107,487; Non-Residential Outdoor: 35,829; Striped Parking Area: 2,232 (Architectural Coating – sqft)

OffRoad Equipment

El Monte MMJ Park - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	8.00	9	0.56
Building Construction	Generatr Sets	1	8.00	84	0.74
Building Construction	Cranes	1	8.00	231	0.29
Building Construction	Forklifts	2	7.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	8.00	130	0.42
Paving	Rollers	2	8.00	80	0.38
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Scrapers	1	8.00	367	0.48
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	8	46.00	18.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	9.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

El Monte MMJ Park - South Coast AQMD Air District, Summer

3.2 Site Preparation - 2019

Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.2075	0.0000	0.2075	0.0224	0.0000	0.0224			0.0000			0.0000
Off-Road	1.7557	21.5386	11.9143	0.0245		0.8537	0.8537		0.7854	0.7854		2,426.5408	2,426.5408	0.7677		2,445.7341
Total	1.7557	21.5386	11.9143	0.0245	0.2075	0.8537	1.0612	0.0224	0.7854	0.8078		2,426.5408	2,426.5408	0.7677		2,445.7341

Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Worker	0.0352	0.0273	0.3595	9.5000e-004	0.0894	7.0000e-004	0.0901	0.0237	6.4000e-004	0.0244		94.4791	94.4791	2.9500e-003		94.5530
Total	0.0352	0.0273	0.3595	9.5000e-004	0.0894	7.0000e-004	0.0901	0.0237	6.4000e-004	0.0244		94.4791	94.4791	2.9500e-003		94.5530

El Monte MMJ Park - South Coast AQMD Air District, Summer

3.2 Site Preparation - 2019

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.2075	0.0000	0.2075	0.0224	0.0000	0.0224			0.0000			0.0000
Off-Road	1.7557	21.5386	11.9143	0.0245		0.8537	0.8537	0.7854	0.7854	0.7854	0.0000	2,426.5408	2,426.5408	0.7677		2,446.7341
Total	1.7557	21.5386	11.9143	0.0245	0.2075	0.8537	1.0612	0.0224	0.7854	0.8078	0.0000	2,426.5408	2,426.5408	0.7677		2,446.7341

Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Worker	0.0392	0.0273	0.3595	9.5000e-004	0.0894	7.0000e-004	0.0901	0.0237	6.4000e-004	0.0244			94.4791	2.9500e-003		94.5530
Total	0.0392	0.0273	0.3595	9.5000e-004	0.0894	7.0000e-004	0.0901	0.0237	6.4000e-004	0.0244			94.4791	2.9500e-003		94.5530

3.3 Building Construction - 2019
Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBib- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	2.5581	18.9103	15.2545	0.0250		1.0901	1.0901		1.0449	1.0449		2,312.1454	2,312.1454	0.4810		2,324.1705
Total	2.5581	18.9103	15.2545	0.0250		1.0901	1.0901		1.0449	1.0449		2,312.1454	2,312.1454	0.4810		2,324.1705

Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBib- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0694	2.0596	0.4979	4.6700e-003	0.1152	0.0136	0.1289	0.0332	0.0131	0.0462		497.1955	497.1955	0.0329		498.0179
Worker	0.2253	0.1568	2.0670	5.4600e-003	0.5142	4.0000e-003	0.5182	0.1364	3.6900e-003	0.1401		543.2550	543.2550	0.0170		543.6797
Total	0.2947	2.2164	2.5649	0.0101	0.6294	0.0176	0.6470	0.1695	0.0167	0.1863		1,040.4504	1,040.4504	0.0499		1,041.6976

3.3 Building Construction - 2019

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	MBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	2.5581	18.9103	15.2545	0.0250		1.0901	1.0901		1.0449	1.0449	0.0000	2,312.145 ₄	2,312.145 ₄	0.4810		2,324.170 ₅
Total	2.5581	18.9103	15.2545	0.0250		1.0901	1.0901		1.0449	1.0449	0.0000	2,312.145₄	2,312.145₄	0.4810		2,324.170₅

Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	MBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0694	2.0596	0.4679	4.6700e-003	0.1152	0.0136	0.1289	0.0332	0.0131	0.0462		497.1955	497.1955	0.0329		498.0179
Worker	0.2253	0.1568	2.0670	5.4600e-003	0.5142	4.0000e-003	0.5182	0.1364	3.6900e-003	0.1401		543.2550	543.2550	0.0170		543.6797
Total	0.2947	2.2164	2.5649	0.0101	0.6294	0.0176	0.6470	0.1695	0.0167	0.1863		1,040.450₄	1,040.450₄	0.0499		1,041.697₆

El Monte MMJ Park - South Coast AQMD Air District, Summer

3.4 Paving - 2019

Unmitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.2453	12.5685	11.8507	0.0178		0.7301	0.7301		0.6728	0.6728		1,746,243 ₂	1,746,243 ₂	0.5418		1,759,787 ₀
Paving	0.1048					0.0000	0.0000		0.0000	0.0000		0.0000	0.0000			0.0000
Total	1.3501	12.5685	11.8507	0.0178		0.7301	0.7301		0.6728	0.6728		1,746,243₂	1,746,243₂	0.5418		1,759,787₀

Unmitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0735	0.0511	0.5740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2869
Total	0.0735	0.0511	0.5740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2869

El Monte MMJ Park - South Coast AQMD Air District, Summer

3.4 Paving - 2019

Mitigated Construction On-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.2453	12.5685	11.8507	0.0178		0.7301	0.7301		0.6728	0.6728	0.0000	1,746,243 ₂	1,746,243 ₂	0.5418		1,759,787 ₀
Paving	0.1048					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.3501	12.5685	11.8507	0.0178		0.7301	0.7301		0.6728	0.6728	0.0000	1,746,243₂	1,746,243₂	0.5418		1,759,787₀

Mitigated Construction Off-Site

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0735	0.0511	0.6740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2889
Total	0.0735	0.0511	0.6740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2889

3.5 Architectural Coating - 2019
Unmitigated Construction On-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	29.3311					0.0000	0.0000		0.0000	0.0000			0.0000				0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238			282.0423
Total	29.5975	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238			282.0423

Unmitigated Construction Off-Site

Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000			0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000			0.0000
Worker	0.0441	0.0307	0.4044	1.0700e-003	0.1006	7.8000e-004	0.1014	0.0267	7.2000e-004	0.0274		106.2890	106.2890	3.3200e-003			106.3721
Total	0.0441	0.0307	0.4044	1.0700e-003	0.1006	7.8000e-004	0.1014	0.0267	7.2000e-004	0.0274		106.2890	106.2890	3.3200e-003			106.3721

El Monte MMJ Park - South Coast AQMD Air District, Summer

3.5 Architectural Coating - 2019
Mitigated Construction On-Site

Category	ib/day											ib/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	29.3311					0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423
Total	29.5975	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423

Mitigated Construction Off-Site

Category	ib/day											ib/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Worker	0.0441	0.0307	0.4044	1.0700e-003	0.1006	7.8000e-004	0.1014	0.0267	7.2000e-004	0.0274		106.2890	106.2890	3.3200e-003		106.3721
Total	0.0441	0.0307	0.4044	1.0700e-003	0.1006	7.8000e-004	0.1014	0.0267	7.2000e-004	0.0274		106.2890	106.2890	3.3200e-003		106.3721

4.0 Operational Detail - Mobile

El Monte MMJ Park - South Coast AQMD Air District, Summer

4.1 Mitigation Measures Mobile

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	1.1401	6.0213	17.0609	0.0596	4.7028	0.0580	4.7608	1.2584	0.0545	1.3129	6.058.0275	6.058.0275	6.058.0275	0.2911		6.065.3052
Unmitigated	1.1401	6.0213	17.0609	0.0596	4.7028	0.0580	4.7608	1.2584	0.0545	1.3129	6.058.0275	6.058.0275	6.058.0275	0.2911		6.065.3052

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
General Light Industry	499.46	94.59	48.73	1,670.471	1,670.471
Parking Lot	0.00	0.00	0.00		
Total	499.46	94.59	48.73	1,670.471	1,670.471

