

## Environmental Checklist Form

Project title: Wander Hotel		
Lead agency name and address: City of Twentynine Palms 6136 Adobe Road Twentynine Palms, CA 92277		
Contact person and phone number: Travis Clark, Community Development Director 760-367-6799 X 1008 tclark@29palms.org		
Project location: The project site is located at the northwest corner of the Foothill Drive and Split Rock Avenue in the City of Twentynine Palms.		
Project sponsor's name and address: Wander Hotel JT, LLC 4544 Tobias Avenue Sherman Oaks, CA 91403		
Existing General Plan designation: Service Commercial (CS)		Existing Zoning: Service Commercial (CS)

Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The applicant proposes the development of a "shipping container" hotel on a vacant lot consisting of 39 parcels that total  $\pm 9.36$  acres. The project site is located in Tract No.2810, and encompasses APNs 0616-262-01 to -24, and 0616-261-01 to -12 and -22 to -24. The proposed development will occur in two phases. Phase 1 will occupy the northern bulk of the site, and the remaining southern portion of the site is proposed to be developed in Phase 2 (see Exhibit 4).

The proposed project site is currently undeveloped and does not have any structures onsite. An east-west dirt road (Hastings Drive) bisects the project site. There are multiple drainages onsite in a generally southwest to northeast direction. The site is bounded by Boling Drive on the north (paved), Bullion Avenue on the west (paved), Foothill Drive on the south (unpaved), and Split Rock Avenue on the east (unpaved). Phase 1 will include street improvements on parts of Boling Drive, Bullion Avenue, and Split Rock Avenue along the project boundary. Phase 2 will also include street improvements which will complete the half-widths of all streets surrounding the project.

The project proposes a hotel consisting of one-story shipping container structures and private patios, and associated development, including a central clubhouse to include a pool, office and gift shop, an on-site sewage treatment facility, driveways, parking lots and landscaping. Phase 1 will include a total of 65 container rooms (21 big rooms, 4 ADA rooms, and 40 small rooms), a laundry/break room, a clubhouse, unconditioned storage containers, as well as the sewage treatment facility, parking lot and landscaping. A total of 65 parking stalls will be provided for Phase 1, including 6 ADA stalls and 4 electric

vehicle stalls. The project proposes three access points, the main entry/exit on Split Rock Avenue with an access driveway which will run east-west through the site to Bullion Avenue, and a sewage treatment access on Boling Drive.

Phase 2 proposes up to 28 additional hotel rooms (12 big rooms and 16 small rooms) and 34 parking spaces (including 2 ADA stalls and 2 electric vehicle stalls). Full details of Phase 2 development are not yet available. At buildout, the project will include a total of 93 rooms.

All structures will be built with 40-foot metal shipping containers; the clubhouse will also include a 20-foot container as a pass-through gate. A pool is proposed south of the clubhouse. Each hotel room is proposed with its own private patio with firepit and picnic/sitting furniture.

Uses bordering the project area include:

- Single family residential, commercial and institutional uses and vacant lots to the north;
- The City of Twentynine Palms Public Works Department, and an animal shelter to the west; and
- Vacant lots to the east and south.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)  
On the basis of this initial evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

September 20, 2021

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

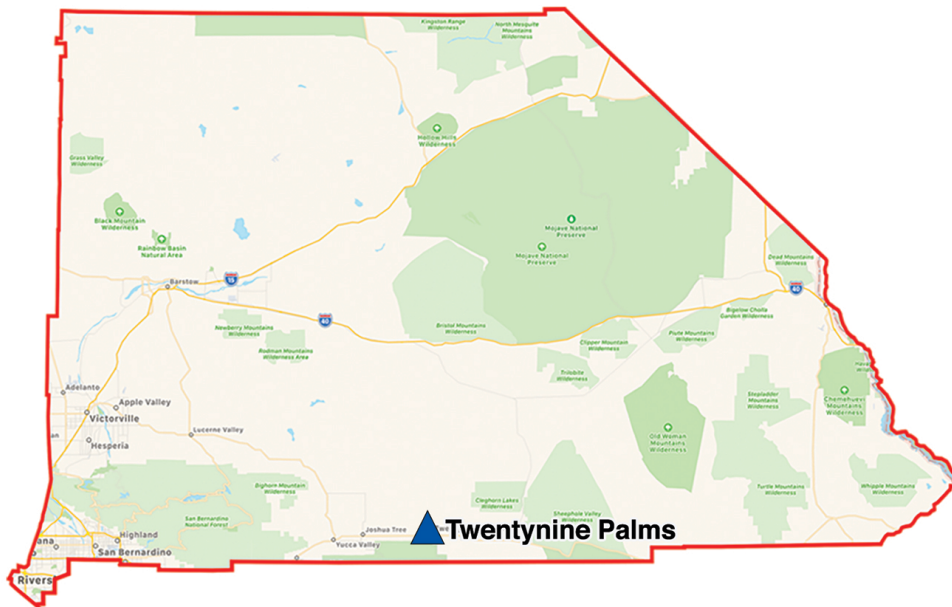
- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) the significance criteria or threshold, if any, used to evaluate each question; and
  - b) the mitigation measure identified, if any, to reduce the impact to less than significance.



**CALIFORNIA**

**PACIFIC  
OCEAN**

**MEXICO**



**SAN BERNARDINO COUNTY**



Source: Google Earth 2020



01.15.21

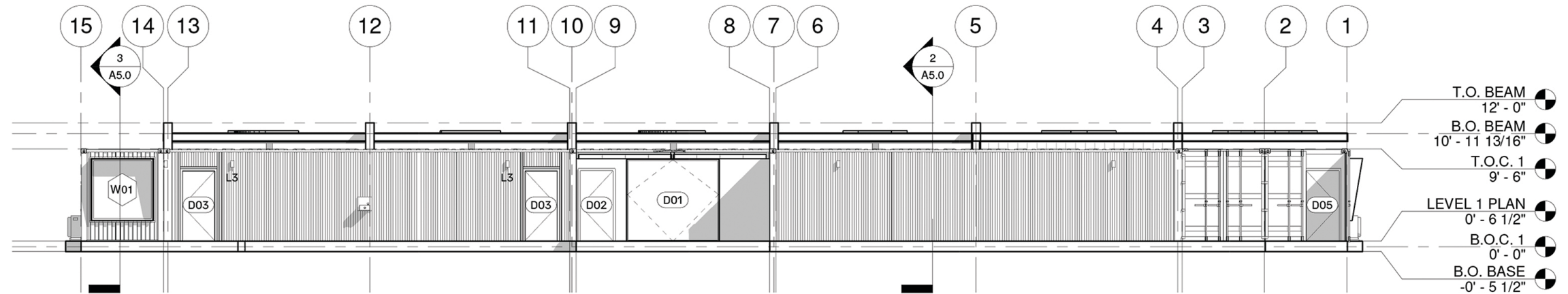
Source: Google Earth 2020



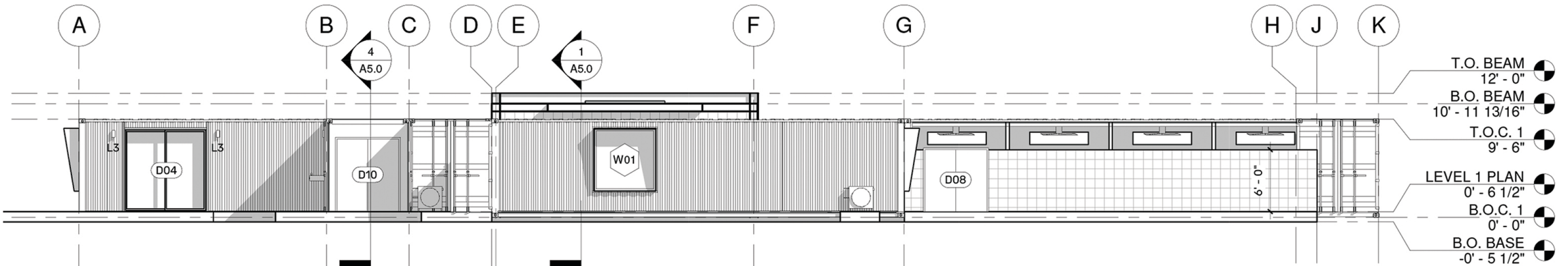
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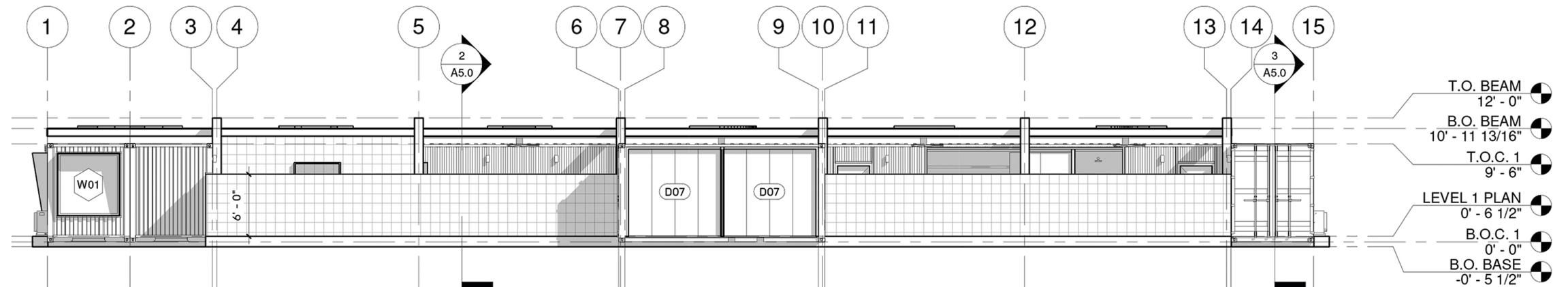
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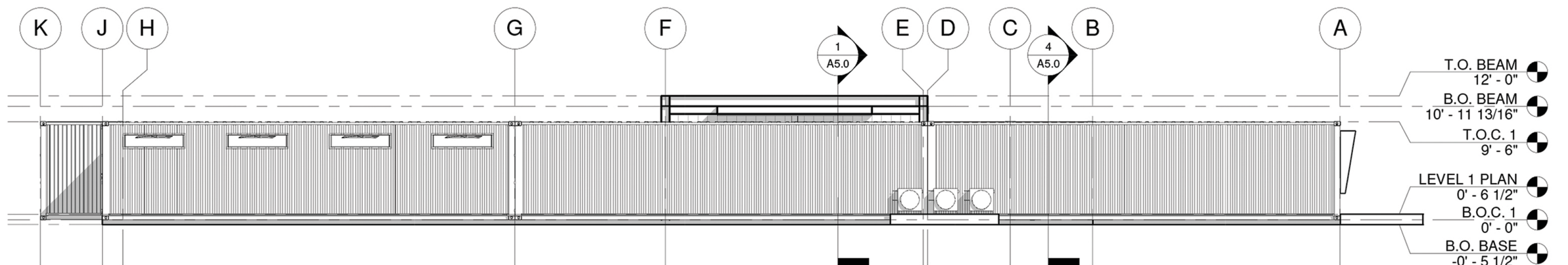
WEST



SOUTH

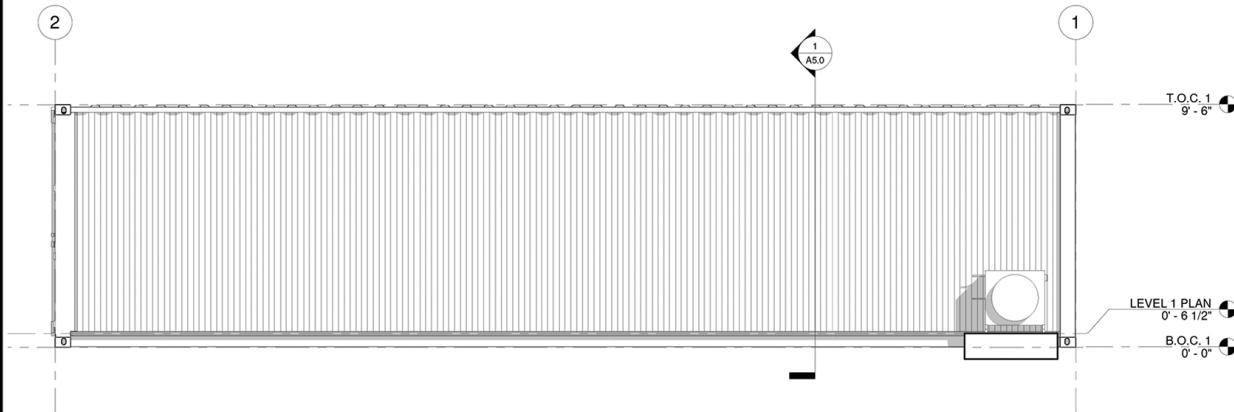


EAST

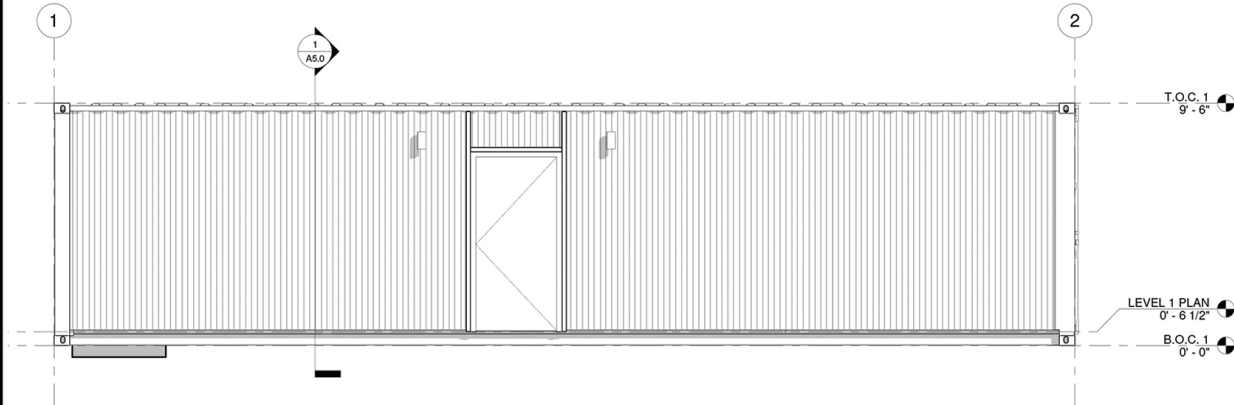


Source: RadLab San Diego, 2021

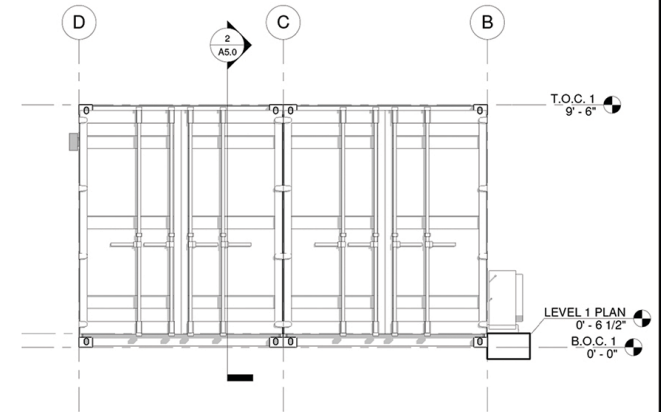
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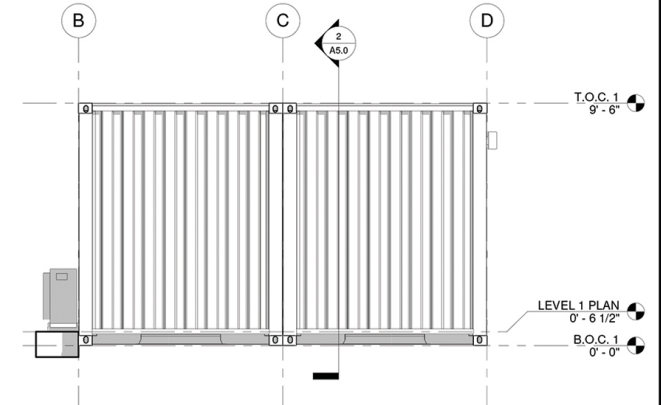
## SOUTH



## EAST

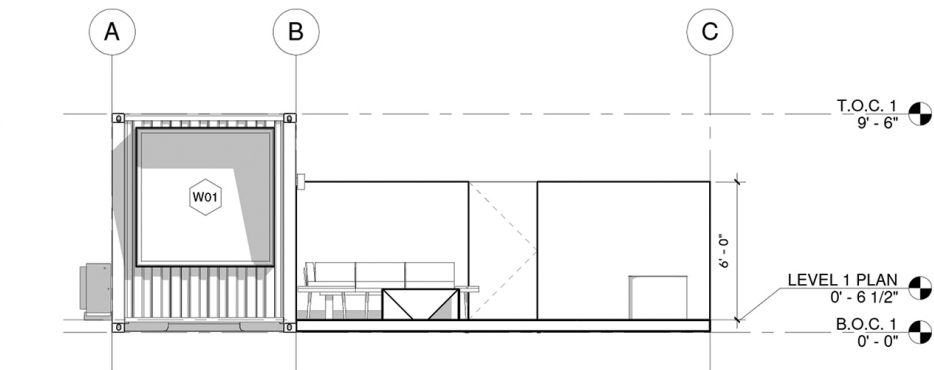
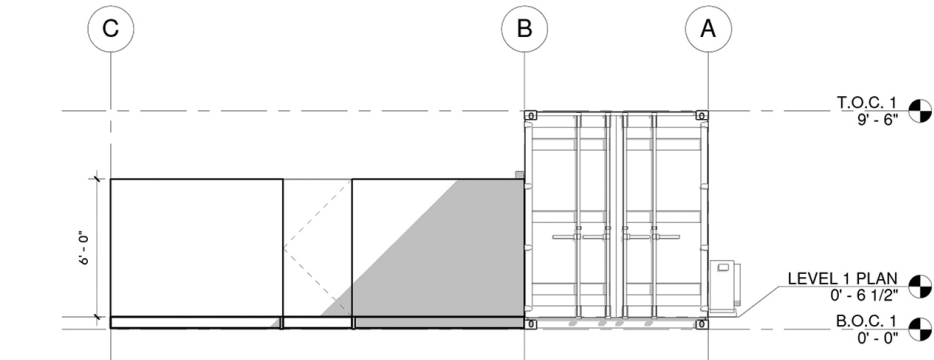
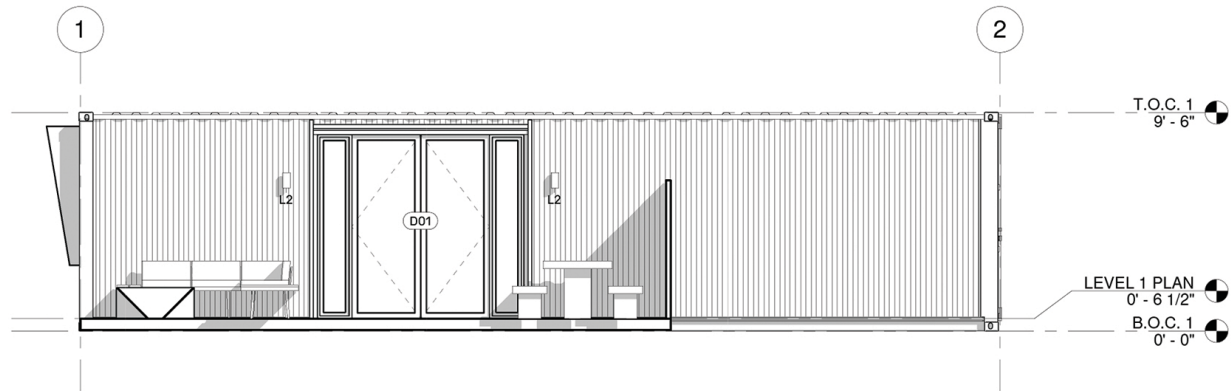
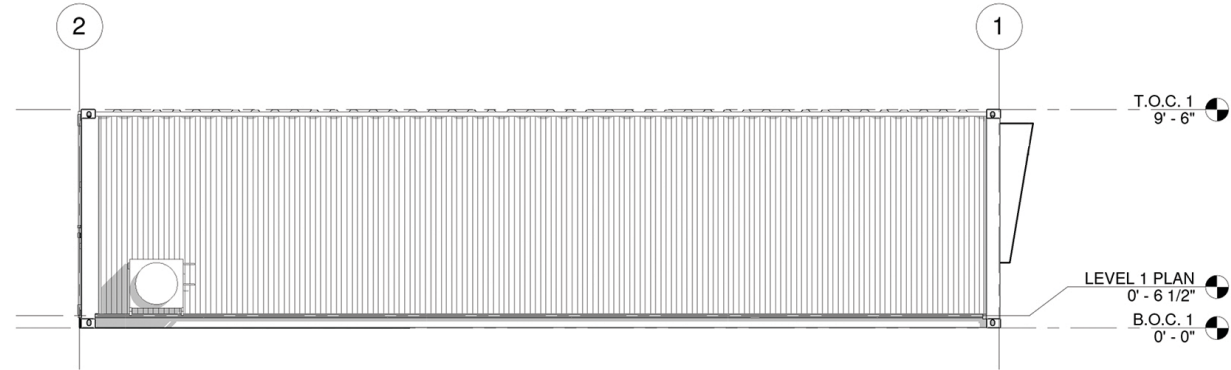


## WEST



Source: RadLab San Diego, 2021

## Big Room/ADA Room



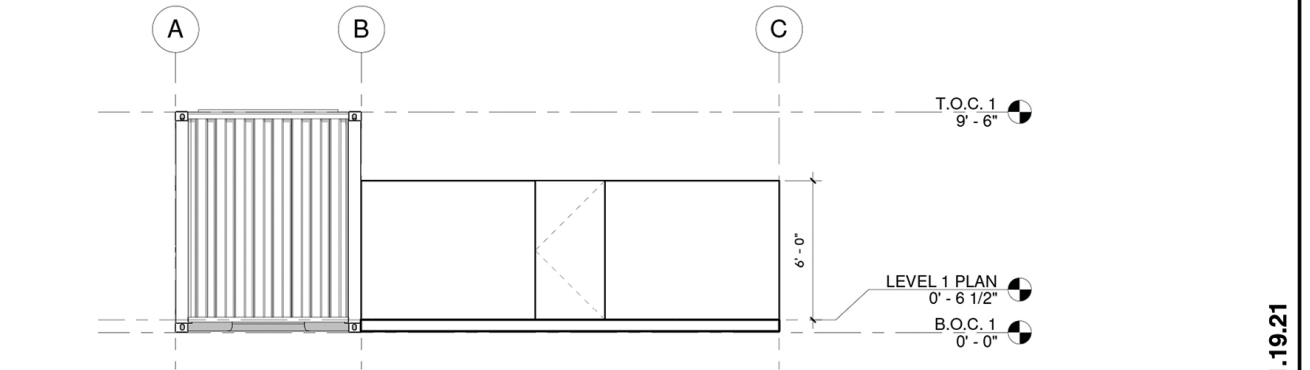
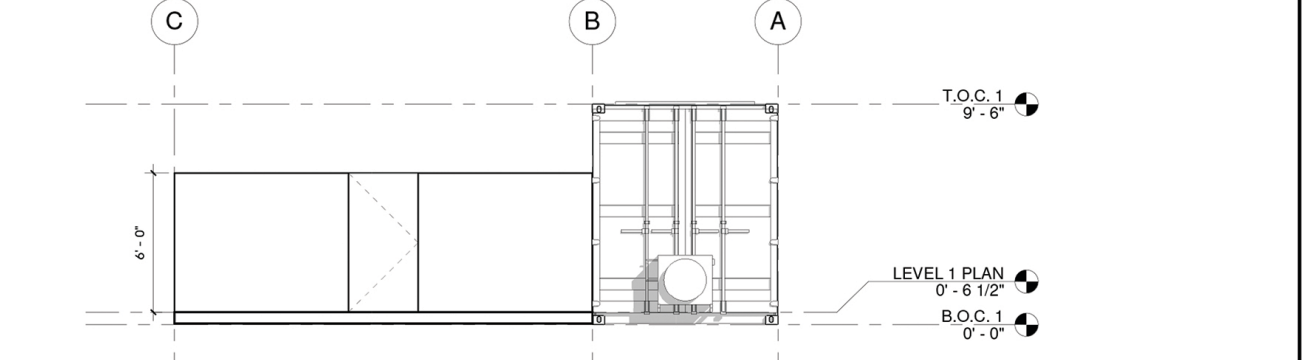
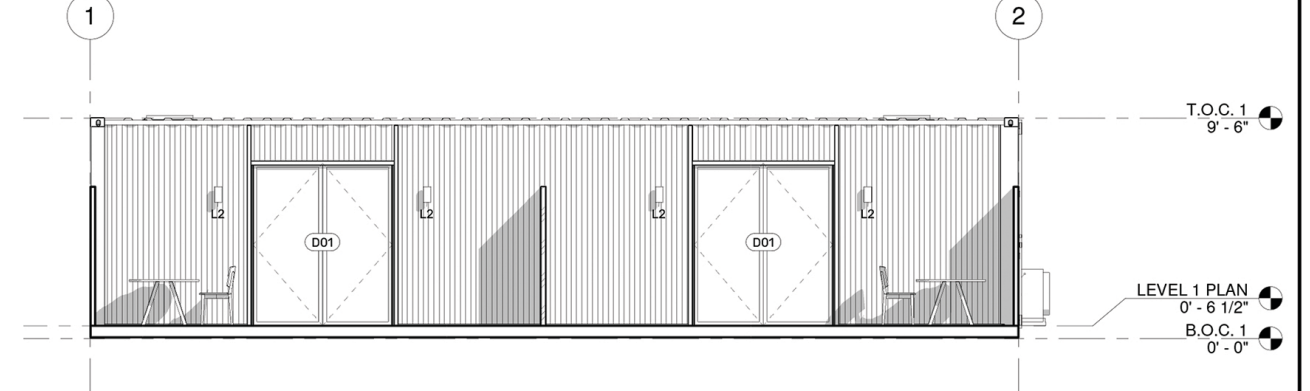
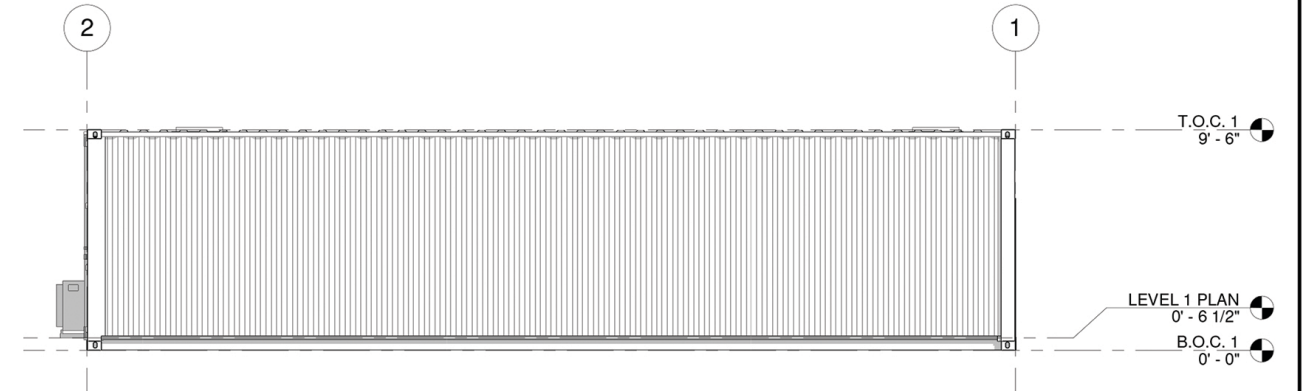
North

South

East

West

## Small Room



Source: RadLab San Diego, 2021

01.19.21

	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Sources: City of Twentynine Palms Development Code; Google Earth; City of Twentynine Palms General Plan.

## Environmental Setting

The City of Twentynine Palms is located in the Morongo Basin which forms the southwestern corner of the Mojave Desert. In the basin, Joshua Tree National Park lies to the south of the City and the Marine Corps Ground Air Combat Center to the north. The Mojave Desert is separated from the Sonoran Desert to the south by the Little San Bernardino and Eagle Mountains, which are extensions of the Transverse Range. The western Mojave Desert is a flat, sparsely vegetated region interspersed with mountain ranges and dry lakes.

The subject site is located southwest of the downtown area near the southerly City boundary and the National Park. The surrounding area consists of vast vacant lands and sparse residential, commercial, and institutional uses in one- and two-story structures. The development of the proposed container hotel is expected to be generally consistent with the project area appearance, as described below.

## Discussion of Impacts

**a, c) Less Than Significant Impact.** The City of Twentynine Palms is situated in the Mojave Desert to the north of Joshua Tree National Park (Exhibit 1, 2, and 3). Properties in the project vicinity enjoy close-up views of the Little San Bernardino Mountains located approximately 0.38 miles to the south. Distant mountain views

in all other directions are limited due to distance and topography, and partially obstructed by intervening development, mostly only the top-range and ridge remain visible; therefore, the immediate scenic value is diminished in these directions.

The proposed project will result in the development of a 'shipping container' hotel (Exhibit 5) and associated infrastructure including street improvements, parking lot and on-site sewage treatment facility. The proposed hotel includes a total of 93 rooms in two sizes, a clubhouse with pool area, a laundry/break room and storage; 28 rooms proposed in the southern portion of the site will be developed in Phase 2. All proposed structures onsite will be made from primarily 40-foot-long containers and one 20-foot-long container. The clubhouse located in the center of the site will have a maximum height of 12 feet, and all other structures will have a maximum height of 9.5 feet. Given the size and style of the proposed structures, the project will have less than significant impacts on scenic vistas in the surrounding area, as explained below.

The structures will be made out of containers and have light gauge steel framing. The project will be consistent with the existing buildings in the project area in that many of them also have metal framing and exteriors with a modern/industrial appearance. The proposed hotel will fit into the rustic high desert environment while showing a sense of modern, crisp and creative design.

