

**CITY OF COALINGA
COMMUNITY DEVELOPMENT DEPARTMENT**



CITY OF COALINGA
The Sunny Side of the Valley

**COMMERCIAL MARIJUANA PERMANENT ORDINANCE, JUNIPER
RIDGE INDUSTRIAL PARK CITY-INITIATED REZONE AND GENERAL
PLAN AMENDMENT, AND CLAREMONT PROPERTY PROJECT**

**INITIAL STUDY / MITIGATED NEGATIVE
DECLARATION**

September 2016



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TABLE OF CONTENTS

A. BACKGROUND 1

B. SOURCES..... 2

C. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 2

D. DETERMINATION 3

E. BACKGROUND AND INTRODUCTION..... 4

F. PROJECT DESCRIPTION 4

G. ENVIRONMENTAL CHECKLIST 15

 I. AESTHETICS.....16

 II. AGRICULTURE AND FORESTRY RESOURCES.20

 III. AIR QUALITY.23

 IV. BIOLOGICAL RESOURCES.30

 V. CULTURAL RESOURCES.38

 VI. GEOLOGY AND SOILS.....42

 VII. GREENHOUSE GAS EMISSIONS.....47

 VIII. HAZARDS AND HAZARDOUS MATERIALS.....50

 IX. HYDROLOGY AND WATER QUALITY.....56

 X. LAND USE AND PLANNING.63

 XI. MINERAL RESOURCES.66

 XII. NOISE.....68

 XIII. POPULATION AND HOUSING.....72

 XIV. PUBLIC SERVICES.....74

 XV. RECREATION.78

 XVI. TRANSPORTATION/TRAFFIC.80

 XVII. UTILITIES AND SERVICE SYSTEMS.....85

 XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.....90

APPENDIX

Ocean Grown Extract, LLC., Claremont Property Project Operation Plan

INITIAL STUDY

September 2016

A. BACKGROUND

1. Project Title: Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and General Plan Amendment, and the Claremont Property Project
2. Lead Agency Name and Address: City of Coalinga
Community Development Department
155 West Durian Avenue
Coalinga, CA 93210
3. Contact Person and Phone Number: Sean Brewer
Community Development Director
(559) 935-1533 Ext. 143
4. Project Location: City of Coalinga, CA
5. Project Sponsor's Name and Address: City of Coalinga
Community Development Department
155 West Durian Avenue
Coalinga, CA 93210
(559) 935-1533
6. Project Description Summary:

The proposed project consists of three components. 1) City of Coalinga-initiated rezone and General Plan Amendment (GPA) of four properties, identified as Fresno County Assessor Parcel Numbers (APNs) 083-280-10ST, -11ST, -12ST, and -13ST, in the existing Juniper Ridge Industrial Park. The rezone and GPA would amend the Service Commercial (CS) zoning district to Light Manufacturing/Business (MBL) and Commercial Service (CS) land use designation to Manufacturing/Business (MB) respectively. The rezone and GPA would create consistency between the General Plan Land Use Map, Zoning Map, and the adopted Juniper Ridge Business/Industrial Park Master Area Plan. 2) The Commercial Marijuana Operations (CMO) Permanent Ordinance, which would supersede the current interim CMO Urgency Ordinance providing permanent standards for commercial marijuana facilities and establish consistency with the Medical Marijuana Regulations and Safety Act (MMRSA). 3) Analysis of a rezone and GPA for the former Claremont Custody Center property located at 185 West Gale Avenue, identified as APN 070-041-17ST, and analysis of proposed reuse of the Claremont facility as a CMO. The rezone would amend the existing Public Facilities (PF) zoning district to MBL and Public Facilities (PF) land use designation to MB.

B. SOURCES

All the technical reports and modeling results prepared for the project analysis are available upon request at the City of Coalinga City Hall. The following documents are referenced information sources utilized for purposes of this Initial Study/Mitigated Negative Declaration:

1. California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005.
2. California Department of Conservation. *Fresno County Important Farmland 2014 [Sheet 1 of 2]*. Published December 2015.
3. California Department of Forestry and Fire Protection. *Draft Fire Hazard Severity Zones in LRA*. September 2007.
4. California Regional Water Quality Control Board, Central Valley Region. *Order R5-2015-0113, Waste Discharge Requirements General Order for Discharges of Waste Associated with Medicinal Cannabis Cultivation Activities*. Adopted October 2, 2015
5. City of Coalinga. *City of Coalinga General Plan 2005-2025*. June 2009.
6. City of Coalinga. *City of Coalinga Press Release*. June 19, 2014.
7. City of Coalinga. *Claremont Custody Center Operations*. Data on file at City
8. City of Coalinga. *Development Impact Fees Master List*. Updated October 16, 2014.
9. City of Coalinga. *Final Master Environmental Impact Report for the City of Coalinga 2025 General Plan Update SCH#: 2005021140*. May 2009.
10. City of Coalinga. *Juniper Ridge Business/Industrial Park Master Area Plan*. June 19, 2008.
11. Institute of Traffic Engineers. *Trip Generation Handbook 9th Edition*. Published 2012.
12. Ocean Grown Extracts, LLC. *Claremont Property Project Operation Plan*. August 2016.
13. San Joaquin Valley Air Pollution Control District. *2016 Ozone Plan for 2008 8-Hour Ozone Standard*. Adopted – June 16, 2016.
14. United States Department of Agriculture, Natural Resources Conservation Service. *Web Soil Survey*. Accessible at <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed in August 2016.
15. United States Fish and Wildlife Service. *National Wetlands Inventory*. Accessible at <https://www.fws.gov/wetlands/Data/Mapper.html>. Accessed in August 2016.

C. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

D. DETERMINATION

On the basis of this initial study:

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

Signature

Sean Brewer

Printed Name

Date

City of Coalinga

For

E. BACKGROUND AND INTRODUCTION

This Initial Study identifies and analyzes the potential environmental impacts of the proposed project. The information and analysis presented in this document are organized in accordance with the order of the California Environmental Quality Act (CEQA) checklist in Appendix G of the CEQA Guidelines. If the analysis provided in this document identifies potentially significant environmental effects of the project, mitigation measures that shall be applied to the project are prescribed.

The mitigation measures prescribed for environmental effects described in this Initial Study will be implemented in conjunction with the project, as required by CEQA. The mitigation measures will be incorporated into the project through project conditions of approval. The City will adopt findings and a Mitigation Monitoring/Reporting Program for the project in conjunction with its approval of the project.

On October 9, 2015, Governor Brown signed into law Assembly Bill (AB) 266, AB 243, and Senate Bill (SB) 643, which together establish a framework for regulating medical marijuana and are commonly referred to as MMRSA.

- **AB 266** establishes a Bureau of Medical Marijuana Regulation to oversee licensing and operating rules for marijuana growers, product producers, and retailers.
- **AB 243** authorizes the State to use licensing fees to carry out the framework and a fund for helping local governments address environmental problems associated with cultivation.
- **SB 643** addresses medical clinics that specialize in issuing medical marijuana recommendations to patients without valid health needs and creates standards for labeling products.

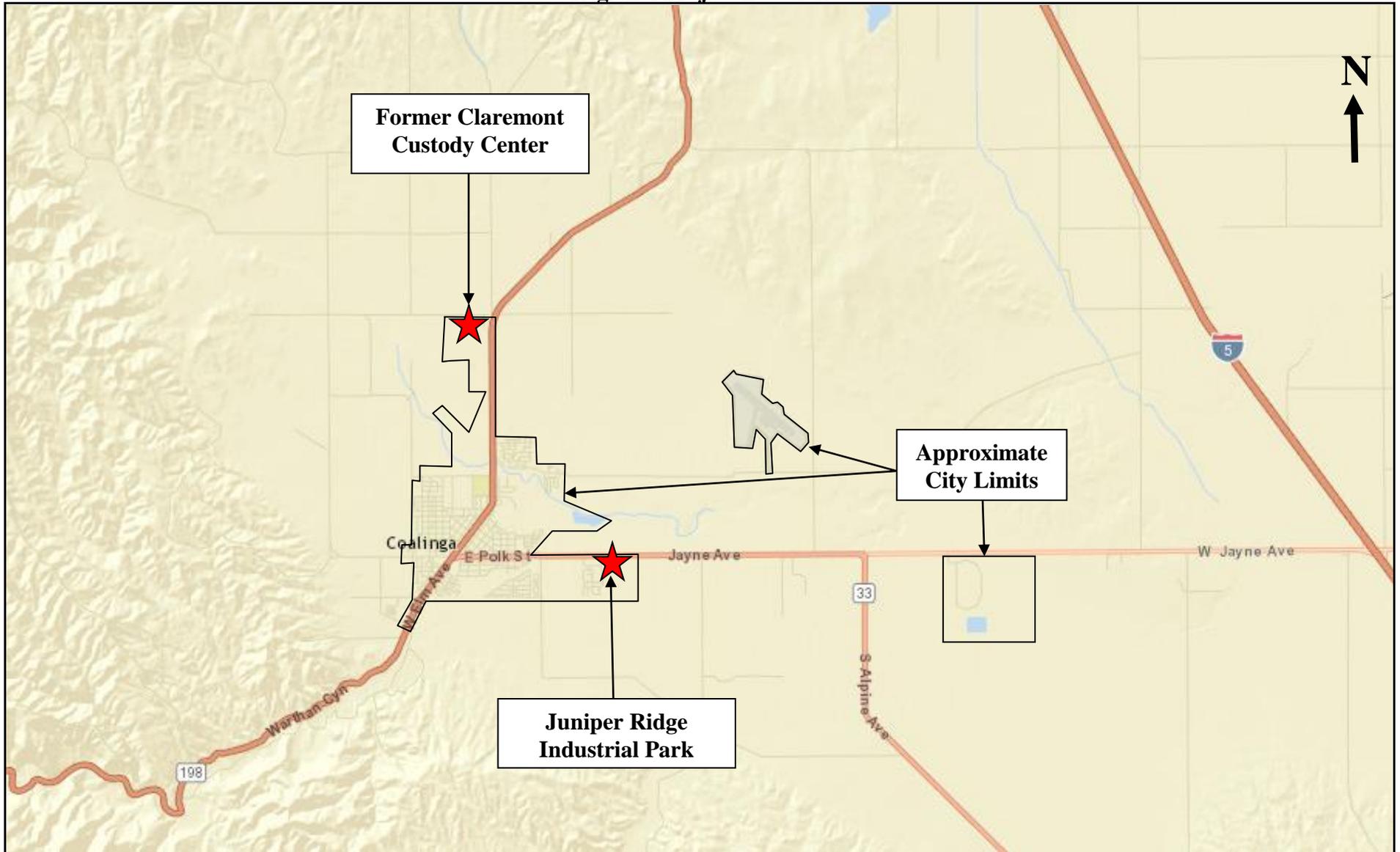
On July 7, 2016 the City Council adopted Ordinance No. 786, titled Commercial Marijuana Operations (Urgency Ordinance). The Urgency Ordinance established the need for increased access to legal medical marijuana, allowed the operation of CMOs within the City of Coalinga, regulated the operation of said CMOs, and included a rezone and General Plan Amendment for the Claremont Custody Center property. On August 18, 2016 the City Council extended the Urgency Ordinance for an additional ten months, unless superseded by a Permanent CMO Ordinance.

The Juniper Ridge Business/Industrial Park Master Area Plan (JRBIPAP) was adopted on June 19, 2008. The JRBIPAP satisfied city requirements, which specify that major annexations or development projects be accompanied by a development plan.

F. PROJECT DESCRIPTION

The proposed project consists of 1) the City-initiated rezone and GPA of four properties in the existing Juniper Ridge Industrial Park, 2) adoption of the CMO Permanent Ordinance, and 3) a rezone and GPA of the former Claremont Custody Center in the City of Coalinga (see Figure 1).

Figure 1
Regional Project Location



Juniper Ridge Industrial Park

In June 2008, the City of Coalinga adopted the Juniper Ridge Business/Industrial Park Master Area Plan to guide the development of Approximately 48 acres in the eastern part of the City. Currently, the Juniper Ridge Industrial Park is predominately vacant. The Juniper Ridge Industrial Park component of the proposed project consists of the City initiated rezone and GPA of the four following properties (see Figure 2):

- APN 083-280-11ST;
- APN 083-280-12ST;
- APN 083-280-13ST; and
- APN 083-280-14ST.

The rezone would amend the zoning of the four aforementioned properties from Service Commercial (CS) to Light Manufacturing/Business (MBL) (see Figure 3). The GPA would amend the General Plan land use designations for the same four properties from Commercial Service (CS) to Manufacturing/Business (MB), which would create consistency between the General Plan Land Use Map and Zoning Map (see Figure 4).

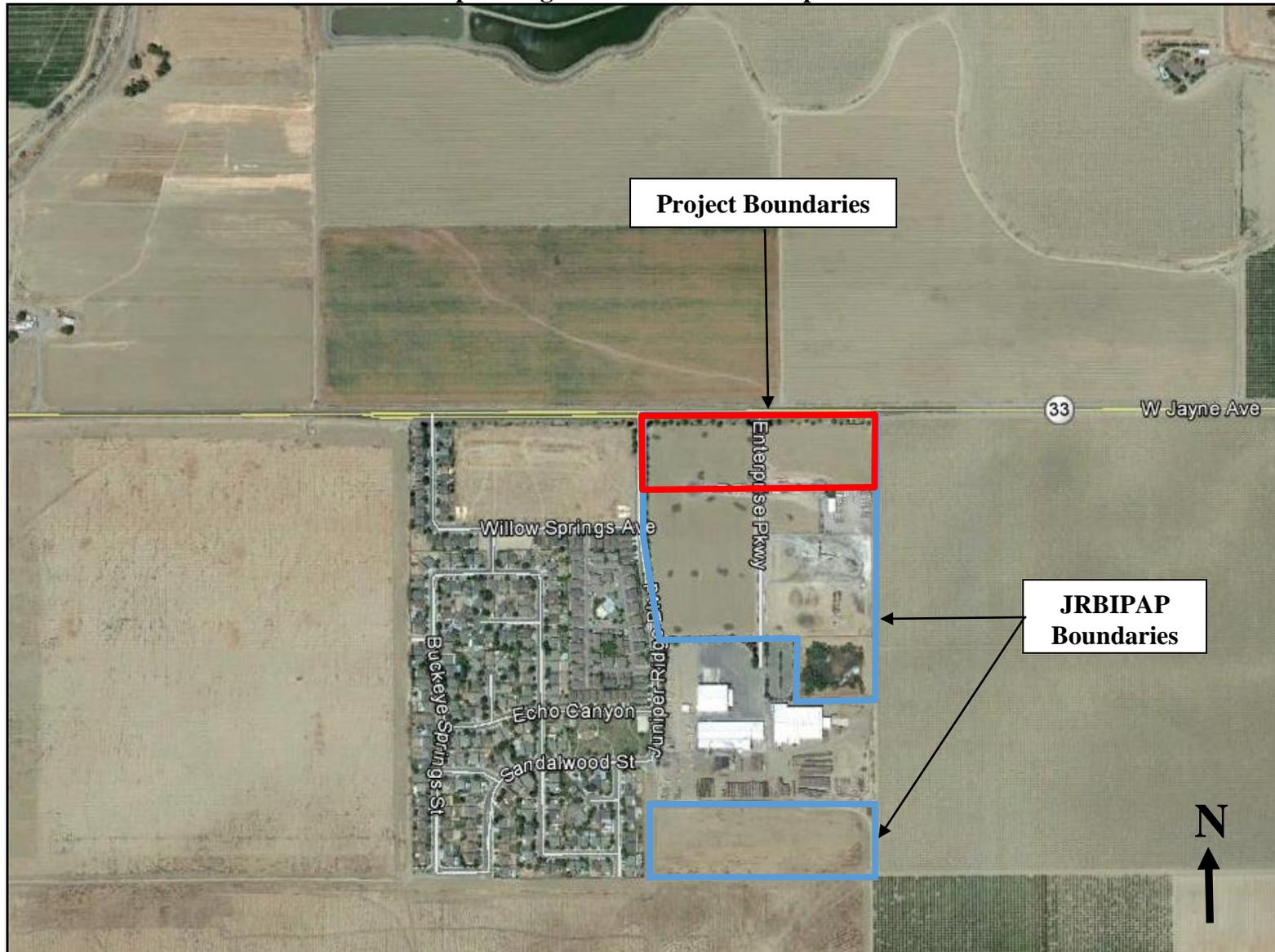
Commercial Marijuana Operations Permanent Ordinance

The City of Coalinga currently has an interim CMO Urgency Ordinance in place regulating the application process for CMOs within the City. The proposed CMO Permanent Ordinance would supersede the Urgency Ordinance. The proposed CMO Permanent Ordinance would provide permanent standards for commercial marijuana facilities within the City and create consistency with MMRSA. The CMO Permanent Ordinance consists of citywide standards and regulations for CMOs.

Ordinance Standards and Regulations

The proposed CMO Permanent Ordinance would allow Commercial Marijuana Operations to conduct cultivation, processing, extraction, manufacturing, testing, distribution, and transportation activities under Conditional Use Permits (CUP) and Regulatory Permits (RP) within areas of the City zoned MBL. The requirement of CMOs to operate under a CUP and RP, allows the City to strictly control such activities, and provides a means of enforcement for potential violations. Central to the CMO Permanent Ordinance is the inclusion of specific *Minimum Operational Requirements and Restrictions*, which regulate various portions of CMOs including, the registration of employees, the type of signage allowed, the distance of CMOs from schools, as well as building construction and security standards among other regulations. In addition to the operational permits required by the CMO Permanent Ordinance, separate Employee Permits are required for each employee. The requirements and restrictions included in the CMO Permanent Ordinance would be applied to each CMO through the RP process. Applications for RPs would be required to include site diagrams and floor plans, maps depicting the distance from schools, security plans, and employee information among other requirements. The RP would be reviewed by the City of Coalinga's Community Development Department and the Chief of Police for adequacy. The CMO Permanent Ordinance includes protocols regarding the enforcement of regulations and the denial or revocation of permits. As such, the CMO Permanent Ordinance would allow CMOs to operate within the City under the strict governance and approval of the Police Chief and Planning Commission, and would be required to operate in such a manner as to avoid the creation of public nuisance or hazard.

Figure 2
Juniper Ridge Industrial Park Component



**Figure 3
Juniper Ridge Industrial Park Rezone Exhibit**

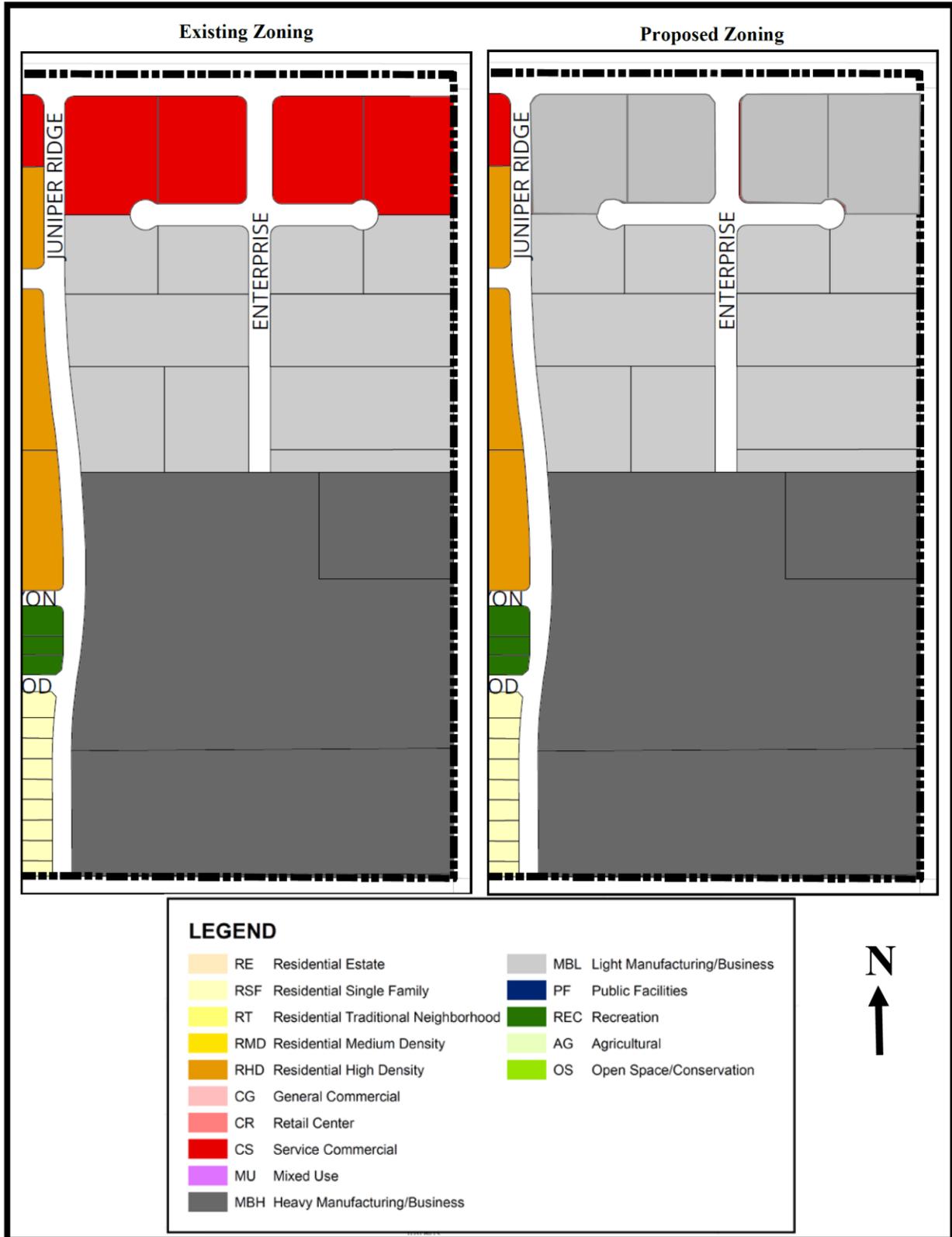
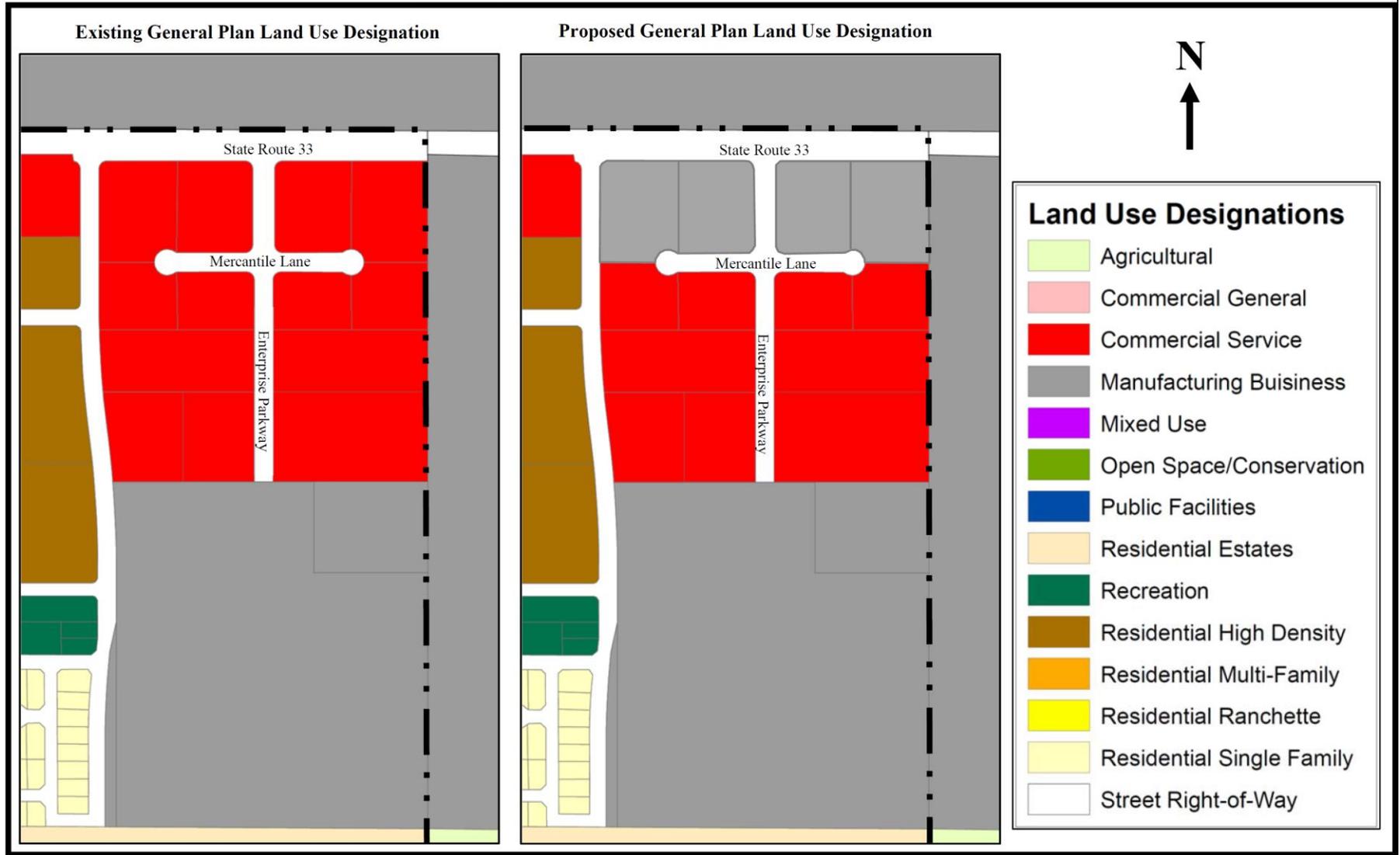


Figure 4
Juniper Ridge Industrial Park General Plan Amendment Exhibit



Former Claremont Custody Center

The former Claremont Custody Center located at 185 West Gale Avenue in the northern part of the City of Coalinga (see Figure 5). The Claremont Custody Center contract was terminated by the California Department of Corrections and Rehabilitations (CDCR) on August 7, 2011 and the facility is currently vacant.¹ The CMO Urgency Ordinance included a rezone from PF to MBL, and a GPA from PF to MB for the Claremont Custody Center property (see Figure 6 and Figure 7). An analysis of the GPA and rezone is included in this IS/MND.