4.3 Trip Type Information

Land Use	Miles				Trip %				Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-NW	H-O or C-NW	H-W or C-W	HS or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by	
General Light Industry	16.60	8.40	6.90	59.00	28.00	13.00	92	5	3			
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0			

4.4 Fleet Mix

Date: 9/27/2018 9:40 AM

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CalEEMod Version: CalEEMod.2016.3.2

El Monte MMJ Park - South Coast AQMD Air District, Summer

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.547828	0.043645	0.199892	0.122290	0.016774	0.005862	0.020637	0.032653	0.002037	0.001944	0.004777	0.000705	0.000956
Parking Lot	0.547828	0.043645	0.199892	0.122290	0.016774	0.005862	0.020637	0.032653	0.002037	0.001944	0.004777	0.000705	0.000956

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Install High Efficiency Lighting

Category	lb/day										lb/day			CO2e		
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2		CH4	N2O
Natural Gas Mitigated	0.0383	0.3484	0.2926	2.0900e-003		0.0265	0.0265	0.0265	0.0265	0.0265		418.0531	418.0531	8.0100e-003	7.6600e-003	420.5374
Natural Gas Unmitigated	0.0383	0.3484	0.2926	2.0900e-003		0.0265	0.0265	0.0265	0.0265	0.0265		418.0531	418.0531	8.0100e-003	7.6600e-003	420.5374

5.2 Energy by Land Use - NaturalGas

Unmitigated

Land Use	NaturalGas Use KBTU/yr	lb/day										CO2e					
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total		Bio-CO2	NBio-CO2	Total CO2	CH4	N2O
General Light Industry	3553.45	0.0383	0.3484	0.2926	2.0900e-003	0.0265	0.0265	0.0265	0.0265	0.0265	0.0265	0.0000	0.0000	418.0531	8.0100e-003	7.6600e-003	420.5374
Parking Lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0383	0.3484	0.2926	2.0900e-003	0.0265	0.0265	0.0265	0.0265	0.0265	0.0265	0.0000	0.0000	418.0531	8.0100e-003	7.6600e-003	420.5374

Mitigated

Land Use	NaturalGas Use KBTU/yr	lb/day										CO2e					
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total		Bio-CO2	NBio-CO2	Total CO2	CH4	N2O
General Light Industry	3.55345	0.0383	0.3484	0.2926	2.0900e-003	0.0265	0.0265	0.0265	0.0265	0.0265	0.0265	0.0000	0.0000	418.0531	8.0100e-003	7.6600e-003	420.5374
Parking Lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0383	0.3484	0.2926	2.0900e-003	0.0265	0.0265	0.0265	0.0265	0.0265	0.0265	0.0000	0.0000	418.0531	8.0100e-003	7.6600e-003	420.5374

6.0 Area Detail

6.1 Mitigation Measures Area

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Category	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Mitigated	1.5184	1.5000e-004	0.0169	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004			0.0385
Unmitigated	1.5184	1.5000e-004	0.0169	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004			0.0385

6.2 Area by SubCategory

Unmitigated

SubCategory	lb/day																
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Architectural Coating	0.1848					0.0000	0.0000		0.0000	0.0000			0.0000				0.0000
Consumer Products	1.4320					0.0000	0.0000		0.0000	0.0000			0.0000				0.0000
Landscaping	1.5900e-003	1.5000e-004	0.0169	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004			0.0385
Total	1.5184	1.5000e-004	0.0169	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004			0.0385

El Monte MMJ Park - South Coast AQMD Air District, Summer

6.2 Area by SubCategory

Mitigated

SubCategory	ROS	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBlc-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Architectural Coating	0.1848				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Consumer Products	1.4320				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Landscaping	1.5900e-003	1.6000e-004	0.0169	0.0000	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004		0.0385
Total	1.6184	1.6000e-004	0.0169	0.0000	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005		0.0360	0.0360	1.0000e-004		0.0385

7.0 Water Detail

7.1 Mitigation Measures Water

- Install Low Flow Bathroom Faucet
- Install Low Flow Kitchen Faucet
- Install Low Flow Toilet

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

El Monte MMJ Park - South Coast AQMD Air District, Summer

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation