

City of
SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

ENVIRONMENTAL PLANNING
SERVICES

300 Richards Boulevard
Third Floor
Sacramento, CA 95811

MITIGATED NEGATIVE DECLARATION

The City of Sacramento, California, a municipal corporation, does hereby prepare, declare, and publish this Negative Declaration for the following described project:

We Grow California Cannabis Campus Project (P17-020) - The proposed project, located at 8280 Elder Creek Road within the city limits of the City of Sacramento, Sacramento County. Property in the general vicinity of the project site is dominated by industrial and light-industrial uses. The proposed project consists of the construction and operation of a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary on a former industrial site in the City of Sacramento.

The Lead Agency is the City of Sacramento. The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that there is no substantial evidence that the project, as identified in the attached Initial Study, will have a significant effect on the environment. This Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. An Environmental Impact Report is not required pursuant to the Environmental Quality Act of 1970 (Sections 21000, et seq., Public Resources Code of the State of California).

This Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Sections 15000 et seq. of the California Code of Regulations), the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento, and the Sacramento City Code.

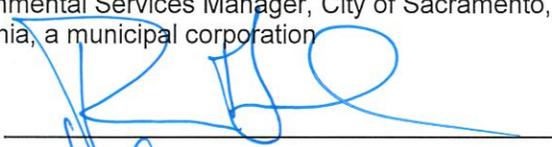
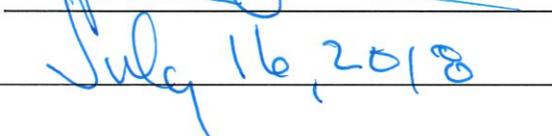
A copy of this document and all supportive documentation may be reviewed or obtained at the City of Sacramento, Community Development Department, 300 Richards Boulevard, 3rd Floor, Sacramento, CA 95811 from 9:00 a.m. to 4:00 p.m. (or 8:00 a.m. to 5:00 p.m. with prior arrangement). The document is also available on the CDD website at:

<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>

Environmental Services Manager, City of Sacramento,
California, a municipal corporation

By: _____

Date: _____



**Initial Study/Mitigated Negative Declaration
We Grow California Cannabis Campus Project (P17-020)**

Prepared for:

**City of Sacramento
Community Development Department
Environmental Planning Services**
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JULY 2018

We Grow California Cannabis Campus Project

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1 INTRODUCTION

1.1 Project Overview

The We Grow California Cannabis Campus project (proposed project) consists of the construction and operation of a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary on a former industrial site in the City of Sacramento (City).

1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) exempt, CEQA is applicable to any discretionary project that must be approved by a public serves as the foundation for environmental law and policy in California. CEQA emphasizes the need for public disclosure and identifying and preventing environmental damage associated with proposed projects. Unless the project is deemed categorically exempt. This project does not fall under any of the statutory or categorical exemptions listed in the 2016 CEQA Statute and Guidelines (California Public Resources Code, Section 21000 et seq.; 14 California Code of Regulations (CCR) 15000 et seq.), and, therefore, must meet CEQA requirements.

1.3 Project Planning Setting

The proposed project site is located at 8280 Elder Creek Road within the city limits of the City of Sacramento. Property in the general vicinity of the project site is dominated by industrial and light-industrial uses.

The project site is located within the geographic limits of the Power Inn Alliance (PIA), a property-based business improvement district (PBID), created in 2006 to “Advocate for business, transportation and community.” The PIA is located in the southeastern quadrant of the city and is home to over 10,000 businesses.

City of Sacramento 2035 General Plan

The City’s 2035 General Plan (General Plan) was adopted on March 3, 2015. The 2035 General Plan includes policy guidelines to guide future development in the City and provide for the protection of the City’s resources. The project is consistent with the underlying land use designation and zoning in the City’s 2035 General Plan.

City of Sacramento 2035 Master EIR

The City’s Master EIR (MEIR), certified in March 2015, is intended to streamline the later environmental review of projects or approval included within the project, plan or program analyzed in the MEIR. Subsequent projects that are consistent with the City’s 2035 General Plan and that have been considered in the analysis contained in the MEIR will not, in most cases, require extensive additional environmental review before they can be approved. In many cases

We Grow California Cannabis Campus Project

an Initial Study can be prepared for such projects to document their consistency with the general plan and MEIR, and to identify project-specific significant impacts that were not considered in the MEIR, if any, after which a finding of conformance can be made. Other projects that are within the scope of the MEIR, but whose effects were not analyzed in the MEIR would be addressed in an appropriate follow-up CEQA document. The proposed project, while not specifically identified as a future project in the MEIR, is proposing a use that is consistent with the underlying land use designation and zoning and would not require a general plan amendment or rezone. Therefore, City staff has determined the project is consistent with the MEIR and will be evaluated using the City's Initial Study checklist.

City of Sacramento Cannabis Ordinance

In response to the legalization of adult-use cannabis, the City of Sacramento adopted three separate ordinances that allow the cultivation, manufacturing, distribution, and retail sale of cannabis and cannabis products. Title 5, Chapter 5.150 of the City Code, regulates cannabis businesses consistent with state law and required city permits; Title 8, Chapter 8.132 oversees the cultivation of cannabis; and Title 17, Chapters 17.228.900, 17.228.910 and 17.228.920 regulate the location for cannabis manufacturing, distribution, testing, cultivation and sales (dispensary). In late May 2018, the City adopted an ordinance amending Chapter 17.228.900 of the City Code to limit cannabis cultivation and distribution to no more than 2.5 million square feet in the Power Inn Alliance Business Improvement District to address an undue concentration of cannabis production in this area of the City.

1.4 Public and Agency Review

The City will issue a Notice of Availability/Notice of Intent to Approve (NOA/NOI) for this initial study. The notice will provide dates for submitting written comments regarding the initial study along with information regarding upcoming hearings. This Initial Study and the NOA/NOI are available for review on the City's website at <http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports> and at the public counter at the City of Sacramento, Community Development Department, Environmental Planning Services, 300 Richards Blvd, Third Floor, Sacramento, California 95811.

Questions regarding this Initial Study may be submitted to:

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Community Development Department, Environmental Planning Services
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We Grow California Cannabis Campus Project

2 PROJECT DESCRIPTION

The We Grow California Cannabis Campus project (proposed project) consists of the construction and operation of a 266,394 square foot facility consisting of two rehabilitated existing buildings and three newly constructed state-of-the-art Mixed Light Cultivation Facilities (MLCF) that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only (non-storefront) dispensary.

As of January 1, 2018, the State of California legalized adult use and purchase of cannabis for recreation (Medical and Adult Use Cannabis Regulation and Safety Act (SB 94)). Medical use of cannabis has been legal in the state since 1996. Legislation legalizing medical and adult use cannabis requires both state and local licensing and was purposefully designed to ensure that each jurisdiction could, if it so chooses, create a permitting system appropriate for their community. Under both state and local law, cannabis businesses may only do business with other legally licensed businesses. To ensure this practice and to avoid diversion of cannabis to the illicit market, a ‘seed to sale’ Track and Trace system is required at every step in the cultivation, manufacturing and distribution of cannabis products. Each plant and product is designed with a unique identifier which is electronically traced as the product is moved by licensed distributors from cultivation to manufacturing, processing or retail outlets.

In response to the legalization of adult-use cannabis, the City of Sacramento adopted ordinances (Title 5, Chapter 5.150, Title 8, Chapter 8.132, Title 17, Chapter 17.228) that allow the cultivation, manufacturing, distribution, and retail sale of cannabis and cannabis products.

In compliance with SB 94, the City has a robust application process for both a Conditional Use Permit (CUP) and a Business Operations Permit (BOP). The application process includes requirements to provide the following:

- Security Plan meeting State requirements as well as those of the Sacramento Police Department.
- Neighborhood Responsibility Plan which includes the voluntary contribution of 1% of gross receipts to offset any unforeseen consequences of cannabis businesses in the City of Sacramento (included as Appendix A).
- Community Relations Plan identifying a Community Liaison who is available to respond to neighbors and City staff 24 hours per day (included as Appendix B).
- Odor Control Plan to ensure no odors emanate from the interior of the facility to the outside environment (included as Appendix C).

We Grow California Cannabis Campus Project

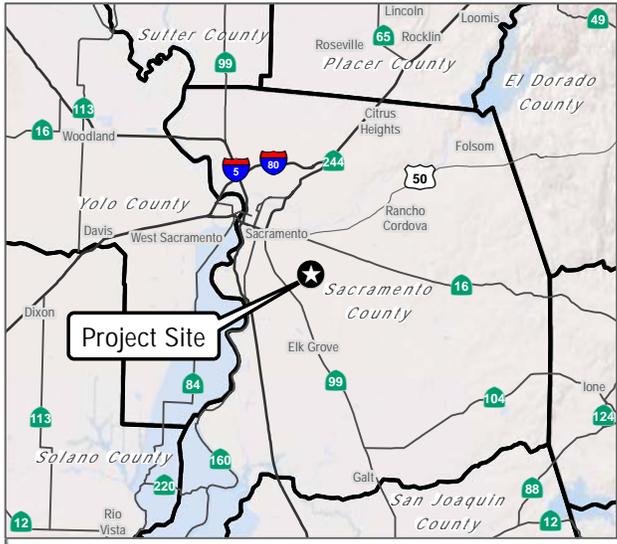
- Energy Efficiency Plan that includes efforts to reduce energy use and resulting greenhouse gas emissions designed in coordination with the Sacramento Municipal Utility District (SMUD) (included as Appendix D).
- Water Efficiency Plan that includes efforts to minimize water use, eliminate runoff and ensure minimal use (included as Appendix E).
- Wastewater Plan to ensure no nutrients or pollutants are released into the City's wastewater system (included as Appendix E).
- Hazardous Spill Plan to address the use, storage and disposal of fertilizers and other chemicals (included as Appendix F).
- Business Operations Plan that includes: cash handling, transportation of cannabis product, technology for inventory controls (Track and Trace), financial management, price lists, management structure, tax compliance, insurance certificates, state licenses and other details related to the operation of the cannabis business.

2.1 Project Location

The project site is located at 8280 Elder Creek Road in the southeast portion of the City of Sacramento (City), as shown on Figure 1, Regional Location. The project site is situated just to the east of the intersection of Power Inn Road and Elder Creek Road (see Figure 2, Project Location).

The 11.36-acre project site includes the following Assessor Parcel numbers (APNs) 064-0010-028, 064-0010-053.

The closest elementary school to the project site is Elder Creek Elementary School, located approximately 0.7 mile to the northwest. The closest middle school, Will C. Wood Middle School is located 1.7 miles northwest of the project site. The closest high school, Cristo Rey High School, is located 1.8 miles also to the northwest of the project site. There are several neighborhood parks located within the residential area to the west of the project site. The nearest parks, Danny Nunn Park and Sim Park, are located approximately 0.7 mile from the site. The closest residential development is located approximately 0.5 mile west of the project site.



 Project Boundary

SOURCE: Bing Maps 2018; Sacramento County 2018

FIGURE 1
Regional Location

We Grow California Cannabis Campus Project

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SOURCE: Bing Maps 2018; Sacramento County 2018

FIGURE 2
Project Site

We Grow California Cannabis Campus Project

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2.2 Project Setting and Surrounding Land Uses

Existing uses on the project site include two metal buildings that were constructed in 1969 and total 57,200 square feet (sf). These buildings were previously used for automotive repair and storage, manufacturing, as well as unpermitted mobile home trailers. The remainder of the project site is undeveloped and includes some areas of impervious surface with the remainder of the site a mix of gravel and weeds (see Figure 2). There are no trees on the project site; there are overhead electrical lines within a Sacramento Municipal Utilities District (SMUD) easement that traverse the western portion of the site, including along the southern boundary of the project site and along Elder Creek Road. The site is flat and is situated approximately 36 feet above mean sea level.

The project site is located in an industrial area of the city adjacent to a building supply company to the east, Elder Creek Road, Morrison Creek and the U.S. Naval and Marine Reserve Readiness Center to the north, vacant land to the south, and a window tinting business to the west. Other surrounding uses include a concrete supply business, Sierra Waste Recycling and Transfer Station, and a FedEx ground facility. Union Pacific railroad tracks border the western side of the project site and 60 kV overhead utility lines run parallel to the southern boundary of the site.

The site is designated Industrial in the City's 2035 General Plan and zoned Heavy Industrial (M-2 (S)). Land surrounding the project site is designated in the City's 2035 General Plan Industrial and zoned Heavy Industrial (M-1(S)). The maximum allowable floor area ratio for Industrial is 1.0 (City of Sacramento 2015).

The project site is located in Zone X on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs), which is within an area of 0.2 percent annual chance of a flood event.

2.3 Project Background, Objectives and Goals

We Grow California Cannabis was founded by Guy Matalon, Barry Shy and Ori Bytton, with the intent of building and creating the first integrated Cannabis Campus in the City of Sacramento. The facility would be entirely owned and operated by We Grow California and would not be leasing space to other cannabis cultivators or manufacturers.

The overarching goal of the proposed project, as described by the project applicant, is to create a strong business model, create jobs, be a strong corporate neighbor, and set the standard for commercial cannabis in the City of Sacramento. Accordingly, the project applicant has developed the following values for the proposed project:

1. **Consumer Safety** - Committed to providing the highest quality and safest cannabis product consistent with stringent state requirements including purchasing practices,

We Grow California Cannabis Campus Project

testing standards, labeling, packaging, shipping, recall preparedness, and record keeping to ensure all product information provided to customers is accurate and timely.

2. **Integrity** - Conduct business in a professional and ethical manner consistent with maintaining the integrity of the cannabis industry and follow all applicable state and local cannabis laws and regulations and other applicable laws and regulations relevant to our responsibilities as an employer.
3. **Quality** – Commitment to stringent quality standards and accountability in our distribution processes to produce the highest quality and safest cannabis product in the industry.
4. **Research** – Commitment to further clinical research relating to cannabis and commit, to the extent practicable, to support research activities that are ethically defensible, socially responsible, scientifically valid, and meet good clinical practice.
5. **Access** – Safe access to cannabis for all registered cannabis patients and adult consumers through maintaining strain diversity and ensuring a consistent supply.
6. **Security** - Commitment to prevent the misuse of cannabis at every stage of the supply chain under our control and ensuring all facilities are secure through constant monitoring, intrusion protection, and inventory tracking requirements.
7. **Sustainability** - Commit to using sustainable growing methods, minimizing exposure to impurities, and reducing our environmental impact and protecting the City’s natural resources.
8. **Team** – Commitment to our employees through mutual appreciation, respect, open communication and recognition as well as ongoing education for every employee. All employees will be thoroughly trained to maintain high quality assurance standards and compliance requirements.

2.4 Project Components

The proposed project includes development of a Mixed Light Cultivation Facility (MLCF) for cannabis cultivation; a non-volatile manufacturing/extraction operation of cannabis; a distribution center; and a delivery-only dispensary (no on-site retail) that would provide on-demand mobile delivery of cannabis. The project includes a total of 266,394 sf in five buildings on an approximately 11-acre site, as shown in Figure 3, Site Plan and in Table 1. The total area to be graded/disturbed is 9.75 acres.

We Grow California Cannabis Campus Project

**Table 1
Proposed Project Land Use**

Proposed Buildings	Building Use	Square Footage
Building 1	Cultivation Processing	20,254
	Manufacturing (non-volatile) includes kitchen	17,115
	Distribution Center	3,223
	Delivery-only Dispensary	1,416
	Office	4,220
	Assembly	12,887
<i>Subtotal</i>		54,895
Building 2	Nursery/Cultivation Area	17,059
MLCF*-1	Cultivation Area	61,044
MLCF-2	Cultivation Area	83,365
MLCF-3	Cultivation Area	50,031
<i>Subtotal</i>		194,440
Total		266,394
<i>Proposed Parking</i>		
Surface lot	245 spaces	
Bicycle	13 spaces	

Note: * Mixed Light Cultivation Facility

Source: Thomas Bouffard Architects, Site Plan, 2018.

The existing buildings on the site, identified as Buildings 1 and 2, would be renovated to accommodate the project. Building 1 is a large metal clad industrial building that was used for automotive repair and other manufacturing uses. The project would remove approximately 7,200 sf of the western portion of the building to accommodate a driveway for fire and emergency access. Building 2 is a partially enclosed warehouse structure that would be renovated to fully enclose the building. Both buildings would be designed with metal siding, similar to what exists currently, and painted a tan color with the exterior doors, door and window frames painted in a terra cotta color. The MLCF buildings would be designed to meet the City’s relevant building and design standards and would have opaque walls with a translucent roof to allow entry of natural daylight. To control the amount of natural light there would be three light deprivation curtains that open and close on a computer-controlled automatic system. The curtains can completely block out all internal light allowing no light to escape creating a “glow” in the adjacent area. Building walls would be insulated, weatherproofed and sealed to ensure no odors would escape from the MLCF buildings. The buildings would be painted in a light color and would range in height from approximately 15-feet to 22-feet tall at the highest point. Figures 4 through 8 show aerial visual simulations of what the project would look like once completed and Figure 9 shows a plan view of Building 1.

A description of the cultivation, manufacturing and distribution process is provided below.

We Grow California Cannabis Campus Project

Building 2 (Nursery)

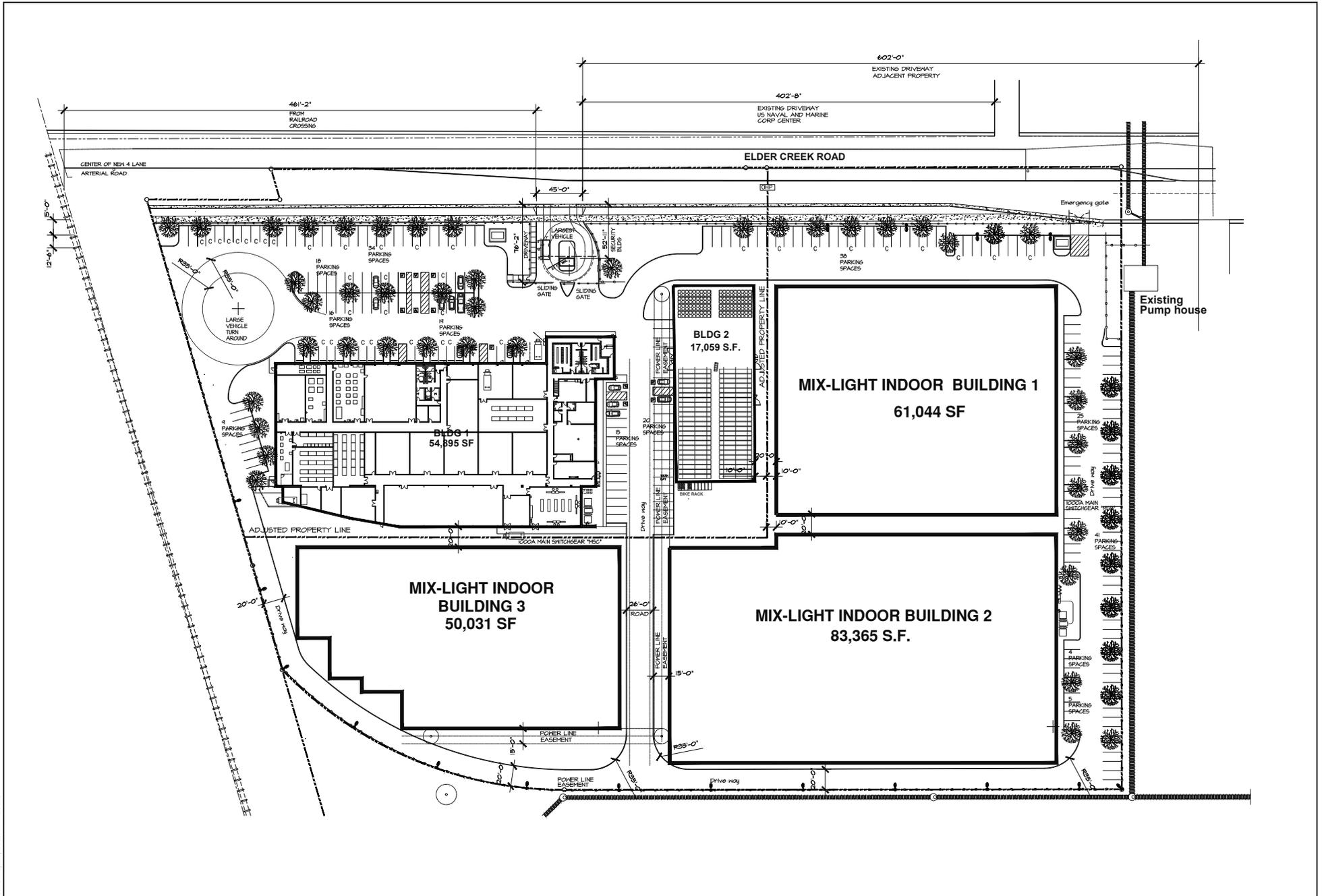
The existing building on the project site would be renovated into a state-of-the-art nursery facility for plant cultivation. In the nursery, plants would be propagated from “mother” plants. Cuttings would be dipped in rooting compound and placed in 50-cell individual planting flats. The cuttings would be placed under light-emitting diode (LED) light fixtures, 24-hours/day, for 14-days. Once the cuttings have developed roots, the plugs would be transplanted to small containers that contain Rockwool (a type of potting material used in lieu of soil for water conservation) and placed within the Vegetative Room. Plants are then placed under LED lights for 18-hours/day for a 14-day period. During the growing period, plants are fed daily, according to their size and condition. Plants would receive nutrients through a drip irrigation system, controlled by a dosing system. During this stage, plants would be pruned which encourages water efficiency and minimizes or eliminates runoff of wastewater. Also at this stage in the process, plants would be tagged with a unique identifier label or tag and entered into the state’s Track and Trace system. This statewide program is designed to record the inventory and movement of cannabis and cannabis products through the commercial cannabis supply chain — from cultivation to sale. The tag on each plant would contain a bar code as well as the facility name, license number, unique identification number, order information, and identifier (e.g., medical).

Mixed Light Cultivation Facilities (MLCF)

After 14-days, plants would be moved from the Vegetative Room in Building 2 into one of the three MLCF buildings. Plants in the MLCF would receive light for 12-hours per day and would mature in 56 days. During this period of the process plants would be fed daily and typically would receive one of three different concentrations of nutrient mix via the fertigation¹ system: low, medium, and high. Plants would receive the low concentration during vegetation, medium concentration during early flower, and high concentration during late flower. During the final week plants are leached and flushed with clean, pH-adjusted water.

Once the plants are harvested, the space would be cleaned, sanitized, and replenished with a new batch of vegetative plants. Harvesting, cleaning, and sanitizing a room takes approximately 24-hours.

¹ Fertigation is the injection of fertilizers, soil amendments, and other water-soluble products into an irrigation system.



SOURCE: TBA 2018

FIGURE 3
Site Plan

We Grow California Cannabis Campus Project

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SOURCE: TBA 2018

DUDEK

FIGURE 4

Aerial View Looking Northeast

We Grow California Cannabis Campus Project IS/MND

We Grow California Cannabis Campus Project

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SOURCE: TBA 2018

DUDEK

FIGURE 5

Aerial View Looking Northwest

We Grow California Cannabis Campus Project IS/MND

We Grow California Cannabis Campus Project

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SOURCE: TBA 2018

DUDEK

FIGURE 6

Aerial View from Elder Creek Road Looking Southwest

We Grow California Cannabis Campus Project IS/MND

We Grow California Cannabis Campus Project

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SOURCE: TBA 2018

DUDEK

FIGURE 7

Aerial View from Elder Creek Road Looking Southeast

We Grow California Cannabis Campus Project IS/MND

We Grow California Cannabis Campus Project

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SOURCE: TBA 2018

DUDEK

FIGURE 8

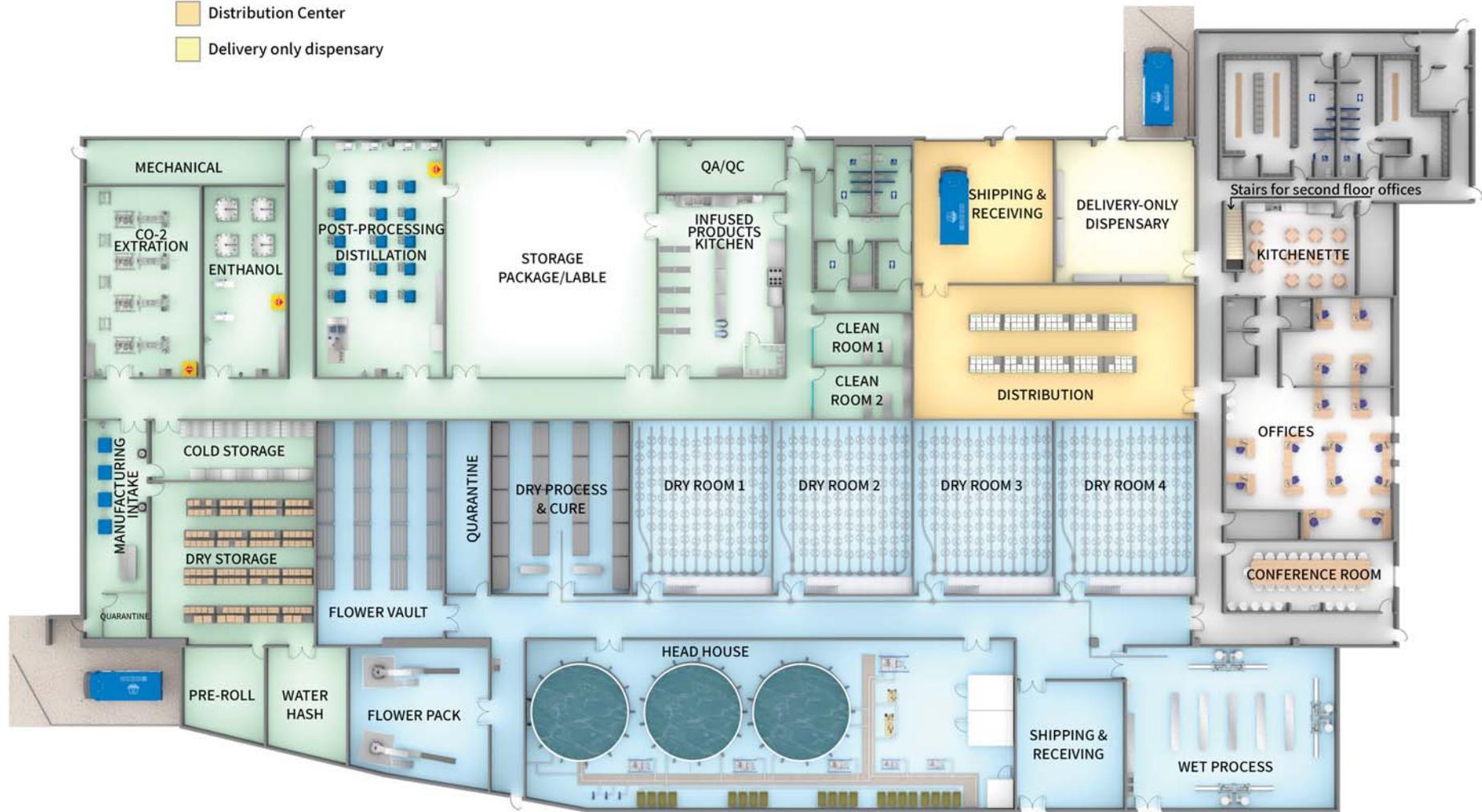
Main Project Entrance

We Grow California Cannabis Campus Project IS/MND

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- LEGEND:
- Cultivation
 - Non-Volatile Manufacturing
 - Distribution Center
 - Delivery only dispensary



SOURCE: TBA 2018

FIGURE 9

Plan View of Building 1

We Grow California Cannabis Campus Project

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Lighting

LED lighting would be used throughout all areas of the facility with the exception of the nursery and the MLCF buildings. Indoor lighting for nursery cultivation would include a mix of natural light and Double-Ended (DE) High Pressure Sodium (HPS) lighting. The DE-HPS lights improve the quality of the plants and are considered the industry standard. The MLCF buildings are designed to allow sunlight to be used to provide light throughout most of the year and would be supplemented with DE-HPS lights when necessary.

Building 1 (Manufacturing/Processing)

Building 1 is an existing building on-site that would be renovated to include administrative office space and compliance and security functions. In addition, all the manufacturing, processing and distribution activities would take place in this building as well. After plants are harvested, they would be moved into Building 1 for processing. Processing is a separate license under the state, but is included in the City's Cultivation Operations permit. Processing includes logging each item into the Track and Trace system, removing flower buds, sorting products by strain, preparing batches for testing, distribution and/or packaging.

The plant processing process is described in more detail as follows.

Bud Removal - Wet Processing Room

The first step is “de-boning” of the branches which entails removing the flower buds from the “wish-boned” branches, and sorting the product into strain specific batches. At this point, the wet cannabis is ready to be processed through the automated trimmer. The branches would then be collected, weighed, and logged into the Harvest Record, according to the plant's particular strain.

Auto-Trimming - Wet Processing Room

After the plants are de-boned they are processed through the “Twister T2 Trimmer.” This is an automated trimmer that removes all the flowers from the stems. This process requires placing approximately 20 pounds of cannabis on the conveyor belt for approximately 60 minutes. The process mechanically trims the flowers from the plants which are collected in a bin at the base of the machine. The flowers are then moved into a drying room for 7 days to remove any remaining moisture. The next step in the process is curing.

Curing (Dry Process)

Many of the aromatic compounds (terpenes) that give cannabis its unique smell and flavor can degrade and evaporate at temperatures as low as 70°F. Therefore, the flowers are placed in an

We Grow California Cannabis Campus Project

air-tight container and once a day the container is opened for 1 to 3 hours to allow any moisture to escape. The curing process is complete in approximately two weeks.

Once the plant material has been cured it would be logged into the state's Track and Trace system in accordance with state requirements and either be sent to the on-site manufacturing facility, packaged to be sent to an off-site manufacturing facility, or packaged for retail sale.

Manufacturing/Extraction

Within this building, the manufacturing and extraction of cannabis oil would occur to infuse other products such as tinctures, capsules, vapor cartridges, or edibles. A commercial kitchen would be used to make various edibles such as baked goods, non-alcoholic beverages and other edible products infused with cannabis oil. The non-volatile extraction process includes loading cured plant material into the system's extraction vessel. The extraction process includes releasing liquid carbon dioxide into the extraction vessel for a predetermined time depending upon the product to be produced. Once the process is complete, the resulting extracted product would be collected and immediately transferred into a temperature/food-safe container. Once completed, the final product would be weighed, recorded and packaged in accordance with local and state guidelines, before being transferred into cold storage, or used in-house for product infusion. All products manufactured would meet all state regulations related to dosing for both medical and adult use products.

Distribution Facility

The Distribution Facility (located in Building 1) transfers cannabis end products to other licensed entities; collects taxes; and oversees product testing. Within the Distribution Facility, the following activities would take place:

- Coordinate the testing of cannabis (flower, edibles, concentrates, topicals and tinctures);
- Purchase of cannabis from licensed cultivators and manufacturers;
- Sale of cannabis to licensed manufacturers and dispensaries; and
- Storage of cannabis flower, edibles, concentrates, topicals and tinctures.

Delivery-Only Dispensary

The project includes a Delivery-only Dispensary component (located in Building 1) that would purchase all of its cannabis products from licensed distributors. Instead of patients and customers going to a storefront dispensary, they can order their desired products online from the project's state-compliant website and have it delivered directly to their home. This customer base consists of homebound or elderly medical patients and people living in areas where dispensaries are not

We Grow California Cannabis Campus Project

available. Prior to sale identification of the patient or consumer would be confirmed and all other state-mandated requirements would be verified. Within the dispensary the purchase of cannabis products from licensed distributors would take place and the bar code would be swiped per the Track and Trace System to prevent illegal product diversion through the unique identifier assigned to each plant.

Employees

The project includes a total of 300 full-time employees that would work in the greenhouses, manufacturing, distribution, delivery-only (non-storefront) dispensary buildings, and in the corporate office. Business hours would be seven days per week from 7:00 a.m. to 10:00 p.m. and employees would work in two shifts: 6:00 a.m. to 2:00 p.m. and 2:00 p.m. to 10:00 p.m. Business hours for the dispensary would be from 8:00 a.m. to 9:00 p.m. seven days per week.

Security and Fencing

The project is required to provide on-site security and to prepare a Security Plan to address the risk inherent with this type of business. The project would provide 24-hour security, seven days per week; either two security guards daily on 12-hour shifts, or three security guards daily on 8-hour shifts. The entire project site would be fenced with an 8-foot-high climb-resistant, decorative metal, post-style iron fence. On-site equipment would be screened with a 6-foot high chain link with tan color slats. Primary access to the facility would be through a main gate located off Elder Creek Road. The gate would be closed and locked after hours.

All vehicles/visitors accessing the project site would be required to stop at a staffed gate house located at the main entrance during operating hours. Visitors would be required to stop and show their identification and licensing credentials, as appropriate, at the gate house. The project includes a Security Director and security officers, as needed. No one under the age of 21 would be allowed on the premises. The Security Plan has been prepared consistent with state and local laws and the project applicant has indicated that their security consultant, Palladin, would continue to work closely with the City's Police Department to ensure the plan meets all security requirements. Some of the plan requirements include:

- All visitors would be required to log in on written or electronic logs. All logs would be maintained by the Security Director for no less than 90 days. The visitor log would include visitor name, date of birth, identification type and number (driver's license number), date of visit, duration of visit, purpose of visit, and name of person visiting.
- Visitors would be escorted at all times by a designated employee and would be required to wear a badge during the entirety of their visit.

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- All facility access keys or cards/fobs issued to employees would be managed through a written or digital sign-in/sign-out log and audited daily by the Security Director or its designee. Only managers designated by the Security Director would be permitted to take keys, access cards or fobs off-site.
- Access into the facility would be limited to a single staff entry/exit point, visible from Elder Creek Road. The access point shall remain closed and locked at all times, ingress and egress would be controlled by a manager. A manager shall be on duty during all operational hours of the facility.
- On-site security cameras would be installed throughout the campus. Cameras would be equipped with low-light capability, auto iris, and auto focus, and shall record at high resolution no less than 2 megapixels.
- All exterior building entrances would be maintained in a closed and locked state at all times while not in immediate use or attended by a manager/security agent.
- All interior doors designated as high security areas (lobby, vault, dry, trim, packaging, loading) would remain closed and locked at all times while not in immediate use or attended by a manager/security agent.
- Employees would be required to wear employer-issued identification card in a conspicuous manner at all times while within the facility. Identification cards would be controlled by the facility manager, issued and collected daily to prevent unlawful duplication, replication or counterfeiting.

Vehicle and Emergency Access, Circulation, and Parking

Vehicle and emergency vehicle (police and fire) access to the campus would be from Elder Creek Road with secondary emergency vehicle access provided at a fire-access gate located in the northeast corner of the project site. During operating hours all vehicles are required to log in at the gate house (described above). After hours the main gate would be locked. Emergency vehicle access would be provided around the perimeter of the project site to enable access to all project buildings. Knox boxes² would be provided at the gate house (outside of the main gate) and at the secondary fire access gate to enable fire and police personnel to access the campus in the event of a fire or emergency after hours. Roadway widths have been designed per the City's requirements for turning radii to allow fire trucks to easily access internal roadways. The closest fire station to the project site is Station 10, located at 5642 66th Street, approximately 2.5 miles or seven minutes from the site.

² Small, wall-mounted safe that holds building keys for retrieval by fire departments, emergency medical services, and police in emergency situations.

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Delivery vehicles accessing the site would be directed to go to either Building 1 or Building 2. The project does not include any loading docks.

The project includes 245 surface parking spaces for employees and visitors and 13 bicycle spaces provided in bike racks.

Exterior Lighting, Landscaping and Signage

Project lighting would include building mounted lights and parking lot light fixtures. All lighting would conform to the City's 2035 General Plan policy 6.1.12, which requires lighting to be "shielded and directed downward to minimize impacts on adjacent residential uses." Parking lot light fixtures would be approximately 25-foot tall with box type shielded fixtures to prevent spillover light.

The project includes landscaping along Elder Creek Road and in the parking areas in the front of Building 1 and along the eastern side of the project site. Landscaping would consist of drought-tolerant shrubs and native grasses irrigated with a low flow emitter drip system to conserve water. No areas of turf or grass would be included. Trees along Elder Creek Road and in the parking area would include a variety of tree species including Saw leaf zelkova, Southern live oak, Valley live oak and Crape myrtle and would be provided in a 15-gallon size. A total of approximately 100 trees would be planted. The landscaping plan is consistent with the City's Parking Lot Tree Shading Design and Maintenance Guidelines (City of Sacramento 2003) that require all new parking lots to include tree plantings designed to result in 50% shading of parking lot surface areas within 15 years.

The project would include a small exterior sign mounted on Building 1 consistent with the City's sign ordinance requirements.

Odor Management

The buildings in the proposed project have been designed to include state-of-the-art carbon filter air-scrubbers to block potentially offensive odors. Air scrubbers would operate 24 hours/day, and would remove odor, dust and other contaminants, while providing constant, clean airflow. Activated carbon air-scrubbers have the ability to exchange and clean 1,260 cubic feet/minute (CFM) and would be installed in each room within each building. The carbon filled air scrubbers would be changed every 6 months (more frequently if needed). Clean-air buffer zones would be created between the facilities' exterior doors and the rest of the campus to minimize the release of odors. Within each compartment of the MLCF, there would be 12 exhaust fans on the exterior wall opposite of the evaporative cooling walls fitted with a manifold and nozzles provided by OMI, an odor mitigation company. In order to ensure odors are not released into the atmosphere and surrounding areas, OMI would provide a vapor phase unit for each of the exhaust fans.

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These units combine safe odor mitigating chemicals with the exhaust air, preventing the odor from spreading to the surrounding area. All return ducts will feature both a HEPA filter as well as activated carbon filters. Hospital-grade chlorine dioxide gas deodorizer, delivered both in a liquid, and slow-release packet form, will be deployed routinely throughout the processing area to reduce buildup areas within the cultivation processor building.

To minimize odors produced by the facility, as well as eliminating any unavoidable odors produced throughout operations, all doors would remain closed to all buildings, including interior doors. All staff would be required to take a 90 minute in-person training course, highlighting the importance of closing doors and ensuring exhaust and filtration systems are running as required to minimize on-site odors the potential release of objectionable odors. A copy of the project's Odor Control Plan is included in Appendix C.

Green Waste Disposal

The project would generate green waste associated with cultivation activities. The disposal of all green waste is required to go through a rigorous process that includes collection in specific buckets that are dated, weighed and recorded before the waste is transferred into Green Waste Collection bins. At the end of each day all green waste collected in the MLCF buildings and through processing is removed and transferred to a "chipper." To ensure the green waste is unusable it would be chipped and combined with non-cannabis materials (e.g., saw dust, wood chips) for disposal. The resulting green waste product would be transferred and stored in in a locked dumpster prior to being picked up by a designated waste removal company for off-site composting. All green waste bins used to transport materials would be cleaned and sanitized on a daily basis. The chipper and the green waste dumpster would also be power washed and sanitized weekly. Please see Appendix E for more specific details.

Chemical Storage and Disposal

The cultivation process requires the use of fertilizers and other chemicals, including calcium nitrate, iron chelate, ammonium nitrate, and magnesium sulfate. Many of these fertilizers are composed of concentrated salts high in nitrogen, phosphorous, and potassium (in the form of alkaline salts), with an assortment of micronutrients essential for plant growth. Undiluted, these fertilizers can pose an inhalation, skin and eye irritation risk. When mixed with water, the risk is significantly reduced. The project includes adopting Good Agricultural Practices regarding watering criteria and installing a fertilizer injection system (fertigation) to automatically mix, dose, balance pH, and distribute nutrients through a drip-feeding system directly to the plants, to help reduce the potential for a chemical spill. However, many of these fertilizers are considered hazardous waste and are highly regulated by numerous State and local agencies primarily the State Department of Toxic Substances Control (DTSC) pursuant to Title 22, Division 4.5,

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Environmental Health Standards for the Management of Hazardous Waste. DTSC is responsible for the inspection and enforcement of permitted hazardous waste facilities; hazardous waste generators and on-site treaters; transportable treatment units; transporters; and electronic waste recyclers, processors, and collectors.

On the local level, the Sacramento County's Environmental Management Department (EMD) has been designated as the Sacramento region's Certified Unified Program Agency (CUPA) by the California Environmental Protection Agency (CalEPA). The local CUPA is responsible for implementing the local environmental regulatory programs, including Hazardous Materials Release Response Plans and Inventories (Business Plans); California Accidental Release Prevention; Hazardous Waste Generator and Onsite Hazardous Waste Treatment; and Hazardous Material Management Plans (pursuant to the Uniform Fire Code). Within EMD, the Environmental Compliance Division is responsible for all inspections of facilities eligible for regulation within the CUPA programs. Hazardous Materials Business Plan (HMBP) are reviewed by EMD staff and additional on-site technical verification is conducted in conjunction with the required Hazardous Materials Release Response Plan inspection. These entities oversee the proper use, storage and disposal of any hazardous materials.

Staff whose job responsibilities include handling and using the chemicals would be trained on the proper use, storage and disposal requirements. Each building includes storage areas for chemicals that would be designed and located consistent with state and local guidelines. The process for disposal of these wastes includes temporarily storing all used hazardous waste in a plastic-lined metal can or drum waste until it can be removed off-site for disposal. Each can would be labelled "Hazardous Waste," with a list of the hazardous materials that may be placed into the can, and if necessary, labelled "Flammable Materials", as appropriate. Some cans would be dedicated for liquid waste and others for solid waste, such as hazardous-waste-soaked rags. When a can is full, it would be labelled with the date and removed from the facility on a weekly basis by a hazardous waste removal contractor and disposed of at an approved hazardous waste disposal site including Kiefer Landfill or a Transfer and Recycling station.

California law requires that a hazardous waste spill (dependent on the type of chemicals released) shall be immediately reported to EMD and the Governor's Office of Emergency Services, pursuant to Health and Safety Code section 25510. The project includes specific procedures including a Hazardous Materials Spill Plan in the event any chemicals are accidentally released. The steps to follow in the event of an accidental release would be clearly posted throughout the all of the buildings. Staff would be trained to put on protective clothing, goggles and acid resistant gloves and read label for instructions or warnings on how to handle a spill; cover all wet spills according to standard operating procedures; clean up dry spills using a designated scoop; place all dry chemicals in a sturdy plastic bag, tie with vinyl bag ties, and label if contents are known and put into clear plastic drum with lid. Staff in the

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surrounding area of the chemical spill would be notified; drains would be closed to prevent the spill from reaching the environment; electrical equipment in the vicinity of the spill would be turned off; the area would be cordoned off to non-essential staff; first aid kit and spill kits would be available throughout the facility. The Supervisor would report the spill to EMD and the Sacramento City Fire Department, if medical assistance is needed.

All spills and disposal of chemicals would be recorded in the Chemical Spill Log and the Chemical Waste Log, respectively. In addition to documentation, staff responsible for a spill or disposal must notify the Director of Cultivation. Please see Appendix F for more information.

Infrastructure and Energy Conservation Features

The project is designed to minimize its carbon footprint, conserving water and energy usage and reducing any undesired impact on the community at large and its natural resources. The following considerations have been taken and would be implemented as part of the proposed project.

- The use of LED lighting throughout all the buildings (with the exception of the nursery and MLCF buildings). LED lights are up to 80% more efficient than traditional lighting such as fluorescent and incandescent lights and 95% of the energy in LEDs is converted into light and only 5% is wasted as heat. Additionally, a longer life span means lower carbon emissions. LED lights last up to six times longer than other types of lights, reducing the requirements for frequent replacements.
- The use of Double-Ended (DE) High Pressure Sodium (HPS) lighting throughout the flowering area of the facility. DE-HPS improves the quality of the plant and has been the industry standard for over 10 years. They are also more efficient for We Grow's light coverage, electricity and maintenance bills than the single-ended bulb. Additionally, We Grow will implement Mixed Light Cultivation Facility Technology (MLCF), which drastically reduces the need to use lights by 70%. Throughout the majority of the year, natural sunlight will be used for cultivation.
- Use of energy efficient heat retention curtains as well as light deprivation curtains in the MLCF buildings. These curtains not only serve their purpose for triggering the flowering response in the crop production cycle but also save energy by retaining valuable heat in the winter months.
- Sophisticated, intuitive environmental control systems would be used, designed to minimize energy consumption based on interpretation of real time environmental data. For example, if on a sunny day in February the crop is receiving enough natural light radiation to meet the instantaneous needs of the crop, the control software would send an

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output signal to the lighting system to “turn OFF” until such time as the supplemental light is again required, this greatly reduces energy consumption.

- Sensor-driven environmental control systems combined with high-efficiency heating and ventilation equipment (HVAC), including energy efficient dehumidification systems and ventilation fans.
- Buy and source products and materials locally, whenever possible, and a program to recycle all recyclable materials.

Water

The City has an existing 8-inch City water main along the eastern property line and a 24-inch City water transmission main and 12-inch water main in Elder Creek Road. The project site is currently served by a 2-inch water line that ties into the 12-inch water main. The project’s proposed water infrastructure system would use existing connections where feasible and abandon any connections determined inadequate for the project. The City does not allow connections to transmission mains, but would allow the project to tie into the 12-inch water main in Elder Creek Road. The project is proposing to add a second 2-inch water line for irrigation water and use the existing 2-inch water line for potable water. In accordance with City standards water and irrigation would be metered with City approved backflow devices (City of Sacramento 2014).

Water for fire services would also include backflow devices, but consistent with City policy would not be metered. The project’s fire service water system would include a separate, private looped system, with multiple points of connection to the City’s system to increase on-site fire supply and pressure. The minimum lines would be 8 inches in diameter. On-site private fire hydrants and individual building fire sprinkler services would be served by the on-site system.