The City of Coalinga has an approved Disposition and Development Agreement (DDA) with Ocean Grown Extracts. The DDA acknowledges that the likely use that would be proposed within the Former Claremont Custody Center by Ocean Grown Extracts (OGE) would consist of a CMO facility comprising of 77,000 square feet (sf) of indoor cultivation, manufacturing, and testing space. The remaining area of the Claremont Property may be developed for additional CMO activities in the future. However, specific plans for such expansion are not currently available. If future expansion does occur, expansion would be required to abide by all relevant regulations in the CMO Urgency Ordinance or the CMO Permanent Ordinance, should the Permanent Ordinance be approved. Therefore, expanded cultivation activities would only be allowed to occur in enclosed buildings, and outdoor cultivation activity would not be permitted. Because OGE has not submitted information for potential future expansion outside of the existing Claremont Facility, this Initial Study/Mitigated Negative Declaration (IS/MND) includes analysis of potential environmental impacts that could occur with the development of a 77,000-square-foot CMO facility within the former Claremont Custody Center.

Although, OGE has not submitted an application to the City, OGE has provided a proposed Operation Plan for their operations at the Claremont Property. The following potential components for the 77,000-square-foot CMO facility summarize the information included in the Operation Plan and the Operation Plan itself is included in this document as the Appendix:

Intended Uses of Facilities

The facilities would be used for the commercial cultivation of marijuana. OGE, would use 77,000 sf of the Claremont facility for indoor cultivation activities, with a potential for the future expansion of CMO operations over the remaining area of the project site. In addition to cultivation, OGE would use 7,000 sf of the Claremont facility for manufacturing, processing, and packing. A portion of the manufacturing and processing space would be used to perform extraction and testing operations. The extraction process includes killing bacteria, mold, and fungi that may contaminate the vegetable material, before refining the cannabis into a standardized medicinal product for safe and consistent medical application. Following the testing and extraction process, OGE would package the product before delivery to a third party distribution company. Retail and dispensary activity would not occur at the Claremont facility, as all retail and dispensary activity would occur after delivery of the finished product by the distribution company.

¹ City of Coalinga. *City of Coalinga Press Release*. June 19, 2014.

Figure 5
Former Claremont Custody Center

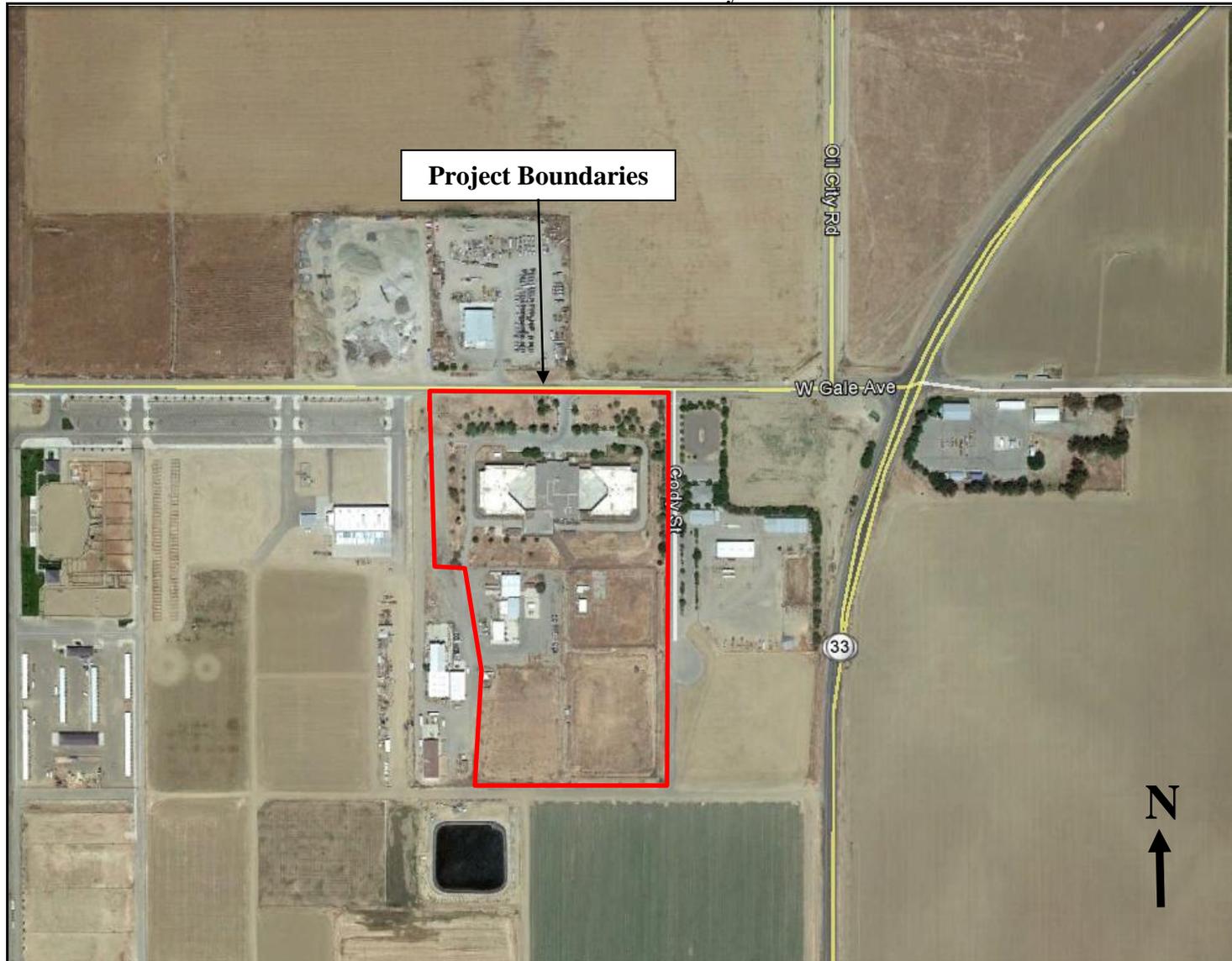


Figure 6
Claremont Custody Center Rezone Exhibit

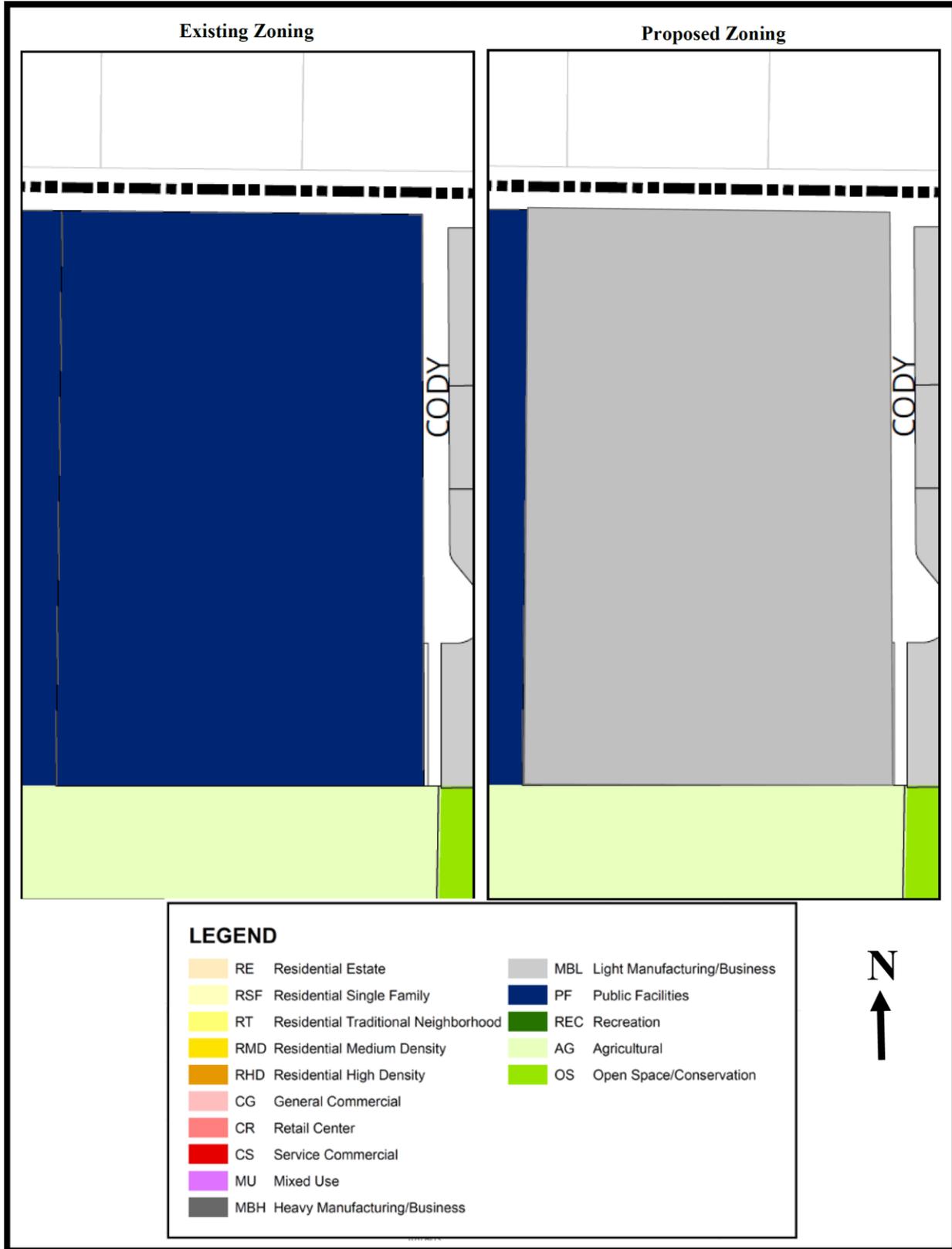
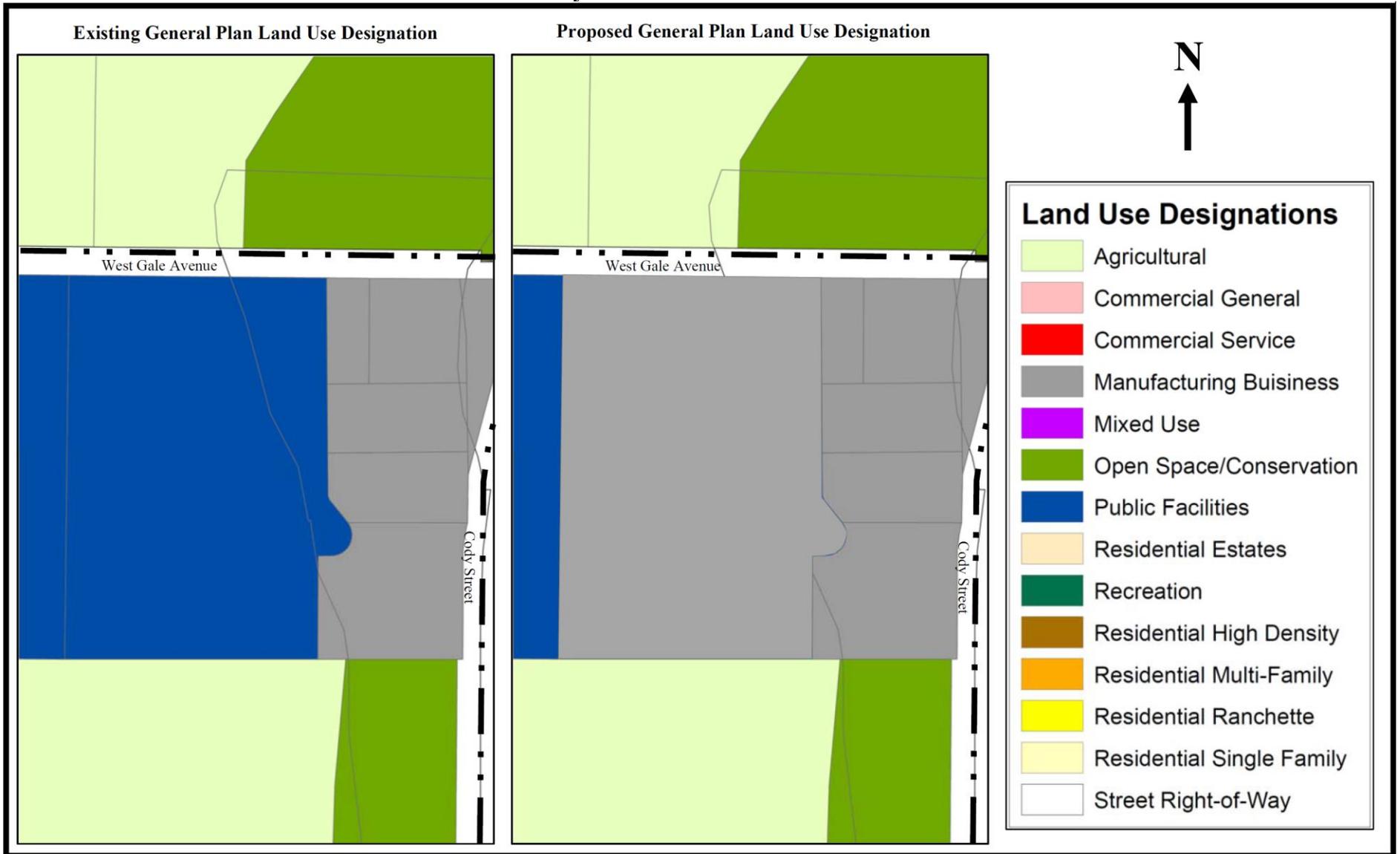


Figure 7
Claremont Custody Center General Plan Amendment Exhibit



Staffing

OGE plans to employ approximately 50 individuals. The employees would conduct operations related to cultivation, extraction, packaging, facilities management, security, lab operations, scientific testing, and administrative work.

Project Phasing

Preparations for the proposed Claremont facility operations would be comprised of three phases. Phase I would include the initial conversion of 2,000 sf of existing facility space for manufacturing purposes, which would be used for processing and packaging operations.

Phase II would include a total build out of 37,000 sf, and would include 32,000 sf of cultivation space as well as 5,000 sf of manufacturing and processing space. While the 32,000 sf of cultivation space would be operated within the existing facility, in accordance with requirements of MMRSA, licenses for the 32,000 sf would be divided under multiple licenses, held by multiple licensees.

At the time of the environmental review, the buildout plans for Phase III had not yet been finalized. While Phase III buildout may involve further work within the Claremont facility, OGE has also indicated that up to 20 acres of the Claremont property may be used for expanded CMO activities at some point in the future. The CMO Permanent Ordinance, if approved, would regulate all cultivation activity, including future expanded operations at the Claremont Property. Relevant regulations for the commercial cultivation of marijuana include the CMO Permanent Ordinance's requirement in section (d) (17) that "operations cannot be seen, heard, or smelled beyond the property line," as well as regulations requiring that all Marijuana Operations occur inside enclosed structures of solid construction, where such structures must meet minimum building code requirements for industrial structures, but may have roofs made of solid non-opaque materials. Because the CMO Permanent Ordinance would require future cultivation to occur within structures meeting the minimum building code for industrial structures, future proposals for the construction of structures related to CMOs would be required to be processed through standard building processing procedures with the City. As OGE has not submitted building plans for such structures to the City, potential impacts related to the cultivation activities outside the existing Claremont facility will not be included within this IS/MND. Analysis of such expanded CMO activities would occur during the CUP, RP, and building approval process, when building plans exist and can be analyzed for potential environmental impact.

Environmental Stewardship

In proposing the reuse of the Claremont facility, OGE has included consideration of methods to reduce the operations environmental impacts. Assuming that cultivation activities would use 1,760 gallons of water per day, with half that amount being reclaimed, and an equivalent amount for employee water use, the OGE operation would use 75 to 67 percent less water than consumed by the Claremont Custody Center at full capacity. Additionally, OGE will pursue a composting and recycling program to reduce the solid waste stream created by the operations.

Discretionary Actions

Implementation of the proposed project would require the following discretionary actions by the City of Coalinga City Council:

- Approval of this IS/MND;
- Approval of a Mitigation Monitoring and Reporting Program;
- General Plan Amendment for four properties in the Juniper Ridge Industrial Park from Commercial Service (CS) to Manufacturing/Business (MB);
- Rezone four properties in the Juniper Ridge Industrial Park from Service Commercial (CS) to Light Manufacturing/Business (MBL);
- Approve Permanent Ordinance for citywide Commercial Marijuana Operations;
- General Plan Amendment – Confirmation of Boundary Change; and
- Rezone former Claremont Custody Center property from Public Facilities (PF) to MBL.

G. ENVIRONMENTAL CHECKLIST

The following Checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are project-specific mitigation measures recommended as appropriate as part of the proposed project. It should be noted that this IS/MND includes an analysis of the three components of the proposed project individually, as noted throughout the discussions within this IS/MND. Recommended mitigation measures are distinguished appropriately as to which component of the project the measures apply.

For this checklist, the following designations are used:

Potentially Significant Impact: An impact that could be significant, and for which mitigation has not been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Less-Than-Significant With Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than-significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The project would not have any impact.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| I. AESTHETICS. | | | | |
| <i>Would the project:</i> | | | | |
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or night-time views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

a-c. The City of Coalinga is on the western edge of California’s Great Central Valley, at the eastern base of the coast ranges. The City of Coalinga’s General Plan describes the visual setting of the City as being in a wide, flat valley bounded by rolling foothills to the west and south. The City is surrounded by rural open space, agriculture, rangeland, and land used for oil production. The Los Gatos and Warthan Creeks run along the northeast and southeast edges of the City, both waterways have varying degrees of riparian vegetation.

Although the City has not officially designated any scenic vistas, the General Plan identifies State Route (SR) 198 and SR 33 as major public viewing corridors for the rolling hills, natural landscape, and agricultural areas surrounding the City. Additionally, the California Department of Transportation (Caltrans) has designated the portion of SR 198 between Interstate 5 and the western Fresno County Line as an Eligible State Scenic Highway. Therefore, any degradation of the scenic value of areas within the public viewing corridors of SR 198 and SR 33 would be considered substantial impacts to a scenic vista.

Juniper Ridge Industrial Park

The Juniper Ridge Industrial Park is located on the eastern edge of the City. The project site is not visible from the Caltrans designated Eligible Scenic Highway portion of SR 198, and therefore would not impact scenic resources within a State scenic highway. Portions of the Juniper Ridge Industrial Park area have already been developed as industrial uses, and the portion of the project site that would be rezoned, although currently vacant, is also anticipated for future development. Because the Juniper Ridge Industrial Park project site has been previously anticipated for future urban development, impacts to scenic vistas that may occur from development of the area have already been anticipated. Nevertheless, development of the project site in accordance with the proposed rezone and GPA would change the existing visual settings from primarily vacant land to light manufacturing and

light industrial land uses. However, development of the proposed project site for such uses was planned by the JRBIPAP, and the proposed rezone and GPA would establish consistency between the planned uses for the project site specifically identified in the JRBIPAP and the broader General Plan land use and zoning designations. Existing General Plan and zoning designations for the project site would allow the construction of structures for commercial and service uses, such as repair facilities, building material sales, light manufacturing/distributing, and wholesale outlets. Structures constructed under the proposed MBL and MB designations would most likely be of similar scale and character to the commercial uses that are currently allowed for the Juniper Ridge project site. Additionally, the JRBIPAP includes design guidelines for development of the area, and future structures would be required to adhere to the guidelines established by the Area Plan. Therefore, because the rezone and GPA would establish consistency between the JRBIPAP and the City's General Plan and zoning designations, the structures allowed under the proposed MB and MBL designations would be generally similar to those structures already anticipated under the currently approved commercial land uses, and the JRBIPAP includes design guidelines for development in the area, the proposed rezone and GPA would result in a *less-than-significant* impact related to adversely affecting a scenic vista, damaging scenic resources within a State scenic highway, and substantially degrading the existing visual character or quality of the site or its surroundings.

CMO Permanent Ordinance

Approval of the permanent ordinance would not directly include the construction of structures or any physical alterations that could impact aesthetic resources, scenic vistas, or State scenic highways. Rather, the permanent ordinance would allow CMO in areas zoned MBL or MB with the approval of a CUP and RP. The approval of a CUP and RP would qualify as a discretionary action taken by the City, and thus would be subject to subsequent project-specific environmental review under CEQA. Additionally, the CMO Permanent Ordinance includes language that future operations "cannot be seen, heard, or smelled beyond the property line." As such, future operations would be scrutinized under both CEQA standards as well as standards within the CMO Permanent Ordinance. Therefore, the CMO Permanent Ordinance would result in a *less-than-significant* impact related to adversely affecting a scenic vista, damaging scenic resources within a State scenic highway, and substantially degrading the existing visual character or quality of the site or its surroundings.

Claremont Property Project

The Claremont Property Project includes the rezone and redesignation of the Claremont property to MBL and MB. The project would then include the reuse of the property and existing structure for CMO. The reuse of the property would include interior renovations of the Claremont facility to accommodate the CMO. Neither of the first two operational phases of the project include any alterations to the exterior of the existing structure. The specific work that would be included in Phase III of the project has not yet been specified by the applicant; however, the applicant anticipates that at some point in the future, up to 20 acres of space outside of the existing facility may be used for cultivation activities. Because the CMO Permanent Ordinance includes strict structural requirements for structures to be used for cultivation activities, the potential impacts that may result from the construction of CMO related structures would need to be analyzed separately, when specific building plans are available for the CMO related structures. As specific building plans for such structures do not

exist for the currently proposed project, the indoor CMO activities are the focus of the current environmental analysis. Additionally, the CMO Permanent Ordinance would require that expanded CMO activity at the Claremont facility obtain subsequent CUP and RP approvals, which would be subject to project-specific environmental review at the time of consideration for new CUPs and RPs. Because the currently proposed operations would occur wholly within existing site structures, visible alterations to on-site structures or the property would not occur with approval of the proposed project. Given that views of the project site would not be altered from public view points, the proposed project would not adversely impact a scenic vista, damage scenic resources within a State scenic highway, or substantially degrade the existing visual character or quality of the site or its surroundings. Therefore, the Claremont Property Project would result in a *less-than-significant* impact.

d. Juniper Ridge Industrial Park

Development of the Juniper Ridge Industrial Park would add additional lighting and glare to the area. The proposed project would rezone and redesignate portions of the Juniper Ridge Industrial Park which are already anticipated for development with the buildout of the Juniper Ridge Industrial Park area. As discussed previously, the rezone and GPA would not significantly change the scale or character of the allowable structures on the project site. Additionally, structures on the project site would be required to comply with Section 9-4.407 of the City of Coalinga's Planning and Zoning Code, which includes lighting and glare requirements that seek to avoid spill over nuisance to existing adjacent land uses. Requirements to avoid spill over are also included in the JRBIPAP, which would further regulate on-site sources of light and glare. Compliance with the City's Planning and Zoning Code, as well as the consistency of the rezone and redesignation with what is anticipated for the project site in the JRBIPAP would ensure that the redesignation and rezone of the Juniper Ridge project site would not create a new source of substantial light or glare which would adversely affect day or night-time views in the area, and the Juniper Ridge Industrial Park rezone and GPA would thus result in a *less-than-significant* impact.

CMO Permanent Ordinance

Approval of the permanent ordinance would not include the construction of structures. However, the CMO may require alterations be made to the lighting of existing structures based on security requirements set forth by the Police Chief per Permanent Ordinance Section (d)(18). Such alterations to lighting would be subject to Section 9-4.407 of the City of Coalinga's Planning and Zoning Code, which would regulate the spillover of light or glare from any security lighting required by the Police Chief. Because lighting would be controlled by the City's Planning and Zoning Code, and the CMO Permanent Ordinance does not include the construction of structures, the proposed project would not create a new source of substantial light or glare which would adversely affect day or night-time views in the area, and thus a *less-than-significant* impact would result.

Claremont Property Project

The Claremont Property Project includes the rezone and redesignation of the Claremont property to MBL and MB. The project would then include the reuse of the property and existing structure for CMO, with the possible future expansion to of CMO to other parts of the Claremont Property. Given the site's past use as a Custody Center, the project site

currently contains sources of outdoor security lighting. Alterations that could increase the intensity of the existing sources of lighting or glare are not anticipated with approval of the project; however, if such alterations are made the new sources of light and glare would be subject to Section 9-4.407 of the City of Coalinga's Planning and Zoning Code. Compliance with the City of Coalinga's Planning and Zoning Code would ensure that the proposed project would not create a new source of substantial light or glare which would adversely affect day or night-time views in the area, and thus a *less-than-significant* impact would result.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact | |
|--|---|--|------------------------------|--------------------------|--------------------------|
| II. AGRICULTURE AND FORESTRY RESOURCES. | | | | | |
| <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i> | | | | | |
| a. | Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |
| b. | Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |
| c. | Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✘ |
| d. | Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✘ |
| e. | Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✘ |

Discussion

a, b. Juniper Ridge Industrial Park

According to the *Fresno County Important Farmland 2014* map, the Juniper Ridge project site is designated as Farmland of Local Importance.² Farmland of Local Importance is designated as farmland within Fresno County that does not meet the definitions of prime, statewide, or unique farmland, but that is or has been used for agricultural production including animal productions. However, the project site is not currently used for agricultural purposes, nor is the site currently zoned or designated for such uses. Indeed, the Juniper Ridge project site is currently designated and zoned for commercial uses, and Williamson Act contracts do not currently exist for the site. The project includes a rezone and GPA for the project site from CS to MB and MBL, such a rezone and GPA would not result in the loss of farmland or rezone of areas currently zoned farmland as the area is currently anticipated for urban development. Therefore, the proposed project would not result in the loss of Prime Farmland, Unique Farmland, or Farmland of statewide importance nor would the project conflict with existing agricultural zoning or a Williamson Act contract. As a result, the proposed project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not include the rezone, redesignation, or direct development of land within the City of Coalinga. Rather, the ordinance conditionally allows CMO uses within areas designated and zoned for MBL or MB. Because the CMO Permanent Ordinance would not involve development of prime, statewide, or unique farmland, and would not rezone any land zoned for agriculture or under a Williamson Act contract, the proposed project would not result in the conversion of farmland to non-agricultural uses nor would the CMO Permanent Ordinance conflict with agricultural zoning. In addition, as the permanent ordinance would allow CMO in areas zoned MBL or MB with the approval of a CUP and RP, which would qualify as a discretionary action taken by the City, any future development associated with CMO would be subject to subsequent project-specific environmental review under CEQA. As such, the project would have a *less-than-significant* impact.

Claremont Property Project

The Claremont property is a developed facility that was formerly used as the Claremont Custody Center. Extensive building and pavement exists on the project site and the *Fresno County Important Farmland 2014* map designates the project site as urban and built-up land. The Claremont project site is currently designated and zoned PF and the proposed project would include a rezone and redesignation to MB and MBL. Because the project site is not designated as prime, statewide, or unique farmland, nor is the site zoned for agricultural use or under an existing Williamson Contract, the proposed project would not result in the conversion of farmland to non-agricultural uses nor would the Claremont Property Project

²California Department of Conservation. *Fresno County Important Farmland 2014 [Sheet 1 of 2]*. Published December 2015.

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration

conflict with agricultural zoning. Therefore, the proposed project would result in a *less-than-significant* impact.

c-e. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The City of Coalinga does not contain zoning for forest or timberland (as defined in Public Resources Code sections 12220(g), 4526, and 51104(g)) and none of the proposed rezones or GPAs would involve any changes in the existing environment which could result in the conversion of farmland or forest and timberland, resulting in *no impact*.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| III. AIR QUALITY. | | | | |
| <i>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</i> | | | | |
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

a-c. The City of Coalinga is located in the San Joaquin Valley Air Basin (SJVAB). The SJVAB is under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD), which regulates air quality in the southern portion of the Central Valley. The SJVAB area is currently designated as a non-attainment area for the State and federal ozone, State and federal particulate matter 2.5 microns in diameter (PM_{2.5}), and State particulate matter 10 microns in diameter (PM₁₀) standards. The SJVAB is designated attainment or unclassified for all other ambient air quality standards (AAQS). It should be noted that although the U.S. Environmental Protection Agency (EPA) revoked their 1-hour ozone standard in 2005, the SJVAB has still been considered in non-attainment and subject to related penalties. However, on February 11, 2016, the California Air Resources Board (CARB) submitted a request to the EPA to make findings necessary to determine the SJVAB is in attainment of the federal 1-hour ozone standard. The SJVAPCD anticipates a final ruling to be reached by the end of 2016.

In compliance with regulations, due to the non-attainment designations of the area, the SJVAPCD periodically prepares and updates air quality plans that provide emission reduction strategies to achieve attainment of the AAQS, including control strategies to reduce air pollutant emissions through regulations, incentive programs, public education, and partnerships with other agencies. The most recent ozone plan is the 2016 Ozone Plan for the

2008 8-Hour Ozone Standard, which was adopted by the SJVAPCD on June 16, 2016. The CARB subsequently conducted a public meeting to consider approval of the 2016 Ozone Plan for the 2008 8-Hour Ozone Standard. If approved, the CARB will submit the plan to the EPA as a revision to the State's Implementation Plan. Additionally, the most recent federal attainment plan for PM is the 2015 Plan for the 1997 PM_{2.5} Standard, which was approved by the SJVAPCD Governing Board on April 16, 2015.

The aforementioned air quality plans contain mobile source controls, stationary source controls, and transportation control measures (TCMs) to be implemented in the region to attain the State and federal standards within the SJVAB. Adopted SJVAPCD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated non-attainment, consistent with applicable air quality plans.

Therefore, the proposed project would result in significant impacts to air quality if the proposed project would increase construction- or operation-related emissions of criteria pollutants, for which the SJVAPCD is in non-attainment, beyond what has been previously anticipated by the City's General Plan EIR, or regional planning documents.

Juniper Ridge Industrial Park

Although the Juniper Ridge Industrial Park is currently predominantly undeveloped vacant land, the project area was anticipated for development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and GPA of the Juniper Ridge project site from CS to MBL and MB, which would establish consistency between the City's General Plan Land Use and Zoning designations, and the JRBIPAP. Such a rezone and GPA for the site would slightly change the allowable uses for the project site, where CS land uses are focused on retail and service uses that usually require a single-purpose trip, and MB/MBL uses are focused on employment, light industrial, and business uses.

While the site uses would be altered by the GPA and zoning change, the area of site disturbance would generally remain the same, and development under the CS or MB/MBL would include structures of similar scale and size. Because the area of disturbance would not change, and the scale of construction would be similar between development under the CS and MB/MBL designations, the emissions that would result from buildout of the project site under MB/MBL would be comparable to emissions that would result from buildout under the current CS designation. However, the difference in allowable uses would generate different amounts of vehicle trips to and from the project site. In regards to air quality, the difference in vehicle trips is of importance because emissions from vehicles are often the primary source of operational air quality impacts.³ Therefore, if the proposed rezone and GPA would result in an increased number of operational vehicle trips, the project would be considered to lead to an increase in emissions, which could obstruct the implementation of air quality plans or contribute a net increase of criteria pollutants for which the area is in nonattainment. As presented in the Transportation/Traffic section of this IS/MND, buildout of the Juniper Ridge project site under the MB/MBL designation would result in an estimated decrease in daily

³ San Joaquin Valley Air Pollution Control District. *2016 Ozone Plan for 2008 8-Hour Ozone Standard*. Adopted June 16, 2016.

vehicle trips of approximately 12,259, from what would be anticipated for buildout of the project site under the currently approved CS designation. Because mobile sources, such as single-passenger vehicles, are the major source of operational criteria pollutants, by reducing the anticipated number of vehicle trips to the project site, the proposed project would reduce the amount of operational emissions associated with buildout of the site. Considering that construction emissions for buildout of the Juniper Ridge site would be similar under the CS or MB/MBL designations, but that mobile source emissions would likely decrease, the proposed project would be considered to result in an overall reduction of criteria pollutant emissions. Therefore, the proposed project would not conflict with the implementation of applicable air quality plans, nor would the project lead to the violation of air quality standards or the cumulatively considerable net increase in criteria air pollutants, and the proposed Juniper Ridge Project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance would not directly involve development. Instead, the proposed permanent ordinance involves conditional uses allowed in areas designated MB or MBL. Because the permanent ordinance would not involve construction activities, the proposed permanent ordinance would only involve air quality emissions related to the operation of conditionally permitted CMOs. As discussed above, the primary source of operational emissions would result from mobile sources such as employee commutes, and the transportation of goods to and from the permitted CMO operations. Such activity would be generally similar to the manufacturing and light industrial uses currently approved for MB and MBL designated areas. As such, the proposed project would not be considered to conflict with the implementation of applicable air quality plans, nor would the project lead to the violation of air quality standards or the cumulatively considerable net increase in criteria air pollutants, and the proposed CMO Permanent Ordinance would result in a *less-than-significant* impact.

Claremont Property Project

The Claremont Property Project would involve the reuse of the existing Claremont facility for a CMO. Because the facility already exists, only limited construction activity would occur to renovate the existing structure for the cultivation and processing of marijuana. Following such renovations, the project would result in air quality emissions from sources similar to those described in the CMO Permanent Ordinance section above, that is, mostly from mobile sources such as employee commutes and the movement of goods. The project site was previously used as the Claremont Custody Center which housed 500 inmates and involved 100 employees. Such past operations would have involved daily employee commutes to the project site, as well as the delivery of goods and equipment to provision the 500 inmates and maintain operations.

The movement of goods would continue to occur as processing materials would be delivered while finished products would be shipped by a third party distributor. However, the proposed project would reduce the amount of employees from 100 at the Claremont Custody Center to 50 at the CMO, which would reduce the amount of employee trips, and the inmate population of the project site would be eliminated. Overall, the proposed Claremont Property Project would most likely result in a reduction in the number of daily trips from the project as compared to previous operations as the Claremont Custody Center (see the Transportation

and Traffic section of this IS/MND for further discussion of trip generation). Because emissions of criteria pollutants are directly linked to the number of vehicle trips induced by the operation of a project, by resulting in a reduced number of vehicle trips as compared to previous site operations, the proposed Claremont Property Project would not be considered to conflict with the implementation of applicable air quality plans, nor would the project lead to the violation of air quality standards or the cumulatively considerable net increase in criteria air pollutants, and the proposed project would result in a *less-than-significant* impact.

- d. As discussed above, the three components of the proposed project would not result in impacts related to the emission of criteria pollutants. However, in addition to criteria air pollutants, toxic air contaminants (TACs) are also a category of environmental concern. TACs are present in many types of emissions with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least 40 different TACs. In terms of health risks, the most volatile contaminants are diesel particulate matter (DPM), benzene, formaldehyde, 1,3-butadiene and acetaldehyde. Gasoline vapors contain several TACs, including benzene, toluene, and xylenes. Public exposure to TACs can result from emissions from normal operations as well as accidental releases. Health risks from TACs are a function of both the concentration of emissions and the duration of exposure, which typically are associated with long-term exposure and the associated risk of contracting cancer.

Juniper Ridge Industrial Park

The proposed project would rezone and redesignate a portion of the Juniper Ridge Industrial Park area from CS to MBL and MB. New residential developments on the project site would not be allowed under the MBL and MB designations, and therefore new sensitive receptors would not be introduced to the area. However, the nearest sensitive receptors to the Juniper Ridge Industrial Park project (Juniper Ridge Project) site are the residential developments located approximately 260 feet southeast of the project site. A significant impact would result if the proposed project allowed development of the Juniper Ridge Project site for uses that would involve the emissions of TACs.

The redesignation and rezone of the site to MB and MBL would slightly change the allowable uses at the project site. As such, permitted uses for the CS and MBL zoning designations, identified in Article 4 of Title 9 within the City of Coalinga's Planning and Zoning Code, were compared to possible sources of TACs included in the CARB's Land Use Handbook.⁴ Allowable MBL uses that could create a hazard through the emission of DPM are freight/truck terminals and warehouses. Such a land use would be considered a distribution center, which if the freight/truck terminal included over 100 heavy-duty diesel truck trips per day, would be considered by the CARB as a significant source of DPM, which would require a health risk analysis if sited within 1,000 feet of sensitive receptors. However, the existing CS designation currently allows wholesale and distribution centers on the project site. A wholesale and distribution center would be subject to the same considerations by the CARB, and could potentially be built within 1,000 feet of the nearest sensitive receptor under current zoning and land use designations. Therefore, the proposed project would not change

⁴ California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005.

the likelihood that a source of DPMs would be sited in proximity to existing sensitive receptors, and thus the proposed redesignation and rezone of the Juniper Ridge project site would not increase the risk or likelihood of development emitting TACs within proximity to sensitive receptors.

The CARB also includes other land uses that are considered sources of TACs, however the Planning and Zoning Code prohibits development in areas designated MBL from including land uses that would involve the manufacture, processing or treatment of hazardous materials. Such a prohibition ensures that land uses, other than the currently allowed distribution centers, would not be developed on the project site.

Therefore, redesignating and rezoning the Juniper Ridge site to MB/MBL would not increase the risk of DPM emissions, nor would the MB/MBL designations allow for any new land uses that would be considered a source of TACs. As such, the proposed project would not lead to an increased risk of exposing sensitive receptors to substantial air pollutants, and the Juniper Ridge Project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance involves conditionally allowable uses within areas designated as MB/MBL. As discussed in the Hazards and Hazardous Materials section of this IS/MND marijuana cultivation and processing activities may involve the use of materials considered to be flammable. However, CMOs are not anticipated to involve any activities that would directly involve the emission of TACs. CMOs could involve distribution activity, but, as discussed above, such activity is permitted in any area designated or zoned MB and MBL. Because the CMO Permanent Ordinance would not lead to activities that would involve greater emissions of TACs or DPMs than are currently allowed under the existing land use regulations for areas designated and zoned MB and MBL, the proposed project would not lead to an increased risk of exposing sensitive receptors to substantial air pollutants, and the CMO Permanent Ordinance would result in a *less-than-significant* impact.

Claremont Property Project

The Claremont Property Project involves the reuse of the Claremont Facility for a CMO and the rezone and redesignation of the project site to MBL/MB. As discussed above, CMOs, such as that which would occur at the Claremont Facility with approval of the project, would not be considered a significant source of TACs. Additionally, the closest residential development is located over 1.25-miles from the Claremont property, and thus, sensitive receptors would be outside of all distance thresholds advised by the CARB. Because the proposed project would not involve operations that would lead to the emission of TACs, and sensitive receptors do not exist within the close proximity to the project site, the proposed project would not lead to an increased risk of exposing sensitive receptors to substantial air pollutants, and the Claremont Property Project would result in a *less-than-significant* impact.

e. Juniper Ridge Industrial Park

The proposed project would allow the future development of the project site for MB or MBL uses. Typical odor-generating land uses include, but are not limited to, wastewater treatment plants, landfills, and composting facilities. Such uses would not be allowed under the MB or MBL land use types, and as such the proposed project would not allow the development of new odor-generating land uses. Moreover, Article 4 of Title 9, within the City of Coalinga's Planning and Zoning Code, specifically prohibits developments within MBL zoned areas from involving the manufacture, processing or treatment of materials which may be obnoxious or offensive. However, with the approval of the CMO Permanent Ordinance the Juniper Ridge Project site could be used for CMOs, which could create objectionable odors. Potential future CMOs would be subject to all odor related regulations contained within the CMO Permanent Ordinance, and as discussed below, such odor regulations would control potential offensive odors from CMOs. Finally, the SJVAPCD's Rule 4102 prohibits the discharge of air contaminants that would create a nuisance or annoyance, and the SJVAPCD accepts complaints related to odors. Given the existing regulations on allowable development, and the SJVAPCD's existing restrictions on odor producing emissions, the proposed project would not be anticipated to expose sensitive receptors objectionable odors and a *less-than-significant* impact would result.

CMO Permanent Ordinance

The proposed ordinance does not directly involve development which could create objectionable odors. However, the CMO Permanent Ordinance would conditionally allow the cultivation and processing of marijuana, which could result in objectionable odors. In recognition of the possible odors that would be emitted by a CMO, the CMO Permanent Ordinance includes specific odor control requirements as part of the minimum operational requirements and restrictions of CMOs. The CMO Permanent Ordinance includes the requirement that exhaust air filtration systems with odor prevention be installed, which would ensure that odors generated by cannabis cultivation would not be detectable outside the facility. Additionally, the City has developed a monitoring and compliance program that would periodically inspect each facility to ensure that the air ventilation and exhaust filtration systems are working and odors are not detectable form outside of the CMO facility. If violations of the ordinance occurred, and objectionable odors were produced, enforcement activities could be undertaken by the City to ensure that odors were properly controlled. Additionally, permitted CMOs would also be subject to SJVAPCD's Rule 4102, which would allow members of the public to submit complaints, should violations occur. Because the CMO Permanent Ordinance includes odor control requirements, and the SJVAPCD prohibits the emission of objectionable odors, the proposed CMO Permanent Ordinance would not be anticipated to expose sensitive receptors objectionable odors and a *less-than-significant* impact would result.

Claremont Property Project

The proposed cultivation and processing operation at the Claremont facility could involve the creation of objectionable odors. However, both the CMO Urgency Ordinance and the CMO Permanent Ordinance contain specific regulations regarding odor control. The Urgency

Ordinance required that CMOs may not be seen, heard, or smelled outside of the premises, and section (d)(15) of the CMO Permanent Ordinance requires air ventilation and exhaust systems sufficient to ensure that odors cannot be detected outside of the premises. The Claremont Property Project would be required to abide by the aforementioned odor regulations, which would ensure that odors are not smelled outside of the premises. Additionally, the City has developed a monitoring and compliance program that would periodically inspect each facility to ensure that the air ventilation and exhaust filtration systems are working and odors are not detectable from outside of the CMO facility. Should a violation of the odor regulations of the CMO Urgency Ordinance or the CMO Permanent Ordinance occur, complaints could be submitted to the SJVAPCD, and enforcement action could occur. However, the Claremont facility is over 1.25-miles away from the nearest residences, which would make exposure of sensitive receptors to objectionable odors highly unlikely. Additionally, should future activities on the Claremont Property include expanded CMO outside of the existing structures, such activity would be subject to subsequent environmental review, which would analyze possible impacts related to odors. Because the Claremont Property Project would be regulated by the odor requirements of the CMO Urgency Ordinance, the CMO Permanent Ordinance, and the SJVAPCD and is not in proximity to sensitive receptors, the proposed project would not be anticipated to expose sensitive receptors to objectionable odors and a *less-than-significant* impact would result.

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and
General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than- Significant Impact | No Impact | |
|----------------------------------|---|--|-------------------------------------|-------------------------------------|--------------------------|
| IV. BIOLOGICAL RESOURCES. | | | | | |
| <i>Would the project:</i> | | | | | |
| a. | Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. | Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. | Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. | Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. | Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. | Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

- a. Special-status species are plants and animals that are legally protected under the State and/or Federal Endangered Species Act (FESA) or other regulations. The FESA of 1973 declares that all federal departments and agencies shall utilize their authority to conserve endangered and threatened plant and animal species. The California Endangered Species Act (CESA) of 1984 parallels the policies of FESA and pertains to native California species. Special-status species also include other species that are considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or denning locations, communal roosts, and other essential habitat.

According to the General Plan Master EIR, based on a query of the California Natural Diversity Database (CNDDDB) (2006) and the CNPS Electronic Inventory of Rare and Endangered Plants (2006), the following 12 sensitive plant species were identified as occurring within the region

- Heartscale (*Atriplex cordulata*)
- Brittscale (*Atriplex depressa*)
- Lesser saltscale (*Atriplex minuscula*)
- Lost Hills crownscale (*Atriplex vallicola*)
- Dwarf calycadenia (*Calycadenia villosa*)
- California jewel-flower (*Caulanthus californicus*)
- Hall's tarplant [*Hemizonia (Deiandra) halliana*]
- Recurved larkspur (*Delphinium recurvatum*)
- Hoover's woolly-star (*Eriastrum hooveri*)
- Pale-yellow layia (*Layia heterotricha*)
- San Joaquin woolly-threads [*Lembertia (Monolopia) congdonii*]
- Showy madia (*Madia radiata*)

In addition, based on the CNDDDB query, the following 30 sensitive wildlife species have been documented in the region.

Insects

- San Joaquin dune beetle (*Coelus gracilis*)
- Redheaded sphecid wasp (*Eucerceris ruficeps*)
- Hopping's Blister Beetle (*Lytta hoppingi*)
- Molestan blister beetle (*Lytta molesta*)
- Morrison's blister beetle (*Lytta morrisoni*)

Amphibians

- Western spadefoot [*Scaphiopus (Spea) hammondii*]
- Foothill yellow-legged frog (*Rana boylei*)

Reptiles

- Western pond turtle (*Clemmys marmorata*)
- Blunt-nosed leopard lizard (*Gambelia sila*)
- San Joaquin coachwhip (*Masticophis flagellum ruddocki*)
- Coast (California) horned lizard (*Phrynosoma coronatum frontale*)

Birds

- White-tailed kite (*Elanus leucurus*)
- Northern harrier (*Circus cyaneus*)
- Golden eagle (*Aquila chrysaetos*)
- Prairie falcon (*Falco mexicanus*)
- Swainson's hawk (*Buteo swainsonii*)
- Short-eared owl (*Asio flammeus*)
- Western burrowing owl (*Athene cunicularia hypugea*)
- Le Conte's thrasher (*Toxostoma lecontei*)
- Tricolored blackbird (*Agelaius tricolor*)
- Loggerhead shrike (*Lanius ludovicianus*)
- California horned lark (*Eremophila alpestris actia*)
- Lark sparrow (*Chondestes grammacus*)

Mammals

- Roosting bat species (Order Chiroptera)
- San Joaquin antelope squirrel (*Ammospermophilus nelsoni*)
- San Joaquin pocket mouse (*Perognathus inornatus inornatus*)
- Giant kangaroo rat (*Dipodomys ingens*)
- Short-nosed kangaroo rat (*Dipodomys nitratoides brevinasus*)
- Tulare grasshopper mouse (*Onychomys torridus tularensis*)
- San Joaquin kit fox (*Vulpes macrotis mutica*)

Construction of projects within the City could have the effect of removing or disturbing habitat, potentially resulting in harm to sensitive species during habitat removal or indirectly if the habitat is used for foraging or for other means of sustenance. Policy OSC1-3 of the General Plan is intended to reduce potential impacts to sensitive and special-status species in the Coalinga area; however, according to the General Plan Master EIR, although development projects would be evaluated on a project-by-project basis to ensure that impacts to sensitive habitats (e.g., wetlands, habitat for special-status species) are mitigated in accordance with most current regulations, compliance with these regulations would not necessarily ensure that development would be able to feasibly provide for "no net loss" of wetland habitat or habitats for listed species.

Juniper Ridge Industrial Park

The Juniper Ridge project site is currently anticipated for commercial development. The proposed project would rezone and redesignate the project site to MBL and MB.

Development of the project site as light industrial or business uses was anticipated by the JRBIPAP, and the proposed GPA and rezone would establish consistency between the JRBIPAP and the General Plan land use and zoning designations. The project would not alter the amount of land anticipated for development, or significantly change the scale or intensity of future development for the Juniper Ridge project site. Therefore, the proposed project would not be anticipated to create any impacts to the aforementioned species that were not anticipated by the General Plan.

To determine what species may be present on the site, and thus what species may be impacted by development, the CNDDDB was queried for a five-mile area surrounding the Juniper Ridge Project site. The query identified six plant species and 20 animal species within the five-mile query area. The habitat requirements of the identified species were compared to the available habitat at the Juniper Ridge project site to determine what species within the query area may use the site. The Juniper Ridge project site has been historically disturbed through development of the surrounding area, and regular site disking. The historic disturbance and regular disking allows for only sparse, weedy vegetation to persist on the site, while small landscape trees exist on the perimeter of the site. The persistent disturbance and lack of vegetation make the Juniper Ridge project site poor or unsuitable habitat for many species. Indeed, considering the low elevation, lack of water features, and regular disturbance, the project site is unlikely to provide habitat to any of the six special-status plant species identified within five-miles of the Juniper Ridge project site. However, the open, sparsely vegetated, arid project site provides potential habitat for 15 of the 20 species identified in the CNDDDB query. In particular, American Badgers (*Taxidea taxus*), blunt-nosed leopard lizards (*Gambelia sila*), burrowing owls (*Athene cunicularia*), Le Conte's thrashers (*Tocostoma lecontei*), Morrison's blister beetles (*Lytta morrisoni*), prairie falcons (*Falco mexicanus*), San Joaquin coachwhips (*Masticophis flagellum ruddocki*), San Joaquin Kit foxes (*Vulpes Macrotis mutica*), short-nosed kangaroo rats (*Dipodomys nitratoides brevinasus*), silvery legless lizards (*Anniella pulchra pulchra*), Swainson's hawks (*Buteo Swainsoni*), western mastiff bats (*Eumops perotis californicus*), and western spadefoots (*Spea hammondi*) may all use the project site for nesting, mating, or foraging.

Disturbance of the Juniper Ridge project site, and the potential habitat that the site provides, was anticipated by the General Plan and General Plan EIR. As such, the proposed Juniper Ridge rezone and redesignation would not result in any adverse effects to special-status species in excess of impacts identified in the City's General Plan EIR. However, the General Plan EIR concluded that buildout of the General Plan would result in a significant and unavoidable impact to special-status species within the planning area. As such, buildout of the proposed project may result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service and a *potentially significant* impact would result.

Mitigation Measure(s)

Implementation of the following mitigation measure would ensure that the impact is *less-than-significant*.

IV-1. In conjunction with the submittal of any application for development of the Juniper Ridge Project site, the project applicant(s) shall have a site-specific

biological resources evaluation prepared by a qualified biologist, and shall comply with all mitigation measures included in the biological resources evaluation, including, but not limited to, preconstruction surveys for any special-status plant or wildlife species that the biological resources evaluation determined to have the potential to exist on-site. If special status species are found on-site during surveys the report shall include avoidance and/or protection measures to ensure that project implementation does not result in adverse effects to protected biological resources. The biological resources evaluation shall be subject to review and approval by the City of Coalinga's Community Development Department and/or City Council in conjunction with their review of the development application.

IV-2 *In the event that the Coalinga Habitat Conservation Plan is adopted prior to the submittal of any application for development of the project site, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address special-status species as set forth in the Coalinga Habitat Conservation Plan implementation document.*

CMO Permanent Ordinance

The CMO Permanent Ordinance does not include the rezone, redesignation, or development of land within the City of Coalinga. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. Because the CMO Permanent Ordinance would not directly involve development of new structures or the disturbance of land, the permanent ordinance would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The approval of the CMO Permanent Ordinance may indirectly lead to development through the increased application for building permits for structures which would serve as CMOs; however, such development would be subject to standard development review processes as well as environmental review for the CUP and RP related to such future CMOs. The environmental review process for the CMO would require consideration of special-status species, migratory corridors, and wildlife nursery sites. Because the CMO Permanent Ordinance would not directly involve land development, and any future development applying for use permits under the CMO would be required to undergo subsequent environmental review, the CMO Permanent Ordinance would not be anticipated to result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont property is highly disturbed and currently contains a large facility, which was previously used for the Claremont Custody Center. The Claremont Property Project would involve the reuse of the Claremont Custody Center as an indoor CMO. Following renovation of the Claremont Custody Center, OGE may expand their operations to areas outside of the

existing Claremont facility structures. If such expanded CMO activities were to occur in the future, they would be required to undergo project-specific environmental review at the time of approval. Such environmental review is outside of the scope of this IS/MND, as specific plans for expanded cultivation activity or new CMO related structures at the Claremont Facility do not currently exist. As such, the project does not currently include any land disturbance outside of the Claremont facility, and would not be expected to result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service and a *less-than-significant* impact would result.

b, c. Juniper Ridge Industrial Park

The Juniper Ridge Industrial Park has been anticipated for development by the JRBIPAP and the City's General Plan. The proposed rezone and redesignation of the project site would result in buildout of the project site with structures of a similar scale and intensity as currently approved for the project site. The project site has been disked and disturbed by development of the surrounding area, and is dominated by ruderal vegetation. Sensitive habitats or natural communities including riparian areas are not known to exist on the project site. Wetlands are not known to occur on the project site, and the project site is not included in the United States Fish and Wildlife Service's *National Wetlands Inventory*.⁵ The proposed Juniper Ridge rezone and redesignation would not alter the area of disturbance anticipated by the General Plan EIR or the JRBIPAP, and because wetlands are not known to occur on the project site, the proposed Juniper Ridge Project would not have a substantial effect on a sensitive natural community, riparian area, or wetland area. As a result, the proposed Juniper Ridge Project would have a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance would not directly involve development of any areas within the City of Coalinga. Rather, the CMO Permanent Ordinance would involve conditionally approved uses associated with CMOs. Although the project would not directly involve development activity, by allowing additional uses in areas designated and zoned MB/MBL, the project may encourage development of such sites for future economic use. Development of areas designated and zoned MB/MBL was anticipated by the City's General Plan and analyzed by the General Plan EIR. Therefore, impacts to wildlife occurring as a result of buildout of areas designated for MB development have already been analyzed and anticipated. Nevertheless, the project would require CMO activity be conditionally approved, any development being completed for future use as a CMO would be subject to project-specific environmental reviews. Such environmental review would include consideration of sensitive natural communities, riparian areas, or wetland areas, and would include mitigation, where appropriate, to avoid or reduce potential impacts to such biological resources. Thus, the CMO Permanent Ordinance would not directly lead to land disturbance or development, nor would the CMO Permanent Ordinance increase the amount of land approved for development. Therefore, the CMO Permanent Ordinance would not have a substantial effect

⁵ United States Fish and Wildlife Service. *National Wetlands Inventory*. Accessible at <https://www.fws.gov/wetlands/Data/Mapper.html>. Accessed in August 2016.

on a sensitive natural community, riparian area, or wetland area and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont Property was extensively disturbed and developed for use as the Claremont Custody Center. The project site is dominated by ruderal vegetation, with extensive paved areas, multiple structures, and some landscaped areas. Riparian areas, other sensitive natural communities, or wetlands are not known to occur on the project site. The proposed Claremont Property Project would reuse the facility for a CMO. Although the proposed project would include renovations of the existing facilities, ground disturbance or new development outside of the existing structures is not anticipated to occur at this time. As such, the proposed Claremont Property Project would not have a substantial effect on a sensitive natural community, riparian area, or wetland area and a *less-than-significant* impact would result.

d. Juniper Ridge Industrial Park

The Juniper Ridge Industrial Park was anticipated for development by the JRBIPAP and the City's General Plan. Development in certain areas of the Juniper Ridge Industrial Park area has already occurred; however, most of the project area is vacant land. The Juniper Ridge Industrial Park is bordered by Jayne Avenue to the north, existing residential areas to the west, and agricultural land to the west and south. The Juniper Ridge Project site, although undeveloped, has been disturbed through disking, and what vegetation does persist on the site is ruderal and sparse. Because the project site is highly disturbed, bordered by roads to the north, east, and west, and enclosed by development to the south and west, the Juniper Ridge Project site is unlikely to act as a significant wildlife movement corridor. Additionally, the project site has already been anticipated for development for CS land uses, development of the site under the proposed MB/MBL land use designations would not create any new or more severe impacts than would occur under the previous CS land use, as development would occur with a similar scale and land use intensity under both the approved and proposed designations. Because the project site is highly disturbed, unlikely to act as a movement corridor, and development under the proposed MB/MBL designations would not increase the severity of any potential development related impacts, the proposed Juniper Ridge Project would not interfere substantially with the movement of wildlife or impede use of a wildlife nursery area, and a *less-than-significant* impact would result.

CMO Permanent Ordinance

The CMO Permanent Ordinance would not directly involve development of any areas within the City of Coalinga. Rather, the CMO Permanent Ordinance would involve conditionally approved uses associated with CMOs. Although the project would not directly involve development activity, by allowing additional uses in areas designated and zoned MB/MBL, the project may encourage development of such sites for future economic use. However, because the project would require CMO activity be conditionally approved, any development being completed for future use as a CMO would be subject to project-specific environmental reviews. Such environmental review would include consideration of wildlife movement corridors and wildlife nursery areas, and would include mitigation, where appropriate, to avoid or reduce potential impacts to such biological resources. The CMO Permanent

Ordinance would not directly lead to land disturbance or development nor would the CMO Permanent Ordinance increase the amount of land approved for development. Therefore, the CMO Permanent Ordinance would not have a substantial wildlife movement corridors or the use of wildlife nursery areas and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont Property was extensively disturbed and developed for use as the Claremont Custody Center. The project site is dominated by ruderal vegetation, with extensive paved areas, multiple structures, and some landscaped areas. Because the site is dominated by existing structures, such as fences, pavement, and structures, the project site is unlikely to serve as a wildlife movement corridor, and the sparse vegetation makes the site unlikely to serve as a wildlife nursery area. The proposed Claremont Property Project would reuse the facility for a CMO. Although the proposed project would include renovations of the existing facilities, ground disturbance or new development outside of the existing structures is not anticipated to occur at this time. Given the disturbed nature of the project site, the currently proposed Claremont Property Project would not change the existing environment of the project site. As such, the proposed Claremont Property Project would not have a substantial wildlife movement corridors or the use of wildlife nursery areas and a *less-than-significant* impact would result.

e. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The General Plan Master EIR identifies policies related to the protection of biological resources and indicates that any future development within the General Plan area would be required to comply with Policies OSC1-1 through OSC1-5 of the General Plan. The City of Coalinga does not currently have any other local policies or ordinances related to biological resources in place (i.e., a tree preservation ordinance). Because all three projects would be required to comply with all relevant General Plan policies, the proposed project would not conflict with any local policies or ordinances protecting biological resources and *less-than-significant* impact would occur.

f. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The City of Coalinga is not located within a Natural Community Conservation Plan (NCCP). According to the General Plan Master EIR, the City is located within the boundaries of the Pacific Gas and Electric Company (PG&E) San Joaquin Valley Operation and Maintenance Habitat Conservation Plan (HCP). The San Joaquin Valley Operation and Maintenance HCP addresses small-scale temporary effects due to operation and maintenance of the service area that are dispersed over a large geographic area. The activities covered in the HCP include two categories of activities for which PG&E requests take authorization conducted in accordance with CPUC requirements – operation and maintenance activities and minor construction activities. Although the City is located within the HCP boundary, the HCP covers only PG&E-related operation and maintenance and construction activities and does not cover any other facilities or activities. Therefore, implementation of the proposed project would not conflict with the intent of the HCP and a *less-than-significant* impact would result.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| V. CULTURAL RESOURCES. | | | | |
| <i>Would the project:</i> | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource on site or unique geologic features? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

a-d. Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and redesignation of the Juniper Ridge project site, but would not change the area of disturbance. Additionally, the intensity of allowable development under the proposed MB and MBL designations would be generally consistent with the currently approved commercial land use. Therefore, the proposed project would not be expected to increase any potential impacts to historic, archaeological, paleontological, or geologic features. Although the impacts of development of the Juniper Ridge project site as MB or MBL would not be more severe than development as CS, development of the site could still potential result in impacts to cultural resources. However, the Juniper Ridge project site is regularly disturbed by disking, and thus any cultural resources that persist would be underground and thus unknown, because surficial resources would have been previously damaged or destroyed during past site disturbance activity. Nevertheless, the City of Coalinga General Plan and General Plan EIR indicate that previous archaeological and cultural resources have been found in proximity to local waterways. The Juniper Ridge project site is 0.5-mile south from Los Gatos Creek, and thus the possibility that site development could result in the disturbance of destruction of historic, archaeological, or paleontological resources could occur and the project has the potential to disturb human remains interred outside of formal cemeteries. Therefore, the Juniper Ridge Industrial Park project could result in a *potentially significant* impact.

Mitigation Measure(s)

Implementation of the following mitigation measures would ensure that the above impact is reduced to a *less-than-significant* level.

- V-1. *During construction, in the event of the accidental discovery or recognition of any human remains further excavation or disturbance of the find or any nearby area reasonably suspected to overlie adjacent human remains shall not occur until compliance with the provisions of CEQA Guidelines Section 15064.5(e)(1) and (2) has occurred. The Guidelines specify that in the event of the discovery of human remains other than in a dedicated cemetery, no further excavation at the site or any nearby area suspected to contain human remains shall occur until the County Coroner has been notified to determine if an investigation into the cause of death is required. If the coroner determines that the remains are Native American, then, within 24 hours, the Coroner must notify the Native American Heritage Commission, which in turn will notify the most likely descendants who may recommend treatment of the remains and any grave goods. If the Native American Heritage Commission is unable to identify a most likely descendant or most likely descendant fails to make a recommendation within 24 hours after notification by the Native American Heritage Commission, or the landowner or his authorized agent rejects the recommendation by the most likely descendant and mediation by the Native American Heritage Commission fails to provide a measure acceptable to the landowner, then the landowner or his authorized representative shall reintern the human remains and grave goods with appropriate dignity at a location on the property not subject to further disturbances. Should human remains be encountered, a copy of the resulting County Coroner report noting any written consultation with the Native American Heritage Commission shall be submitted as proof of compliance to the City's Community Development Department.*
- V-2. *During construction, if any prehistoric or historic artifacts, or other indications of cultural deposits, such as historic privy pits or trash deposits, are found once ground disturbing activities are underway, all work within the vicinity of the find(s) shall cease and the find(s) shall be immediately evaluated by a qualified archaeologist. If the find is determined to be a historical or unique archaeological resource, contingency funding and a time allotment to allow for implementation of avoidance measures or appropriate mitigation shall be made available (CEQA Guidelines Section 15064.5). Work may continue on other parts of the project site while historical or unique archaeological resource mitigation takes place (Public Resources Code Sections 21083 and 21087).*
- V-3. *Prior to ground disturbance activities, the applicant shall retain the services of a professional paleontologist to educate the construction crew that will be conducting grading and excavation at the project site. The education shall consist of an introduction to the geology of the project site and the kinds of fossils that may be encountered, as well as what to do in case of a discovery.*

Should any vertebrate fossils (e.g., teeth, bones), an unusually large or dense accumulation of intact invertebrates, or well-preserved plant material (e.g., leaves) be unearthed by the construction crew, then ground-disturbing activity shall be diverted to another part of the project site and the paleontologist shall be called on-site to assess the find and, if significant, recover the find in a timely matter. Finds determined significant by the paleontologist shall then be conserved and deposited with a recognized repository, such as the University of California Museum of Paleontology. The alternative mitigation would be to leave the significant finds in place, determine the extent of significant deposit, and avoid further disturbance of the significant deposit. Proof of the construction crew awareness training shall be submitted to the City's Community Development Department in the form of a copy of training materials and the completed training attendance roster.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not include the rezone, redesignation, or development of land within the City of Coalinga. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. As such, the CMO Permanent Ordinance would not involve any new development or ground disturbing activities that could disturb historic, archeological, paleontological, or geologic resources or that could disturb human remains. The approval of the CMO Permanent Ordinance may indirectly lead to development through the increased application for building permits for structures which would serve as CMOs; however, such development would be subject to standard development review processes as well as environmental review for the CUP and RP related to the potential future CMO. The environmental review process for the CMO would require consideration of undisturbed historic, archeological, paleontological, or geologic resources or human remains. Therefore, the proposed project would be unlikely to disturb or destroy previously undisturbed historic, archeological, paleontological, or geologic resources or human remains, a *less-than-significant* impact would occur.

Claremont Property Project

The Claremont Property has been previously developed for use as the Claremont Custody Center. OGE's application for reuse of the project site does not currently involve the construction of additional permanent structures. All site work currently proposed by OGE for CMO would occur within the Claremont facility, and would not involve the disturbance of land outside the facility. Therefore, the proposed project would be unlikely to disturb or destroy previously undisturbed historic, archeological, paleontological, or geologic resources or human remains, and the proposed project would result in a *less-than-significant* impact.

e. Juniper Ridge Industrial Park and Claremont Property Project

Tribal cultural resources are generally defined by Public Resources Code 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. Because the proposed project includes a request for a GPA, in compliance with Senate Bill (SB) 18, the City of Coalinga initiated consultation

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration

with the pertinent Native American Tribes through the distribution of notification letters. The City had not yet received responses at the time of publication.

Concurrently, a records search of the Sacred Lands File was performed by the Native American Heritage Commission for the Juniper Ridge project site. The Sacred Lands File search returned negative results for known cultural resources on the Juniper Ridge project site. The Juniper Ridge project site does not contain any existing structures and past disturbance of the site makes the persistence of surficial tribal resources unlikely. Although past disturbance of the project site makes the discovery of surficial resources unlikely, application of Mitigation Measures V-1 and V-2 would reduce the project's impacts to possible unknown cultural, tribal or historical resources to less-than-significant levels.

A similar search of the Sacred Lands File was not necessary for the Claremont property because the Claremont property is already developed, and the proposed Claremont Property Project, does not at this time involve any new land disturbance activities that could impact tribal cultural resources.

Given the low likelihood of the presence of tribal resources due to the disturbed nature of both sites and Mitigation Measures V-1 and V-2 which requires future construction at the Juniper Ridge project site to halt if any potential resources are found, as well as the City's compliance with AB 52 and SB 18, the project would result in a *less-than-significant* impact to tribal cultural resources

CMO Permanent Ordinance

The CMO Permanent Ordinance does not include the rezone, redesignation, or development of land within the City of Coalinga. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. As such, the CMO Permanent Ordinance would not involve any new development or ground disturbing activities that could disturb or damage tribal cultural resources and the CMO Permanent Ordinance would therefore result in a *less-than-significant* impact.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|--|-------------------------------------|-------------------------------------|
| VI. GEOLOGY AND SOILS. | | | | |
| <i>Would the project:</i> | | | | |
| a. | Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | |
| i. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i. | Rupture of a known earthquake fault, as delineated on the most recent Alquist - Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault? | | | |
| ii. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Result in substantial soil erosion or the loss of topsoil? | | | | |
| c. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | | | | |
| d. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code? | | | | |
| e. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | | | | |

Discussion

a.i.ii. Juniper Ridge Industrial Park

The City of Coalinga is located in a seismically active region of California. The closest mapped active fault is the Nunez fault approximately six miles to the northwest of Coalinga; however, several other faults exist in the general area, and in 1983 the Coalinga Earthquake, centered eight miles northeast of the City, measured 6.7 on the Richter scale, and caused damage throughout the City, particularly to historic structures. Given the distance of known faults to the project sites the risk of seismically induced ground rupture is low. However, risks from seismically induced ground shaking may impact the proposed project. In order to mitigate the shaking effects and possible effects from expansive soils, future development of the project parcels should be designed using sound engineering judgment and the current

California Building Code (CBC) requirements. The risk of damage to structures from seismic shaking would not be altered by the rezone and redesignation of the Juniper Ridge project site from CS to MB and MBL, as future structures would be of similar scale and would be exposed to similar seismic conditions. Therefore, impacts related to ground shaking and ground rupture would be *less than significant*.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not involve the construction of new structures. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. As such, the CMO Permanent Ordinance would not involve the exposure of new structures or people to seismic ground shaking or ground ruptures. Therefore, impacts related to ground shaking and ground rupture would be *less than significant*.

Claremont Property Project

The Claremont facility was previously used as a Custody Center where up to 500 inmates lived. Reusing the project site for a CMO would not include any new residents at the project site and would not involve the construction of any new permanent structures. As such, the Claremont Property Project would not involve the significant exposure of new structures or people to seismic ground shaking or ground ruptures. Therefore, impacts related to ground shaking and ground rupture would be *less than significant*.

a.iii Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

Liquefaction is a phenomenon in which saturated cohesionless soils are subject to a temporary, but essentially total loss of shear strength because of pore pressure build-up under the reversing cyclic shear stresses associated with earthquakes. The groundwater table in the area of Coalinga is between 300 and 400 feet below the ground surface. As such, City of Coalinga's General Plan concluded that the potential for liquefaction in the City is very low. Therefore, the proposed project would not experience adverse impacts due to liquefaction and a *less-than-significant* impact would result.

a.iv. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The proposed project areas are located on the western edge of California's Central Valley in a relatively flat area. Significant slopes do not exist within the City, and as such the potential for seismic induced landslide in the City is low. Therefore, the proposed project would not experience adverse impacts due to landslides and a *less-than-significant* impact would result.

b. Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and redesignation of the Juniper Ridge project site, but would not change the area of disturbance. Additionally, the intensity of allowable

development under the proposed MB and MBL designations would be generally consistent with the currently approved commercial land uses. As such, construction activities related to development of the project site for MB or MBL uses would result in similar risks of erosion and topsoil loss as development under the current CS designations. Additionally, any future development would be required to comply with all relevant General Plan Goals and Policies that seek to reduce erosion including Goal S3, and Implementation Measure S2-3.4. Because development of the project site has already been anticipated, and any development that would occur under the MB or MBL designations would be required to abide by all applicable, local and state regulations concerning erosion control, the proposed project would not result in substantial soil erosion or topsoil loss and a *less-than-significant* impact would result.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not involve ground disturbing activities. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. As such, the CMO Permanent Ordinance would not directly involve land disturbance, which could cause erosion. However, approval of the ordinance may lead to increased applications for agricultural activities related to CMO. Such activities would be regulated by provisions within the CMO Permanent Ordinance, as well as existing local and state regulations including all relevant General Plan Goals and Policies that seek to reduce erosion including Goal S3, and Implementation Measure S2-3.4. Because the CMO Permanent Ordinance would not directly involve ground disturbance, and any subsequent cultivation activities would be required to abide by all applicable, local and state regulations concerning erosion control, the proposed project would not result in substantial soil erosion or topsoil loss and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont Property has been previously developed for use as the Claremont Custody Center. The proposed CMO would rely on indoor cultivation during the initial phases of development. Indoor cultivation of marijuana would not include any ground disturbing activity, and does not necessarily require the use of soil. Because indoor cultivation does not include ground disturbance, the potential for the Claremont Property Project to result in erosion of soil or topsoil loss is very unlikely. As such, the proposed project would not result in substantial soil erosion or topsoil loss and a *less-than-significant* impact would result.

c. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

As discussed earlier in this section, the risk of liquefaction and landslide is considered low within the City. Lateral spreading is a failure within weak soils, typically due to liquefaction, which causes a soil mass to move along a free face, such as an open channel, or down a gentle slope. As such, reduction of liquefaction risk reduces the potential for lateral spreading. As discussed above, liquefaction is not expected to impact the proposed project, and as a result lateral spreading is not expected to create a substantial risk on- or off-site.

Strong ground shaking can cause settlement by allowing sediment particles to become more tightly packed, thereby reducing pore space. Unconsolidated, poorly packed alluvial deposits are especially susceptible to this phenomenon. Inadequately compacted artificial fills may also experience seismically-induced settlement. Following the 1983 Coalinga earthquake,

several damage assessment studies were initiated. Based on the settlement values reported after the 1983 event, the potential for seismic settlement and/or differential compaction within the planning area is considered minimal.

Therefore, the proposed project would not be located on a geologic or soil unit that is unstable or that would become unstable as a result of the proposed projects would result in a *less-than-significant* impact.

d. Juniper Ridge Industrial Park

The City of Coalinga General Plan EIR concluded that expansive soils exist in the Coalinga area. Such soils can pose a hazard to structures through shrinking and swelling induced by fluctuations in moisture content. The proposed project would include a rezone and redesignation of the Juniper Ridge project site, which would allow for development of the project site for the purposes of light manufacturing/business. It should be noted that development of the project site was already anticipated by the JRBIPAP and the City's General Plan. The United States Department Agriculture's Web Soil Survey indicates that the Juniper Ridge site is mostly underlain by excelsior sandy, loam with only two percent of the site being underlain by posochanet clay loam.⁶ The Web Soil Survey further indicates that only the Excelsior sandy loam is not considered expansive, but the posochanet clay loam is considered somewhat expansive. However, the expansive nature of the soil would not be significantly limiting to site development, as only a small portion of the site is underlain by expansive soils and the posochanet clay loam is not considered a highly expansive soil.

In addition, future development would be required to consider geologic hazards by the City of Coalinga's General Plan policy S2-2. Therefore, potential hazards posed by the posochanet clay loam would need to be addressed prior to the approval of grading plans through a site specific geotechnical study. Because hazards due to expansive soils would most likely be minor, and would be addressed prior to the issuance of building plans, the proposed project would not locate structures on expansive soils, and a *less-than-significant* impact would result.

CMO Permanent Ordinance, and Claremont Property Project

Neither the CMO Permanent Ordinance nor the Claremont Property Project would involve the construction of new permanent structures. As such, neither portion of the proposed project would locate structures on expansive soils, and a *less-than-significant* impact would result.

⁶ United States Department of Agriculture, Natural Resources Conservation Service. *Web Soil Survey*. Accessible at <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed in August 2016.

e. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The use of septic tanks or alternative wastewater disposal systems would not be required, nor are they proposed as part of the projects. Therefore, *no impact* would occur regarding the capability of soil to adequately support the use of septic tanks or alternative wastewater disposal systems.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|--------------------------|
| VII. GREENHOUSE GAS EMISSIONS. | | | | |
| <i>Would the project:</i> | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | ✘ | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |

Discussion

a,b. Emissions of greenhouse gases (GHGs) contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on earth. An individual project’s GHG emissions are at a micro-scale level relative to global emissions and effects to global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

GHG emissions attributable to typical development are primarily associated with increases of carbon dioxide (CO₂) and, to a lesser extent, other GHG pollutants, such as methane (CH₄) and nitrous oxide (N₂O) associated with operational sources such as mobile sources or vehicles, utilities (electricity and natural gas), water usage, wastewater generation, and the generation of solid waste. Mobile sources of GHG emissions typically constitute the largest operational source of emissions for proposed projects. Additionally, construction activities associated with development emit GHG through the commute of construction workers, the operation of machinery, and the transport of construction materials, among other sources.

Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and redesignation of the Juniper Ridge project site, but would not change the area of disturbance and the intensity of the development allowable for the project site would remain generally consistent between the approved commercial and proposed light manufacturing/business uses. Because the area of disturbance and intensity of land use would remain similar between the approved CS and the proposed MB/MBL designations, construction activities that would result from future development of the project site would be approximately equal between the approved and proposed land use types.

Because mobile emissions are generally the largest source of GHG emissions, the proposed project would result in an impact to GHG emissions if the project were to result in greater

vehicle trips to and from the project site during the operation of future development. As discussed in greater detail in the Transportation/Traffic section of this IS/MND a rezone and GPA for the project site to MB/MBL from CS, is estimated to reduce the amount of vehicle trips that would result from the development and operation of the Juniper Ridge Project site. In addition to the anticipated reduction in GHG emissions from reduced vehicle trips, the project would be required to abide by the SJVAPCD's Climate Change Action Plan (CCAP). In order to comply with statewide GHG emissions reduction targets, the CCAP includes requirements for GHG reductions for new development projects. The future development on the Juniper Ridge Project site would be required to comply with the minimum GHG reduction through the implementation of Best Performance Standards (BPSs). Without implementation of the CCAP's BPSs, future build out of the project site could lead to significant GHG emissions. Therefore, the Juniper Ridge Project may have a significant impact on the environment, or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs; and impacts would be considered *potentially significant*.

Mitigation Measure(s)

Implementation of the following mitigation measure would ensure that the impact is *less-than-significant*.

- VII-1. *Future building plans for development of the Juniper Ridge Industrial Park project site shall incorporate all applicable Best Performance Standards, consistent with guidance in the SJVAPCD's CCAP to achieve the minimum requirements for GHG emissions reductions included in the CCAP. The building plans, including the Best Performance Standards shall be submitted to the Community Development Department for review of compliance with the CCAP.*

CMO Permanent Ordinance

The CMO Permanent Ordinance involves conditionally approved uses of areas designated MB and MBL. As such, the ordinance would not directly involve development, which would result in construction emissions of GHGs. Although the CMO Permanent Ordinance may lead to applications for CMOs, such operations would occur in areas zoned MBL and designated MB, and which were therefore anticipated for use as light manufacturing and business and included in SJVAPCD's CCAP. In addition, any future development applying for use permits under the CMO would be required to undergo subsequent environmental review, which would require consideration of compliance with the CCAP. Therefore, the proposed project would not increase the amount of GHG emissions anticipated under the CCAP and would not be considered to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs; and impacts would be considered *less than significant*.

Claremont Property Project

The Claremont Custody Center previously housed 500 inmates and was operated by 100 employees. Because inmates were housed on site, operations would occur 24 hours per day, every day of the year. As further discussed in the Transportation/Traffic section of this

IS/MND, operation of the Claremont Custody Center would have involved employee commutes, visitors, and the delivery of goods and services. The proposed reuse of the facility would involve a CMO where 50 employees would commute to and from work, and movement of goods would also occur to and from the site. Given the reduction in employees, visitor trips, and the elimination of the need to provision 500 inmates, the proposed Claremont Property Project would most likely result in transportation demand less than what occurred during the operation of the Claremont Custody Center. The continuation or reduction in transportation trips to and from the site would ensure that mobile GHG emissions would not exceed the emissions from previous on-site activities.

Additionally, OGE would renovate portions of the existing facilities for use as a CMO. Such renovations would be required to be conducted in accordance with current state building codes, which would include the latest energy efficiency measures included in Title 24 of the California Building Code. Such enhanced energy efficiency measures would help to off-set and reduce the energy demanded by indoor cultivation activity. Additionally, as discussed in the Hydrology and Water Quality, and the Utilities and Service Systems sections of this IS/MND the proposed Claremont Property Project would most likely reduce the amount of water demanded by the project while simultaneously reducing the wastewater generated by the project as well. Such a reduction in water demand and wastewater production would help to reduce the GHG emissions of the project because the transport and treatment of water and wastewater generates direct and indirect GHG emissions. Because the project would likely reduce the transportation demand from the project site, would incorporate energy efficiency measures consistent with requirements for renovations within Title 24 of the California Building Code and would reduce the water demand and wastewater generation at the site, the proposed Claremont Property Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs; and impacts would be considered *less than significant*.

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and
General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than- Significant Impact | No Impact |
|---|---|--|-------------------------------------|--------------|
| VIII. HAZARDS AND HAZARDOUS MATERIALS. | | | | |
| <i>Would the project:</i> | | | | |
| a. | | | ✘ | |
| | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | |
| b. | | | ✘ | |
| | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment? | | | |
| c. | | | | ✘ |
| | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | |
| d. | | | ✘ | |
| | Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | | | |
| e. | | | ✘ | |
| | For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | | | |
| f. | | | ✘ | |
| | For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | | | |
| g. | | | ✘ | |
| | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | |
| h. | | | ✘ | |
| | Expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | | | |

Discussion

a-b. Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project includes a request to redesignate and rezone the project site to MB/MBL, which would allow for light industrial, manufacturing, office, and business-oriented land uses. Although specific development plans for the project site do not currently exist, light industrial and manufacturing operations are more likely to involve the use of hazardous materials than the service oriented land uses allowed by the current CS designation. As such, by redesignating and rezoning the Juniper Ridge project site, the risk of hazard through the routine use, transport, or reasonably foreseeable upset of hazardous materials may be elevated as a result of the proposed redesignation and rezone. However, the use of hazardous materials is regulated by the City of Coalinga Planning and Zoning Code Chapter 4, Article 4, Performance Standards. The City Code requires that the use, handling, storage, and transportation of hazardous materials comply with all applicable California Hazardous Materials Regulations, California Fire and Building Code, regulations from the Department of Toxic Substances, and the Fresno County Department of Public Health. The Fresno County Department of Public Health requires that businesses that plan to handle hazardous materials, including flammable liquids or solids, in amounts equal to or exceeding 500 pounds of solids or 55 gallons of liquids, must submit a Hazardous Materials Business Plan. The Hazardous Materials Business Plan must include the type and quantity of hazardous materials, a site map, risks of using the materials, spill prevention, employee training, and emergency response plans. Such Business Plans must be resubmitted annually or within 30 days of significant changes to hazardous materials use on-site. Compliance with the aforementioned regulations would ensure that should future development at the Juniper Ridge project site involve hazardous materials, the use of such materials would be conducted in a manner acceptable under state law. Because the current project would not directly involve the use of hazardous materials, and any future development would be subject to all of the aforementioned regulations, the proposed project would not create a significant hazard to the public through the use, transport, or reasonably foreseeable upset of hazardous materials, and, as such, a *less-than-significant* impact would result.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not directly involve the use, transport or reasonably foreseeable upset of hazardous materials. However, CMOs applying for permits under the CMO Permanent Ordinance may involve the use of hazardous materials including, agricultural chemicals as well as butane and other flammable materials for use during the extraction process. The CMO Permanent Ordinance requires any CMO using flammable materials to comply with all applicable fire and building codes, and any other requirements placed upon the CMO by the Coalinga Fire Department (CFD). If a CMO is found not to be in compliance with such requirements, enforcement clauses of the CMO Permanent Ordinance can be invoked against the violating operation. Additionally, any CMOs operating under the permanent ordinance would also be required to conform to the applicable state and county regulations included in the above Juniper Ridge Industrial Park discussion. Adherence to the City, County, State and CFD requirements would ensure that any CMO activity

permitted under the CMO Permanent Ordinance would not create a significant hazard to the public through the use, transport, or reasonably foreseeable upset of hazardous materials, and, as such, a *less-than-significant* impact would result.

Claremont Property Project

As discussed throughout this document, the proposed reuse of the Claremont property would involve the cultivation and processing of commercial marijuana. During various stages of processing the proposed project would use various hazardous materials including n-butane, gaseous CO₂, ethanol, combustible liquids, flammable liquids, isopropanol, methanol, formic acid, ethyl acetate, acetone, acetonitrile, and dimethyl sulfoxide. Such a CMO operation would be required to conform with the CMO Permanent Ordinance and the City's Planning and Zoning Code requirements for the use of hazardous and flammable materials discussed above. Additionally, the Claremont Property Project would be subject any applicable state laws regarding hazardous materials and the Fresno County requirements for submission of a Hazardous Materials Business Plan. Because the Claremont Property Project would be required to comply with all applicable City, County, State and CFD regulations and requirements the proposed project would not create a significant hazard to the public through the use, transport, or reasonably foreseeable upset of hazardous materials, and, as such, a *less-than-significant* impact would result.

c. Juniper Ridge Industrial Park

While future development of the Juniper Ridge project site may involve the emission or handling of hazardous materials, existing or planned schools are not located within one-quarter mile of the project site. Therefore, the Juniper Ridge Industrial Park project would not involve the emission or use of hazardous materials within one-quarter of a mile of an existing or planned school, and the project would result in a *no impact*.

CMO Permanent Ordinance

CMO operations applying for use permits under the CMO Permanent Ordinance may involve the use or emission of hazardous materials. However, Section (d)(12) of the CMO Permanent Ordinance requires that CMO cannot be operated within 1,800 feet of an existing or proposed school. As such, CMOs would not be allowed within one-quarter of a mile of any existing or planned school, and emissions or use of hazardous materials would not occur in proximity to such schools. As a result, the proposed project would result in *no impact*.

Claremont Property Project

While the reuse of the Claremont facility for a CMO would involve the emission or handling of hazardous materials, existing or planned schools are not located within one-quarter mile of the project site. Therefore, the Claremont Property Project would not involve the emission or use of hazardous materials within one-quarter of a mile of an existing or planned school, and the project would result in a *no impact*.

d. Juniper Ridge Industrial Park and Claremont Property Project

Neither the Juniper Ridge Industrial Park site nor the Claremont Property Project are located on sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5,⁷ and neither project would create a significant hazard to the public or the environment. Therefore, *no impact* would occur.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not include specific development plans for any project sites within the City. Rather, the CMO Permanent Ordinance involves permitted uses in area already developed or designated MB/MBL. Any project applying for use permits under the CMO Permanent Ordinance would be subject to a project-specific environmental review. Such an environmental review would involve an analysis of the project site for potential inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, because the CMO Permanent Ordinance does not directly involve development, the proposed CMO Permanent Ordinance would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and thus would not create a significant hazard to the public or the environment. Therefore, a *less-than-significant* impact would occur.

- e-f. In 1996, to address concerns about proximity to schools and associated noise hazards, the City relocated and constructed the Coalinga Municipal Airport at the corner of Phelps and Calaveras Avenues approximately four miles east-northeast of the City in the southwest portion of Fresno County. The airport is located within the Airport Master Plan Area, as described in the Land Use Element of the General Plan.

Juniper Ridge Industrial Park and Claremont Property Project

The Juniper Ridge project site and the Claremont Property are not located within an airport land use plan or within two miles of a public airport or public airport use. The closest airport to the project site is the new Coalinga Municipal Airport, which is approximately three miles to the east of the Claremont Property and two miles northeast of the Juniper Ridge Project site. Because proposed project site is not within the vicinity of a private airstrip, and the project would not result in a safety hazard for people residing or working in the project area, the proposed project would result in *no impact*.

CMO Permanent Ordinance

The proposed CMO Permanent Ordinance would not directly involve development within an airport land use zone or within two-miles of an existing airport. Rather, the proposed permanent ordinance would involve permitted uses within areas zoned and designated MBL or MB. Because the CMO Permanent Ordinance would not directly involve development the permanent ordinance would not place additional structures within the vicinity of an airport. Similarly, where CMOs are permitted within two-miles of the Coalinga Municipal Airport, such CMOs would occur in areas zoned and designated by the City for business or light

⁷ California Department of Toxic Substances Control. *EnviroStor*. Available at: <http://www.envirostor.dtsc.ca.gov>. Accessed June 2016.

manufacturing activities, and the conditionally permitted CMOs would expose workers to similar risk as any business or light manufacturing activity. However, because CMOs would be conditionally approved, such applications would be subject to project-specific environmental reviews, which would consider potential hazards posed by locating such activities in an airport land use zone or within two-miles of an airport. Because the project would not involve the construction of new structures within to-miles of an existing airport, would not directly place workers within to-miles of an existing airport, and future development under the permanent ordinance would be required to undergo subsequent environmental review, the CMO Permanent Ordinance would not result in a safety hazard for people residing or working in the project area, the proposed project would result in a *less-than-significant* impact.

g. Juniper Ridge Industrial Park

Development of the Juniper Ridge Industrial Park was planned through the JRBIPAP. The JRBIPAP anticipated that the project sites under current review would be developed for MBL/MB uses, and the site access, and area circulation was designed with such uses in mind. The proposed project would only involve the rezone and redesignation of the Juniper Ridge Project site from CS to MBL/MB, which would establish consistency between the JRBIPAP and the General Plan as well as the City's Zoning designation, but the project would not include the direct development of the project site. Future development of the site under the proposed zoning and General Plan designation of MBL/MB would have similar effects on the area's circulation system as development under the currently approved CS designations. Such effects would be limited to expanding the site access to accommodate development, and would not be anticipated to include the construction of any barriers or the alteration of surrounding circulation infrastructure, which could impede emergency response. As such, the proposed project would not impair or physically interfere with an adopted emergency response plan and a *less-than-significant* impact would occur.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not include any development proposals. Instead, the CMO Permanent Ordinance would conditionally allow CMOs to operate in areas designated MBL/MB. If such CMO applications involved development of currently undeveloped sites, the conditional nature of the allowed use under the CMO Permanent Ordinance would require that project-specific environmental reviews be conducted, which would analyze the new development's impact on emergency response plans. However, if such activities were to be permitted within existing structures, the operation of a CMO would result in similar impacts to emergency response as other light industrial or manufacturing uses allowed under MBL/MB. Because the proposed CMO Permanent Ordinance does not involve development, the proposed project would not construct barriers that would impede the implementation of an emergency response plan or physically interfere with an adopted emergency response plan and a *less-than-significant* impact would occur.

Claremont Property Project

The Claremont facility was previously used as the Claremont Custody Center where 500 inmates were housed and 100 employees worked. The Claremont Property Project would involve the reuse of the Claremont facility as a CMO, and would include interior renovations

to the Claremont facility to accommodate such operations. However, the Claremont Property Project does not include any physical alterations to the existing circulation system of the property, which could lead to the construction of barriers that would impede the implementation of an emergency response plan. Therefore, the proposed project would not impair or physically interfere with an adopted emergency response plan and *less-than-significant* impact would occur.

h. Juniper Ridge Industrial Park and

Within the City of Coalinga, wildland fires primarily pose potential hazards in the hilly areas where chaparral and other vegetation are present. The Juniper Ridge project site is not located in a hilly area with chaparral or other dense vegetation. However, the California Department of Forestry and Fire Protection's (CAL FIRE) *Draft Fire Hazard Severity Zones in LRA* for Fresno County depicts the project site as being within an area of high fire hazard.⁸ The *Draft Fire Hazard* map further indicates that the Juniper Ridge project site is within a local responsibility area (LRA) meaning that the project site is under the fire protection jurisdiction of the Coalinga Fire Department. As discussed in further detail in the Public Services section of this IS/MND the Coalinga Fire Department can provide fire protection to the Juniper Ridge project site. Therefore, while the Juniper Ridge project site is within a high fire hazard zone, fire protection provided by the Coalinga Fire Department would ensure that the risk of impacts from fire hazards would be *less than significant*.

CMO Permanent Ordinance

The proposed CMO Permanent Ordinance would not directly involve the development of structures. Rather, the CMO Permanent Ordinance involve the use of structures within areas zoned as MB or MBL. Because the CMO Permanent Ordinance does not involve the construction of new structures, the proposed permanent ordinance would not expose people or structures to the risk of loss, injury or death due to wildfires, and *no impact* would result.

Claremont Property Project

Within the City of Coalinga, wildland fires pose potential hazards in the hilly areas where chaparral and other vegetation are present. The Claremont Property is not located in a hilly area with chaparral or other dense vegetation. Fire protection for the site is provided by the Coalinga Fire Department, and fire service would continue with the implementation of the Claremont Property Project. Therefore, *no impact* would result with regard to the exposure of people or structures to risk of loss, injury or damage due to wildfire.

⁸ California Department of Forestry and Fire Protection. *Draft Fire Hazard Severity Zones in LRA*. September 2007.

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and
General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than- Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| IX. HYDROLOGY AND WATER QUALITY. | | | | |
| <i>Would the project:</i> | | | | |
| a. Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g. Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h. Place within a 100-year floodplain structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

- a.f. In California, the State Water Resources Control Board (SWRCB) issued a statewide General Permit to regulate runoff from construction sites involving grading and earth moving in areas over one acre. The SWRCB is acting to enforce requirements of the federal Clean Water Act, pursuant to regulations issued by the U.S. EPA for the National Pollutant Discharge Elimination System (NPDES). Although the NPDES program is established by the federal Clean Water Act, the permits are prepared and enforced by the regional water boards through program delegation to California and implementing authority in the California Water Code. This State Order (Water Quality Order 99-08-DWQ) requires construction projects covered under the General Permit to use the “best available technology economically achievable,” and the “best conventional pollution control technology.” Each construction project in the City of Coalinga that is subject to the permit is required to have a Storm Water Pollution Prevention Plan (SWPPP) prepared, which identifies likely sources of sediment and pollution and incorporates measures to minimize sediment and pollution in runoff water. The objectives are established based on the designated beneficial uses (e.g., water supply, recreation, and habitat) for a particular surface water or groundwater.

The City of Coalinga is a permittee under the NPDES General Permit for Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Order No. 2013-0001-DWQ), also known as the Small MS4 General Permit. The Order prohibits polluted stormwater and non-stormwater discharges into the storm drain system, identifies receiving water limitations on constituent loading, and requires preparation of a Storm Water Quality Management Plan (SWQMP). The SWQMP is required for all MS4 permits to address prohibited discharges from construction, industrial and commercial, municipal operations through structural mechanisms and programs addressing illicit connections and discharges, public outreach and education, and land use planning to be measured against performance and effectiveness indicators during the mandatory annual review.

Juniper Ridge Industrial Park

The Juniper Ridge Project site was anticipated for development by the JRBIPAP, the City’s General Plan and the City’s Zoning. The proposed project would not alter the area of disturbance, but instead would alter the types of land uses permitted on for buildout of the site by rezoning and redesignating the site from CS to MBL/MB. Although the CS and MBL/MB allow different types of land uses, the intensity and scale of permitted structures is generally similar between the designations. Additionally, because the area of disturbance would not change, the potential for construction related erosion to lead to sedimentation and pollution would not be increased by the proposed project. Similarly, as the scale and intensity of permitted structures is similar between the MBL/MB and CS designations, future development of the site as MBL or MB would create a similar amount of impervious surfaces on the project site. Impervious surfaces would create greater runoff from the project site; however, because development of the site was planned by the JRBIPAP, the nearby JRBIPAP stormwater detention basin located to the south of the project site would be sized adequately to accommodate runoff from the project site.

Because the proposed Juniper Ridge Project would not change the area of disturbance or the amount of stormwater runoff anticipated by the General Plan, the General Plan EIR, and the JRBIPAP, the proposed Juniper Ridge Project would not violate water quality standards, waste discharge standards, or substantially degrade water quality in excess of what would be expected for development of the site under the currently approved CS designations. Therefore, the proposed project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The proposed CMO Permanent Ordinance would allow for permitted CMOs to operate in areas designated as MB/MBL. Because marijuana is an agricultural product, the operation of CMOs would involve generally similar wastewater generation as typical agricultural activities. However, CMOs permitted under the proposed ordinance would differ from typical agricultural wastewater generation in a number of ways. Because the CMO Permanent Ordinance requires that CMOs be located within solid structures in areas designated MB/MBL, CMOs would operate as indoor cultivation operations. Indoor cultivation would not involve the disturbance of land, and thus would not lead to erosion or the discharge of sediment polluted water. Additionally, indoor cultivation would be expected to use less water than outdoor cultivation, as indoor cultivation would rely on precision irrigation and would be able to reclaim water used for irrigation. However, wastewater discharges from CMOs would most likely contain fertilizers, pesticides and other agricultural chemicals, similar to traditional agricultural activities.

Section (d)(14)(f) of the CMO Permanent Ordinance requires all CMOs to comply with applicable environmental regulations, and “use best practices to avoid environmental harm.” Relevant environmental regulations applied by section (d)(14)(f) include a recent order related to waste discharge requirements for medicinal cannabis cultivation activities issued by the Central Valley Regional Water Quality Control Board, Best Management Practices for Cannabis Cultivation required by the State Water Resources Control Board, and recommendations related to the use of agricultural chemicals, and requirements related to pesticide use in marijuana cultivation released by the California Department of Pesticide Regulation.^{9,10,11} Because CMOs operating under the CMO Permanent Ordinance would be subject to all applicable state regulations relating to wastewater discharge, and specifically to those regulations related agricultural and cannabis cultivation related discharge, the future activity permitted under the CMO Permanent Ordinance would not be anticipated to violate water quality standards, waste discharge standards, or substantially degrade water quality. Therefore, the CMO Permanent Ordinance would be expected to result in a *less-than-significant* impact.

⁹ California Regional Water Quality Control Board, Central Valley Region. *Order R5-2015-0113, Waste Discharge Requirements General Order for Discharges of Waste Associated with Medicinal Cannabis Cultivation Activities*. Adopted October 2, 2015

¹⁰ California State Water Resources Control Board. *Cannabis Cultivation Best Management Practices*. Posted July 15, 2015.

¹¹ California Department of Pesticide Regulation. *Pesticide Use on Marijuana*. 2015.

Claremont Property Project

The Claremont Property Project involves the reuse of the existing Claremont facility for a CMO. While the project would include interior renovations to the Claremont facility, exterior renovations or ground disturbing activities are not included in the proposed Claremont Property Project. As such, the proposed Claremont Property Project would not alter the amount or composition of stormwater runoff leaving the site, and thus would not result in the degradation of water quality due to stormwater runoff.

The Claremont Property Project would involve marijuana cultivation and processing activities, which could result in the discharge of water containing fertilizers, pesticides, or chemicals related to processing and packaging to the City's wastewater system. Similar to the above discussion regarding the CMO Permanent Ordinance's effect on water quality, the proposed Claremont Property Project would be subject to all applicable state regulations relating to wastewater discharge, and specifically to those regulations related agricultural and cannabis cultivation related discharge. Because the Claremont Property Project would be subject to such regulations the proposed project would not be anticipated to violate water quality standards, waste discharge standards, or substantially degrade water quality, and as such would be anticipated to result in a *less-than-significant* impact.

b. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The Bureau of Reclamation provides domestic water service to Coalinga. The major source of water is the Central Valley Project by way of the Coalinga Canal. The City's General Plan EIR concluded that groundwater in the area is unsuitable for domestic water use and is only marginally suitable for agricultural uses given the elevated concentrations of total dissolved solids. Therefore, the proposed project would not increase the use of groundwater, which could lead to a deficit in groundwater recharge.

The development at the Juniper Ridge project site could impact recharge of groundwater given the potential for increased impervious surfaces. However, the site is relatively small in comparison to the amount of undeveloped or agricultural land surrounding the areas, and landscaping requirements within the JRIBPAP would ensure that some impervious surfaces remained where water would be allowed to infiltrate the soil at the Juniper Ridge site.

The Claremont Property Project would occur within the Claremont facility and thus would not involve the construction of new impervious surfaces. If CMO activities are expanded in the future at the Claremont Property site, such activities would be the subject to project-specific environmental review, which would assess potential impacts to groundwater in the area.

The CMO Permanent Ordinance would not directly involve development which would involve construction of new impervious surfaces, and thus would not affect groundwater recharge.

Because the City of Coalinga uses surface water for domestic water resources, and the proposed projects are not anticipated to significantly alter groundwater recharge patterns in

the area, the proposed projects would not be anticipated to substantially deplete groundwater resources or interfere with groundwater recharge. Therefore, overall, a *less-than-significant* impact would result.

c-e. Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and redesignation of the Juniper Ridge project site, but would not change the area of disturbance. Additionally, the intensity of allowable development under the proposed MB and MBL designations would be generally consistent with the currently approved commercial land use. The JRBIPAP also included plans for a centralized drainage basin that would serve the entire JRBIPAP area. Because development of the project site was anticipated by the JRBIPAP for light manufacturing/business uses, the runoff that would result from development of the site as MB or MBL was included in the sizing of the JRBIPAP drainage infrastructure. Therefore, adequate capacity exists to accommodate future runoff that would result from site buildout. Additionally, future development of the project site would be subject to Goal S3 of the City's General Plan, which seeks to prevent unnecessary drainage, erosion and sedimentation, as well as General Plan Implementation Measures S3-1.1 through S3 1.4. Such local regulations would ensure that future site development would not result in the alteration of drainage patterns that would cause substantial erosion or siltation on or off-site. Because sufficient drainage infrastructure exists to accommodate development of the project site as MB or MBL, and future development would be subject to local regulations related to drainage, the proposed project would not substantially alter the existing drainage pattern leading to on or off-site erosion nor would the project exceed the capacity of existing or planned stormwater drainage systems. As such, a *less-than-significant* impact would result.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not involve ground disturbing activities. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. As such, the CMO Permanent Ordinance would not directly involve land disturbance, which would lead to changes in drainage patterns or the exceedance of stormwater drainage systems. As such, the proposed project would not substantially alter existing drainage patterns leading to on or off-site erosion nor would the project exceed the capacity of existing or planned stormwater drainage systems, and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont Property has been previously developed for use as the Claremont Custody Center. The existing development on the project site includes large amounts of paved areas and structures. The proposed project would involve CMO activities, which would occur completely within the existing structures. Because project activity would not involve outdoor disturbances the proposed project would not substantially alter existing drainage patterns leading to on or off-site erosion nor would the project exceed the capacity of existing or planned stormwater drainage systems, and a *less-than-significant* impact would result.

g-i. Juniper Ridge Industrial Park

Based on the FEMA Flood Insurance Rate Map (FIRM), (Map Number ID: 06019C3214H), the project site is within Zone X, which is described by FEMA as an area determined to be outside the 0.2 percent annual chance floodplain. In addition, dams or levees are not located upstream of the proposed project site; thus, flooding due to dam or levee failure would not occur. Because the project site is not within a 100-year floodplain, the proposed project would not place housing or structures within a 100-year floodplain or expose people or structures to risks involving flooding. Therefore, impacts would be *less than significant*.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not involve ground disturbing activities. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. As such, the CMO Permanent Ordinance would not directly involve the placement of housing or structures within a 100-year floodplain, or within an area at risk of loss, injury or death involving flooding due to a levee or dam failure. Therefore, impacts would be *less than significant*.

Claremont Property Project

Based on the FEMA Flood Insurance Rate Map (FIRM), (Map Number ID: 06019C3211H), the majority of the site is within Zone X, however a portion of the project site is in Zone A. The proposed project involves the reuse of the Claremont Custody Center for a CMO. Reuse of the site as a CMO would involve approximately 50 employees and would not include any on-site residents. In contrast, operation of the facility as the Claremont Custody Center included 500 inmates and 100 employees. Therefore, the proposed project would expose fewer people to risk from flooding. Additionally, the indoor CMO activity proposed as part of the project would not involve the construction of any new structures, which would redirect flood flows. As such, the Claremont Property Project would not directly involve the placement of housing or structures within a 100-year floodplain, or within an area at risk of loss, injury or death involving flooding due to a levee or dam failure. Therefore, impacts would be *less than significant*.

j. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

Tsunamis are defined as sea waves created by undersea fault movement. A tsunami poses little danger away from shorelines. As Coalinga is not near a coastline, the project sites would not be exposed to flooding risks from tsunamis and adverse impacts would not result.

A seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir, whose destructive capacity is not as great as that of tsunamis. The project is not located near a closed body of water. Therefore, risks from seiches and adverse impacts would not result.

Mudflows typically occur in mountainous or hilly terrain. Given the existing and proposed flat topography of the project sites, risks from mudflows and adverse impacts would not

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration result. Therefore, potential impacts resulting from tsunamis, seiches, or mudslides would be *less than significant*.

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

Discussion

a. Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for development by the JRBIPAP. The project site is currently surrounded by predominantly vacant land with an existing industrial development along Mercantile Lane, to the southeast of the project site. Residential developments also exist to the west of the JRBIPAP area; however, development of the project would not impact the circulation system of the nearby residential development. Because substantial development does not exist surrounding the project site, and development of the site was anticipated by the JRBIPAP, and the General Plan, the project would not physically divide an established community and a *less-than-significant* impact would result.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not involve construction activities. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned for MBL or MB. As such, the CMO Permanent Ordinance would not directly involve development which could divide an established community, resulting in a *less-than-significant* impact.

Claremont Property Project

The Claremont Facility exists to the north of most development in the City and is bordered by existing MBL and public facility development. The Claremont Property Project does not involve the development of undeveloped land, rather the project would reuse the existing Claremont facility for a CMO. As such, the Claremont Property Project would not divide an established community, and would result in a *less-than-significant* impact.

b. Juniper Ridge Industrial Park

Currently, the City's General Plan and zoning designations for the Juniper Ridge project site are inconsistent with the sites' anticipated uses within the JRBIPAP. The project would re-establish consistency within the three documents through a GPA and rezone to MB and MBL. Currently, the Juniper Ridge project site is zoned Service Commercial and designated Commercial Service, which allows uses such as repair facilities, building material sales, auto dealers, light manufacturing and distributing. Meanwhile the proposed designation of MB and zoning of MBL would allow for large and small-scale businesses involving manufacturing, distribution, wholesale outlets, and office space. As such, the allowable land uses for the CS, MB, and MBL are generally similar and would be anticipated to have similar environmental impacts. Should the GPA and rezone be approved the proposed project would be consistent with the plans and policies in the Coalinga General Plan, Zoning Code, and JRBIPAP resulting in a *less-than-significant* impact.

CMO Permanent Ordinance

On July 7, 2016 the City of Coalinga City Council adopted a CMO Urgency Ordinance, which allowed CMOs to operate within the City. The CMO Permanent Ordinance supersedes the CMO Urgency Ordinance, and further codifies conditionally allowed uses within areas designated and zoned for MB or MBL. The CMO Permanent Ordinance would include specific guidelines and requirements to ensure that any operations would not result in additional environmental impacts than what would be expected with currently approved uses for MB or MBL sites. As such, should the CMO Permanent Ordinance be adopted, the proposed project would be consistent with the plans and policies in the Coalinga General Plan and Zoning Code resulting in a *less-than-significant* impact.

Claremont Property Project

The Claremont Property Project includes a request for a rezone and GPA to redesignate the site from PF to MB and MBL. The project site was formerly used as the Claremont Custody Center, however, the Center has been vacant since 2011. The California Department of Corrections and Rehabilitations indicated, in 2014, that the Claremont facility would not be contracted for future use as a custody center. Because the facility would not be used as a public facility, as the facility had been in the past, the existing PF designation is now inappropriate. As such, OGE would reuse the project site for a CMO. Use of MBL or MB sites for the cultivation of commercial marijuana was allowed by the interim CMO Urgency Ordinance. As such, should the City approve the redesignation and rezone of the Claremont facility the proposed project would be consistent with the plans and policies in the Coalinga General Plan and Zoning Code resulting in a *less-than-significant* impact.

c. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The City of Coalinga is not located within a Natural Community Conservation Plan (NCCP). According to the General Plan Master EIR, the City is located within the boundaries of the Pacific Gas and Electric Company (PG&E) San Joaquin Valley Operation and Maintenance Habitat Conservation Plan (HCP). The San Joaquin Valley Operation and Maintenance HCP

addresses small-scale temporary effects due to operation and maintenance of the service area that are dispersed over a large geographic area. The activities covered in the HCP include two categories of activities for which PG&E requests take authorization conducted in accordance with CPUC requirements – operation and maintenance activities and minor construction activities. Although the City is located within the HCP boundary, the HCP covers only PG&E-related operation and maintenance and construction activities and does not cover any other facilities or activities. Therefore, implementation of the proposed project would not conflict with the intent of the HCP and a *less-than-significant* impact would result.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|--------------------------|
| XI. MINERAL RESOURCES. | | | | |
| <i>Would the project:</i> | | | | |
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |

Discussion

a,b. Two active surface mines exist adjacent to the City of Coalinga. The mines are bounded on the north by Gale Avenue, on the east by SR 198, on the west by Monterey Street, and on the south by the former airport property and the City limits. The operations include both extraction and processing of the materials into construction aggregates, concrete, and asphalt. According to the General Plan Master EIR, the California Division of Mines and Geology (CDMG) has not performed a comprehensive survey of all potential mineral resource locations or classified other locations within Fresno County into Mineral Resource Zones (MRZ). Regardless of the status of mineral resources at a particular site, a potentially significant impact would only occur if known mineral resources were present and could be extracted through standard mining practices without intrusion by incompatible uses.

Juniper Ridge Industrial Park

The Juniper Ridge project would involve a GPA and rezone to designate the project site MB and MBL. The project site was anticipated for development in the JRBIPAP, the City’s General Plan, and the zoning map for uses other than mineral extraction. Although the Juniper Ridge project site is immediately surrounded by vacant land or industrial uses, residential uses exist approximately 300 feet to the southwest. Due to the proximity to existing residential developments, mineral resource extraction on the Juniper Ridge project site would be considered an incompatible use. Additionally, mineral resources are not known to exist at the Juniper Ridge Project site. Because mineral resources are not known to occur at the site, and extraction could not occur on the project site due to nearby incompatible uses, the Juniper Ridge project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance concerns the conditionally allowed uses within areas designated and zoned for MB or MBL. As such the CMO Permanent Ordinance does not involve new development or the intrusion of incompatible uses into areas used for mineral resource extraction. Therefore, the CMO Permanent Ordinance would not result in the loss of availability of a known mineral resource and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont property has been previously developed for use as the Claremont Custody Center, and mineral extraction activity currently occurs 0.25-mile to the west and south of the project site. The Claremont Property Project would involve the repurposing of existing structures for the cultivation of marijuana. Because the Claremont Property Project would occur on a previously developed site, the project would not involve the loss of availability of a known mineral resource and a *less-than-significant* impact would occur.

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| XII. NOISE. | | | | |
| <i>Would the project result in:</i> | | | | |
| a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion

a, c, d. Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and redesignation of the Juniper Ridge project site, but would not change the area of disturbance. Additionally, the intensity of allowable development under the proposed MB and MBL designations would be generally consistent with the currently approved commercial and proposed light manufacturing/business uses. Under the current CS land designations uses such as repair facilities, industrial suppliers, light manufacturing/distributing, and wholesale outlets would be allowed. The Light Manufacturing and Business designation allows similar uses which include secondary

offices, bulk retail, warehouses, light industrial and service uses. Because the allowed uses under CS and Light Manufacturing and Business are generally consistent, the development and operation of the project site for Light Manufacturing and Business would not be expected to generate levels of noise in excess of what would be expected from development of the site under the approved CS designation. The City's General Plan EIR concluded that noise from buildout of the General Plan would not result in the exposure of noise-sensitive land uses to excess noise sources because General Plan Policies and Implementation Measures N1-1 and N1-2 would sufficiently mitigate any excess noise created near noise receptors. As such, development under MB and MBL that would be allowed by the proposed project would not subject the nearest residential development, located approximately 300 feet to the southwest, to a substantial increase in ambient noise levels from development that could currently occur under the CS designation.

Additionally, any subsequent projects seeking to develop the project site for noise producing uses would be subject to the City of Coalinga's Planning and Zoning Code Section 9-4.405, which requires a noise or acoustic study for any new projects that would create noise. The requirement of future projects to a noise study would ensure that future projects would be forced to mitigate noise production to the extent feasible and would avoid exposure of nearby residents to noise levels in excess of levels prescribed in the Safety, Air Quality and Noise Element of the General Plan.

Given the above discussion, the proposed rezone and GPA of the Juniper Ridge project site would not be anticipated to lead to the exposure of persons to or the generation of noise in excess of City standards or a substantial increase in ambient noise levels as compared to development that could occur under the current CS designation. As such, the proposed project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance involves conditionally allowed uses within areas designated and zoned MB or MBL. Any operations applying to begin a CMO would be subject to project-specific environmental review. In accordance with the City of Coalinga's Planning and Zoning Code Section 9-4.405, if the CMO was deemed to be a noise creating activity, the subsequent projects would be subject to acoustical studies to determine if the operations would subject nearby sensitive receptors to increased ambient noise levels or noise levels in excess of City standards. However, CMOs would not be anticipated to generate significantly more noise than would be expected to be generated by other MB/MBL uses. Because the CMO Permanent Ordinance itself would not be a noise generating project, and subsequent CMOs applying for approval under the permanent ordinance would be subject to project-specific environmental reviews, the proposed project would not result in an increase in ambient noise levels or the generation of noise in excess of City standards. Therefore, the proposed project would result in a *less-than-significant* impact.

Claremont Property Project

The Claremont facility was previously used for the Claremont Custody Center. The proposed project would include the reuse of the Claremont facility for a CMO, which would require a

rezone of the project site from PF to MBL. The Claremont Property Project would involve alterations to the interior of the Claremont facility and in the future OGE may expand their CMO to other areas of the project site. The project site is surrounded by mostly industrial uses, and residential developments do not exist in the project area. As such any increase in noise levels at the project site would not expose residential land uses to increased noise levels in excess of City standards or an increase in ambient noise levels. However, project operations would be unlikely to substantially increase noise generation from the project site as compared to noise that would have been generated by the previous use of the site as the Claremont Custody Center, which involved up to 500 inmates and 100 employees. OGE's operation would only include 50 employees, which would reduce the amount of noise generated from employee commutes and inmate activity. Therefore, the proposed project would not result in an increase in ambient noise levels or the generation of noise in excess of City standards. As a result, the proposed project would result in a *less-than-significant* impact.

b. Juniper Ridge Industrial Site

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and redesignation of the Juniper Ridge project site, but would not change the area of disturbance. Groundborne vibrations would be generated during construction activities regardless of the project site's zoning or land use designation and the level of groundborne vibrations created by future construction would likely be of comparable magnitude between projects built under CS or MB and MBL. Commercial, office, and retail land uses that would be allowed under the CS and MB/MBL designations are not typically considered to be vibration generating activities. Heavy industrial land uses may, in some cases, be considered vibration generating activities; however, industrial activity that would cause excess amounts of groundborne vibrations, would not be allowed in areas other than those designated as Heavy Manufacturing/Business (MBH). Because the proposed Juniper Ridge Project would not designate any new lands MBH, and land uses associated with CS and MB/MBL would generate similar amounts of groundborne vibrations during construction and operation, the proposed project would not involve the exposure of people to or the generation of excessive groundborne vibrations. Therefore, the proposed project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not directly involve construction activities. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned MB or MBL. Therefore, the project would not be anticipated to cause groundborne vibrations due to construction activities. Any future project applying for a permit under the CMO Permanent Ordinance would be subject to subsequent environmental analysis. Such analysis would include an analysis of possible sources of groundborne vibrations from future projects. However, in general, CMOs would not be expected to generate excessive amounts of groundborne vibrations as such operations do not rely on heavy machinery and the processing portion of such operations would not be considered a heavy manufacturing

process. Because future uses would be subject to environmental review, and CMOs in general would not be expected to generate excess amounts of groundborne vibrations through the use of heavy machinery, the proposed project would not result in the generation of excess amounts of groundborne vibrations and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont Property Project involves the redesignation and rezone of the Claremont project site to MB/MBL and the reuse of the facility as a CMO. The project site is not located near any land uses sensitive to groundborne vibrations. Additionally, the proposed project does not involve land disturbance or the construction of new structures, which could create excessive groundborne vibrations to nearby structures. While OGE anticipates that processing would occur on-site, the processing activities would not be expected to create significant amounts of vibrations. Because the Claremont Property Project would not involve construction or operational sources of vibration the proposed project would not result in the generation of excess amounts of groundborne vibrations and a *less-than-significant* impact would result.

e, f. Juniper Ridge Industrial Park, CMO Permanent Ordinance, Claremont Property Project

According to the General Plan Master EIR, airport noise within the City was assessed through the use of established noise contours found in the Airport Master Plan. Airport noise contours (as shown in Figure 7 of the Initial Study prepared for the Airport Master Plan) indicate that the 50 dBA through 65 dBA CNEL noise contours do not extend beyond the airport boundaries. The nearest air strip to the proposed project sites is the New Coalinga Municipal Airport. Neither the Juniper Ridge project site or the Claremont Property are within two-miles of the project site. Because the project sites are outside of the 65 dBA CNEL noise contours for the New Coalinga Municipal Airport, the proposed project would result in *no impact* related to exposing people residing or working in the project area to excessive noise levels for a project located within an airport land use plan and would not expose people residing or working in the project area to excessive noise.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| XIII. POPULATION AND HOUSING. | | | | |
| <i>Would the project:</i> | | | | |
| a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion

a. Juniper Ridge Industrial Park

The Juniper Ridge project site was anticipated for development by the JRBIPAP, and the City’s zoning and General Plan designations. Redesignating the site to MB and MBL would result in a slight change in the acceptable uses of the project site; however, the redesignation would not include new areas for development that have not been previously approved. Therefore, the Juniper Ridge project would not lead to additional indirect population growth because development of the project site was previously anticipated. As such, a *less-than-significant* impact would result.

CMO Permanent Ordinance

The CMO Permanent Ordinance involves allowing new conditional uses within areas designated as MB or MBL. As such, the CMO Permanent Ordinance does not directly involve new development. Any future projects involving CMO would be required to conduct environmental reviews, which would consider the growth inducing impacts of subsequent CMOs. However, because the CMO Permanent Ordinance itself does not involve new development the proposed project would not lead to population growth and would be considered to have a *less-than-significant* impact.

Claremont Property Project

The Claremont facility was previously used as the Claremont Custody Center with a maximum capacity of 500 inmates and 100 employees. The proposed project would involve the reuse of the project site for a CMO, which would not involve residents and only 50 employees. Because the closing of the Claremont Custody Center eliminated 100 jobs in the community, the population of Coalinga could meet the staffing needs of OGE’s Claremont CMO without population growth. As such, the proposed project would not lead to population growth and would thus result in a *less-than-significant* impact.

b,c. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The Juniper Ridge Industrial Park project area and the Claremont Property do not currently contain housing units. Therefore, development or reuse of the Juniper Ridge project site or the Claremont Property would not displace existing housing or populations of people. Additionally, the CMO Permanent Ordinance would only address uses within areas designated or zoned as MB/MBL, and thus would not involve areas approved for housing or the development of housing. Because the proposed projects would not involve the displacement of housing or population, the proposed project would result in *no impact*.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|--------|--------------------------------|--|------------------------------|-----------|
|--------|--------------------------------|--|------------------------------|-----------|

XIV. PUBLIC SERVICES.

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

| | | | | |
|-----------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| a. Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |
| c. Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✘ |
| d. Parks? | <input type="checkbox"/> | <input type="checkbox"/> | ✘ | <input type="checkbox"/> |

Discussion

a. Juniper Ridge Industrial Park

Development of the Juniper Ridge Industrial Park was anticipated by the JRBIPAP, the City’s General Plan, and the City’s Zoning. While the proposed redesignation of the project site from CS to MB/MBL would allow development for slightly different land uses than anticipated by the zoning and General Plan designations, development under the proposed MB/MBL designation would continue to be required to comply with the California Building Code and the California Fire Code. Furthermore, the City of Coalinga’s General Plan EIR concluded that buildout of the General Plan could be served by adequate fire services, and although the project would include a rezone and GPA, the changes the General Plan and City Zoning would not be anticipated to significantly increase the demand for fire protection in the City beyond what was anticipated by the City’s General Plan or General Plan EIR. Because the proposed project would not create new areas of growth within the City’s planning area, the proposed project would not require the physical expansion or alteration of fire protection facilities beyond what was anticipated by the General Plan. As such, the proposed project would have a *less-than-significant* impact related to fire protection.

CMO Permanent Ordinance

The proposed CMO Permanent Ordinance does not directly involve development that would cause an increase in fire protection demand. Rather, the proposed ordinance would involve conditionally approved uses in areas and structures already zoned MBL. Such areas would have already been anticipated for development by the General Plan, and would be provided with adequate fire protection service as concluded by the General Plan EIR. In addition to existing regulations regarding fire prevention and preparedness within the City’s Planning and Zoning Code, section (d)(14)(c) of the proposed CMO Permanent Ordinance includes

further requirements for CMOs using flammable materials to comply with all applicable fire codes and allows for additional requirements to be established by the Coalinga Fire Department. Because the proposed project would include development that was previously anticipated by the City's General Plan, and includes requirements regarding fire code compliance and Coalinga Fire Department input, the proposed project would not require the physical expansion or alteration of fire protection facilities beyond what was anticipated by the General Plan. Additionally, the City would charge CMOs an annual licensing fee, which would be used to defray any potential costs resulting from monitoring or compliance of CMOs. Therefore, the proposed project would have a *less-than-significant* impact related to fire protection.

Claremont Property Project

The Claremont facility was previously used as the Claremont Custody Center where up to 500 inmates were housed and up to 100 employees worked. The proposed project would reduce the number of people on site to approximately 50 employees, and would not place any residents at the facility. The proposed Claremont Property Project would involve the reuse of the Claremont facility, and would use the existing fire suppression infrastructure within the facility. Additionally, section (d)(14)(c) of the proposed CMO Permanent Ordinance would allow the Coalinga Fire Department would be able to apply additional requirements to ensure the safe operation of extraction and processing activities, which involve flammable materials. Because the project site was previously served by the Coalinga Fire Department, and would be required by the Coalinga Fire Department to make any necessary safety improvements prior to operation, the proposed Claremont Property Project would not be anticipated to require the physical expansion or alteration of fire protection facilities, and the project would have a *less-than-significant* impact related to fire protection.

b. Juniper Ridge Industrial Park

Development of the Juniper Ridge Industrial Park was anticipated by the JRBIPAP, the City's General Plan, and the City's Zoning. While the proposed redesignation of the project site from CS to MB/MBL would allow development for slightly different land uses than anticipated by the zoning and General Plan designations, development under the proposed MB/MBL designation would be provided protection by the Coalinga Police Department. Additionally, the rezone and redesignation would not allow for the development of residential housing units, which would alter the officer to resident ratio of the City. The City of Coalinga's General Plan EIR concluded that buildout of the General Plan could be served by adequate police protection services, and although the Juniper Ridge project would include a rezone and GPA, the changes the General Plan and City Zoning would not be anticipated to significantly increase the demand for police protection in the City beyond what was anticipated by the City's General Plan or General Plan EIR. Because the proposed Juniper Ridge project would not create new areas of growth within the City's planning area, the proposed Juniper Ridge project would not require the physical expansion or alteration of police protection facilities beyond what was anticipated by the General Plan. As such, the proposed Juniper Ridge project would have a *less-than-significant* impact related to police protection.

CMO Permanent Ordinance

The CMO Permanent Ordinance involves the conditional permitting of CMOs in compliance with Proposition 215, the Compassionate Use Act (approved by voters in 1996), Senate Bill 240, and the MMRSA, which was signed in 2015. The City of Coalinga recognizes, through the CMO Permanent Ordinance, that the previous approaches to medical marijuana in the State and City has led to significant health and safety consequences associated with procuring medical marijuana on the black market. The proposed CMO Permanent Ordinance would allow for the legal, permitted and regulated production of commercial marijuana and associated products within the City. However, given the continuing illegality of recreational marijuana, the CMO Permanent Ordinance has identified the need for the production of marijuana to be highly regulated to ensure that illegal activity would not be supported by the legal, permitted CMOs that would be allowed under the proposed CMO Permanent Ordinance. As such, the CMO Permanent Ordinance includes a plethora of requirements relating to employees, building security, documentation, and overall operations. Included in such regulations are strict requirements for background checks of potential employees, building security features such as camera systems and drive gates, 24-hour armed security patrols, and allowance of complete facility access to the Coalinga Police Department, among other regulations.

The Coalinga Police Department would be involved in the approval process of all future CMOs to ensure compliance with the CMO Permanent Ordinance and sufficient security. Because the Coalinga Police Department would be involved with future permitting processes under the CMO Permanent Ordinance for all new CMOs, the Coalinga Police Department would be able to assess the Department's ability to provide adequate police services on a case-by-case basis. As approvals occur on a case-by-case basis, the Coalinga Police Department anticipates the ability to hire one additional officer to handle any potential increase in workload. The costs of hiring a new officer would be partially off-set through payment of annual licensing fees by CMOs in the City. However, the requirements for building security features and 24-hour security patrols would be expected to maintain significant amounts of operational security responsibilities on the applicant and the CMO. Therefore, while the CMO Permanent Ordinance involves the cultivation of marijuana, the strict permit requirements prior to and during operations would ensure that demand on police protection by the CMOs would not be significantly greater than other uses approved for MB/MBL designated areas, which would not include such employee background checks or building security features.

If the applications under the proposed CMO Permanent Ordinance result in the need for a new officer to be hired by the Coalinga Police Department, this new officer could be accommodated by existing facilities, and the increased staffing cost would be off-set through the collection of licensing fees. Thus, although a new officer may be hired, the addition of one officer would not require the construction or physical expansion of any police facilities. As a result, the proposed CMO Permanent Ordinance would not increase the demand for police protection in a manner that would require new or physically expanded police facilities, and as such the CMO Permanent Ordinance would have a *less-than-significant* impact related to police protection.

Claremont Property Project

The Claremont Custody Center was previously operated with 500 inmates, which would have posed a significant safety concern for the Coalinga Police Department. Since the facility was closed, the City has been responsible for the property, which would have included Police protection services to deter vandalism and other threats to the facility. The Claremont Property Project would reuse the facility as a CMO, and leverage the existing security infrastructure to provide building security for the contained CMO. Additionally, OGE would employ multiple security personnel and work with the Coalinga Police Department in regards to any needed improvements to on-site security features. In addition to the project's location in a highly secure facility, the project would significantly reduce potential demand on the Coalinga Police Department by integrating existing and expanded security features in a similar manner as that discussed above. Because the Claremont Property Project would comply with all relevant state, local, and Coalinga Police Department regulations, the project would not be anticipated to increase the demand for police protection in such a manner that new or physically expanded police facilities would be required. As such, the Claremont Property Project would have a *less-than-significant* impact related to police protection.

c. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The proposed projects would involve MBL/MB development. Such development would not add students to the City's current population, and thus would not increase demand on the City's school system. Where development may occur, for instance at the Juniper Ridge project site, such future development would be required to pay development fees under Senate Bill 50. Because future developments would pay development fees, and would not lead to direct student population growth in the area, the project would have *no impact* related to schools in the area

d. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The proposed project involved development and site uses within MBL and MB designated areas. The City of Coalinga does not require industrial developments to pay impact fees as industrial development does not lead an increase in City residents who would require more park space under state regulations. However, the Coalinga-Huron Parks & Recreation District does require new industrial development to pay impact fees. The Claremont Property Project does not involve new development, and therefore would not be required to pay the Coalinga-Huron Parks & Recreation impact fee. Concurrently, any development related to future buildout of the Juniper Ridge Industrial Park or development related to the CMO Permanent Ordinance would be subject to park fees. However, because the proposed Juniper Ridge rezone and redesignation and the CMO Permanent Ordinance projects would not result in population growth, the proposed projects would not result in the need for new park facilities. Because the proposed projects would not require the construction of new park facilities, and future development related to the Juniper Ridge Industrial Park and CMO Permanent Ordinance would pay the required fees, the proposed project would have a *less-than-significant* impact related to public parks.

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| XV. RECREATION. | | | | |
| <i>Would the project:</i> | | | | |
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

a,b. Juniper Ridge Industrial Park

The proposed project involves the rezone and redesignation of the Juniper Ridge project site from CS to MB and MBL. The Coalinga-Huron Parks & Recreation District collects development impact fees based on the impacts to demand on parks that would result from land use developments. For instance, a residential development would generate more residents in an area, who would use existing recreation facilities or increase the demand for such facilities. Meanwhile a commercial development would not directly generate more residents; however, the increased economic activity may induce greater activity in the area, thus, resulting in a less severe impact on demand for recreation facilities. For development occurring in the City of Coalinga, an industrial development would be subject to a \$0.09 per sf Coalinga-Huron Parks & Recreation District Impact Fee. Because the proposed project involves redesignation of the project site from CS to MB and MBL, future development of the site for MB or MBL uses would be subject to the development fee. Payment of the development fee would defray any impacts caused by increased demand or deterioration of recreation facilities, but because the project would not add any new residents to the project area, the proposed project would be unlikely to require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Given the payment of development fees as a requirement of future development, the proposed project would have a *less-than-significant* impact related to the increased use of existing recreation facilities and the accelerated deterioration of recreation facilities.

CMO Permanent Ordinance

The CMO Permanent Ordinance involves conditionally allowed uses within areas designated and zoned MB or MBL. The Coalinga-Huron Parks & Recreation District assesses development fees on development projects to mitigate potential impacts due to increased use of existing parks and recreation facilities. Because the CMO Permanent Ordinance does not directly involve development, the ordinance would not be subject to Parks & Recreation development fees. Future development seeking approval of a CMO under the permanent ordinance would be subject to subsequent environmental review, which would require an

analysis of the need for development impacts on a project-specific basis. Because the proposed project would not result in development and subsequent projects undertaken under the CMO Permanent Ordinance would be subject to environmental review, the proposed project would result in a *less-than-significant* impact related to the increased use of existing recreation facilities and the accelerated deterioration of recreation facilities.

Claremont Property Project

The Claremont Property Project involves the reuse of an existing structure for a CMO. OGE would develop indoor cultivation and processing facilities, and may expand to other areas of the project site in the future. Such expanded CMO activity would be subject to a separate project-specific environmental review process, which would include the analysis of potential impacts on recreation facilities. Because the Claremont Property Project would involve the reuse of the Claremont facility, rather than the development of new facilities, the project would not be subject to Coalinga-Huron Parks & Recreation development fees. As such, the proposed project would result in a *less-than-significant* impact related to the increased use of existing recreation facilities and the accelerated deterioration of recreation facilities.

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

Discussion

a,b. Juniper Ridge Industrial Park

The Juniper Ridge project site is currently undeveloped vacant land, which was anticipated for commercial and industrial development by the JRBIPAP. The City of Coalinga has also anticipated development of the site through the General Plan and zoning designations of CS. The proposed project would include a rezone and redesignation of the Juniper Ridge project site to MBL and MB. The Circulation Element of the City of Coalinga’s General Plan indicates that future development within the City should seek to maintain a level of service (LOS) grade of “C” or better. LOS is a commonly used metric to qualitatively measure traffic operating conditions where a letter grade of “A” corresponds to low traffic volumes, with unimpeded vehicle flow while a grade of “F” corresponds to stop and go traffic with highly

impeded vehicle flow. Therefore, the proposed project would conflict with the applicable plan if the project would result in a deterioration of the LOS within the project vicinity to below C.

To determine the effect that the GPA and rezone could have on the LOS of the surrounding circulation network, the Institute of Traffic Engineer’s (ITE) *Trip Generation Handbook* was used to estimate the amount of traffic induced by development typical of a CS or a MB/MBL land use.¹² Because specific development plans do not yet exist for the site, general land use categories were used to estimate possible vehicle trip generation rates that could result from build out of the project site under the CS or MB/MBL land use. To that end, development of the project site under the current CS designation was assumed to be a shopping center, while the development under the proposed MB/MBL designations was assumed to be a business park.

It should be noted that the generation rate for business park was assumed, rather than for light industrial, as the trip generation rate for business park is higher than for light industrial. Accordingly, use of a business park trip generation rate provides for a conservative comparison by maximizing the estimated traffic generation associated with site development. Additionally, for a uniform comparison, the entire site was assumed to be built-out for the same use, either as one large shopping center or one large business park, and the land area of 405,100 sf was used for both scenarios. The results of the ITE trip generation estimates are presented below in Table 1.

| Land Use | Daily Trips | AM Peak Hour | PM Peak Hour |
|---|--------------------|---------------------|---------------------|
| Shopping Center | 17,298 | 389 | 1,503 |
| Business Park | 5,039 | 567 | 510 |
| Difference | -12,259 | +178 | -993 |
| <i>Source: Institute of Traffic Engineers. Trip Generation Handbook 9th Edition. Published 2012.</i> | | | |

As shown in Table 1 above, development of a business park, representative of development under the MB/MBL designation, instead of a CS designation, would result in an estimated 12,259 fewer trips per day. In addition to the reduction in total daily trips, the proposed project would also result in a 993 daily vehicle trip reduction during the PM peak traffic hour. However, because shopping centers typically become busier in the afternoon and evening, while employment areas like business parks typically induce morning commuter traffic, the proposed project would lead to a 178 trip increase during the AM peak traffic hour.

The City’s General Plan EIR indicates that under current buildout assumptions of the City’s planning area, the portion of Jayne Avenue (SR 33) from the City to the project site would operate at LOS C. Because the proposed project’s redesignation and rezone of the project site from CS to MB/MBL would reduce the total number of daily vehicle trips and PM peak hour trips, the proposed project would not be expected to cause the LOS on Jayne Avenue to deteriorate beyond what was anticipated by the General Plan EIR. Additionally, future development of the proposed project site would be subject to the Fresno Council of

¹² Institute of Traffic Engineers. *Trip Generation Handbook 9th Edition*. Published 2012.

Governments' Transportation Impact Fee, which assesses fees based on land-use types to help defray potential impacts to area congestion. The Transportation Impact Fee would be determined depending on the type of development proposed for the project site under the MB/MBL designation and zoning, and fee payment would be required as part of the development approval process of future site development under Section 8-1.A.01 of the City's Planning and Zoning Code. Therefore, the proposed project would not be considered to conflict with any applicable regulations regarding the effectiveness of the transportation system, and the proposed project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not directly involve development. Rather, the ordinance concerns the conditionally allowed uses within areas designated and zoned MB or MBL. CMOs involve employee trips, as well as goods delivery and distribution to a similar degree as many other approved MB or MBL land uses. As such, new CMOs would not be anticipated to generate a substantially different impact related to traffic than currently approved MB or MBL land uses. Additionally, because CMOs would be conditionally permitted uses, individual future CMO projects would be subject to project-specific environmental review, which would require analysis and appropriate mitigation, if necessary, of potential traffic impacts. Therefore, the proposed project does not directly involve changes in activities that would conflict with applicable plans related to performance of nearby circulation networks or that would conflict with an applicable congestion management plan, and a *less-than-significant* impact would occur.

Claremont Property Project

As discussed throughout this IS/MND the Claremont Custody Center previously operated with 100 employees and a maximum of 500 inmates. Such operations included vehicle trips for employees, inmate transfers, the transportation of goods and equipment, and visitation. The proposed project would use the same facility for 77,000 sf of indoor commercial marijuana cultivation, testing, and manufacturing. Such an operation would involve approximately 50 employees commuting to the site as well as the transportation of cultivation equipment/supplies, and the distribution of finished products by third party distributors.

The ITE's *Trip Generation Handbook* includes a trip generation rate for prisons, which would be generally similar to the past operation of the Claremont Custody Center. Using the prison trip generation rate and assuming that the operational area of the Claremont Custody Center was identical to the area proposed for use as a CMO, the associated daily trips during operation of the Claremont Custody Center are estimated to be 780. Given the relatively recent nature of the marijuana industry, the ITE does not currently publish a trip rate for CMOs; however, given that the proposed CMO would involve 50 employees commuting to work, assumptions could be made for the maximum amount of likely trips. If every employee at the CMO was to drive to work separately in single-passenger vehicles, employee commutes would result in 100 daily trips. In addition to the 100 daily commute trips, some employees would likely leave the facility and return during the workday (assume 50 additional trips for this analysis), and additional trips would be created by the movement of goods to and from the project site (conservatively assume 50 additional vehicle trips for this analysis), which would encompass single-passenger equivalents for any heavy-duty semi-

truck trips. Based on the aforementioned assumptions, the number of daily trips to the Claremont property during operation of a CMO are estimated to be approximately 200 daily vehicle trips. Because the project would result in 580 fewer daily trips than what has occurred on the project site during operation of the Claremont Custody Center, the proposed project would not be expected to conflict with applicable plans related to performance of nearby circulation networks, and thus the proposed project would be anticipated to result in a *less-than-significant* impact.

c. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The proposed project would not require any changes to existing regional air traffic activity. In addition, the nearest airport, the New Coalinga Municipal Airport, is located approximately two miles northeast of the Juniper Ridge project site and three miles from the Claremont Property Project site. Therefore, *no impact* would occur.

d, e. Juniper Ridge Industrial Park

The Juniper Ridge Industrial Park area was planned for development in the JRBIPAP, and during the planning stages for the site, a transportation system was planned and developed to service the development area. The proposed project involves a rezone and redesignation of the Juniper Ridge project site from CS to MB/MBL. The rezone and redesignation of the Juniper Ridge project site would not have a direct effect on the existing JRBIPAP circulation. Furthermore, the only circulation infrastructure needed to serve future development under the MB/MBL zoning and General Plan designation would be direct site access and parking. Such features would be unlikely to increase hazards or result in inadequate emergency access to the project site. Additionally, site access and parking would be required to comply with all applicable regulations within the City's Planning and Zoning Code, which would ensure that proper design considerations are given to emergency access. Finally, development of the project site would be subject to project-specific review by the City, which would include consideration of emergency access to the project site. The project-specific environmental review process would ensure that the project would not result in an increase in hazards or inadequate emergency access. Because the project site would not include major alterations to the existing circulation network, and the City would review any proposed development plans for the project site, the proposed project would result in a *less-than-significant* impact related to the creation of hazards or inadequate emergency access.

CMO Permanent Ordinance

The CMO Permanent Ordinance does not directly involve development. Rather, the CMO ordinance concerns the conditionally allowed uses within areas designated and zoned MB or MBL. As such, the CMO ordinance would not directly involve alterations to circulation networks or emergency access. Any future development projects involving applications for use permits under the CMO Permanent Ordinance would be subject to project-specific environmental review, which would require analysis of potential hazards or inadequate emergency access. Because the CMO Permanent Ordinance itself would not involve physical development, nor would the ordinance directly affect the City's circulation system or emergency access to any site in the City, the proposed project would result in a *less-than-significant* impact related to the creation of hazards or inadequate emergency access.

Claremont Property Project

The Claremont Facility was previously designed to allow for adequate emergency access and to avoid the creation of any hazards. Because the proposed Claremont Property Project would only involve interior renovations of the existing facilities, the proposed project would not result in the creation of hazards nor would the project result in inadequate emergency access. As such, the proposed Claremont Property Project would result in a *less-than-significant* related to the creation of hazards or inadequate emergency access.

f. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

The proposed projects would not result in the physical alteration of the existing circulation infrastructure in the City of Coalinga. The City has not formally adopted any plans or programs addressing public transit, pedestrian, or bicycle facilities. However, the City's General Plan includes goals and policies that encourage a safe and efficient circulation system that includes alternative means of transportation. Because the proposed projects would not involve the direct alteration of the City's circulation, transit, pedestrian, or bicycle systems or infrastructure, the proposed projects would not be expected to result in a decrease in performance or safety of any such infrastructure. Therefore, the proposed projects would have a *less-than-significant* impact on alternative transportation.

Commercial Marijuana Permanent Ordinance, Juniper Ridge Industrial Park City-Initiated Rezone and General Plan Amendment, and the Claremont Property Project Initial Study/Mitigated Negative Declaration

| Issues | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|--------|--------------------------------|--|------------------------------|-----------|
|--------|--------------------------------|--|------------------------------|-----------|

XVII. UTILITIES AND SERVICE SYSTEMS.

Would the project:

| | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g. Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

a, b, e. Juniper Ridge Industrial Park

Buildout of the Juniper Ridge Industrial Park has been anticipated by the City of Coalinga General Plan and the JRBIPAP. The proposed project includes the redesignation and rezone of the Juniper Ridge Project site from CS to MB/MBL. While the rezone and GPA would allow for slightly different land uses to be developed on the project site, the overall scale and intensity of site development would remain generally similar. Unlike rezoning or designating the site for heavy industrial or traditional agricultural uses, which may create large amounts of wastewater, the light manufacturing and business centered uses of MB/MBL would likely

generate wastewater to a similar degree as the currently allowed CS land uses. Because the allowable development of the site would produce generally similar amounts of wastewater as compared to buildout under the CS designation, future development would not be expected to exceed the wastewater treatment demand that would have been assumed for General Plan buildout of the site. As such, the proposed rezone and GPA would not be anticipated to exceed wastewater treatment requirements, or capacity, thereby necessitating the need for new or expanded wastewater treatment facilities, and the proposed Juniper Ridge Project would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The proposed CMO Permanent Ordinance would allow new conditional uses within areas designated as MB/MBL, but would not directly involve new development. Permitted CMOs would occur in previously developed structures, which would already be generating wastewater, or in areas anticipated by the General Plan for future development. Because CMOs would be conditionally permitted uses under the proposed CMO Permanent Ordinance, CMOs would be subject to project-specific-environmental review prior to approval of the individual projects. Such environmental review would include consideration of General Plan policy PFS8-2, which directs that any development may only be permitted if adequate wastewater utility service exists. Therefore, wastewater capacity and impacts related to the induced need for the construction of new wastewater infrastructure would be analyzed on a project-specific basis. Because the proposed CMO Permanent Ordinance would not result directly in the creation or discharge of wastewater, and future development under the CMO Permanent Ordinance would be subject to project-specific environmental review, which would ensure adequate wastewater utility service exists, the proposed project would not be anticipated to exceed wastewater treatment requirements, or capacity, thereby necessitating the need for new or expanded wastewater treatment facilities, and the proposed CMO Permanent Ordinance would result in a *less-than-significant* impact.

Claremont Property Project

The Claremont Custody Center previously operated with 500 inmates and 100 employees, which had an associated water demand of approximately 7,075 gallons per day.¹³ As discussed in further detail in question “d.” of this section, the proposed project would result in an approximately 75 percent reduction in water demand. The reduced water demand would translate to reduced wastewater generation, as wastewater is generated from used water. Additionally, 50 employees are anticipated to work on site as opposed to the 100 employees that previously worked on site. Thus, the amount of wastewater generated by humans would be reduced as a result of the proposed project. Because wastewater generation would be reduced from previous operations, the existing wastewater infrastructure would have sufficient capacity to accommodate the wastewater generation associated with the proposed Claremont Property Project. As such, the proposed project would not be anticipated to exceed wastewater treatment requirements, or capacity, thereby necessitating the need for new or expanded wastewater treatment facilities, and a *less-than-significant* impact would result.

¹³ City of Coalinga. *Claremont Custody Center Operations*. Data on file at City.

c. Juniper Ridge Industrial Park

Development of the entire Juniper Ridge Industrial Park was planned by the JRBIPAP. The JRBIPAP anticipated that the project area would be built out for MB/MBL land uses, which would include the construction of impervious surfaces such as pavement and buildings. Such impervious surfaces would increase the amount of stormwater runoff created on the project site. The JRBIPAP planned for such runoff through the design of stormwater infrastructure to accommodate site buildout and the construction of a drainage basin hydraulically sized to accommodate runoff from the entire project area. The proposed rezone and GPA would establish consistency between the JRBIPAP's anticipated buildout and the General Plan and zoning designations for the project site. Rezoning and redesignating the Juniper Ridge Project site from CS to MBL/MB would not change the area of planned disturbance or increase the amount of impervious surfaces anticipated for buildout of the project site. Rather, development of the project site as MBL/MB was anticipated by the JRBIPAP, and the drainage basin was designed accordingly to accommodate future runoff from site buildout. Because the proposed Juniper Ridge Project would not change the area of disturbance or the amount of anticipated impervious surfaces planned for the site, and adequate capacity would be available in the drainage basin designed per the JRBIPAP, the proposed rezone and redesignation would not require the construction of new or expanded storm drainage infrastructure. Therefore, a *less-than-significant* impact would result.

CMO Permanent Ordinance

The proposed CMO Permanent Ordinance does not directly involve development, which would lead to the creation of stormwater runoff. Rather, the proposed CMO Permanent Ordinance would involve new permitted uses for areas designated as MB/MBL. If the CMO Permanent Ordinance is adopted, applications for CMOs within previously developed areas may be filed. Operations occurring within existing structures would not involve any changes to stormwater drainage or runoff that would require the construction of new or expanded infrastructure. Additionally, if applications are filed for CMOs that would require the construction of new structures, such structures would be built in areas already designated or zoned as MB/MBL, which, given their land use designations, would have been anticipated for development by the City's General Plan and analyzed in the City's General Plan EIR. The General Plan EIR concluded that application of General Plan policies and implementation measures PFS8-1, PFS8-2, S2-3, and S3-1, would ensure that General Plan buildout would not exceed the capacity of existing or planned stormwater drainage systems. Because the CMO Permanent Ordinance would allow new uses in previously developed areas, which would not alter stormwater drainage, or may indirectly lead to development in areas planned for development by the City's General Plan, the proposed project would not lead to development in excess of what was anticipated by the City's General Plan, that could therefore require new or expanded stormwater drainage infrastructure not previously anticipated. In addition, the application process for a CMO CUP and RP would require subsequent project-specific environmental review under CEQA. The project-specific environmental review would ensure compliance with the aforementioned General Plan polices. As such the proposed CMO Permanent Ordinance would not require new or expanded stormwater infrastructure and a *less-than-significant* impact would result.

Claremont Property Project

The Claremont property was previously developed for operation of the Claremont Custody Center, and, thus, drainage infrastructure currently exists on the project site. The reuse of the project site for a CMO would involve renovations to the interior of the facility; however, changes to the exterior of the facility that could increase stormwater runoff associated with the project site are not currently proposed. Because the proposed Claremont Property Project would not alter the amount of stormwater runoff associated with the project site, the proposed Claremont Property Project would not require new or expanded stormwater infrastructure, and a *less-than-significant* impact would result.

d. Juniper Ridge Industrial Park

The Juniper Ridge Industrial Park was anticipated for development by the JRBIPAP, the City's General Plan, and the City's Zoning. The proposed rezone and GPA would establish consistency between the JRBIPAP, the City's General Plan, and the City's Zoning. Although the types of land uses allowed under the CS and MB/MBL designations differ, the general intensity of land use would be comparable. Additionally, the business-oriented and light manufacturing land uses permitted under the proposed MB/MBL designations would likely create similar water demand as the retail and commercial developments what would be expected for development under the existing CS designations. Because development under the proposed MB/MBL designations would result in similar water use patterns as development under the current CS designation, future buildout of the site after the proposed rezone and GPA would not result in a drastic increase in water demand from what has been anticipated for the project site. The Juniper Ridge Project would not require new or expanded water resources or entitlements, and thus would result in a *less-than-significant* impact.

CMO Permanent Ordinance

The CMO Permanent Ordinance would not directly involve water use. Instead, the CMO Permanent Ordinance would involve conditionally approved uses within areas already designated for development under the MB/MBL designations. Although marijuana cultivation is an agricultural process, the indoor cultivation of marijuana allows for the strict control of water usage and precision application of irrigation water. Therefore, CMOs would not be expected to generate water demand in excess of what would be anticipated for currently approved light industrial or manufacturing processes. Additionally, because CMOs would be conditionally approved under the CMO Permanent Ordinance, CMOs would be subject to project-specific environmental review. The project-specific environmental review would include analysis of consistency with General Plan policies, specifically, PFS8-2, which requires that any development may only be permitted if adequate utility service exists, and PFS8-3, which requires reductions in per capita water consumption. Compliance with the aforementioned General Plan policies would ensure adequate water supply exists to serve the future CMOs, and would encourage water conservation in permitted CMOs. As such, future CMOs permitted under the CMO Permanent Ordinance would be served by adequate water supplies given the application of relevant General Plan policies, and new or expanded water entitlements would not be necessary. Therefore, the proposed project would result in a *less-than-significant* impact related to water supply.

Claremont Property Project

Previous operation of the Claremont facility as the Claremont Custody Center required 7,075 gallons of water per day to serve the 500 inmates and 100 employees. OGE's plans include 3,520 plants using 0.5-gallon of water per day per plant, with 50 percent of the water being reclaimed. As such, OGE anticipates that the proposed cultivation activity would require 880 gallons per day of water. OGE further expected that employee requirements, such as restroom use and drinking water, and cleaning would require an equivalent amount, bringing the total operational water demand to 1,760 gallons per day. The demand associated with previous operations of 7,075 gallons per day was met by existing water supplies. Given that the proposed Claremont Property Project would reduce water demand by 5,315 gallons per day, adequate water supply exists to accommodate the proposed project (see Attachment). Therefore, the proposed Claremont Property Project would not require new or expanded water entitlements, and a *less-than-significant* impact would result.

f.g. Juniper Ridge Industrial Park, CMO Permanent Ordinance, and Claremont Property Project

Solid waste collection in the City of Coalinga is provided by Mid Valley Disposal. Once collected, solid waste is transported to the Coalinga Disposal Site. The Coalinga Disposal Site is operated by Fresno County, and has a maximum daily permitted capacity of 100 tons per day. Currently, the landfill receives approximately 50 tons per day and is anticipated to be capable of serving the region for the next 28 to 33 years. Given the remaining daily capacity of the Coalinga Disposal Site, the City of Coalinga has adequate solid waste capacity to accommodate the proposed projects. Additionally, any solid waste generated by the proposed projects would be subject to all relevant requirements for construction and operational waste diversion and disposal. As such, the proposed projects would have a *less-than-significant* impact related to solid waste.

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

Discussion

a. Juniper Ridge Industrial Park and CMO Permanent Ordinance

Although unlikely, the possibility exists that the project sites may contain special-status species and/or serve as foraging habitat for such species. This IS/MND includes mitigation measures that would reduce any potential impacts to a less-than-significant level. Furthermore, mitigation measures are included within this IS/MND to ensure that implementation of the proposed project would not eliminate important examples of California’s history or prehistory. Therefore, the proposed rezone and redesignation of the project site and the proposed CMO Permanent Ordinance would have a *less-than-significant* impact to special-status species, sensitive natural communities, and/or California’s history.

Claremont Property Project

The proposed Claremont Property Project would involve the reuse of an existing facility. Currently, plans to use the Claremont property for CMO activity outside of the existing structures has not been submitted, and any potential expansion of the

currently proposed CMO activities would be subject to future project-specific environmental analyses. Because the Claremont Property Project does not include any plans to alter the exterior of the facility, and any potential future plans for expanded CMO activities would be analyzed separately, the proposed Claremont Property Project would result in *no impact* related to special-status species, sensitive natural communities, and/or California's history.

b. Juniper Ridge Industrial Park and CMO Permanent Ordinance

Development that converts rural areas to urban/suburban uses may be regarded as achieving short-term goals to the disadvantage of long-term environmental goals. However, the inevitable impacts resulting from population and economic growth are mitigated by long-range planning to establish policies, programs, and measures for the efficient and economical use of resources. Long-term environmental goals, both broad and specific, have been addressed previously in several regulatory documents, such as the City's General Plan and General Plan EIR. As discussed throughout this document, the rezone and GPA of the Juniper Ridge Project site would establish consistency with the City's General Plan, Planning and Zoning Code, and the JRBIPAP. Additionally, future development related to buildout of the Juniper Ridge Project site or development indirectly induced by the CMO Permanent Ordinance would be required to undergo project-specific environmental review and comply with all relevant General Plan goals, policies, implementation measures, and sections of the Planning and Zoning Code. In addition, the project does not involve any direct development. Therefore, the impact is *less than significant*.

Claremont Property Project

The proposed Claremont Property Project would reuse an existing facility for a CMO. Reusing the Claremont facility would avoid the need for development of vacant land elsewhere, which could create significant environmental impacts. Therefore, the reuse of the Claremont facility would not have impacts that are individually limited but cumulatively considerable, and the proposed Claremont Property Project would result in a *less-than-significant* impact.

c. Juniper Ridge Industrial Park

The Juniper Ridge Industrial Park was anticipated for development by the JRBIPAP, the City's General Plan, and the City's Planning and Zoning Code. The project site is not known to pose significant threats to human health or well-being, and the proposed rezone and GPA of the project site would not allow for development that could pose significant threats to human health. In addition, future development of the site would be designed in accordance with all applicable building standards and codes to ensure adequate safety is provided for the future residents of the proposed project. Therefore, impacts related to environmental effects that could cause adverse effects on human beings would be *less than significant*.

CMO Permanent Ordinance, and Claremont Property Project

Substantial adverse effects on human beings are not anticipated with approval of the CMO Permanent Ordinance or the Claremont Property Project. Both projects would involve strict oversight by the Community Development Department, as well as the Coalinga Fire Department, and the Coalinga Police Department. Such oversight would ensure that future CMOs and the reuse of the Claremont Property would not result in significant adverse effects on human beings, and, thus, the proposed projects would result in a *less-than-significant* impact.

Appendix

Ocean Grown Extract, LLC.
Claremont Property Project
Operation Plan

Ocean Grown Extract, LLC. Claremont Property Project Operation Plan
August 2016

I. Project Overview

- Ocean Grown Extracts is in contract to acquire the Claremont Custody Center (77K Square Feet for Indoor Cultivation and additional ~20 acres for potential outdoor cultivation over time)
- Ocean Grown plans to leverage the exiting security of the building and build out the facility in phases
- OGE plans on hiring ~50 employees from the local Coalinga area to support our immediate operational needs

II. Introduction to Ocean Grown Extracts

- Ocean Grown Extracts (OGE) is a premium medical cannabis brand from CA with experience in Washington State focused on the rapidly expanding medicinal cannabis extract market
- Above all, we prioritize safety, legality and ethics are looking to base our California operation in a forward-thinking municipality like Coalinga that shares our values
- We have developed a reputation for high-quality, strict adherence to consistent process and premium branding
- Our team is comprised of experienced professionals who are experts in their functional areas

III. Legal Information

- Ocean Grown Extracts was incorporated in CA in 2015 as a California Co-Op

IV. Intended Uses of Facilities

- Ocean Grown Extracts intends to perform the following business-to-business functions within the medical cannabis supply chain:
 - Cultivation & Processing –
 - Cannabis can be grown indoors in a soil-like medium under artificial light, adding fertilizer when the plants are given water. Cultivating cannabis indoors allows the cultivator complete control over the growing environment. Plants of any type can be grown faster indoors than out due to 24-hour light, additional atmospheric CO₂, and controlled humidity, which allows freer CO₂ respiration.
 - To grow plants indoors, a growing medium (e.g. soil or growing substrate), water, nutrients, light and air need to be supplied to the plant (with the exception of aeroponic cultivation, in which case a growing medium is not required).
 - Extraction/Testing
 - The extraction process kills bacteria, mold and fungi present in the vegetable material it is extracted from, making it a safer medical use product than black market cannabis

- Extracts provide a way to create a standardized medicinal product, which leads to consistent and repeatable medical experiences.
- Packaging
 - This is the act of placing finished goods into transportation and retail packaging
 - Ocean Grown Extracts has invested considerable time and effort create well-designed branding and packaging consistent with our high-quality product
- Distribution
 - Delivery of finished goods to 3rd party distribution company who will deliver to dispensaries
 - We have no intention to act as a retailer/dispensary

V. Staffing Overview

- Current Team - The OGE team currently consists of functional experts in the following areas:
 - Co-Founder and CEO – Casey Dalton
 - Co-Founder and Head of Product Development – Kelly Dalton
 - CFO – Outside CPA and Advisors
 - COO – Operations and IT
 - Business Development
 - Marketing & Design
 - Legal Team
 - Intellectual Property
 - Real Estate
 - Corporate Law
- Planned Hires – Over the next 3 months, OGE plans to hire approximately 50 individuals across the following functions
 - Cultivation Operator
 - Extraction Operator
 - Packagers
 - Operations Supervisor
 - Facilities Management/Site Engineer
 - Security
 - Senior Scientist
 - Junior Scientist
 - Lab Operations
 - Admin Staff

▪ Detail on Expected Hiring Effort

| Job Roles | Annual | Year 1 | Year 2 | Year 3 | Year 1 | Year 2 | Year 3 | 3 Year Period |
|--|------------------|------------|-----------|------------|--------------------|--------------------|--------------------|---------------------|
| Lab Operations - (~5k square feet) | Salary | Qty | | | Salaries | | | |
| General Manager | \$115,000 | 1 | 1 | 1 | \$115,000 | \$117,300 | \$120,750 | \$353,050 |
| Scientific Director | \$105,000 | 1 | 1 | 1 | \$105,000 | \$107,100 | \$110,250 | \$322,350 |
| Senior Scientist | \$80,000 | 1 | 2 | 2 | \$80,000 | \$163,200 | \$168,000 | \$411,200 |
| Junior Scientist | \$70,000 | 2 | 3 | 4 | \$140,000 | \$214,200 | \$294,000 | \$648,200 |
| Senior Admin Staff | \$60,000 | 1 | 1 | 1 | \$60,000 | \$61,200 | \$63,000 | \$184,200 |
| Admin Staff | \$50,000 | 1 | 2 | 3 | \$50,000 | \$102,000 | \$157,500 | \$309,500 |
| Operator | \$60,000 | 6 | 12 | 16 | \$360,000 | \$734,400 | \$1,008,000 | \$2,102,400 |
| Packaging | \$40,000 | 10 | 12 | 16 | \$400,000 | \$489,600 | \$672,000 | \$1,561,600 |
| | \$580,000 | 23 | 34 | 44 | \$1,310,000 | \$1,989,000 | \$2,593,500 | \$5,892,500 |
| Ocean Grown (~20k Square feet) | | | | | | | | |
| General Manager | \$115,000 | 1 | 1 | 1 | \$115,000 | \$117,300 | \$120,750 | \$353,050 |
| Head of Operations | \$85,000 | 1 | 1 | 1 | \$85,000 | \$86,700 | \$89,250 | \$260,950 |
| Operations Supervisor | \$65,000 | 2 | 3 | 4 | \$130,000 | \$198,900 | \$273,000 | \$601,900 |
| Packaging | \$40,000 | 4 | 6 | 8 | \$160,000 | \$244,800 | \$336,000 | \$740,800 |
| Cultivation Operators (Trimmers/Potters) | \$35,000 | 10 | 12 | 16 | \$350,000 | \$428,400 | \$588,000 | \$1,366,400 |
| Extraction Operators | \$35,000 | 2 | 4 | 6 | \$70,000 | \$142,800 | \$220,500 | \$433,300 |
| Facilities Manager | \$95,000 | 1 | 1 | 1 | \$95,000 | \$96,900 | \$99,750 | \$291,650 |
| Drivers | \$75,000 | 2 | 3 | 4 | \$150,000 | \$229,500 | \$315,000 | \$694,500 |
| Security Lead | \$75,000 | 1 | 1 | 1 | \$75,000 | \$76,500 | \$78,750 | \$230,250 |
| Janitorial | \$30,000 | 4 | 6 | 8 | \$120,000 | \$183,600 | \$252,000 | \$555,600 |
| Daily Cleaning/Rubbish | \$30,000 | 1 | 2 | 2 | \$30,000 | \$61,200 | \$63,000 | \$154,200 |
| Security | \$35,000 | 2 | 3 | 4 | \$70,000 | \$107,100 | \$147,000 | \$324,100 |
| Engineer/Maintenance | \$65,000 | 1 | 2 | 3 | \$65,000 | \$132,600 | \$204,750 | \$402,350 |
| | \$780,000 | 32 | 45 | 59 | \$1,515,000 | \$2,106,300 | \$2,787,750 | \$6,409,050 |
| * excludes build-out costs (using local contractors) | | | | | | | | |
| Total Jobs Required & Related Salaries | | 55 | 79 | 103 | \$2,825,000 | \$4,095,300 | \$5,381,250 | \$12,301,550 |

VI. Proposed Project Phasing

- Phase I – Initial Build out of Manufacturing Facility
 - ~2,000 square feet for processing and packaging operation
- Phase II – Initial Build out of 37,000 square feet
 - 22,000 cultivation
 - 10,000 cultivation
 - 5,000 – manufacturing and processing
- Phase III – To Be Determined

VII. Environmental Stewardship

- Water - OGE will consume 25-33% the water of CCC at full occupancy (prison)
 - Claremont Usage from May-August 2010 was 849k gallons (7,075 per day)
 - OGE projects 1,760 gallons per day based on following assumptions
 - 16 lights per room X 44 rooms x 80 plants per room = 3520 plants (22k sq. feet)
 - 3520 plants X 0.5 Gallons/Plant/Day = 1760 Gallons/Day X 50% reclaimed water
 - Assume an equivalent amount for employee water requirements & cleaning
- Electricity - OGE projects usage of 20 kWh less than 1 Megawatt per month
- Solid waste
 - Composting
 - Recycling

Overall Processing Flow

The facility will convert clients' bulk cannabis plant material into high purity cannabis oil extract and other formulations in exchange for a service fee. The active ingredient will be extracted, activated, purified, refined, and packaged within the facility.

| Function | Description | Hazardous Materials | Engineering Controls |
|---|---|---|---|
| Intake | Cannabis plant material is unloaded, labeled, inventoried, and entered into tracking database. | n/a | n/a |
| Grind | Cannabis plant material is dried, then ground into coarse particles for storage and extraction. | n/a | Particulate filter in room or in exhaust ducting |
| Extraction (Hydrocarbon) | Ground plant material undergoes the extraction process with liquid n-butane as the solvent. Equipment is run at modest pressure (under 75 psi) and temperature (under 40°C and 98%+ of the charged solvent is recovered). | n-butane (100 lbs) | -Hydrocarbon Sensor wired to sight & sound alarm -High ventilation rate -Fire-rated construction |
| Extraction (Supercritical CO ₂) | Ground plant material extracted with nonflammable high purity CO ₂ in its supercritical state. Closed loop extraction recovers majority of charged CO ₂ . | Gaseous CO ₂ (500 lbs) | -CO ₂ monitors -Increased ventilation |
| Decarboxylation | THC-A converted to psychoactive THC by thermal conversion under vacuum. Process releases small amounts of CO ₂ as it is released from the THC-A. | n/a | Odor control with activated carbon filter in exhaust ducting |
| Clarification | Lipids removed from crude THC extract by using precipitation from ethanol under cryogenic temperatures. 99.9%+ ethanol used in this process is recovered in a closed-loop recovery. | Ethanol (20 gallons) | n/a |
| Refinement | High temperature refinement of THC to its purest form. No solvents are used here. | n/a | n/a |
| Infusion | Terpene infusion blends are comprised of combustible liquids with moderately high flash points. These blends are mixed with the pure THC oil to produce infused blends with beneficial properties and taste. | Combustible Liquids (500 lbs) Flammable Liquids (80 lbs) | Odor control with activated carbon filter in exhaust ducting. HazMats stored in safety cabinet and dispensed in a fume hood. |
| Packaging | Finished oils are filled into their final containers and packaged for final point of sale. | n/a | n/a |

| | | | |
|-----------------------|--|--|----------------------------------|
| Finished Products | Storage of finished products after final packaging – awaiting pickup from client. | n/a | n/a |
| Cleaning | Glass, stainless steel, and HDPE is cleaned using hot water and sterilization baths. Isopropanol is used on oils throughout the facility. | Isopropanol throughout the facility | |
| Analytical Laboratory | Samples are tested for potency, microbiological contamination, and terpenoid profile. Testing instrumentation requires standard laboratory solvents. All dispensing is done in a fume hood and all storage will be in flammables storage cabinets. | Isopropanol (10 gallons) Methanol (5 gallons) Formic Acid (1 gallon) Ethyl Acetate (10 gallons) Acetone (10 gallons) Acetonitrile (1 gallon) Dimethyl Sulfoxide (1 gallon) | Fume hood with hazardous exhaust |