In order to significantly reduce water consumption in the cultivation operation, the project would use a drip-irrigation system, flood benches, and a fertilizer injection system (fertigation) to water and “feed” the plants. Fertigation systems automatically mix, dose, balance pH, and distribute nutrients through a drip-feeding system directly to the plants. City water would be pumped through filters into a “fresh water tank”. When plants are ready to be fed, fresh water would be pumped and nutrients mixed using the Fertigation system (eliminating the need for mixing tanks). This would occur in the head-house, which is located in Building 1. Irrigation pumps controlled by digital timers would be set to deliver water/nutrients to plants 3 times per day, for approximately 1-2 minutes each time (based on small, medium or large plants). Drip irrigation systems slowly release just the right amount of nutrient solution required, thus saving water. It is estimated that 95% of all irrigated water delivered to plants would be absorbed during “feeding.” The remaining 5% runoff would drain into a large holding tank, where it is filtered and reused for plant irrigation (i.e., closed loop system).

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Runoff water from plant irrigation would be pumped from the MLCF buildings, through a filter, and back into the head-house into the Drainage Water Tank. Drainage water would then be pumped through an R.O. System, where inorganic solids (such as salts) are removed and clean water is returned to the Treatment Water tank. Some of the treated water would be used to help cool the MLCF buildings (PAD wall), and some would be used for additional plant irrigation and feeding.

Three on-site reservoirs (fresh water, treatment water, and drainage water) located in Building 1 would serve as nutrient mixing and storage tanks. Each tank would have a storage capacity of 39,626 gallons.

Landscape irrigation would use a low flow emitter drip system to minimize water used for landscaping. All plumbing fixtures would be low flow water saving fixtures, per California Energy Code. The toilets would be 1.28 gallons per flush, lavatory faucets would be 1.5 gallons per minute, and urinals would use 0.125 gallons per flush.

Water Demand

Water demand for plant cultivation is estimated to not exceed 50,000 gallons per day (GPD). At maximum capacity, there would be 70,000 plants within the facility. Based on the water demand required for irrigation it is estimated one pound of cannabis can be produced for under 100 gallons of water.

It is estimated that an additional 500 GPD would be used for ancillary cleaning and daily sink and toilet use.

Total water use for the proposed project is conservatively estimated to total 96.45 acre-feet of water per year.

Wastewater

There is an existing 4- to 6-inch sewer line that currently serves the project site that ties into an existing 10-inch sewer line that runs along Elder Creek Road. The project would abandon the existing sewer line connection and install an 8-inch sewer line to serve the site.

All building drain pipes would be connected to the Drainage Water Tank and water used to clean any areas where cannabis has been stored or processed would be directed into the Drainage Water Tank. From this tank, water would be sent through the Reverse Osmosis unit for treatment prior to going to Treatment Tank B to be reused. Any remaining water would be sent to the Brackish Water Tank for disposal into the sewer system.

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Stormwater and Drainage

There is an existing 12-inch storm drain pipe that runs east-west adjacent to the eastern boundary of the project site. The project proposes to tie into this drainage pipe where it crosses Elder Creek Road. Running parallel to this pipe is an existing 54-inch storm drain pipe with a 48-inch storm drain pipe running adjacent to the southern boundary of the project site. The project would also tie into the existing 48-inch drainage pipe. Consistent with City requirements, all runoff from the project site would be pre-treated using self-contained water quality manholes prior to being released into the City’s storm drain infrastructure.

A copy of the project’s Drainage Plan and Water Quality Plan are included in Appendix G.

Energy

The project would require electricity for lighting and other business-related activities. The project applicant has joined SMUD’s Greenergy Program that supports developing renewable sources of energy. The project includes a total of four backup generators to provide backup power in the event of an emergency. The project applicant has estimated the project would consume 57,464 kilowatt-hours (kWh) per day, as shown in Table 2. See also Appendix D.

Table 2
Proposed Project’s Electrical Consumption

Buildings	Kilowatt-hours per day
Building 1	17,239
Building 2	5,746
MLCF 1	11,929
MLCF 2	13,929
MLCF 3	8,620
Total	57,464

Source: Tyler Loeffler, Next Big Crop, via email April 30, 2018

Off-Site Improvements

Off-site project improvements include widening Elder Creek Road along the project frontage to include curb, gutter and sidewalk. This would include relocating above ground and below ground utilities in coordination with the utility provider.

Site Clearing, Grading, and Construction

Construction activities would include site clearing, with the exception of the existing buildings that would remain, minor grading, and utility relocation. Approximately 30,000 sf of existing

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pavement would be removed and recycled to be used for road base material. No import or export of soils would be required. There would be trenching for on-site utilities and widening of Elder Creek Road to install curb, gutter and sidewalk. Construction is anticipated to take 12 to 18 months to complete and all grading would comply with the City's Manual for Grading/Erosion and Sediment Control, which requires all internal construction road ways to be constructed using clean crushed rock and a water truck would be on site for dust control. All construction equipment, including construction employee vehicles would be staged on-site.

It is anticipated there would be approximately 12 daily construction truck trips during the most intense stage of construction activities and up to 50 construction personnel on the site. The project applicant is required to obtain a Construction General Permit that requires preparation of a Stormwater Pollution Prevention Plan to be provided to the State Water Resources Control Board. The City also requires a Construction Traffic Management Plan be prepared that would be reviewed and approved by the City. It is anticipated most construction vehicles would travel on Power Inn Road to access Highway 50.

Project Schedule

All of the buildings would be constructed in the same phase and there would not be any phasing of project components. Construction is anticipated to take 12 to 18 months.

2.5 Required Discretionary Actions and Approvals

The City of Sacramento requires the following discretionary actions for project approval:

- **Adoption of the MND and Mitigation Monitoring Program.** Before the City can approve the proposed project, it must verify that the MND was completed in compliance with the requirements of CEQA, that the decision-making body has reviewed and considered the information in the MND, and that the MND reflects the independent judgment of the City of Sacramento. Approval of the MND also requires adoption of a Mitigation Monitoring Program (MMP), which specifies the methods for monitoring mitigation measures required to eliminate or reduce the project's significant effects on the environment.
- **Conditional Use Permit** to cultivate, manufacture and distribute cannabis.
- **Conditional Use Permit** to deliver cannabis.

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3 INITIAL STUDY CHECKLIST AND DISCUSSION

Project title / Project Number:

We Grow California Cannabis Campus Project / P17-020

Lead agency address:

City of Sacramento
Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, California 95811

Contact person and phone number:

Scott Johnson, Associate Planner
Community Development Department, Environmental Planning Services
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Sacramento, California 95811
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Project Planner name and address:

Danny Abbes, Assistant Planner
City of Sacramento Community Development Department
300 Richards Blvd, Third Floor
Sacramento California 95811
916.264.5011

Date Initial Study Completed: July 17, 2018

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 1500 *et seq.*). The Lead Agency is the City of Sacramento.

The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan MEIR and is consistent with the land use designation and the permissible densities and intensities of use for the project site as set forth in the 2035 General Plan. See CEQA Guidelines Section 15176 (b) and (d).

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The City has prepared the attached Initial Study to review the discussion of cumulative impacts, growth inducing impacts, and irreversible significant effects in the 2035 General Plan Master Environmental Impact Report (MEIR) to determine their adequacy for the project (see CEQA Guidelines Section 15178(b),(c)) and identify any potential new or additional project-specific significant environmental effects that were not analyzed in the MEIR and any mitigation measures or alternatives that may avoid or mitigate the identified effects to a level of insignificance, if any.

As part of the MEIR process, the City is required to incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the MEIR (CEQA Guidelines Section 15177(d)). Policies included in the 2035 General Plan that reduce significant impacts identified in the MEIR are identified and discussed (see also the MEIR). The mitigation monitoring plan for the 2035 General Plan, which provides references to applicable general plan policies that reduce the environmental effects of development that may occur consistent with the general plan, is included in the adopting resolution for the MEIR. See City Council Resolution No. 2015-0060, beginning on page 60. The resolution is available at <http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-ReportsReports>.

This analysis incorporates by reference the general discussion portions of the 2035 General Plan MEIR. (CEQA Guidelines Section 15150(a)). The MEIR is available for public review at the City of Sacramento, Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, California 95811, and on the City's web site at: <http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-ReportsReports>.

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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. Compliance with mitigation measures provided would ensure all impacts can be reduced to a level of less than significant.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" 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 checked="" type="checkbox"/> Transportation and Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

We Grow California Cannabis Campus Project

EVALUATION OF ENVIRONMENTAL IMPACTS

LAND USE, POPULATION AND HOUSING, AGRICULTURAL AND FOREST RESOURCES AND MINERAL RESOURCES

Introduction

The California Environmental Quality Act (CEQA) requires the Lead Agency (City of Sacramento) to evaluate the impacts of a project on the existing physical conditions within the area that would be affected by the project. Included in this analysis is an evaluation of the proposed project's consistency with applicable general plans and regional plans. An inconsistency between the proposed project and an adopted land use plan would not constitute a physical change in the environment. However, although a project may not directly create a physical change in the environment by conflicting with an adopted plan, it may result in environmental effects as a result of changes in planning in the community regarding infrastructure and services, or by inducing population growth directly or indirectly. An evaluation of physical environmental impacts of the proposed project is included below in Sections 3.1 through 3.14.

This section of the Initial Study discusses impacts to land use and planning, including consistency with applicable land use designations, plans, and policies, population and housing, agricultural and forestry resources, and mineral resources.

Discussion

Land Use and Planning

The project site is designated as Industrial in the 2035 General Plan and is zoned Heavy Industrial (M-2 (S)), which allows the manufacture or treatment of goods from raw materials. Land surrounding the project site is designated in the 2035 General Plan as Industrial and zoned Heavy Industrial (M-1(S)) (City of Sacramento, 2015 Figure LU1 page 3-34). The proposed project involves construction and operation of a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary on a former industrial site in the City. The facility would consist of two rehabilitated existing buildings and three newly constructed state-of-the-art Mixed Light Cultivation Facilities (MLCF) as listed in Table 1. The proposed project would also construct a surface parking lot that would accommodate 245 vehicles and 13 bicycles.

The project site is located in an industrial area of the city adjacent to a building supply company to the east, Elder Creek Road, Morrison Creek and the U.S. Naval and Marine Reserve Readiness Center to the north, vacant land to the south, and a window tinting business to the west. Other surrounding uses include a concrete supply business, Sierra Waste Recycling and Transfer Station, and a FedEx ground facility. The project site is designated and zoned for

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industrial uses and the project is not proposing a general plan amendment or rezone. The proposed project would be consistent with surrounding land uses and the City's underlying land use designation and zoning and therefore is not further evaluated.

Population and Housing

The proposed project would construct greenhouses for cannabis cultivation and a manufacturing/extraction and distribution facility in an industrial area in the City. The project does not include development of new housing and would not induce population growth. The project site is currently developed with two metal clad buildings that were used for industrial and manufacturing uses; it does not contain any existing housing that would need to be removed to accommodate the project. The project site is designated and zoned for industrial uses and the project is not proposing a general plan amendment or rezone to change the underlying designations. The proposed project would not result in the displacement of existing housing or people, or require the construction of replacement housing. No impact to population and housing would occur as a result of the proposed project.

Agricultural and Forestry Resources

Section 4.1 of the City's 2035 General Plan MEIR evaluates the impact of development under the 2035 General Plan on agricultural resources. The MEIR concluded that buildout of the 2035 General Plan (including the project site) would have a less-than-significant impact on agricultural resources within the City, and would minimize the conversion of farmland outside of the City limits.

The project site is located in an industrial area of the City on a site that is developed with two metal clad buildings that was formerly used for industrial and manufacturing and truck storage. The project site does not contain any trees or forestry resources. The site is designated and zoned Industrial. There are no existing Williamson Act contracts on any portion of the project site and no existing agricultural or timber-harvesting operations are located on or in the vicinity of the project site. The project site is designated as Urban and Built Up land on the Sacramento County Important farmland Map prepared by the Department of Conservation Farmland Mapping and Monitoring Program (DOC 2016). For these reasons, the proposed project would result in no impact to agricultural or forestry resources.

Mineral Resources

The City's 2035 General Plan MEIR Background Report identifies areas known as Mineral Resource Zones (MRZs) classified on the basis of geologic factors, without regard to existing land use and land ownership. The areas are categorized into four general classifications (MRZ-1 through MRZ-4). The project site is characterized as being within Resource Zone MRZ-4. MRZ-4 defines those areas of no known mineral occurrences where geologic information does not rule

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out the presence or absence of significant mineral resources and therefore is not further evaluated (City of Sacramento 2014, pp. 6-93-6-94).

The City’s MEIR concluded that buildout of the 2035 General Plan would result in a less-than-significant impact on mineral resources that would be of importance to the state, region, or City through compliance with 2035 General Plan Policies ER 5.1.1, ER 5.1.2, and ER 5.1.3. The project site is within an area designated MRZ-4, and would not be located in a zone that contains mineral deposits that would be of value to the state, region, or City. The proposed project would have a less-than-significant impact on mineral resources.

3.1 Aesthetics

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
I. AESTHETICS – Would the project...			
a) Create a source of glare that would cause a public hazard or annoyance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a new source of light that would be cast onto oncoming traffic or residential uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character of the site or its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

As discussed in Section 2, Project Description, existing uses on the project site include two metal buildings that are estimated to have been constructed in the late 1960s and total 57,200 sf. These buildings were previously used for automotive repair and storage as well as unpermitted mobile home trailers. The remainder of the project site is undeveloped and includes some areas of impervious surface with the remainder of the site a mix of gravel and weeds. There are no trees on the project site, but there are overhead electrical lines within a SMUD easement that traverse the western portion of the site, including along the southern boundary of the project site and along Elder Creek Road.

The project site is located in an industrial area of the city adjacent to a building supply company to the east, Elder Creek Road, Morrison Creek and the U.S. Naval and Marine Reserve Readiness Center to the north, vacant land to the south, and a window tinting business to the west. Other surrounding uses include a concrete supply business, Sierra Waste Recycling and Transfer Station, and a FedEx ground facility. Union Pacific railroad tracks border the

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western side of the project site and 60 kV overhead utility lines run parallel to the southern boundary of the site.

The site is designated Industrial in the City's 2035 General Plan and zoned Heavy Industrial (M-2 (S)). Land surrounding the project site is designated in the City's 2035 General Plan as Industrial and zoned Heavy Industrial (M-1(S)).

Standards of Significance

The significance criteria used to evaluate the project impacts to aesthetics is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to aesthetics would occur if the project would:

- a. Create a source of glare that would cause a public hazard or annoyance.
- b. Create a new source of light that would be cast onto oncoming traffic or residential uses.
- c. Substantially degrade the existing visual character of the site or its surroundings.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.13 of the MEIR addresses the change in visual resources associated with future development under the 2035 General Plan. The MEIR concluded that as the City is largely built-out, new development within the City under the 2035 General Plan would result in less-than-significant impacts to scenic resources. Also due to the built-out nature of the City and compliance with general plan policies, building codes, and design review for larger projects, the MEIR found that development under the 2035 General Plan would result in less-than-significant impacts regarding lighting and glare.

Relevant 2035 General Plan Policies

The following General Plan policies related to aesthetics and visual resources are applicable to the proposed project:

Land Use and Urban Design Element

Goal LU 2.7: City Form and Structure. Require excellence in the design of the city's form and structure through development standards and clear design direction.

Policy LU 2.7.2: Design Review. The City shall require design review that focuses on achieving appropriate form and function for new and reuse and reinvestment projects to promote creativity, innovation, and design quality.

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Policy LU 2.7.8: Screening of Off-street Parking. The City shall reduce the visual prominence of parking within the public realm by requiring most off-street parking to be located behind or within structures or otherwise fully or partially screened from public view.

Goal LU 7.2: Industrial Development. Maintain industrial districts that provide for the manufacturing of goods, flex space, and research and development that are attractive, compatible with adjoining nonindustrial uses, and well-maintained.

Policy LU 7.2.6: Industrial Development Design. The City shall require that new and renovated industrial properties and structures incorporate high-quality design and maintenance.

Policy LU 7.2.7: Property Maintenance. The City shall encourage and, where legally permissible, require owners of visually unattractive or poorly maintained industrial properties to upgrade existing structures and properties to improve their visual quality.

Policy LU 7.2.8: Hazardous Industries. The City shall require industrial uses that use solvents and/or other toxic or hazardous materials to be sites in concentrated locations away from existing or planned residential, commercial, or employment uses and require preparation of Hazardous Substance Management Plans to limit the possibility of contamination.

Environmental Resources Element

Goal ER 7.1: Visual Resource Preservation. Maintain and protect significant visual resources and aesthetics that define Sacramento.

Policy ER 7.1.3: Lighting. The City shall minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary, and requiring light for development to be directed downward to minimize spill-over onto adjacent properties and reduce vertical glare.

Policy ER 7.1.4: Reflective Glass. The City shall prohibit new development from (1) using reflective glass that exceeds 50 percent of any building surface and on the bottom three floors, (2) using mirrored glass, (3) using black glass that exceeds 25 percent of any surface of a building, (4) using metal building materials that exceed 50 percent of any street-facing surface of a primarily residential building, and (5) using exposed concrete that exceeds 50 percent of any building.

Answers to Checklist Questions

- a,b) Glare is produced when expansive surfaces reflect light, creating a nuisance and hazard for people in the vicinity. Large light-colored surfaces or glass are the most likely to produce glare. The proposed project would not include materials or surfaces that would

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result in substantial glare that could cause a public hazard or annoyance. This is a less-than-significant impact.

The project site contains minimal lighting at present. Existing sources of light surrounding the project site include exterior building lights to the north, west and east of the project site and illuminated surface parking lots to the east of the project site.

LED lighting would be used throughout all areas of the facility with the exception of the MLCF buildings. Indoor lighting for nursery cultivation would include a mix of natural light and Double-Ended (DE) High Pressure Sodium (HPS) lighting. The DE-HPS lights improve the quality of the plants and are considered the industry standard. The MLCF buildings are designed to allow sunlight to be used to provide light throughout most of the year and would be supplemented with DE-HPS lights when necessary.

Project lighting would include exterior building mounted lights and parking lot light fixtures. All lighting would conform to the City's 2035 General Plan policy 6.1.12, which requires lighting be "shielded and directed downward to minimize impacts on adjacent residential uses." Parking lot light fixtures would be approximately 25-foot tall with box type shielded fixtures to prevent spillover light.

The project would include a small exterior sign mounted on Building 1 consistent with the City's sign ordinance requirements.

Proposed project lighting would increase lighting in the surrounding area, but would be consistent with the project site's industrial and light industrial surroundings. Lighting is subject to the Uniform Building Code and Sacramento City Code requirements, ensuring that all lighting would be downward facing and directed away from the nearest sensitive receptor (e.g., residences). The buildings would be designed consistent with 2035 General Plan Policy ER 7.1.4, that prohibits using reflective glass that exceeds 50 percent of any building surface, using mirrored glass or black glass that exceeds 25 percent of any surface of a building, using metal building materials that exceed 50 percent of any street-facing surface of a primarily residential building, or using exposed concrete that exceeds 50 percent of the building. The project would not create a new source of light that would be directed towards oncoming traffic or any residential uses. Project impacts would be **less than significant** and there would be no additional significant effects.

- c) As described above, the project site contains existing industrial buildings and disturbed habitats. The project includes landscaping along Elder Creek Road and in the parking areas in the front of Building 1 and along the eastern side of the project site. Landscaping would consist of shrubs and native grasses that would be drought tolerant and would be

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irrigated with a low flow emitter drip system to conserve water. No areas of turf or grass would be included. Trees along Elder Creek Road and in the parking area would include a variety of tree species including Saw leaf zelkova, Southern live oak, Valley live oak and Crape myrtle. A total of approximately 100 trees would be planted. The landscaping plan is consistent with the City’s Parking Lot Tree Shading Design and Maintenance Guidelines (City of Sacramento 2003) that require all new parking lots to include tree plantings designed to result in 50% shading of parking lot surface areas within 15 years.

The project site at present does not contain a high level of visual quality or character, as it contains vacant industrial buildings, consistent with surrounding land uses and structures. Figures 1 through 8 show how the project would look once completed. The change in visual character would be a **less-than-significant impact** and there would be no additional significant effects.

Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Aesthetics.

3.2 Air Quality

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
II. AIR QUALITY – Would the project...			
a) Result in construction emissions of NO _x above 85 pounds per day?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in operational emissions of NO _x or ROG above 65 pounds per day?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in PM ₁₀ concentrations equal to or greater than five percent of the State ambient air quality standard (i.e., 50 micrograms/cubic meter for 24 hours) in areas where there is evidence of existing or projected violations of this standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in exposure of sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
g) Result in TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Conflict with the Climate Action Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Ambient air quality is generally affected by climatological conditions, the topography of the air basin, the type and amounts of pollutants emitted, and, for some pollutants, sunlight. The project site is located within the Sacramento Valley Air Basin (SVAB). Topographical and climatic factors in the SVAB create the potential for high concentrations of regional and local air pollutants. This section describes relevant characteristics of the air basin, types of air pollutants, health effects, and existing air quality levels.

The SVAB includes Sacramento, Shasta, Tehama, Butte, Glenn, Colusa, Sutter, Yuba, Yolo, and portions of Solano and Placer counties. The SVAB extends from south of Sacramento to north of Redding and is bounded on the west by the Coast Ranges and on the north and east by the Cascade Range and Sierra Nevada. The San Joaquin Valley Air Basin is located to the south.

The Sacramento Metropolitan Air Quality Management District (SMAQMD) is the designated air quality management district for the City. SMAQMD has established significance thresholds for project construction and operational emissions within the City. Air pollutant emissions during proposed project construction and operation were modeled using CalEEMod and used in this analysis. A copy of the Air Quality Emissions Modeling Report is included in Appendix H.

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter equal to or less than 10 microns in aerodynamic diameter (PM₁₀), particulate matter equal to or less than 2.5 microns in aerodynamic diameter (PM_{2.5}), and lead (Pb). In

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California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Existing Air Quality

Under both the federal and state Clean Air Acts, standards identifying the maximum allowable concentration of the criteria air pollutants have been adopted. The U.S. EPA has designated Sacramento County (which includes the City) as a nonattainment area for the federal 8-hour O₃ standard, and CARB has designated the County as a nonattainment area for the state 1-hour and 8-hour O₃ standards. The County has been designated as a nonattainment area for the state 24-hour and annual PM₁₀ standards. The County is designated as a nonattainment area for the 2006 federal 24-hour PM_{2.5} standard. The air basin is designated as unclassified or attainment for all other criteria air pollutants.

Sensitive Receptors

The project site is located in an area that is designated as Industrial in the 2035 General Plan and is zoned Heavy Industrial (M-2 (S)), which allows the manufacture or treatment of goods from raw materials. The closest sensitive receptors to the project site include residential neighborhoods, approximately 0.5 of a mile west of the project site and Elder Creek Elementary School located approximately 0.7 of a mile northwest of the project site.

Standards of Significance

The significance criteria used to evaluate the project impacts to air quality is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to air quality would occur if the project would:

- a. Result in construction emissions of NO_x above 85 pounds per day.
- b. Result in operational emissions of NO_x or ROG above 65 pounds per day.
- c. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- d. Zero (0). If all feasible BACT/BMPs are applied, then 80 lbs/day and 14.6 tons/year.
- e. Zero (0). If all feasible BACT/BMPs are applied, then 82 lbs/day and 15 tons/year.
- f. Result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm).
- g. Result in exposure of sensitive receptors to substantial pollutant concentrations.

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- h. Result in TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources.
- i. Conflict with the Climate Action Plan.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.2 of the MEIR addresses the air quality effects of development within the City under the 2035 General Plan. Policies included in the 2035 General Plan were considered to mitigate potential air quality impacts resulting from development under the 2035 General Plan. Although these policies would lessen impacts related to air quality, long-term operational emissions of ozone precursors and particulate matter would remain a significant and unavoidable impact of future development (Impact 4.2-3). The MEIR concluded that exposure to sources of toxic air contaminants (TAC) could also be a potentially significant impact. Policies outlined in the Environmental Resources (ER) Element would mitigate potential impacts related to TAC's to a less-than-significant level.

Relevant 2035 General Plan Policies

The following General Plan policies related to air quality are applicable to the proposed project:

Environmental Resources

Goal ER 6.1: Improved Air Quality. Improve the health and sustainability of the community through improved regional air quality and reduced greenhouse gas emissions that contribute to climate change.

Policy ER 6.1.2: New Development. The City shall review proposed development projects to ensure projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM₁₀ and PM_{2.5}) through project design.

Policy ER 6.1.3: Emissions Reduction. The City shall require development projects that exceed SMAQMD ROG and NO_x operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project.

Policy ER 6.1.4: Sensitive Uses. The City shall coordinate with SMAQMD in evaluating exposure of sensitive receptors to toxic air contaminants, and will impose appropriate conditions on projects to protect public health and safety.

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Policy ER 6.1.10: Coordination with SMAQMD. The City shall coordinate with SMAQMD to ensure projects incorporate feasible mitigation measures to reduce GHG emissions and air pollution if not already provided for through project design.

Policy ER 6.1.15: Preference for Reduced-Emission Equipment. The City shall give preference to contractors using reduced-emission equipment for City construction projects and contracts for services (e.g., garbage collection), as well as businesses that practice sustainable operations.

SMAQMD Rules

The SMAQMD requires contractors to follow rules relating to construction activities and building design. Applicable rules are listed below.

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from Sac Metro Air District prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the Sac Metro Air District early to determine if a permit is required, and to begin the permit application process. Other general types of uses that require a permit include, but are not limited to, dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions. Portable construction equipment (e.g., generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower is required to have a Sac Metro Air District permit or a California Air Resources Board portable equipment registration (PERP).

Rule 402: Nuisance. The developer or contractor is required to prevent dust or any emissions from on-site activities from causing injury, nuisance, or annoyance to the public.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

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Rule 453: Cutback and Emulsified Asphalt Paving Materials. This rule prohibits the use of certain types of cut back or emulsified asphalt for paving, road construction or road maintenance activities.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify the Sac Metro Air District of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

California Code of Regulations (CCR)

The following requirements set forth in the CCR are also applicable to the project.

17 CCR, Division 3, Chapter 1, Subchapter 7.5, §93105 Naturally Occurring Asbestos: The developer or contractor is required to notify the Sac Metro Air District of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. The developer or contractor is required to comply with specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

13 CCR, Division 3, Chapter 9, Article 5, Portable Equipment Registration Program: The developer or contractor is required to comply with all registration and operational requirements of the portable equipment registration program such as recordkeeping and notification.

13 CCR, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and 13 CCR, Division 3, Chapter 10, Article 1, §2485 regarding Anti-Idling: Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. These apply to diesel powered off-road equipment and on-road vehicles, respectively.

Answers to Checklist Questions

a-g) *Construction*

Construction of the proposed project would result in a temporary addition of pollutants to the local air shed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling demolition debris and from construction workers travelling to and from the site. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Therefore, an increment of day-to-day variability exists.

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Pollutant emissions associated with construction of the proposed project were quantified using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. Default values provided by the program were used where detailed project information was not available.

It was assumed that total construction would occur over a period of 18 months. CalEEMod was used to quantify emissions of ozone precursors (ROG and NO_x) and coarse particulate matter (PM₁₀) emissions from off-road equipment, grading, on-road worker vehicle emissions, and vendor delivery trips. Construction of the project would also generate carbon monoxide (CO), sulfur dioxide (SO_x) and fine particulate matter (PM_{2.5}) emissions. The results of the model outputs provided in Appendix H; however, only the criteria air pollutants that the SMAQMD have adopted thresholds for are presented in Table 3, Estimated Construction Emissions.

Table 3
Estimated Construction Emissions

Year	NO _x	PM ₁₀	PM _{2.5}
	<i>pounds per day</i>		
2018	59.6	10.8	6.9
2019	21.6	1.4	1.2
<i>Pollutant Threshold</i>	<i>85</i>	<i>80*</i>	<i>82*</i>
Threshold Exceeded?	No	No	No

Notes: Values shown are the maximum summer and winter daily emissions results from CalEEMod. Detailed results are included in Appendix H.

* SMAQMD PM Thresholds if all feasible BACT/BMPs are applied including watering of the project site two times per day.

NO_x = oxides of nitrogen; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter

Source: Dudek 2018.

As shown in Table 3, emissions of NO_x, PM₁₀, and PM_{2.5} associated with construction activities would not exceed any of the SMAQMD significance thresholds during construction and fall far below the thresholds. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. Furthermore, the SCAQMD's CEQA Guide recommends that projects implement the use of best management practices (BMPs) in order to reduce fugitive dust generated from construction activities. The project contractor would be required to implement the following BMPs:

- a. Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- b. Cover or maintain at least 2 feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.

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- c. Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- d. Limit vehicle speeds on unpaved roads to 15 miles per hour.
- e. All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

As such, implementation of the required fugitive dust control measures would ensure air quality and fugitive dust-related impacts associated with construction would be **less than significant** and there would be no additional significant effects.

Operation

Following the completion of construction activities, the proposed project would generate pollutant emissions from on-site energy use and vehicles travelling to and from the project site. Operational emissions estimates consider pollutants generated from area, energy, and mobile sources. Estimated operational emissions from the proposed project are provided below in Table 4, Estimated Unmitigated Operational Emissions.

Table 4
Estimated Unmitigated Operational Emissions

Source	ROG	NO _x	PM ₁₀	PM _{2.5}
	<i>pounds per day</i>			
Area	6.4	0.0	0.0	0.0
Energy	0.3	2.5	0.2	0.2
Mobile	4.4	16.1	10.9	3.0
Emergency Generators**	0.0	0.5	0.0	0.0
Project Total	11.1	19.1	11.1	3.2
<i>Pollutant Threshold</i>	65	65	80*	82*
Threshold Exceeded?	No	No	No	No

Notes: Values shown are the maximum summer and winter daily emissions results from CalEEMod. Detailed results are included in Appendix H.

* SMAQMD PM Thresholds if all feasible BACT/BMPs are applied.

** A permit from SMAQMD is required for the emergency generators.

ROG = reactive organic gases; NO_x = oxides of nitrogen; PM₁₀ = coarse particulate matter, PM_{2.5} = fine particulate matter

Source: Dudek 2018.

As shown in Table 4, emissions of ROG, NO_x, PM₁₀, and PM_{2.5} from project operation would not exceed the SMAQMD operational thresholds and would be far below the acceptable thresholds. Impacts associated with project-generated operational criteria

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air pollutant emissions would be **less than significant** and there would be no additional significant effects.

- h) Please see Section 3.5, Greenhouse Gases that addresses potential conflicts with the City’s adopted Climate Action Plan. The impact was determined to be **less than significant**.

Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Air Quality.

3.3 Biological Resources

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
III. BIOLOGICAL RESOURCES – Would the project...			
a) Create a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal species?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The United States Department of Fisheries and Wildlife (USFWS) Information for Planning and Consulting (IPaC) is an online mapping and database program for projects to identify potential special-status species within a project site and vicinity. The IPaC system identified one reptile, two amphibians, one fish, one insect, and two crustacean species that have a potential to be located on the project site where habitat suitable for the species occurs within the project site. The results of the database query is included in Appendix M.

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The species IPaC identified include Giant Garter Snake, California Red-legged Frog, California Tiger Salamander, Delta Smelt, Valley Elderberry Longhorn Beetle, Vernal Pool Fairy Shrimp, and Vernal Pool Tadpole Shrimp (USFWS, 2018). The species which have a potential to occur within the project site require specific suitable habitat in order to be likely to occur. No such suitable habitat is located within the project site as no wetlands, riparian areas, elderberry bushes, or vernal pools are located within the project site; all of which are required to occur in order for special-status species to be present.

The entire project site is highly disturbed and/or developed. No trees are located on the site and no plant communities besides sparse weeds are present. The project site does not have the potential to provide habitat required for sensitive species or wildlife. A review of aerial maps and the IPaC database query was conducted to determine the likelihood of the site supporting sensitive biological resources. The project site is in a developed area of the City and contains industrial buildings and a gravel and paved parking area. The remainder of the project site is highly disturbed and is often graded/moved to prevent any vegetative communities to grow.

The project site does not contain suitable habitat for species of special concern or special-status species. The project site does not contain critical habitat (USFWS, 2018).

Standards of Significance

The significance criteria used to evaluate project impacts to biological resources is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to biological resources would occur if the project would:

- a. Create a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected.
- b. Result in substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal species.
- c. Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands).

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The City's General Plan MEIR evaluates the effects on biological resources associated with development within the City under the 2035 General Plan in Section 4.3. The MEIR found that development under the 2035 General Plan could cause potential impacts by degrading the quality of the environment or reducing habitat or populations below self-sustaining levels of special-

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status birds due to the loss of both nesting and foraging habitat. Several policies included in the 2035 General Plan would mitigate impacts to biological resources caused by development under the 2035 General Plan.

Cumulative impacts of development under the 2035 General Plan on special-status plant species, loss of habitat for special-status animal species, and loss of riparian habitat, wetlands and sensitive natural communities were found to be less than significant in the MEIR. Impacts contributing to the regional loss of special-status species or their habitat were found to be a significant and unavoidable impact (Impact 4.3-11).

Relevant 2035 General Plan Policies

The following General Plan policies related to biological resources are applicable to the proposed project:

Environmental Resources Element

Goal ER 1.1: Water Quality Protection. Protect local watersheds, water bodies and groundwater resources, including creeks, reservoirs, the Sacramento and American Rivers, and their shorelines.

Policy ER 1.1.4: New Development. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster development), source controls, storm water treatment, runoff reduction measures, best management practices (BMPs) and Low Impact Development (LID), and hydromodification strategies consistent with the city's NPDES Permit.

Policy ER 1.1.7: Construction Site Impacts. The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

Policy ER 2.1.10: Habitat Assessments and Impact Compensation. The City shall consider the potential impact on sensitive plants and wildlife for each project requiring discretionary approval. If site conditions are such that potential habitat for sensitive plant and/or wildlife species may be present, the City shall require habitat assessments, prepared by a qualified biologist, for sensitive plant and wildlife species. If the habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either (1) protocol-level surveys shall be conducted (where survey protocol has been established by a resource agency), or, in the absence of established survey protocol, a focused survey shall be conducted consistent with industry-recognized best practices; or (2) suitable habitat and presence of the species shall

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be assumed to occur within all potential habitat locations identified on the project site. Survey Reports shall be prepared and submitted to the City and the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS) (depending on the species) for further consultation and development of avoidance and/or mitigation measures consistent with state and federal law.

Answers to Checklist Questions

- a) The proposed project would not create a potential health hazard or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area due to the lack of biological and flora resources on and surrounding the project site. The closest vegetative community is to the south of the project site; however, it is an undeveloped area that contains various weeds. No component of the proposed project would impact the open space vegetative communities. The proposed project could create noise during construction that may affect common animal populations within the area; however, this would be temporary and would be a **less-than-significant impact** and there would be no additional significant effects.
- b) The proposed project would not result in substantial degradation of the quality of the environment, reduction of habitat, reduction of population below self-sustaining levels of threatened or endangered species due to the lack of such resources present on or adjacent to the site, and because no component of the proposed project affects these resources. The proposed project could create noise during construction that may temporarily affect the quality of nesting habitat near the project site; however, due to the lack of nesting habitat near the project site, this is unlikely and would be considered a **less-than-significant impact** and there would be no additional significant effects.
- c) The proposed project would not affect other species of special concern to regulatory agencies or natural resource organizations (such as regulatory waters and wetlands) since no species of special concern are likely to be on the project site due to the lack of suitable and high-quality habitat. No water features or wetlands are located on or near the project site; therefore, there would be **no impact** to these resources and there would be no additional significant effects.

Mitigation Measures

No mitigation would be required.

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Findings

The project would have no additional project-specific environmental effects relating to Biological Resources.

3.4 Cultural Resources

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
IV. CULTURAL RESOURCES – Would the project...			
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"/>
b) Directly or indirectly destroy a unique paleontological resource?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Cultural resources within the City and in the surrounding area include prehistoric and historic resources. Prehistoric resources are those sites and artifacts associated with the indigenous, non-Euroamerican population, generally dating prior to contact with people of European descent. Historic resources include structures, features, artifacts, and sites that date from Euroamerican settlement of the region.

The 2035 General Plan Background Report designates areas within the City that have the potential to have high or moderate sensitivity for archeological resources. The project site is not located within an area of high or moderate archeological sensitivity according to this report (City of Sacramento 2015, Chapter 6, Section 6.4, Figure 6.4-1).

A site visit was conducted by an archeologist in April 2018 to document resources that may be present on the site (see Appendix I Cultural Resources Memorandum). In addition, a records search of the project site, including a surrounding half-mile buffer was conducted on April 12, 2018. A total of seventeen (17) previous cultural resources technical investigations have been conducted within a half-mile of the proposed project site. None of these are known to have directly included portions of the site, as shown in Table 1 in Appendix I. Four (4) historic age resources have been recorded within the surrounding half-mile records search area. These resources include the Western Pacific Railroad (P-34-001302) and the Sacramento Army Depot (P-34-004100), which are both adjacent to the project area. Two other resources are recorded within the half-mile buffer, a military building within the Sacramento Army Depot (P-34-001617) and a transmission tower (P-34-004521). None of the four resources are eligible for

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listing on the National Register of Historic Places (NHRP) or the California Register of Historical Resources (CRHR).

There are two existing corrugated metal clad buildings within the project site were constructed in 1969 and total 57,200 square feet. These buildings were previously used for automotive repair, manufacturing, and storage as well as parking for unpermitted mobile home trailers and trucks. These buildings would be rehabilitated to provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center, a delivery-only (non-storefront) dispensary, and office space.

The 2035 General Plan MEIR has determined that the Policy Area is not considered sensitive for paleontological resources and the likelihood of discovery would be very low. However, paleontological resources may be present in fossil-bearing soils and rock formations below the ground surface. Ground-disturbing activities have the potential to damage or destroy paleontological resources. The likelihood of any paleontological resources to be present on the project site is considered low.

The City of Sacramento sent letters to all tribes that have requested to be notified of any upcoming projects, pursuant to Assembly Bill 52 (AB 52). Because AB 52 is a government-to-government process, all records of correspondence related to notification and any subsequent consultation are confidential and on file with the City. The City will complete compliance with AB 52 requirements prior to consideration of project approval.

Standards of Significance

The significance criteria used to evaluate the project impacts to cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to cultural resources would occur if the project would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.
- b. Directly or indirectly destroy a unique paleontological resource.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.4 of the 2035 General Plan MEIR addresses the effects of development on cultural resources within the City. The MEIR concluded that impacts on historic resources and archeological resources due to development under the 2035 General Plan would be significant and unavoidable (Impacts 4.4-1 and 4.4-2). Adherence to applicable policies and regulations

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would reduce potential impacts related to paleontological resources to a less-than-significant level (impact 4.5-5).

Relevant 2035 General Plan Policies

The following General Plan policies related to cultural resources are applicable to the proposed project:

Historic and Cultural Resources

Goal HCR 2.1: Identification and Preservation of Historic and Cultural Resources. Identify and preserve the city’s historic and cultural resources to enrich our sense of place and our understanding of the city’s prehistory and history.

Policy HCR 2.1.2: Applicable Laws and Regulations. The City shall ensure compliance with City, State, and Federal historic preservation laws, regulations, and codes to protect and assist in the preservation of historic and archaeological resources, including the use of the California Historical Building Code as applicable. Unless listed in the Sacramento, California, or National registers, the City shall require discretionary projects involving resources 50 years and older to evaluate their eligibility for inclusion on the California or Sacramento registers for compliance with the California Environmental Quality Act.

Policy HCR 2.1.3: Consultation. The City shall consult with appropriate organizations and individuals (e.g., California Historical Resources Information System (CHRIS) Information Centers, the Native American Heritage Commission (NAHC), the CA Office of Planning and Research (OPR) “Tribal Consultation Guidelines,” etc.) and shall establish a public outreach policy to minimize potential impacts to historic and cultural resources.

Policy HCR 2.1.6: Planning. The City shall take historical and cultural resources into consideration in the development of planning studies and documents.

Policy HCR 2.1.16: Archeological & Cultural Resources. The City shall develop or ensure compliance with protocols that protect or mitigate impacts to archaeological and cultural resources including prehistoric resources.

Answers to Checklist Questions

- a) A historical resource is defined by Public Resources Code Section 21084.1 and California Environmental Quality Act (CEQA) Guidelines Section 15064.5 as any resource listed or determined to be eligible for listing in the California Register of Historical Resources as well as some California State Landmarks and Points of Historical Interest. In addition, potentially eligible resources are evaluated for listing

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in the California Register of Historical Resources prior to making a finding as to the project's impacts on historical resources. Generally, resources must be at least 50 years old to be considered for listing in the California Register of Historical Resources as a historical resource.

According to the original building permit on-file with the city, the general contractor James McLaughlin constructed the two existing metal buildings in 1969. The site was previously used as a millwork facility through the late 1970s. Later the site was used for automobile maintenance and storage. The project would renovate the interior and exterior of the existing buildings for reuse as part of the campus. A small portion of one of the buildings (Building 1) is proposed to be removed in order to accommodate access for emergency vehicles around the perimeter of the project site. The buildings on the project site are 49 years old, and therefore are not considered eligible for listing on the California Register pursuant to Public Resources Code Section 4852 (d)(2), which requires enough time to have passed to gain a scholarly perspective on events or individuals associated with the resource. Based on this information, the City's Preservation Director has made the preliminary determination the resources are not eligible for listing in the California Register or the Sacramento Register of Historic and Cultural Resources, and as such, substantial evidence exists that none of the buildings on the project site are considered historical for the purposes of CEQA. Therefore, any potential impacts of the project on built environment historical resources would be considered **less than significant**.

In consideration of the past disturbances on the project site, the likelihood of encountering significant subsurface archaeological deposits or features is considered low. Based on an archeological review of the site visit no archaeological resources were identified within the project site or immediate vicinity as a result of the pedestrian survey and the CHRIS records search. However, to ensure that impacts to cultural resources remain less than significant, should any such resources be encountered during project grading or construction, the project would be required to implement Mitigation Measure CR-1. With implementation of Mitigation Measure CR-1, impacts to archaeological resources would be **less-than-significant** with mitigation incorporated.

- b) The project site is located in a developed area and supports two one-story metal buildings and a paved surface parking lot. In consideration of the severity of past disturbance on the project site, the likelihood of encountering significant subsurface paleontological deposits or features is considered low. Compliance with Policy HCR 2.2.16 requires the City to identify and protect all paleontological resources in compliance with accepted protocols. These procedures include criteria for qualifications for personnel, survey, research, testing, training, monitoring, cessation, and resumption of construction, identification, evaluation, and reporting, as well as compliance with recommendations to address any

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significant adverse effects where determined by the City to be feasible. Compliance with Policy HCR 2.1.16 would reduce potential impacts to paleontological resources to **less than significant** and there would be no additional significant effects.

Mitigation Measures

Mitigation Measure CUL-1

Unanticipated Archaeological Resources Discoveries. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all earth-disturbing work occurring in the vicinity (generally within 100 feet of the find) shall immediately stop and notification shall be given to the City. The City will retain a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards, to evaluate the significance of the find and determine whether or not additional study is warranted. If the discovery proves significant under CEQA (14 CCR 15064.5(f); Public Resources Code Section 21082) or Section 106 of the National Historic Preservation Act (36 Code Federal Regulations 60.4), additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Findings

All additional significant environmental effects of the project relating to Cultural Resources can be mitigated to a less-than-significant level.

3.5 Energy

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
V. ENERGY – Would the project...			
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Structures built would be subject to Titles 20 and 24 of the California Code of Regulations, which reduce demand for electrical energy by implementing energy-efficient standards for

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residential and non-residential buildings. The 2035 General Plan includes policies (see 2035 General Plan Energy Resources Goal U 6.1.1) to encourage energy-efficient technology by offering rebates and other incentives to commercial and residential developers, coordination with local utility providers and recruitment of businesses that research and promote energy conservation and efficiency.

The General Plan MEIR discussed energy conservation and relevant general plan policies in Section 6.3 (page 6-3). The discussion concluded that with implementation of the general plan policies and energy regulation (e.g., Title 24) development allowed in the general plan would not result in the inefficient, wasteful or unnecessary consumption of energy.

The project applicant has coordinated with the Sacramento Municipal Utilities District (SMUD) and have joined their Greenergy Program. SMUD has indicated they have adequate resources to serve the electrical needs of the project.

Standards of Significance

The significance criteria used to evaluate the project impacts to cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to energy would occur if the project would:

- a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation.
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Energy Resources (U 6) of the 2035 General Plan MEIR addresses the effects of development on energy consumption within the City. The MEIR concluded that impacts on energy resources due to development under the 2035 General Plan would be less than significant through adherence to applicable general plan policies and regulations. Relevant goals and policies from the 2035 General Plan are included below. The Sacramento Climate Action Plan (CAP) (Final Draft, January 13, 2012), outlines strategies and measures for greenhouse gas reductions and energy reducing. Strategy 3: Energy Reduction and Renewable Energy. The goals of the CAP include achieving a zero net energy in all new construction by 2030; achieve an overall 15 percent reduction in energy usage in all existing residential and commercial buildings by 2020 (City of Sacramento, 2012).

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Relevant General Plan Policies

The following General Plan policies related to energy are applicable to the proposed project:

Utilities

Goal U 6.1: Adequate Level of Service. Provide for the energy needs of the city and decrease dependence on nonrenewable energy sources through energy conservation, efficiency, and renewable resource strategies.

Policy U 6.1.5: Energy Consumption per Capita. The City shall encourage residents and businesses to consume 25 percent less energy by 2030 compared to the baseline year of 2005.

Policy U 6.1.6: Renewable Energy. The City shall encourage the installation and construction of renewable energy systems and facilities such as wind, solar, hydropower, geothermal, and biomass facilities.

Policy U 6.1.7: Solar Access: The City shall ensure, to the extent feasible, that sites, subdivisions, landscaping, and buildings are configured and designed to maximize passive solar access.

Policy U 6.1.15: Energy Efficiency Appliances. The City shall encourage builders to supply Energy STAR appliances and HVAC systems in all new residential developments, and shall encourage builders to install high-efficiency boilers where applicable, in all new non-residential developments.

Answers to Checklist Questions

- a) The proposed project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources during construction or operations of the proposed project. The applicant has coordinated with SMUD and SMUD has indicated they can serve the energy needs of the project. The applicant proposes to implement Appendix D, the Energy Efficiency Plan in order to reduce energy costs and avoid significant impacts to energy resources. This plan includes conserving energy usage by using LED lighting throughout most of the buildings. LED lights are up to 80% more efficient than traditional lighting such as fluorescent and incandescent lights and 95% of the energy in LEDs is converted into light and only 5% is wasted as heat. The MLCF buildings are designed to use natural sunlight for cultivation, which helps to save on energy. The project also proposes to use energy efficient heat retention curtains as well as light deprivation curtains in the MLCF buildings. These curtains help save energy by retaining heat in the winter months. The project also proposes a sophisticated and intuitive environmental control systems designed to minimize energy consumption based on interpretation of real time

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environmental data. The project has been designed to be energy-efficient and to not result in the wasteful use of energy resources. This is a **less-than-significant impact** and there would be no additional significant effects.

The proposed project would not conflict with or obstruct a state of local plan for renewable energy or energy efficiency. The 2035 MEIR outlines policies and goals in order to continuously reduce energy consumption through Low Impact Development (LID) and state-of-the-art technology to incorporate into new developments. City-wide goals for energy consumption conservation are continuously being updated and implemented. The City encourages LID development and green waste recycling. The proposed project would implement LID components such as LED lighting throughout; double-ended (DE) high-pressure sodium (HPS) lighting throughout flowering areas; energy efficient heat-retention curtains and light deprivation curtains; high energy efficient environmental control systems; transparent roofs to utilize natural light whenever possible; a closed loop irrigation system; and would implement recycling of all materials (Appendix D). The project would not conflict with the City’s Climate Action Plan, as discussed below under Section 3.6 and impacts would be **less than significant** and there would be no additional significant effects.

Findings

The project would have no additional project-specific environmental effects relating to Energy resources.

Mitigation Measures

No mitigation would be required.

3.6 Greenhouse Gas Emissions

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
VI. GREENHOUSE GAS EMISSIONS – Would the project...			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose or reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Environmental Setting

The City of Sacramento adopted a community wide Climate Action Plan (CAP) on February 14, 2012 to identify actions the City can take to reduce greenhouse gas (GHG) emissions through GHG reduction targets, strategies, and specific actions. The CAP was incorporated into the City's 2035 General Plan on March 3, 2015. The City has retained a goal of reducing community-wide emissions to 15% below 2005 levels by 2020, 38% below 2005 levels by 2030, and 83% below 2005 levels by 2050. In order to ensure that future development is in compliance with the City's GHG emissions reduction goals (City of Sacramento 2017). The City has designed self-mitigating policies for all development and operations in the city to adhere to. Proposed new development in the City can demonstrate their compliance through the use of the City's Climate Action Plan Consistency Checklist. The CAP Consistency Review Checklist contains seven criteria that the proposed project must be consistent with in order show reductions in greenhouse gas emissions (City of Sacramento 2017).

Standards of Significance

The significance criteria used to evaluate the project impacts to greenhouse gases/climate change is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to greenhouse gas emissions would occur if the project would:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.14 of the City's 2035 General Plan MEIR addresses the potential for new development to generate an increase in GHG emissions under the 2035 General Plan. The MEIR concluded that GHG emissions associated with development under the 2035 General Plan would be less than significant. Several policies incorporated in the 2035 General Plan address climate change and GHG emissions, specifically Policies U 6.1.1 through 6.1.17, which describe efforts the City should take to reduce overall energy use, promote renewable energy systems and facilities, and coordinate with regional organizations, businesses, utility providers, property owners and builders to increase energy efficiency within the City. These policies include those relating to use of higher-efficiency vehicles, promoting pedestrian, bicycle, and public transit transportation, and sustainable development. Table 4.14-3 of the MEIR lists all General Plan policies that address climate change. Relevant policies from the 2035 General Plan are included below.

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Relevant General Plan Policies

The following General Plan policies related to greenhouse gas emissions are applicable to the proposed project:

Land Use

Goal LU 2.6. City Sustained and Renewed. Promote sustainable development and land use practices in both new development, reuse, and reinvestment that provide for the transformation of Sacramento into a sustainable urban city while preserving choices (e.g., where to live, work, and recreate) for future generations

Policy LU 2.6.4: Sustainable Building Practices. The City shall promote and, where appropriate, require sustainable building practices that incorporate a “whole system” approach to designing and constructing buildings that consume less energy, water and other resources, facilitate natural ventilation, use daylight effectively, and are healthy, safe, comfortable, and durable.

Environmental Resources

Goal ER 6.1. Improved Air Quality. Improve the health and sustainability of the community through improved regional air quality and reduced greenhouse gas emissions that contribute to climate change.

Policy ER 6.1.7: Greenhouse Gas Reduction in New Development. The City shall reduce greenhouse gas emissions from new development by discouraging auto-dependent sprawl and dependence on the private automobile; promoting water conservation and recycling; promoting development that is compact, mixed use, pedestrian friendly, and transit oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio in each community; and other methods of reducing emissions.

Policy ER 6.1.10: Coordination with SMAQMD. The City shall coordinate with SMAQMD to ensure projects incorporate feasible mitigation measures to reduce GHG emissions and air pollution if not already provided for through project design.

Policy ER 6.1.14: Preference for Reduced-Emission Equipment. The City shall give preference to contractors using reduced-emission equipment for City construction projects and contracts for services (e.g., garbage collection), as well as businesses that practice sustainable operations.

Utilities

Policy U 6.1.7: Solar Access: The City shall ensure, to the extent feasible, that sites, subdivisions, landscaping, and buildings are configured and designed to maximize passive solar access.

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Policy U 6.1.15: Energy Efficiency Appliances. The City shall encourage builders to supply Energy STAR appliances and HVAC systems in all new residential developments, and shall encourage builders to install high-efficiency boilers where applicable, in all new non-residential developments.

Answers to Checklist Questions

- a,b) The project’s short-term construction related and long-term operational GHG emissions were estimated using CalEEMod. All project modeling results are included in Appendix H.

Construction

Construction of the proposed project would result in short-term GHG emissions, which are primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. CalEEMod was used to calculate the annual GHG emissions for project construction. Table 5, Project Estimated Annual Construction GHG Emissions, presents estimated construction emissions.

SMAQMD has adopted the quantitative threshold for construction GHG emissions of 1,100 MT CO₂e for land use development projects (SMAQMD 2018). A project that exceeds the thresholds may have a cumulatively considerable contribution of GHG emissions.

Table 5
Project Estimated Annual Construction GHG Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons per Year</i>			
2018	220.92	0.06	0.00	222.39
2019	289.23	0.07	0.00	290.92
Total				513.31
<i>Pollutant Threshold</i>				<i>1,100</i>
Threshold Exceeded?				No

Notes: Detailed results are included in Appendix H.

MT = metric tons; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.

Source: Dudek 2018.

As shown in Table 5, estimated annual construction-related GHG emissions would be approximately 513 MT CO₂e per year. Therefore, construction impacts of the proposed project would not exceed the applied threshold of 1,100 MT CO₂e per year and impacts would be **less than significant** and there would be no additional significant effects.

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Operation

Long-term operational emissions would occur over the life of the project. The proposed project would be considered to have a significant effect relating to operational greenhouse gas emissions if it fails to comply with the City's GHG policies. However, the proposed project has committed to reducing greenhouse gas emissions. The project's consistency with the City's CAP is evaluated below.

1. Is the proposed project substantially consistent with the City's over-all goals for land use and urban form, allowable floor area ratio (FAR) and/or density standards in the City's 2035 General Plan?

The proposed project is consistent with the City's underlying land use designation and zoning for the project site which allows for industrial land uses. The proposed project would comply with the City's 2035 General Plan Land Use and Urban Form Designations and Development Standards, and would be consistent with the allowable FAR of 1.0 specified in the General Plan.

2. Would the proposed project include traffic-calming measures?

The proposed project would not increase vehicle traffic volumes and traffic hazards necessitating the need for traffic-calming measures. Within the parking lot area traffic speeds are limited and areas where pedestrians would cross internal driveways to access the buildings would be striped and signed noting pedestrian crossing, consistent with the City's standards. Therefore, this criteria does not apply to the proposed project.

3. Would the proposed project incorporate pedestrian facilities and connections to public transportation consistent with the City's Pedestrian Master Plan?

The project includes the construction of a 266,394 square foot facility that would provide cannabis cultivation and distribution. Consistent with City roadway standards, the frontage of the proposed project along Elder Creek Road would include development of a sidewalk allowing for pedestrian access to the project site. Therefore, the proposed project would provide adequate pedestrian facilities and would not preclude connections to public transportation to be implemented.

4. Would the proposed project incorporate bicycle facilities consistent with the City's Bikeway Master Plan, and meet or exceed minimum standards for bicycle facilities in the Zoning Code and CALGreen?

The proposed project would incorporate 13 on-site bicycle parking spaces consistent with the Bikeway Master Plan, Zoning Code, and CALGreen standards. In addition, the project site would be accessible by bicycle. Elder Creek

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Road includes dedicated bike lanes for the portion west of Power Inn Road and bike lanes have been developed on Florin Perkins Road, east of the proposed projects. Since the project site would be accessible by on-street bikeways, the proposed project would be consistent with the Bikeway Master Plan and meets the CAP Consistency Checklist for bicycle facilities.

5. For residential projects of 10 or more units, commercial projects greater than 25,000 square feet, or industrial projects greater than 100,000 square feet, would the project include on-site renewable energy systems (e.g., photovoltaic systems) that would generate at least a minimum of 15% of the project's total energy demand on-site?

The proposed project would be designed in compliance with the 2016 Title 24 Building Energy Efficiency Standards, effective January 1, 2017. The City's CAP Consistency Review Checklist was based on improving efficiency by 30 percent above the requirements of the 2008 Title 24 standards (effective January 1, 2010). Since setting that standard, the State has updated the Building Energy Efficiency Standards on an approximate three-year cycle, with each cycle resulting in increasingly stringent energy requirements. For example, the 2016 Building Energy Efficiency Standards went into effect on January 1, 2017. The California Energy Commission has stated that the 2013 Title 24 standards would use 25 percent less energy for lighting, heating, cooling, ventilation, and water heating than the Title 24 standards used for the City's CAP (2008 Title 24 standards), and that buildings built to the 2016 standards will use approximately 25 percent less energy for lighting, heating, cooling, ventilation and water heating than those built to the 2013 standards. These energy improvements enacted by the State and applicable to project pursuant to the Title 24 Building Energy Efficiency Standards would satisfy the reduction requirements that are identified in the City's CAP.

6. Would the proposed project (if constructed on or after January 1, 2014) comply with minimum CALGREEN Tier 1 water efficiency standards?

The proposed project would comply with the minimum current CALGREEN Tier 1 water efficiency standards. Furthermore, the proposed project would incorporate a low flow emitter drip system to minimize water used for landscaping while all plumbing fixtures would be low flow water saving fixtures. In order to significantly reduce water consumption in the cultivation operation, the project would use a drip-irrigation system, flood benches, and a fertilizer injection system to water and "feed" the plants.

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Based on this review, the proposed project is consistent with the City’s CAP. Therefore, the proposed project would not generate GHG emissions that exceed the acceptable threshold and would not conflict with a plan or policy adopted to reduce GHGs and the impact is **less than significant**.

Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Greenhouse Gas emissions.

3.7 Geology, Soils and Seismicity

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
VII. GEOLOGY, SOILS, AND SEISMICITY – Would the project...			
a) Allow a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The proposed project is located in the Sacramento Valley within the Great Valley geomorphic province, a relatively flat alluvial plain that is composed of deep layers of sedimentary deposits and has undergone periods of subsidence and uplift over millions of years. A Geotechnical Report was prepared for the project site by MPE Engineering, Inc., and is included in Appendix J. The Natural Resources Conservation Service maps three soils on the project site: San Joaquin silt loam, leveled, 0 to 1 percent slopes; San Joaquin silt loam, 0 to 3 percent slopes; and Xerants-Urban land-San Joaquin complex, 0 to 5 percent slopes. Both the San Joaquin and Xerants series are classified with Hydrologic Soil Group C. These soils usually have slow soil infiltration rates when thoroughly wet and have a high surface runoff. San Joaquin series consists of moderately deep to a duripan, well and moderately well drained soils that formed in alluvium derived from mixed but dominantly granitic rock sources (Appendix J).

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Based on the stiff and cohesive nature of the soils underlying the site, the potential for liquefaction occurring beneath this site is low. The site is not located within a State Designated Seismic Hazard Zone for liquefaction (Appendix J).

There are no known active faults or Alquist-Priolo Earthquake Fault Zoning Act special studies zones within the City and Sacramento region (City of Sacramento 2014). The nearest earthquake threats are from faults that occur within Northern California, including the San Andreas, Calaveras, and Hayward faults. Sacramento has a low seismic-ground shaking hazard, and accordingly threats from earthquake hazards are low.

Standards of Significance

The significance criteria used to evaluate the project impacts to geology and soils is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to geology and soils would occur if the project would:

- a. Allow a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.5 of the City's 2035 General Plan MEIR addresses the effects of geology, soils, and seismic hazards on development within the City. The MEIR concluded that all impacts related to seismic hazards, underlying soil characteristics, slope stability, and erosion would be reduced to a less-than-significant level with implementation of policies included in the 2035 General Plan. Relevant policies from the 2035 General Plan are included below.

Relevant General Plan Policies

The following General Plan policies related to geology and soils are applicable to the proposed project:

Environmental Constraints Element

Goal EC 1.1: Hazards Risk Reduction. Protect lives and property from seismic and geologic hazards and adverse soil conditions.

Policy EC 1.1.1: Review Standards. The City shall regularly review and enforce all seismic and geologic safety standards and require the use of best management practices (BMPs) in site design and building construction methods.

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Policy EC 1.1.2: Geotechnical Investigations. The City shall require geotechnical investigations to determine the potential for ground rupture, ground-shaking, and liquefaction due to seismic events, as well as expansive soils and subsidence problems on sites where these hazards are potentially present.

Environmental Resources Element

Goal ER 1.1: Water Quality Protection. Protect local watersheds, water bodies and groundwater resources, including creeks, reservoirs, the Sacramento and American Rivers, and their shorelines.

Policy ER 1.1.7: Construction Site Impacts. The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and storm water management and discharge control ordinance.

Answers to Checklist Questions

- a) The proposed project is not located in an area prone to substantial seismic activity, and therefore is not considered to result in exposure to substantial seismic or geologic hazards. The proposed project would construct a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary along with surface parking on a former industrial site in the City. Project construction would include site clearing, with the exception of the two existing buildings that would remain, minor grading, and utility relocation. No import or export of soils will be required. The site is relatively flat and the proposed project would not involve significant changes in topography. Therefore, slope stability, landslide and erosion hazards would not be significant. However, erosion could occur as a result of site grading. Ordinance 15.88.250 of the Sacramento City Code includes requirements for grading and erosion control. Compliance with these requirements would ensure that soil erosion impacts would be less than significant.

The 2035 General Plan identifies that areas susceptible to liquefaction hazards include Central City, Pocket, and North and South Natomas. Based on the soils, the Geotechnical Report did not identify the project site as having the potential for liquefaction hazards. However, soil types can vary considerably depending on depth to ground water. Soils on the project site can affect the stability and durability of buildings and structures located on the project site. The Geotechnical Report prepared for the project includes recommendations appropriate for typical construction projects. Compliance with the recommendations of this geotechnical report would ensure that impacts related to

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geology and soils would be **less than significant** and there would be no additional significant effects.

Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Geology and Soils.

3.8 Hazards and Hazardous Materials

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project...			
a) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The project site is located in a developed industrial area of the City and has historically been used for automotive repair and storage, as well as unpermitted mobile home trailers. The project site is not included on any list of hazardous materials compiled by the State of California (DTSC 2018). The California Department of Forestry and Fire Protection (CAL FIRE) designates the project site as not being within a very high fire hazard severity zone (CAL FIRE 2008).

A Phase I Environmental Site Assessment (ESA) was prepared for the project site on September 3, 2016 and is attached as Appendix K. It concluded that the project site does not contain any Recognized Environmental Conditions (defined as the presence of likely presence of hazardous substances or petroleum products). However, oil stains on the ground were detected during the inspection on August 29, 2016 where a former truck repair businesses was located and a sump was also observed, however its use was unknown.

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Historical records review indicated that two single walled underground storage tanks (USTs) were installed in 1968 and that one tank was removed. The other tank was closed in place in 1986. Soil samples were taken in 2011 and 2012 and the results revealed no contaminations. As a result, the County issued a No Further Action Letter on June 22, 2012 (Appendix K).

A Hazardous Spill Plan was prepared for the project and included in Appendix F. The Plan lays out specific steps to take in the event of a spill of any potentially hazardous material and identifies all the chemicals required for project operation.

Standards of Significance

The significance criteria used to evaluate the project impacts related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous material would occur if the project would:

- a. Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities.
- b. Expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials.
- c. Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.6 of the City's 2035 General Plan MEIR addresses the effects of hazards and hazardous materials on development within the City. The MEIR determined that although development under the 2035 General Plan may result in the exposure of people to hazards and hazardous materials during construction activities and project operation, impacts would be less than significant. Relevant policies from the 2035 General Plan are included below.

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Relevant General Plan Policies

The following General Plan policies related to hazards and hazardous materials are applicable to the proposed project:

Public Health and Safety Element

Goal PHS 3.1: Reduce Exposure to Hazardous Materials and Waste. Protect and maintain the safety of residents, businesses, and visitors by reducing, and where possible, eliminating exposure to hazardous materials and waste.

Policy PHS 3.1.1: The City shall ensure buildings and sites are investigated for the presence of hazardous materials and/or waste contamination before development for which City discretionary approval is required. The City shall ensure appropriate measures are taken to protect the health and safety of all possible users and adjacent properties.

Policy PHS 3.1.4: Transportation Routes. The City shall restrict transport of hazardous materials within Sacramento to designated routes.

Policy PHS 3.1.8: Risks from Hazardous Materials Facilities. The City shall review proposed facilities that would produce or store hazardous materials, gas, natural gas, or other fuels to identify, and require feasible mitigation for, any significant risks. The review shall consider, at a minimum, the following: presence of seismic or geologic hazards; presence of hazardous materials; proximity to residential development and areas in which substantial concentrations of people would occur; and nature and level of risk and hazard associated with the proposed project.

Goal PHS 3.1: Reduce Exposure to Hazardous Materials and Waste. Protect and maintain the safety of residents, businesses, and visitors by reducing, and where possible, eliminating exposure to hazardous materials and waste.

Policy PHS 3.1.1: Investigate Sites for Contamination. The City shall ensure buildings and sites are investigated for the presence of hazardous materials and/or waste contamination before development for which City discretionary approval is required. The City shall ensure appropriate measures are taken to protect the health and safety of all possible users and adjacent properties.

Policy PHS 3.1.8: Risks from Hazardous Materials Facilities. The City shall review proposed facilities that would produce or store hazardous materials, gas, natural gas, or other fuels to identify, and require feasible mitigation for, any significant risks. The review shall consider, at a minimum, the following: presence of seismic or geologic hazards; presence of hazardous materials; proximity to residential development and areas in which substantial concentrations of people would occur; and nature and level of risk and hazard associated with the proposed project.

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Answers to Checklist Questions

- a) Project construction would involve the use of petroleum-based fuels for maintenance and construction equipment, which would be transported to the site and would be present on the site for short periods of time in a designated staging area. The proposed project would be subject to a Stormwater Pollution Prevention Plan (SWPPP) and implement best management practices (BMPs) to prevent foreseeable upset and accident conditions to the extent possible. To minimize impacts from the handling and use of potentially hazardous materials, the contractor would follow all necessary precautions according to the applicable California Health and Safety Codes (Chapter 6.5, Division 20, California Administration Code, Title 22, relating to Handling, Storage, and Treatment of Hazardous Materials) and the City of Sacramento Building Code and the Uniform Building Code. Since preparation of the Phase 1 ESA in September 2016, the project site, including the buildings, has been cleaned and a significant amount of trash from the prior business uses has been removed and disposed of properly. The Phase 1 ESA noted there were areas of oil staining and a sump was visible on the floor in one of the buildings and recommended the soils be addressed and the sump be further investigated. To address these concerns implementation of Mitigation Measure HAZ-1 would ensure these conditions be remediated as part of further site clean-up.

If evidence of contaminated soils is discovered during grading, implementation of Mitigation Measure HAZ-2 would ensure that contaminants would be cleaned up immediately in compliance with applicable regulations in the event of a spill or release. All hazardous materials would be used, stored, transported, and disposed of according to applicable federal, state and local requirements. Therefore, impacts associated with the exposure or people to contaminated soils during construction would be less than significant with Mitigation Measure HAZ-2.

The proposed project involves operation of a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only (non-storefront) dispensary. Cannabis cultivation would require the use of fertilizers and other chemicals, including calcium nitrate, iron chelate, ammonium nitrate, and magnesium sulfate, which are considered hazardous waste and are highly regulated by numerous State and local agencies primarily the State Department of Toxic Substances Control (DTSC) pursuant to Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste.

The project includes adopting Good Agricultural Practices regarding watering criteria and installing a fertilizer injection system (fertigation) to automatically mix, dose, balance pH, and distribute nutrients through a drip-feeding system directly to the plants, to help reduce the potential for a chemical spill. DTSC is responsible for the inspection and

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enforcement of permitted hazardous waste facilities; hazardous waste generators and on-site treaters; transportable treatment units; transporters; and electronic waste recyclers, processors, and collectors. On the local level, the Sacramento County's Environmental Management Department (EMD) has been designated as the Sacramento region's Certified Unified Program Agency (CUPA) by the California Environmental Protection Agency (CalEPA). The local CUPA is responsible for implementing the local environmental regulatory programs, including Hazardous Materials Release Response Plans and Inventories (Business Plans); California Accidental Release Prevention; Hazardous Waste Generator and Onsite Hazardous Waste Treatment; and Hazardous Material Management Plans (pursuant to the Uniform Fire Code). Within EMD, the Environmental Compliance Division is responsible for all inspections of facilities eligible for regulation within the CUPA programs. Hazardous Materials Business Plans (HMBPs) are reviewed by EMD staff and additional on-site technical verification is conducted in conjunction with the required Hazardous Materials Release Response Plan inspection. These entities oversee the proper use, storage and disposal of any hazardous materials.

Staff handling and using the chemicals on the project site would be trained on the proper use, storage and disposal requirements. All hazardous waste would be disposed of in a manner consistent with state and local laws (see Appendix F). The process for disposal of these wastes includes temporarily storing all used hazardous waste in a plastic-lined metal can or drum waste until it can be removed off-site for disposal. Each can would be labelled "Hazardous Waste," with a list of the hazardous materials that may be placed into the can, and if necessary, labelled "Flammable Materials", as appropriate. Some cans would be dedicated for liquid waste and others for solid waste, such as hazardous-waste-soaked rags. When a can is full, it would be labelled with the date and removed from the facility on a weekly basis by a hazardous waste removal contractor and disposed of at an approved hazardous waste disposal site including Kiefer Landfill or a Transfer and Recycling station.

In the event of a hazardous waste spill (dependent on the type of chemicals released), the spill is required to be immediately reported to EMD and the Governor's Office of Emergency Services, pursuant to Health and Safety Code section 25510. The project includes specific procedures including a Hazardous Materials Spill Plan (see Appendix F) in the event any chemicals are accidentally released. The steps to follow in the event of an accidental release would be clearly posted throughout all of the buildings. Staff would be trained to put on protective clothing, goggles and acid resistant gloves and read labels for instructions or warnings on how to handle a spill; cover all wet spills according to standard operating procedures; clean up dry spills using a designated scoop; place all dry chemicals in a sturdy plastic bag, tie with vinyl bag ties, label if contents are known and

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- put into clear plastic drum with lid. Staff in the surrounding area of the chemical spill would be notified, drains would be closed to prevent the spill from reaching the environment, electrical equipment in the vicinity of the spill would be turned off, the area would be cordoned off to non-essential staff, and first aid kit and spill kits would be available throughout the facility. The Supervisor would first report the spill to EMD and the Sacramento City Fire Department, if help is needed. All spills and disposal of chemicals would be recorded in the Chemical Spill Log and the Chemical Waste Log, respectively. In addition to documentation, staff responsible for a spill or disposal must notify the Director of Cultivation. Therefore, with adherence to specified procedures and all applicable federal, state, and local regulations related to hazardous materials, impacts would be **less than significant**.
- b) The existing buildings on the project site were constructed in 1969 and therefore could contain asbestos-containing materials. However, only renovations to enclose the buildings would occur and it is unlikely that asbestos-containing material would be disturbed. In the event that asbestos-containing material is detected during building renovations, Mitigation Measure HAZ-3 would be implemented. Compliance with Mitigation Measure HAZ-3 would reduce any impacts to **less than significant**.
- c) The project site falls within the City Drainage Basin 148. Based on a Geotechnical Study prepared for the project (see Appendix J), no groundwater was encountered to a maximum depth of 16.5 feet below ground surface. The proposed project is not expected to require excavating to a depth greater than 8 to 10 feet so it is not anticipated groundwater would be encountered during construction activities nor has previous groundwater contamination been identified on the project site. The closest previous groundwater contamination site listed through the State Water Resource Control Board's online system (GeoTracker) is located approximately 200 feet east-northeast of the project site. Groundwater flows in a general north-northwest direction within the vicinity of the project site (SWRCB, 2018). The proposed project would likely not expose people to existing contaminated groundwater during construction activities and the impact would be **less than significant** and there would be no additional significant effects.

Mitigation Measures

Mitigation Measure HAZ-1

During site clearing the area identified as containing oil-stained soil shall be sampled and remediated, by a qualified firm that specializes in the clean-up of existing hazardous conditions. If required, the soil shall be removed and properly disposed of in accordance with applicable federal, State and local (Sacramento County) disposal requirements. In addition, the existing

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sump shall be removed or closed to eliminate its use. These existing conditions shall be addressed and remediated, if required, and verification shall be provided to the City prior to receipt of building permits.

Mitigation Measure HAZ-2

If evidence of contaminated soils is discovered during grading or soil excavation, work in the vicinity of the contaminated area shall cease until the suspected contaminated soils are properly characterized, identified and remediated. Hazardous or contaminated materials may be removed and disposed of from the project site only in accordance with applicable federal, state and local requirements.

Mitigation Measure HAZ-3

If evidence of asbestos-containing materials is discovered during any building renovation, work in the vicinity of the contaminated area shall cease until the suspected contaminated materials are properly characterized, identified and remediated. Hazardous or contaminated materials may be removed and disposed of from the project site only in accordance with applicable federal, state and local requirements.

Findings

All additional significant environmental effects of the project relating to Hazards and Hazardous Materials can be mitigated to a less-than-significant level.

3.9 Hydrology and Water Quality

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
IX. HYDROLOGY AND WATER QUALITY – Would the project...			
a) Substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Environmental Setting

The project site is located within the Lower Sacramento Watershed, Hydrologic Unit Code 18020109 (EPA 2018). The hydrology of the site has been influenced by anthropogenic sources including industrial development in the surrounding area. Sources of hydrology in the project area include precipitation and runoff from the surrounding areas. Existing drainage mains are located along the eastern and southern boundaries of the project site.

A Drainage Study and Water Quality Report were prepared for the project site and are included in Appendix G. The project site falls within City Drainage Basin 148. Two existing main drainage Lines A and B of the Morrison Creek Assessment District Sump 148 run just outside of the project site's south and east boundaries. An existing pump station is located south of Elder Creek Road and adjacent to the northeastern corner of the project site. This pump station elevates the flows from Line A to Morrison Creek Channel. The project's proposed on-site drainage system would be connected to the existing Line A to the east (Appendix G).

The Federal Emergency Management Agency (FEMA) publishes Flood Insurance Rate Maps (FIRM) that delineate flood hazard zones for communities. The project site is located within an area designated as Zone X. FEMA considers areas within Zone X to be protected from the 1% annual chance flood by a Federal flood protection system. This designation became effective in September 2012 (FEMA, 2012).

Standards of Significance

The significance criteria used to evaluate the project impacts to hydrology and water quality is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hydrology and water quality would occur if the project would:

- a. Substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the project.
- b. Substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.7 of the City's 2035 General Plan MEIR addresses hydrology and water quality effects associated with future development within the City. The MEIR identified that development under the 2035 General Plan could result in impacts to water quality due to construction

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activities and operation, and exposure of people to flood risks. Implementation of policies included in the 2035 General Plan would reduce these impacts to less than significant. Relevant policies from the 2035 General Plan are included below.

Relevant 2035 General Plan Policies

The following General Plan policies related to hydrology and water quality are applicable to the proposed project:

Environmental Resources Element

Goal ER 1.1: Water Quality Protection. Protect local watersheds, water bodies and groundwater resources, including creeks, reservoirs, the Sacramento and American rivers, and their shorelines.

Policy ER 1.1.3: Stormwater Quality. The City shall control sources of pollutants and improve and maintain urban runoff water quality through stormwater protection measures consistent with the city's National Pollution Discharge Elimination System (NPDES) Permit.

Policy ER 1.1.4: New Development. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster development), source controls, storm water treatment, runoff reduction measures, best management practices (BMPs) and Low Impact Development (LID), and hydromodification strategies consistent with the city's NPDES Permit.

Policy ER 1.1.5: Limit Stormwater Peak Flows. The City shall require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.

Policy ER 1.1.6: Post-Development Runoff. The City shall impose requirements to control the volume, frequency, duration, and peak flow rates and velocities of runoff from development projects to prevent or reduce downstream erosion and protect stream habitat.

Policy ER 1.1.7: Construction Site Impacts. The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

Environmental Constraints Element

Goal EC 2.1: Flood Protection. Protect life and property from flooding.

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Policy EC 2.1.11: New Development. The City shall require evaluation of potential flood hazards prior to approval of development projects to determine whether the proposed development is reasonably safe from flooding and consistent with California Department of Water Resources (DWR) Urban Level of Flood Protection Criteria. The City shall not approve new development or a subdivision or enter into a development agreement for any property within a flood hazard zone unless the adequacy of flood protection specific to the area has been demonstrated.

Utilities Element

Goal U 4.1: Adequate Stormwater Drainage. Provide adequate stormwater drainage facilities and services that are environmentally-sensitive, accommodate growth, and protect residents and property.

Answers to Checklist Questions

- a) The proposed project would involve development of the project site with a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center, a delivery-only (non-storefront) dispensary, and a paved surface parking lot. Furthermore, Elder Creek Road would also be widened along the project frontage to include curb, gutter and sidewalk. The proposed project would convert natural unvegetated groundcover (approximately 7.90 acres) to paved impervious surfaces (approximately 9.11 acres) (Appendix G). This could alter existing drainage patterns, site infiltration rates, and the rate of surface runoff as calculated within Appendix G. Sacramento City Code Section 13.08.145 addresses mitigation of drainage impacts and requires that when a property contributes drainage to the City's storm drain system or combined sewer system, all storm water and surface runoff drainage impacts resulting from the improvement or development must be fully mitigated to ensure that the improvement or development does not affect the function of the storm drain system or combined sewer system, and that there is no increase in flooding or in water surface elevation that adversely affects individuals, streets, structures, infrastructure, or property. The project site drains into a separated storm drain system and the project would be designed to fully mitigate its contribution to the City's storm water infrastructure.

Storm drainage for the project site would be provided via existing storm drains Line A (54-inch line) located along the eastern and southern property boundary, (Appendix G). Storm water infrastructure that would serve the project site has been sized to accommodate projected development. The City operates under a Phase I National Pollutant Discharge Elimination System (NPDES) permit, which requires developers to include water quality and watershed protection measures for all development projects (City of Sacramento 2014). The City implements a comprehensive Storm Water Quality Improvement Plan (SQIP) to ensure compliance with its NPDES permit. The SQIP contains provisions for construction storm

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water control and post-construction storm water control for new development and redevelopment. These include storm water quality treatment and/or BMPs that are required to be implemented in the project design phase.

Construction projects that involve disturbance of over one acre of land are required by law to seek coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit, SWRCB Order No. 2009-0009-DWQ / CAS000002, as amended). To comply with this permit, construction projects disturbing over one acre must prepare a SWPPP, which specifies BMPs to reduce the contribution of sediments, spilled and leaked liquids from construction equipment, and other construction-related pollutants to storm water runoff. As the proposed project's construction-related disturbance area would exceed one acre in size, it would be required to submit all permit registration documents (including the SWPPP) to the State Water Resources Control Board, obtain a waste discharge identification number as certification of coverage, and implement the SWPPP during construction activities. The SWPPP identifies which structural and nonstructural BMPs would be implemented, such as sandbag barriers, dust controls, perimeter controls, drain inlet protection, proper construction site housekeeping practices, and construction worker training.

After construction, the proposed project would be required to use source control, runoff reduction, and treatment control measures set forth in the Storm Water Quality Design Manual for the Sacramento Region. These include storm water treatment measures, such as swales, filter strips, media filters and infiltration, and spill prevention and cleanup measures. Furthermore, the City's Land Grading and Erosion Control Ordinance and Storm Water Management and Discharge Control Code include requirements for reducing storm water pollutants. The proposed project would comply with the City's SQIP and Storm Water Quality Design Manual, and all other applicable regulations; therefore, it would result in a less-than-significant impact with regard to increase in sediments due to storm water runoff and water quality. The proposed project would have a **less-than-significant impact** on water quality.

- b) The proposed project would involve development of the project site with a cannabis cultivation and manufacturing/extraction facility, distribution center and a delivery-only dispensary; no housing would be constructed as part of the project. No significant changes to topography or drainage patterns that would affect flooding is expected to occur as part of the proposed project. The proposed project would not be located within a 100-year flood hazard area, as designated by FEMA (FEMA 2012). The project site is within Zone X, which designates areas of minimal flood hazard. Therefore, impacts due to flooding would be **less than significant** and there would be no additional significant effects.

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Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Hydrology and Water Quality.

3.10 Noise

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
X. NOISE – Would the project...			
a) Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in residential interior noise levels of 45 dBA Ldn or greater caused by noise level increases due to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The project site is located in a developed area surrounded by industrial uses. The site is located adjacent to a building supply company to the east, Elder Creek Road, Morrison Creek and the U.S. Naval and Marine Reserve Readiness Center to the north, vacant land to the south, and a window tinting business to the west. Other surrounding uses include a concrete supply business, Sierra Waste Recycling and Transfer Station, and a FedEx ground facility. The primary existing noise source within the project area is noise from traffic on local roadways and from industrial operations. The nearest sensitive receptors are residences located approximately 0.5 mile west of

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the project site. The project site is not within the Airport Influence Area for the Sacramento Metropolitan Airport.

It is generally accepted that the average healthy ear can barely perceive a noise level change of 3 dB (Caltrans, 2013). A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as twice or half as loud. A doubling of sound energy results in a 3 dBA increase in sound, which means that a doubling of sound energy (e.g., doubling the average daily numbers of traffic on a road) would result in a barely perceptible change in sound level.

Standards of Significance

The significance criteria used to evaluate the project impacts related to noise is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to noise would occur if the project would:

- a. Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases.
- b. Result in residential interior noise levels of 45 dBA Ldn or greater caused by noise level increases due to the project.
- c. Result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance.
- d. Permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction.
- e. Permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations.
- f. Permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.8 of the MEIR addresses the noise effects of development within the City under the 2035 General Plan. The MEIR concluded that that development under the 2035 General Plan would contribute to the introduction of noise from vehicular traffic, aircraft, railways, light rail and stationary sources. Policies included in the General Plan set exterior and interior noise standards for noise-sensitive uses. Although these policies would reduce impacts due to exterior and interior noise generation, impacts regarding exterior and interior noise levels and construction vibration would remain significant and unavoidable. Implementation of policies included in the 2035 General plan would reduce impacts from construction noise and vibration

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from transportation facilities to less than significant. Relevant policies from the 2035 General Plan are included below.

Relevant General Plan Policies

The following General Plan policies related to noise are applicable to the proposed project:

Environmental Constraints

Goal EC 3.1: Noise Reduction. Minimize noise impacts on land uses and human activity to ensure the health and safety of the community.

Policy EC 3.1.1: Exterior Noise Standards. The City shall require noise mitigation for all development where the projected exterior noise levels exceed those shown in Table EC 1, to the extent feasible.

**Table EC 1
Exterior Noise Compatibility Standards for Various Land Uses**

Land Use Type	Highest Level of Noise Exposure That Is Regarded as “Normally Acceptable” ^a (L _{dn} ^b or CNEL ^c)
Auditoriums, Concert Halls, Amphitheaters	Mitigation based on site-specific study
Sports Arena, Outdoor Spectator Sports	Mitigation based on site-specific study
Playgrounds, Neighborhood Parks	70 dBA
Golf Courses, Riding Stables, Water Recreation, Cemeteries	75 dBA
Office Buildings—Business, Commercial and Professional	70 dBA
Industrial, Manufacturing, Utilities, Agriculture	75 dBA

Notes:

- a. As defined in the Guidelines, “Normally Acceptable” means that the “specified land use is satisfactory, based upon the assumption that any building involved is of normal conventional construction, without any special noise insulation requirements.”
- b. L_{dn} or Day Night Average Level is an average 24-hour noise measurement that factors in day and night noise levels.
- c. CNEL or Community Noise Equivalent Level measurements are a weighted average of sound levels gathered throughout a 24-hour period.
- d. Applies to the primary open space area of a detached single-family home, duplex, or mobile home, which is typically the backyard or fenced side yard, as measured from the center of the primary open space area (not the property line). This standard does not apply to secondary open space areas, such as front yards, balconies, stoops, and porches.
- e. dBA or A-weighted decibel scale is a measurement of noise levels.
- f. The exterior noise standard for the residential area west of McClellan Airport known as McClellan Heights/Parker Homes is 65 dBA.
- g. Applies to the primary open space areas of townhomes and multi-family apartments or condominiums (private year yards for townhomes; common courtyards, roof gardens, or gathering spaces for multi-family developments). These standards shall not apply to balconies or small attached patios in multistoried multi-family structures.
- h. With land use designations of Central Business District, Urban Neighborhood (Low, Medium, or High) Urban Center (Low or High), Urban Corridor (Low or High).
- i. All mixed-use projects located anywhere in the City of Sacramento
- j. See notes d and g above for definition of primary open space areas for single-family and multi-family developments.

Source: Governor’s Office of Planning and Research, State of California General Plan Guidelines 2003, October 2003

Policy EC 3.1.2: Exterior Incremental Noise Standards. The City shall require noise mitigation for all development that increases existing noise levels by more than the allowable increment shown in Table EC-2, to the extent feasible.

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Table EC-2
Exterior Incremental Noise Impact Standards for Noise-Sensitive Uses (dBA)

Residences and buildings where people normally sleep ^a		Institutional land uses with primarily daytime and evening uses ^b	
<i>Existing L_{dn}</i>	<i>Allowable Noise Increment</i>	<i>Existing Peak Hour L_{eq}</i>	<i>Allowable Noise Increment</i>
45	8	45	12
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0

a. This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.

b. This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.

Source: FTA, Transit Noise Impact and Vibration Assessment, May 2006

Policy EC 3.1.8: Operational Noise. The City shall require mixed-use, commercial, and industrial projects to mitigate operational noise impacts to adjoining sensitive uses when operational noise thresholds are exceeded.

Policy EC 3.1.10: Construction Noise. The City shall require development projects subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.

Policy EC 3.1.11: Alternatives to Sound Walls. The City shall encourage the use of design strategies and other noise reduction methods along transportation corridors in lieu of sound walls to mitigate noise impacts and enhance aesthetics.

City of Sacramento Municipal Code

Chapter 8.68 of the City of Sacramento Municipal Code contains applicable noise regulations within City Limits, as listed below:

Section 8.68.060 – Exterior Noise Standards:

- a. The noise standards that apply to all agricultural and residential properties are:
 1. From seven a.m. to ten p.m. the exterior noise standard shall be fifty-five (55) dBA.
 2. From ten p.m. to seven a.m. the exterior noise standard shall be fifty (50) dBA.

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- b. It is unlawful for any person at any location to create any noise which causes the noise levels when measured on agricultural or residential property to exceed for the duration of time set forth following, the specified exterior noise standards in any one hour by:

Cumulative Duration of the Intrusive Sound	Allowance Decibels
Cumulative period of 30 minutes per hour	0
Cumulative period of 15 minutes per hour	+5
Cumulative period of 5 minutes per hour	+10
Cumulative period of 1 minute per hour	+15
Level not to be exceeded for any time per hour	+20

Source: Sacramento City Code, 2012.

- c. Each of the noise limits specified in subsection B of this section shall be reduced by five dBA for impulsive or simple tone noises, or for noises consisting of speech or music.
- d. If the ambient noise level exceeds that permitted by any of the first four noise categories specified in subsection B of this section, the allowable noise limit shall be increased in five dBA increments in each category to encompass the ambient noise level. If the ambient noise level exceeds the fifth noise level category, the maximum ambient noise level shall be the noise limit for that category.

8.68.080 Exemptions

The following activities shall be exempted from the provisions of this chapter:

- a. School bands, school athletic and school entertainment events. School entertainment events shall not include events sponsored by student organizations;
- b. Activities conducted on parks and public playgrounds, provided such parks and public playgrounds are owned and operated by a public entity;
- c. Any mechanical device, apparatus or equipment related to or connected with emergency activities or emergency work;
- d. Noise sources due to the erection (including excavation), demolition, alteration or repair of any building or structure between the hours of seven a.m. and six p.m., on Monday, Tuesday, Wednesday, Thursday, Friday and Saturday, and between nine a.m. and six p.m. on Sunday; provided, however, that the operation of an internal combustion engine shall not be exempt pursuant to this subsection if such engine is not equipped with suitable exhaust and intake silencers which are in good working order. The director of building inspections may permit work to be done during the hours not exempt by this subsection in the case of urgent necessity and in the interest of public health and welfare for a period not to exceed three days. Application for this exemption may be made in conjunction with the application for the work permit or during progress of the work;

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- e. Noise sources associated with agricultural operations provided such operations take place between the hours of six a.m. and eight p.m.; provided, however, that the operation of an internal combustion engine shall not be exempt pursuant to this subsection if such engine is not equipped with suitable exhaust and intake silencers which are in good working order;
- f. Any mechanical device, apparatus or equipment which are utilized for the protection or salvage of agricultural crops during period of adverse weather conditions or when the use of mobile noise sources is necessary for pest control; provided, however, that the operation of an internal combustion engine shall not be exempt pursuant to this subsection if such engine is not equipped with suitable exhaust and intake silencers which are in good working order;
- g. Noise sources associated with maintenance of street trees and residential area property provided said activities take place between the hours of seven a.m. and six p.m.;
- h. Tree and park maintenance activities conducted by the city department of parks and community services; provided, however, that use of portable gasoline-powered blowers within two hundred (200) feet of residential property shall comply with the requirements of Section 8.68.150 of this chapter.

Answers to Checklist Questions

a-e) *Construction*

Project construction would create noise from the use of construction equipment and vehicles. Temporary construction activities would use conventional construction techniques and equipment that would not generate substantial levels of vibration or groundborne noise. Construction activities would include site clearing, with the exception of the existing buildings that would remain and be renovated, minor grading, and utility relocation. There would be trenching for on-site utilities and widening of Elder Creek Road to install curb, gutter and sidewalk. The nearest noise-sensitive receptors are located in the residential area approximately 0.5 of a mile west of the project site. Noise from construction would be temporary, occurring for approximately 12 to 18 months and would comply with the City's Noise Ordinance that permits construction to occur between the hours of 7:00 a.m. and 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sundays. By following the allowed hours of construction operation, the project is exempt as detailed in the City of Sacramento Noise Ordinance 8.68.080 D. Thus, noise from project construction is a **less-than-significant impact**.

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Operation

As stated above, the primary sources of noise in the project vicinity come from traffic. The project does not include any new residential uses and is located in an existing industrial area of the City. The proposed project would increase traffic in the project area by constructing a new facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary. The project includes a total of 300 employees that would work in two shifts in the greenhouses, manufacturing, distribution, and delivery-only (non-storefront) dispensary buildings, and in the corporate office. This addition of employees to the project site would introduce additional vehicle traffic on nearby roadways.

Sound level changes of 3 dB or less are considered barely perceivable by most people, as discussed in the noise setting above. Therefore, a 3 dB increase is the minimum threshold of significance for a traffic noise increase to be perceptible. In order to increase traffic noise levels by 3 dBA, a doubling in the Average Daily Traffic (ADT) count on nearby roads is necessary (Caltrans, 2013). The Traffic Study prepared for the proposed project determined that existing traffic volumes along Elder Creek Road are 15,675 daily trips (see Table 3 in Appendix L). The project is estimated to generate 999 daily vehicle trips which is a less than 10 percent increase in total trips (see Appendix L). Therefore, the increase in project-related traffic to the vicinity roadways would increase the CNEL by 3 dB or less, which is below the discernible level of change for the average human ear. Thus, the increase in off-site traffic noise from future development of the project site would be **less than significant**.

As the majority of facility operations would be indoors, noise from operation of the facility, other than vehicle noise, would be minimal. Furthermore, because the nearest sensitive receptors would be located approximately 0.5 of a mile west of the project site, any noise produced from facility operations or in the proposed parking lot would not cause a significant impact due to distance. This is a **less-than-significant impact**.

- f) There are no historic buildings or known archeological resources near the project site that could be adversely impacted due to project construction or operation. Therefore, **no impact** would occur and there would be no additional significant effects.

Mitigation Measures

No mitigation would be required.

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Findings

The project would have no additional project-specific environmental effects relating to Noise.

3.11 Public Services

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
XI. PUBLIC SERVICES – Would the project...			
a) Result in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The City of Sacramento provides fire protection and law enforcement services to the project site. Police protection services are provided by the Sacramento City Police Department (SPD). The project site is within the Morrison Creek service area (District 6) and is served by Beat 6C, which operates from the Richards Police Facility located at 300 Richards Boulevard, approximately 7.8 miles from the project site (SPD, 2018).

Fire protection services and emergency medical services are provided by the Sacramento Fire Department (SFD). The nearest fire station, Station 10, is located approximately 2.5 miles from the project site at 5642 66th Street. The City has entered a mutual aid agreement with Metro Fire and other fire protection districts within the region that provide further protection services within the City when necessary.

A Security Plan has been prepared for the project to address potential safety and security concerns that may occur due to the presence of cannabis plants and products.

Standards of Significance

The significance criteria used to evaluate the project impacts to public services are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to public services would occur if the project would:

- a. Result in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan.

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SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.10 of the MEIR addresses the public services effects of development within the City under the 2035 General Plan. The MEIR found that implementation of policies included in the 2035 General Plan would reduce impacts related to the provision of police, fire, to less than significant. Relevant policies from the 2035 General Plan are included below.

Relevant General Plan Policies

The following General Plan policies related to public services are applicable to the proposed project:

Public Health and Safety Element

Goal PHS 1.1: Crime and Law Enforcement. Work cooperatively with the community, regional law enforcement agencies, local government and other entities to provide quality police service that protects the long-term health, safety and well-being of our city, reduce current and future criminal activity, and incorporate design strategies into new development.

Policy PHS 1.1.7: Development Review. The City shall continue to include the Police Department in the review of development proposals to ensure that projects adequately address crime and safety, and promote the implementation of Crime Prevention through Environmental Design principles.

Policy PHS 1.1.8: Development Fees for Facilities and Services. The City shall require development projects to contribute fees for police facilities.

Public Health and Safety Element

Goal PHS 2.1: Fire Protection and Emergency Medical Services. Provide coordinated fire protection and emergency medical services that address the needs of Sacramento residents and businesses and maintains a safe and healthy community.

Policy PHS 2.1.4: Response Units and Facilities. The City shall provide additional response units, staffing, and related capital improvements, including constructing new fire stations, as necessary, in areas where a fire company experiences call volumes exceeding 3,500 in a year to prevent compromising emergency response and ensure optimum service to the community.

Policy PHS 2.1.11: Development Fees for Facilities and Services. The City shall require development projects to contribute fees for fire protection services and facilities.

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Policy PHS 2.2.2: Development Review. The City shall continue to include the Fire Department in the review of development proposals to ensure projects adequately address safe design and on-site fire protection and comply with applicable fire and building codes.

Policy PHS 2.2.3: Fire Sprinkler Systems. The City shall promote installation of fire sprinkler systems in new commercial and residential development, and shall encourage the installation of sprinklers in existing structures when it is reasonable and not cost prohibitive.

Policy PHS 2.2.4: Water Supply for Fire Suppression. The City shall ensure that adequate water supplies are available for fire-suppression throughout the city, and shall require development to construct all necessary fire suppression infrastructure and equipment.

Policy PHS 2.2.8: Wildland Hazards on Private Properties. The City shall continue to require private property owners to remove excessive/overgrown vegetation (e.g., trees, shrubs, weeds) and rubbish to the satisfaction of the Fire Department to prevent and minimize fire risks to surrounding properties.

Answers to Checklist Questions

- a) The proposed project would not include the construction of residential or other uses that would induce population growth. Therefore, demand for schools and parks would not increase as a result of the proposed project. The proposed project consists of the construction and operation of a 266,394 square foot facility that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only dispensary on a former industrial site in the City. There would be an increase in use of the project site, which would increase demand for police, fire and emergency medical services, but it is anticipated the existing police and fire personnel would be adequate to address the increase in demand. To address concerns regarding security the applicant has prepared a Security Plan that includes full-time security overseeing the site. The plan has been reviewed for acceptability by the Police Department. The project site would be completely fenced and access to the site would be monitored by on-site security. All vehicles accessing the site would be required to be checked in by security and go through a controlled gate. Because the project is including on-site security it is anticipated calls for assistance from the City's police department would be low.

The project includes the use, storage and disposal of a variety of pesticides and other types of chemicals. To ensure the safe use, storage, handling and disposal of these substances the applicant prepared a Hazardous Spill Plan to address the proper procedures to follow in the event of a spill (see Appendix F). The City's Fire Department has reviewed the site plans to ensure access for fire trucks is provided throughout and around the perimeter of the project

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site. Secondary emergency vehicle access is provided at a fire-access gate located in the northeast corner of the project site. Knox boxes would be provided at the gate house (outside of the main gate) and at the secondary fire access gate to enable fire and police personnel to access the campus in the event of a fire or emergency after hours. Roadway widths have been designed per the City’s requirements for turning radii to allow fire trucks to easily access internal roadways. The closest fire station to the project site is Station 10, located at 5642 66th Street, approximately 2.5 miles or seven minutes from the site.

It is not anticipated that the project would require the City to hire additional police and fire personnel that would necessitate expanding new facilities or constructing new facilities. Therefore, the proposed project would result in a **less-than-significant impact** on public services and there would be no additional significant effects.

Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Public Services.

3.12 Recreation

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
XII. RECREATION – Would the project...			
a) Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The City of Sacramento Parks and Recreation Department maintains parks and recreation facilities within the City. The City contains 226 parks and parkways comprised of approximately 3,200 acres of land (City of Sacramento 2013-2018). These include neighborhood parks, community parks, and regional parks. The project does not include any residences or a new population that would require recreation facilities.

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Standards of Significance

The significance criteria used to evaluate the project impacts to recreation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to recreation would occur if the project would:

- a. Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities.
- b. Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 3.1 of the MEIR addresses the recreation effects of development within the City under the 2035 General Plan. The MEIR concluded that impacts from development under the 2035 General Plan would be less than significant with implementation of Quimby Act and City Code requirements that offset demand for recreational facilities, along with policies included in the 2035 General Plan. Relevant policies from the 2035 General Plan are included below.

Relevant General Plan Policies

The following General Plan policies related to recreation are applicable to the proposed project:

Education, Recreation, and Culture

Goal ERC 2.1: Integrated Parks and Recreation System. Provide an integrated system of parks, open space areas, and recreational facilities that are safe and connect the diverse communities of Sacramento.

Goal ERC 2.2: Parks, Community and Recreation Facilities and Services. Plan and develop parks, community and recreation facilities and services that enhance community livability; improve public health and safety; are equitably distributed throughout the city; and are responsive to the needs and interests of residents, employees, and visitors.

Answers to Checklist Questions

- a,b) The proposed project would not include the construction of residential or other uses that would induce population growth. Therefore, no increase in demand for recreational facilities would occur as a result of the proposed project. The proposed project includes construction of a new 266,394 square foot facility consisting of two

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rehabilitated existing buildings and three MLCF buildings that would provide cannabis cultivation, manufacturing/extraction of cannabis products, a distribution center and a delivery-only (non-storefront) dispensary. The project is a commercial development that does not include any on-site recreation facilities, but the applicant would pay any required City park fees as part of the City’s building permit fees. The proposed project would not impact existing or proposed recreation facilities and would not induce population growth that would increase demand on existing park facilities; therefore, the impact is **less than significant** and there would be no additional significant effects.

Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Recreation.

3.13 Transportation and Traffic

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
XIII. TRANSPORTATION AND TRAFFIC – Would the project...			
a) Roadway segments: degrade peak period Level of Service (LOS) from A,B,C or D (without the project) to E or F (with project) or the LOS (without project) is E or F, and project generated traffic increases the Volume to Capacity Ratio (V/C ratio) by 0.02 or more?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Intersections: degrade peak period level of service from A, B, C or D (without project) to E or F (with project) or the LOS (without project) is E or F, and project generated traffic increases the peak period average vehicle delay by five seconds or more?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Freeway facilities: off-ramps with vehicle queues that extend into the ramp’s deceleration area or onto the freeway; project traffic increases that cause any ramp’s merge/diverge level of service to be worse than the freeway’s level of service; project traffic increases that cause the freeway level of service to deteriorate beyond level of service threshold defined in the Caltrans Route Concept Report for the facility; or the expected ramp queue is greater than the storage capacity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Transit: adversely affect public transit operations or fail to adequately provide for public access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
e) Bicycle facilities: adversely affect bicycle travel, bicycle paths or fail to adequately provide for access by bicycle?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Pedestrian: adversely affect pedestrian travel, pedestrian paths or fail to adequately provide for access by pedestrians?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The project site is located in the City and is adjacent to Elder Creek Road on the north and the Union Pacific rail lines to the west, as shown on Figure 2. Because this is an industrial area of the City there are minimal facilities for pedestrians, bicyclists and transit. A Transportation Analysis was prepared to analyze existing and projected traffic conditions with implementation of the proposed project and is included as Appendix M.

Roadway System

Elder Creek Road is an east-west arterial that has one travel lane in each direction. To the east it extends into unincorporated Sacramento County and continues to Excelsior Road. To the west it extends to Stockton Boulevard where it becomes 47th Avenue. The City of Sacramento 2035 General Plan anticipates widening Elder Creek Road to four lanes in the future.

Power Inn Road, located approximately 0.4 of a mile to the west and Florin Perkins Road, located approximately 0.5 of a mile to the east are north-south arterials with two travel lanes in each direction.

Existing Traffic Volumes

Traffic counts were taken along Elder Creek Road near the project site in April 2018, during the AM and PM peak hours as shown below in Table 6. The Elder Creek Road segment currently operates at LOS D, which meets the City's thresholds.

Table 6
Existing Traffic Volumes

Roadway	AM Peak Hour	PM Peak Hour	Daily
Elder Creek Road	1,168	1,274	15,675

Source: Appendix L

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Trip Generation

The project is estimated to generate approximately 999 weekday trips, which includes 165 AM peak hour trips and 178 PM peak hour trips, as shown in Table 5 included in Appendix L.

Pedestrian, Bicycle and Transit System

Due to the industrial nature of this area there are no sidewalks or striped bike lanes along Elder Creek Road. The closest transit stops are located along Power Inn Road and along Elder Creek Road, east of Power Inn Road, over a half mile from the project site.

Standards of Significance

The significance criteria used to evaluate the project impacts to traffic and circulation is based on Appendix G of the CEQA Guidelines and established standards and policies for the City of Sacramento. According to Appendix G of the CEQA Guidelines and these jurisdiction standards, a significant impact related to traffic and circulation would occur if the project would:

- a. Roadway Segments: The traffic generated by a project degrades peak period LOS from an acceptable level (A, B, C or D without the project) to an unacceptable LOS (E or F with project); or the LOS (without project) is unacceptable, and project generated traffic increases the Volume to Capacity Ratio (V/C ratio) by 0.02 or more.
- b. Intersections: The traffic generated by a project degrades peak period level of service from an acceptable LOS (A, B, C or D without project) to an unacceptable LOS (E or F with project); or the LOS (without project) is unacceptable and project generated traffic increases the peak hour period average vehicle delay by five seconds or more.
- c. Freeway Facilities: Off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway; project traffic increases that cause any ramp's merge/diverge level of service to be worse than the freeway's level of service; project traffic increases that cause the freeway level of service to deteriorate beyond level of service threshold defined in the Caltrans Route Concept Report for the facility; or the expected ramp queue is greater than the storage capacity.
- d. Transit: Adversely affect public transit operations; or fail to adequately provide for access to public transit.
- e. Bicycle Facilities: Adversely affect bicycle travel, bicycle paths; or fail to adequately provide for access by bicycle.
- f. Pedestrian Circulation: Adversely affect pedestrian travel, pedestrian paths; or fail to adequately provide for access by pedestrians.

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Note: General Plan Mobility Element Policy M 1.2.2 (below) sets forth definitions for what is considered an acceptable LOS. Policy M 1.2.2 applies to the study area as follows:

- LOS A-E is to be maintained during peak periods; provided, LOS F may be acceptable if improvements are made to the overall transportation system and/or non-vehicular transportation and transit are promoted as part of the project or a City-initiated project.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.12 of the MEIR addresses the increase in traffic associated with development in the City under the 2035 General Plan. The MEIR analyzed impacts of development under the 2035 General Plan on vehicular, bicycle, pedestrian, public transit, and aviation modes of transportation. The analysis examined existing roadway capacity and levels of service, and transportation impacts due to development under the 2035 General Plan. Implementation of policies included in the 2035 General Plan would reduce most traffic impacts to less than significant. However, impacts to freeway segments (Impact 4.12-4) and impacts to roadway segments (Impact 4.12-3) in adjacent jurisdictions would remain significant and unavoidable. Relevant policies from the 2035 General Plan are included below.

Relevant General Plan Policies

The following General Plan policies related to transportation and traffic are applicable to the proposed project:

Mobility

Policy M 1.2.2: Level of Service (LOS) Standard. The City shall implement a flexible context-sensitive Level of Service (LOS) standard, and will measure traffic operations against the vehicle LOS thresholds established in this policy. The City will measure Vehicle LOS based on the methodology contained in the latest version of the Highway Capacity Manual (HCM) published by the Transportation Research Board. The City's specific vehicle LOS thresholds have been defined based on community values with respect to modal priorities, land use context, economic development, and environmental resources and constraints. As such, the City has established variable LOS thresholds appropriate for the unique characteristics of the City's diverse neighborhoods and communities. The City will strive to operate the roadway network at LOS D or better for vehicles during typical weekday AM and PM peak-hour conditions with the following exceptions described below and mapped on Figure M-1. Exhibit 4.12-2 shows the boundary of each vehicle LOS exception area.

- A. Core Area (Central City Community Plan Area) – LOS F allowed
- B. Priority Investment Areas – LOS F allowed

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C. LOS E Roadways – LOS E is allowed for the following roadways because expansion of the roadways would cause undesirable impacts or conflict with other community values.

- 65th Street: Elvas Avenue to 14th Avenue
- Arden Way: Royal Oaks Drive to I-80 Business
- Broadway: Stockton Boulevard to 65th Street
- College Town Drive: Hornet Drive to La Rivera Drive
- El Camino Avenue: I-80 Business to Howe Avenue
- Elder Creek Road: Stockton Boulevard to Florin Perkins Road
- Elder Creek Road: South Watt Avenue to Hedge Avenue
- Fruitridge Road: Franklin Boulevard to SR 99
- Fruitridge Road: SR 99 to 44th Street
- Howe Avenue: El Camino Avenue to Auburn Boulevard
- Sutterville Road: Riverside Boulevard to Freeport Boulevard

LOS E is also allowed on all roadway segments and associated intersections located within ½ mile walking distance of light rail stations.

D. Other LOS F Roadways – LOS F is allowed for the following roadways (up to the identified volume/capacity ratio shown below) because expansion of the roadways would cause undesirable impacts or conflict with other community values.

- 47th Avenue: State Route 99 to Stockton Boulevard
- Arcade Boulevard: Marysville Boulevard to Roseville Road
- Carlson Drive: Moddison Avenue to H Street
- El Camino Avenue: Grove Avenue to Del Paso Boulevard
- Elvas Avenue: J Street to Folsom Boulevard
- Elvas Avenue/56th Street: 52nd Street to H Street
- Florin Road: Havenside Drive to Interstate 5
- Florin Road: Freeport Boulevard to Franklin Boulevard
- Florin Road: Interstate 5 to Freeport Boulevard
- Folsom Boulevard: 47th Street to 65th Street
- Folsom Boulevard: Howe Avenue to Jackson Highway

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- Folsom Boulevard: US 50 to Howe Avenue
- Freeport Boulevard: Sutterville Road (North) to Sutterville Road (South)
- Freeport Boulevard: 21st Street to Sutterville Road (North)
- Freeport Boulevard: Broadway to 21st Street
- Garden Highway: Truxel Road to Northgate Boulevard
- H Street: Alhambra Boulevard to 45th Street
- H Street 45th: Street to Carlson Drive
- Hornet Drive: US 50 Westbound On-ramp to Folsom Boulevard
- Howe Avenue: US 50 to Fair Oaks Boulevard
- Howe Avenue: US 50 to 14th Avenue
- Raley Boulevard: Bell Avenue to Interstate 80
- South Watt Avenue: US 50 to Kiefer Boulevard
- West El Camino Avenue: Northgate Boulevard to Grove Avenue

If maintaining the above LOS standard would, in the City's judgment be infeasible and/or conflict with the achievement of other goals, LOS E or F conditions may be accepted provided that provisions are made to improve the overall system, promote non-vehicular transportation, and/or implement vehicle trip reduction measures as part of a development project or a city-initiated project. Additionally, the City shall not expand the physical capacity of the planned roadway network to accommodate a project beyond that identified in Figure M4 and M4a (2035 General Plan Roadway Classification and Lanes).

Policy M 1.2.3: Transportation Evaluation. The City shall evaluate discretionary projects for potential impacts to traffic operations, traffic safety, transit service, bicycle facilities, and pedestrian facilities, consistent with the City's Traffic Study Guidelines.

Answers to Checklist Questions

- a) With the addition of project traffic, under Existing plus Project conditions roadway segments of Elder Creek Road would not exceed the City's thresholds, as shown in Table 7 below. The Elder Creek roadway segments would continue to operate at LOS D and the project would not degrade operations to unacceptable levels during the AM or PM peak hours. Therefore, impacts are **less than significant** there would be no additional significant effects.

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Table 7
Existing Plus Project Roadway Segment Conditions

Roadway	Segment	Operational Class	Lanes	Daily Volume	V/C Ratio	LOS
<i>Without Project</i>						
Elder Creek Rd	Power Inn Rd to Florin Perkins Rd	Arterial-Moderate Access control	2	15,675	0.87	D
<i>With Project</i>						
Elder Creek Rd	Power Inn Rd to Florin Perkins Rd	Arterial-Moderate Access control	2	16,175	0.90	D

Source: Appendix L

- b) The proposed project would increase travel volumes, but would not change the LOS at the Elder Creek Road and project driveway to unacceptable levels during the AM or PM peak hours. The intersection would operate at LOS A, as shown in Table 8. The traffic analysis assumes the widening of Elder Creek Road as part of the project along the project frontage in accordance with City Street Design Standards. Therefore, impacts are **less than significant** there would be no additional significant effects.

Table 8
Existing Plus Project Intersection Operating Conditions

Intersection	Existing Plus Project			
	AM Peak Hr		PM Peak Hr	
	Delay (seconds)	LOS	Delay (seconds)	LOS
Elder Creek Rd and Driveway (two-way stop control)	0.9	A	2.0	A
Northbound	15.4	C	20.4	C
Westbound Left Turn	9.3	A	8.7	A

Source: Appendix L

- c) Due to the limited number of vehicle trips the project would generate, the City has determined project traffic would not result in freeway queues exceeding the available storage during peak hours. Therefore, impacts are **less than significant** there would be no additional significant effects.
- d-f) There are limited facilities for pedestrian and bicycle access along Elder Creek Road. The project is required to construct curb, gutter and sidewalk along the project frontage, but this sidewalk would not connect to any existing sidewalk because they currently do not exist along this segment of Elder Creek Road. During project construction heavy vehicles, equipment and trucks would access the site and would be staged on-site during

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construction. Construction may also include disruptions to the transportation network near the project site, including the possibility of temporary lane closures, and/or street closures. These activities could result in degraded roadway operating conditions that could result in inadequate emergency access. Mitigation Measure TRAF-1 requires the project applicant to prepare a construction traffic management plan that would reduce traffic impacts during construction to less than significant. Compliance with Mitigation Measure TRAF-1 would reduce impacts to less than significant.

During project operation, the proposed project would not adversely affect existing or planned transit, bicycle or pedestrian facilities due to the limited number of vehicle trips generated and the project would not adversely affect bicycle travel, bicycle paths, or pedestrian access. The proposed project would also not adversely affect public transit operations or modify or impede any existing or planned transit facilities/routes. Therefore, impacts would be **less than significant**.

Mitigation Measures

Mitigation Measure TRAF-1

Prior to the start of any construction activities, a Construction Traffic Management plan shall be prepared to the satisfaction of the City's Traffic Engineer and subject to review by all affected agencies. The plan shall ensure that acceptable operating conditions on roadways are maintained. At a minimum, the plan shall include:

- Description of trucks including: number and size of trucks per day, expected arrival / departure times, truck circulation patterns.
- Description of staging area including: location, maximum number of trucks simultaneously permitted in staging area, use of traffic control personnel, specific signage.
- Description of street closures and/or bicycle and pedestrian facility closures including: duration, advance warning and posted signage, safe and efficient access routes for emergency vehicles, and use of manual traffic control.
- Description of access plan including: provisions for safe vehicular, pedestrian, and bicycle travel, minimum distance from any open trench, special signage, and private vehicle accesses.
- Provisions for parking for construction workers.

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Findings

All additional significant environmental effects of the project relating to Transportation and Traffic can be mitigated to a less-than-significant level.

3.14 Tribal Cultural Resources

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
XIV. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Assembly Bill (AB) 52 established a consultation process, effective July 1, 2015, between California public agencies and California Native American Tribes. AB 52 further established a category of resources known as tribal cultural resources. At the outset of the CEQA process, public agencies must notify tribes that have requested such notice, of any project that has the potential to impact a tribal cultural resource. The City sent letters to all tribes that have requested notification and one tribe responded.

Relevant General Plan Policies

The following General Plan policies related to tribal cultural resources are applicable to the proposed project:

Historic and Cultural Resources

Policy HCR 2.1.3: Consultation. The City shall consult with appropriate organizations and individuals (e.g., California Historical Resources Information System (CHRIS) Information Centers, the Native American Heritage Commission (NAHC), the CA Office of Planning and

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Research (OPR) “Tribal Consultation Guidelines”, etc.) and shall establish a public outreach policy to minimize potential impacts to historic and cultural resources.

Standards of Significance

The significance criteria used to evaluate the project impacts to tribal cultural resources is based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to tribal cultural resources would occur if the project would:

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR analyzed impacts to archeological resources within the City under the 2035 General Plan. Archeological materials originating from Native American groups that have occupied the City and surrounding areas for thousands of years prior to settlement of non-Native people have been found throughout the City. High sensitivity areas within the City are often associated with the Sacramento and American rivers, along with other watercourses. The MEIR found that development under the 2035 General Plan could impact archeological resources, which could include tribal cultural resources. As protection of all important archeological resources from damage or destruction cannot be assured, the MEIR concluded that impacts to archeological resources would be significant and unavoidable. The MEIR predated AB 52 consultation requirements, and specific impacts to other tribal cultural resources were not evaluated in the MEIR.

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Answers to Checklist Questions

- a,b) A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code, §21084.2). Under AB 52 a tribal cultural resource must have tangible, geographically defined properties that can be impacted by project implementation.

The City received a request to consult with UAIC representatives in response to AB 52 outreach. The UAIC representatives responded that there are historic-age TCRs within the vicinity of the project site, however did not indicate that these resources would be directly impacted by the project. UAIC requested that UAIC representatives be present during any cultural resources survey, be provided the opportunity to monitor during ground disturbing activities if TCRs are identified, and stated that no resource evaluation or data recovery be completed without UAIC consent, and advised that UAIC has a strong preference that TCRs be preserved in place through avoidance. Mitigation has been included to address these concerns raised.

Should a tribal cultural resource be identified that may be impacted, appropriate steps for management will be taken as determined by the City. Mitigation Measure TCR-1 provides specific steps to be taken in the event that unanticipated cultural resources, including those of Native American origin, are encountered during project construction. With this mitigation implemented, the potential for impacts to tribal cultural resources would be **less than significant**.

Mitigation Measures

Mitigation Measure TCR-1

Unanticipated TCR Discovery. All construction crew(s) shall be alerted to the potential to encounter sensitive archaeological material or tribal cultural resources. It is recommended that NAHC-listed affiliated Native American Tribes be provided the opportunity to inspect soil piles, graded areas, or other disturbed areas, within the first five days of ground breaking activity. During this inspection, an on-site meeting of construction personnel shall also be held in order to afford the tribal representative the opportunity to provide tribal cultural resources awareness information and provide management recommendations and information relating to potential impacts to TCRs. In the event that such resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all earth disturbing work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standard and a NAHC-listed Native American representatives be contacted to evaluate the significance of the find and determine whether

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additional study is warranted or for the NAHC-listed Native American representative to provide a feasible and appropriate management approach to any identified resource. The management approach shall be reviewed and finalized by the City, as informed by recommendations provided by NAHC-listed Native American representative and the qualified archaeologist.

Findings

All additional significant environmental effects of the project relating to Tribal Cultural Resources can be mitigated to a less-than-significant level.

3.15 Utilities and Service Systems

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
XV. UTILITIES AND SERVICE SYSTEMS – Would the project...			
a) Result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The project site is served by the Sacramento Metropolitan Utilities District (SMUD), Sacramento Area Sewer District (SASD), Sacramento Regional Wastewater Treatment Plant (SRWTP), Sacramento Recycling and Transfer Station, and the City of Sacramento for public utilities. The site is currently developed with electricity, sewer, and potable water connections. Stormwater would be connected to the existing system.

Water

The City would provide water to serve the proposed project. Water supply is obtained from the American and Sacramento Rivers, along with groundwater wells. The City's 2015 Urban Water Management Plan (UWMP) determined that the City has adequate water supplies to meet the demands of development under the 2035 General Plan. The City possesses 275,917 acre-feet per year (AFY) in water supplies during multiple-dry years, and this amount would increase until 2035 for a total of 294,419 AFY during multiple-dry years (City of Sacramento 2016). The City's retail water demand was 84,832 acre-feet (AF) in 2015. The City estimates that its

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multiple-dry year water demand would be 123,229 AFY in 2020 and 149,213 AFY in 2035. Therefore, the City would have available an excess supply of at least 145,206 AFY of water in the most conservative case (City of Sacramento 2016).

The City has an existing 8-inch City water main along the eastern property line and a 24-inch City water transmission main and 12-inch water main in Elder Creek Road. The project site is currently served by a 2-inch water line that ties into the 12-inch water main. The proposed project would use the existing 2-inch water lines that tie into the 12-inch water main, as well as the addition of a secondary 2-inch water line for irrigation.

Sewer

The Sacramento Regional County Sanitation District (Regional San) provides wastewater treatment services for the project site. SASD maintains smaller local pipelines that connect to larger Regional San pipelines (SASD, 2013). Wastewater is collected by SASD, transported to the Regional San's sewer system, and ultimately conveyed to the SRWTP, located in Elk Grove, for treatment. The SRWTP's current average dry weather flow (ADWF) is approximately 119 million gallons daily (mgd), with a permitted capacity of 181 mgd for ADWF (CRWQCB 2016). The proposed project would connect to existing 4 to 6-inch sewer lines that currently serve the project site that tie into an existing 10-inch sewer line that runs along Elder Creek Road. The project would abandon the existing sewer line connection and install an 8-inch sewer line to serve the site. All building drain pipes would be connected to the project's Drainage Water Tank and water used to clean any areas where cannabis has been stored or processed would be directed into the Drainage Water Tank for treatment through Reverse Osmosis prior to going to Treatment Tank B to be reused. Any remaining water would be sent to the Brackish Water Tank for disposal into the sewer system.

Storm Water Drainage

Storm drain infrastructure within the area consists of gutters, drain inlets, pipes, detention basins, and pumping facilities. These operate through a gravity system of pipes which carry storm water into regional detention basins (City of Sacramento 2016).

Existing infrastructure for stormwater collection that serves the site includes a series of pipelines that connect to the system. Two existing main drainage Lines A and B of the Morrison Creek Assessment District Sump 148 run just outside the project site on the south and east boundaries of the property line (Appendix G). An existing pump station just south of Elder Creek Road and adjacent to the northeastern corner of the project property elevates the flows from Line A to the Morrison Creek Channel. The proposed on-site drainage system would be connected to the existing Line A to the east (Appendix G).

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Solid Waste

Residential solid waste within the City is collected by the Sacramento Department of General Services, and private haulers collect commercial solid waste. Solid waste collected within the City is then transported to the Sacramento Recycling and Transfer Station (8491 Fruitridge Road and 4550 Roseville Road), and transferred to the Kiefer Landfill. The Kiefer Landfill has a permitted capacity of up to 10,815 tons per day, and accepts approximately 6,300 tons of solid waste per day on average (CalRecycle, 2018). The landfill accepts municipal and industrial waste, including household hazardous waste, and is expected to have sufficient capacity until 2065.

Standards of Significance

The significance criteria used to evaluate the project impacts to utilities and service systems are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to utilities and service systems would occur if the project would:

- a. Result in the determination that adequate capacity is not available to serve the projects demand in addition to existing commitments.
- b. Require or result in the construction of new utilities or expansion of existing utilities, the construction of which could cause significant environmental effects.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Section 4.11 of the MEIR addresses the utilities and service systems effects of development within the City under the 2035 General Plan. The MEIR analyzed impacts from development under the 2035 General Plan on water, wastewater, sewer and storm drainage, solid waste, and electricity and natural gas. The MEIR concluded that although policies included under the 2035 General Plan would reduce water supply impacts, effects would remain significant and unavoidable due to an increased demand for potable water and a need for the construction of new water facilities. Impacts related to wastewater treatment and conveyance facilities were determined to be less than significant. Future buildout under the 2035 General Plan was also found to have a less-than-significant impact on solid waste facilities and storm water drainage conveyance facilities. Implementation of policies included in the 2035 General Plan and compliance with Title 20 and Title 24 energy efficiency standards would reduce impacts regarding energy to less than significant. Relevant policies from the 2035 General Plan are included below.

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Relevant General Plan Policies

The following General Plan policies related to utilities and service systems are applicable to the proposed project:

Utilities

Goal U 2.1: High-Quality and Reliable Water Supply. Provide water supply facilities to meet future growth within the City’s Place of Use and assure a high-quality and reliable supply of water to existing and future residents.

Policy U 2.1.9: New Development. The City shall ensure that water supply capacity is in place prior to granting building permits for new development.

Policy U 2.1.15: Landscaping. The City shall continue to require the use of water-efficient and river friendly landscaping in all new development, and shall use water conservation gardens (e.g., Glen Ellen Water Conservation Office) to demonstrate and promote water conserving landscapes.

Policy U 2.1.16: River-Friendly Landscaping. The City shall promote “River Friendly Landscaping” techniques which include the use of native and climate appropriate plants; sustainable design and maintenance; underground (water-efficient) irrigation; and yard waste reduction practices.

Wastewater Systems

Utilities Element

Goal U 1.1: High-Quality Infrastructure and Services. Provide and maintain efficient, high quality public infrastructure facilities and services in all areas of the city.

Policy U 1.1.5: Growth and Level of Service. The City shall require new development to provide adequate facilities or pay its fair share of the cost for facilities needed to provide services to accommodate growth without adversely impacting current service levels.

Policy U 2.1.9: New Development. The City shall ensure that water supply capacity is in place prior to granting building permits for new development.

Policy U 4.1.4: Watershed Drainage Plans. The City shall require developers to prepare watershed drainage plans for proposed developments that define needed drainage improvements per City standards, estimate construction costs for these improvements, and comply with the City’s National Pollutant Discharge Elimination System (NPDES) permit.

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Policy U 4.1.5: Green Stormwater Infrastructure. The City shall encourage “green infrastructure” design and Low Impact Development (LID) techniques for stormwater facilities (i.e., using vegetation and soil to manage stormwater) to achieve multiple benefits (e.g., preserving and creating open space, improving runoff water quality).

Policy U 4.1.6: New Development. The City shall require proponents of new development to submit drainage studies that adhere to City stormwater design requirements and incorporate measures, including “green infrastructure” and Low Impact Development (LID) techniques, to prevent on- or off-site flooding.

Policy U 5.1.1: Zero Waste. The City shall achieve zero waste to landfills by 2040 through reusing, reducing, and recycling solid waste; and using conversion technology if appropriate. In the interim, the City shall achieve a waste reduction goal of 75 percent diversion from the waste stream over 2005 levels by 2020 and 90 percent diversion over 2005 levels by 2030, and shall support the Solid Waste Authority in increasing commercial solid waste diversion rates to 30 percent.

Policy U 5.1.8: Diversion of Waste. The City shall encourage recycling, composting, and waste separation to reduce the volume and toxicity of solid wastes sent to landfill facilities.

Environmental Resources Element

Goal ER 1.1: Water Quality Protection. Protect local watersheds, water bodies and groundwater resources, including creeks, reservoirs, the Sacramento and American Rivers and their shorelines.

Policy ER 1.1.4: New Development. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster development), source controls, storm water treatment, runoff reduction measures, best management practices (BMPs) and Low Impact Development (LID), and hydromodification strategies consistent with the City’s NPDES Permit.

Policy ER 1.1.5: Limit Stormwater Peak Flows. The City shall require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.

Policy ER 1.1.6: Post-Development Runoff. The City shall impose requirements to control the volume, frequency, duration, and peak flow rates and velocities of runoff from development projects to prevent or reduce downstream erosion and protect stream habitat.

Policy ER 1.1.7: Construction Site Impacts. The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to

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protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

Goal U 5.1: Solid Waste Facilities. Provide adequate solid waste facilities, meet or exceed State law requirements, and utilize innovative strategies for economic and efficient collection, transfer, recycling, storage, and disposal of refuse.

Policy U 5.1.8: Diversion of Waste. The City shall encourage recycling, composting, and waste separation to reduce the volume and toxicity of solid wastes sent to landfill facilities.

Policy U 5.1.14: Recycled Materials in New Construction. The City shall encourage the use of recycled materials in new construction.

Policy U 5.1.15: Recycling and Reuse of Construction Wastes. The City shall require recycling and reuse of construction wastes, including recycling materials generated by the demolition and remodeling of buildings, with the objective of diverting 85 percent to a certified recycling processor.

Answers to Checklist Questions

- a) The proposed project includes the construction of industrial buildings for the cultivation of cannabis. As stated in Section 2, Project Description, project components include the addition of three buildings, renovation of the two existing buildings, and parking lots.

Water

As stated in Appendix D, water demand for the project would not exceed 50,000 gallons per day (gpd) for plant irrigation. At maximum capacity, there would be 70,000-plants within the facility. As shown in Table 9, the demand for irrigation water would be 18.2 million gallons per year or 53.9 acre-feet per year.

In addition to irrigation demand the project includes 300 employees and other uses that require water. Using the City's rate of 0.14 acre-feet per year per employee for industrial uses project operation is estimated to result in a water demand of 126.72 gallons per employee per work day, which would require 38,015.92 gallons per day, or 41.99 acre-feet per year,³ as shown in Table 9 (City of Sacramento 2016).

An estimated 500 gallons per day for ancillary cleaning within the facility equates to 182,500 gallons per year, or 0.56 acre-feet per year (0.0005MGD).

³ 0.14 AFY = 45619.1 gallons per person per yr; $45619.1 / 360 = 126.7197$ gallons per employee per day $126.7197 \times 300 \times 360 = 13685730 = 41.99$ AFY

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Combined with irrigation, the project’s total water demand would be 96.45 acre-feet per year.

**Table 9
Proposed Project Water Demand**

Irrigation Water Demand			Employee Water Demand		
<i>Plants</i>	<i>Demand Factor (gpd)</i>	<i>Water Use (gpd)</i>	<i>Employees</i>	<i>Demand Factor</i>	<i>Water Use</i>
17,500 (young)	0.25	4,375	300 ¹	0.14 acre-ft per year per employee	13,685,730 gallons per year
17,500 (juvenile)	0.5	8,750			
35,000 (mature)	1.0	35,000			
Total annual irrigation water demand		17,565,625 gallons per year/17.57 MGY	Total annual employee water demand		13.69 MGY ²
			Cleaning	500 gpd	0.18 MGY
Total Water Demand in acre-feet per year		53.9 AFY			42.55 AFY
Project Total					96.45 AFY

Note:

¹ Project operation is seven days per week, 365 days per year. The water demand assumes 360 working days per year per employee for industrial uses.

² MGY = million gallons/year

Source: City of Sacramento and Appendix D.

According to the City’s MEIR, the City’s water supply would be approximately 145,206 AFY more than the City’s projected demand under the 2035 General Plan during the highest water use year. The development of new industrial uses within the City’s designated industrial land use areas has been adequately addressed within the 2035 General Plan. The 2035 General Plan MEIR considered new industrial uses in estimating water demand.

In order to significantly reduce water consumption, the project includes a professionally-installed, drip-irrigation system, flood benches and fertilizer injection system (fertigation). Fertigation systems automatically mix, dose, balance pH, and distribute nutrients through a drip-feeding system directly to the plants. Irrigation pumps are controlled by digital timers, and would deliver water/nutrients to plants 3 times per day, for approximately 1-2 minutes each time (based on small, medium or large plants). Drip irrigation systems slowly release the amount of nutrient solution required, thus saving water. In addition, approximately 95% of all irrigated water delivered to plants would be absorbed during “feeding”, the additional 5% runoff would drain to a large tank (head-house), where it is filtered and reused (i.e., closed loop system).

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All building drain pipes would be connected to the Drainage Water Tank and water used to clean any areas where cannabis has been stored or processed would be directed into the Drainage Water Tank. From this tank, water would be sent through the Reverse Osmosis unit for treatment prior to going to Treatment Tank B to be reused for on-site irrigation. Any remaining water would be sent to the Brackish Water Tank for disposal into the sewer. This system captures water used on site for cleaning and filters it for reuse as irrigation to minimize the amount of water disposed into the sewer system.

The City’s water supply would sufficiently serve the project’s water demand. Because the City would have adequate water supply to serve the project a **less-than-significant impact** regarding water supply would occur and there would be no additional significant effects.

Wastewater

Sewer flows would ultimately be conveyed to the SRWTP for treatment prior to being discharged into the Sacramento River. The SRWTP’s current ADWF is approximately 119 MGD, with a permitted capacity of 181 MGD for ADWF (CRWQCB 2016). Thus, the SRWTP currently has an excess capacity of approximately 62 MGD.

However, for the purposes of this analysis wastewater estimations using the SASD’s Equivalent Single Family Dwelling (ESD) rates for Warehouse and Office Space the project’s total generation of wastewater would be 7.61 gallons per day (gpd), as shown in Table 10.

**Table 10
Proposed Project Wastewater Generation**

Project Square Footage	Generation Rate (gpd/1,000 sf)	Total (gpd)
Warehouse – 67,734 sf	0.1 ESD	6.77
Office – 4,220 sf	0.2 ESD	0.84
Total		7.61 gpd (0.0000076 mgd)

Source: SASD, Appendix D

The MCLF gross square footage was not included in the calculation because these buildings would only be used for cultivation activities, and wastewater from irrigation and cleaning is accounted for in the closed-loop system as stated above.

The applicant would be required to pay connection fees to mitigate the impact on the SRWTP and conveyance systems, pursuant to Regional San’s Sewer Impact Fee Ordinance. The SRWTP has adequate capacity to provide wastewater services to serve the proposed project without adverse impacts to current service levels. Therefore, the

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project's impact would be **less than significant** and there would be no additional significant effects.

- b) Existing wastewater, water and storm drain infrastructure currently serves the project site. There is an existing 4 to 6-inch sewer line that ties into an existing 10-inch sewer line that runs along Elder Creek Road. The project would abandon the existing sewer line connection and install an 8-inch sewer line to from the existing 10-inch line in Elder Creek Road to serve the site. The City has an existing 8-inch City water main along the eastern property line and a 24-inch City water transmission main and 12-inch water main in Elder Creek Road. The project site is currently served by a 2-inch water line that ties into the 12-inch water main. The proposed project would use the existing 2-inch water lines that ties into the 12-inch water main, as well as the addition of a secondary 2-inch water line for irrigation. Existing infrastructure for stormwater collection that serves the site includes two existing main drainage Lines A and B of the Morrison Creek Assessment District Sump 148 that are adjacent to the south and east boundaries of the property line (Appendix G). The proposed on-site drainage system would be connected to the existing Line A to the east. The project would tie into the existing utility infrastructure and install new infrastructure on site to serve the project. The environmental effects of installing this new infrastructure has been evaluated in other sections of this Initial Study and impacts would be considered **less than significant** and there would be no additional significant effects.

Mitigation Measures

No mitigation would be required.

Findings

The project would have no additional project-specific environmental effects relating to Public Utilities.

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3.16 Mandatory Findings of Significance

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
XVI. MANDATORY FINDINGS OF SIGNIFICANCE – Would the project...			
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) As discussed above, the proposed project would not degrade the habitat of a fish or wildlife species due to the lack of suitable habitat on the project site. The project site does not contain significant historical resources that would be impacted by project implementation. Compliance with mitigation identified would ensure impacts associated with cultural resources would be reduced to less than significant. Therefore, impacts would be **less than significant**.
- b) The cumulative context for the proposed project is the continued buildout of the City’s 2035 General Plan. As discussed in Items 3.1 through 3.15 with implementation of applicable General Plan policies, required regulation and ordinances, and the mitigation measures previously identified herein, the proposed project would not substantially contribute to cumulative impacts and/or cause the cumulative impacts of the 2035 General Plan EIR to exceed the levels described in the MEIR. The proposed project is consistent with the City’s 2035 General Plan and would not result in new or increased cumulative impacts or result in additional significant effects and impacts are **less than significant**.

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- c) The proposed project would not result in environmental impacts that would affect the health or safety of human beings, directly or indirectly. Therefore, impacts would be **less than significant** and there would be no additional significant effects.

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DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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


Signature

7-10-18
Date

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4 REFERENCES AND PREPARERS

4.1 References Cited

CAL FIRE (California Department of Forestry and Fire Protection). 2008. Very High Fire Hazard Severity Zones in LRA for Sacramento County. July 30, 2008.
http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones.

CalRecycle. 2018. Sacramento County Landfill (Kiefer) Facility/Site Summary Details. Accessed June 4, 2018. Available at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/34-AA-0001/Detail/>.

Caltrans. 2013. Technical Noise Supplement. Caltrans (California Department of Transportation). September 2013. http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf.

City of Sacramento, 2003. Parking Lot Tree Shading Design and Maintenance Guidelines. Available online at: [https://www.cityofsacramento.org/-/media/Corporate/Files/Public-Works/Maintenance-Services/ShadingGuidelines2003-\(1\).pdf?la=en](https://www.cityofsacramento.org/-/media/Corporate/Files/Public-Works/Maintenance-Services/ShadingGuidelines2003-(1).pdf?la=en). Accessed June 4, 2018.

City of Sacramento 2013-2018. Parks and Recreation Department. Available online at: <https://www.cityofsacramento.org/ParksandRec/Parks>. Accessed June 4, 2018.

City of Sacramento. 2014. *Draft Master Environmental Impact Report for the City of Sacramento 2035 General Plan Update*. Prepared by Ascent Environmental, Inc. Sacramento, CA: Ascent Environmental. August 2014.
<https://www.cityofsacramento.org/Community-Development/Resources/Online-Library/2035--General-Plan>.

City of Sacramento, 2015. *General Plan Background Report*. Chapter 6, Section 6.4, Figure 6.4-1. Available online at: <https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2035-GP/Chapter-6--Environmental-Resources.pdf?la=en>. Accessed June 4, 2018.

City of Sacramento, 2016. Fruitridge/Broadway Community Plan. March 3, 2015. Accessed June 4, 2018. Available online at: <https://www.cityofsacramento.org/~/-/media/Corporate/Files/CDD/Planning/Community%20Plans/Fruitridge%20Broadway.pdf>.

City of Sacramento. 2016. City of Sacramento 2015 Urban Water Management Plan. Prepared by West Yost Associates. June 2016.

We Grow California Cannabis Campus Project

- City of Sacramento. 2012. Sacramento Climate Action Plan. Accessed June 4, 2018. Available at:http://ascentenvironmental.com/files/9714/0537/0505/Sacramento_CAP_Final_Draft.pdf.
- CRWQCB (California Regional Water Quality Control Board). 2016. Order R5-2016-0020 NPDES NO. CA0077682. April 1, 2016. https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/sacramento/r5-2016-0020.pdf.
- Department of Conservation (DOC), 2016. Farmland Mapping and Monitoring Program. Available online at: <http://www.conservation.ca.gov/dlrp/fmmp>. Accessed June 4, 2018.
- DTSC (Department of Toxic Substances Control). 2018. Envirostor Hazardous Waste and Substances Site List. Accessed June 4, 2018. Available at: <http://www.envirostor.dtsc.ca.gov/>.
- United States Environmental Protection Agency (EPA), 2018. Lower Sacramento Watershed, Hydrologic Unit Code 18020109. <https://water.usgs.gov/lookup/getwatershed?18020109>. Accessed June 4, 2018.
- FEMA (Federal Emergency Management Agency). 2012. Flood Insurance Rate Map for Sacramento County, California. March 26, 2018.
- SASD (Sacramento Area Sewer District). 2013. Standards and Specifications. July 24, 2013. Available online at: <https://www.sacsewer.com/sites/main/files/file-attachments/2013-sasd-standards-and-specifications.pdf>.
- SMAQMD (Sacramento Metropolitan Air Quality Management District). 2018. Guide to Air Quality Assessment in Sacramento County. Accessed May 24, 2018. Available at: <http://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools>.
- SPD (Sacramento Police Department). 2018. Map of Police District 6. June 2018. <https://www.cityofsacramento.org/-/media/Corporate/Files/Police/Crime/Maps/District-6.pdf?la=en>.
- State Water Resources Control Board (SWRCB), 2018. GeoTracker online database and mapping system. Available online at: <http://geotracker.waterboards.ca.gov/>. Accessed June 4, 2018.
- U.S. Fish and Wildlife Service (USFWS). 2018. IPaC online mapping system for special-status species and critical habitat. . <https://ecos.fws.gov/ipac/location/GZHRFQCX3NHXXFOHXQPOZNAHHM/resources> Accessed June 4, 2018.

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