As noted above, there is limited view of the mountain ranges looking to the north. The proposed hotel structures will be similar in height as the existing residential, institutional and commercial properties north of the project site, and thus are not expected to impact viewers from the south. The Joshua Tree National Park is located to the south, and there are currently no structures or paved roads or trails south of the site.

The City's Animal Shelter and Public Works Department are located west of the project site. While the proposed project will partially obstruct the lower and mid-range views of the mountains to the east, impacts are expected to be less than significant since the properties west of the project are institutional uses rather than residential development, and viewers are temporary visitors to the site.

There is one single-story, single-family residential home north of the project site and Boling Drive. The project will obstruct lower and mid-range views directly to the south. However, the project boundary is approximately 180 feet south of the residence, and there will be landscape buffer on the north project boundary. The nearest proposed structure will be approximately 200 feet south of the residence, with a maximum height of 9.5 feet compared to the residence's estimated 15± foot height. Valuable views of the foothills to the southwest will not be impacted. Therefore, impacts on the local scenic vista and public views from the north will be less than significant.

There is currently no development near the project area to the east other than a few roads. Views to the west are already mostly obstructed by existing development, and adding the proposed hotel would not have a significant impact, especially on more valuable views to the southwest.

The site is designated as Service Commercial (CS) on the City's Land Use & Zoning Map. The proposed project is consistent with the development standards set for commercial land uses (including maximum height of 45 feet) and will not conflict with applicable zoning and other regulations governing scenic quality.

Overall, the proposed hotel will be consistent with the current surrounding area and future development in the area and will contribute to the distinct local character. Impacts associated with scenic vistas and visual character will be less than significant.

- b) **No Impact.** The subject site is currently vacant. No significant trees, historic buildings or rock outcroppings are located on-site.

According to the California Department of Transportation, Twentynine Palms Highway (State Highway 62) is an "eligible State Scenic Highway." In the City's General Plan, a small portion of Highway 62 is designated as a scenic highway (excluding that portion of the Highway 62 between Sunrise Road and Wilshire Avenue). The project site is located approximately 0.62 miles south of Highway 62 within the downtown area, where Highway 62 is not designated a scenic highway. The site will not be visible from the Highway, due to distance and intervening development. Given the project location and its consistency with surrounding uses as described above, views along the highway are not expected to change and no impact to this scenic highway would occur.

- d) **Less Than Significant Impact.** Buildout of the proposed project will result in the development of a container hotel and associated infrastructure including parking lots, an on-site sewage treatment facility and street improvements. The project will be developed in two phases: Phase 1 will include 65 rooms, a clubhouse, a laundry/break room and associated infrastructure noted above; Phase 2 will include up to 28 rooms and 34 additional parking spaces. Lighting will be generated by the container structures, outdoor safety and security lights, landscape lighting, as well as automobile traffic and new street lighting. There will be increased light and glare compared to existing conditions. However, the proposed hotel is expected to have limited activity and lighting on the site during nighttime hours, and the project site occurs in a commercial/industrial area, where lighting is less sensitive for surrounding uses. As required by the City Development Code, Section 19.78, lighting for the proposed project will be subject to the city's lighting standards, which require proper shielding of light sources and prohibit light spillage on adjacent properties. A lighting plan will be submitted and approved prior

to development, and all required conditions of approval would be applied to the proposed project. Compliance with City lighting standards will ensure that lighting impacts associated with the proposed project will be less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Farmland Mapping and Monitoring Program, 1984-2018, CA Dept. of Conservation; General Plan Land Use Map; Google Earth.

## Environmental Setting

Agricultural production is generally not active in the Morongo Basin, nor in the City of Twentynine Palms. Commercial farming has not occurred in the City for decades, likely due to its arid environment. Neither the General Plan nor the Development Code contain agricultural or forestry designations or districts, but in certain districts agricultural and related uses are allowed with a Conditional/Administrative Use Permit or other restrictions.

## Discussion of Impacts

- a) **No Impact.** The City and its surrounding communities were not mapped in the Farmland Mapping and Monitoring Program (FMMP) by the California Department of Conservation. The subject property is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, according to the California Dept. of Conservation, nor is it used for agricultural purposes. The project site and surrounding area consist of vacant land and patches of commercial, institutional, and residential uses. The proposed project will not result in any changes to lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Dept. of Conservation, nor to lands used for agricultural purposes.
- b) **No Impact.** There are no Williamson Act contracts on the subject property or properties in the surrounding area. The subject property is designated for Service Commercial use. The proposed project will have no impact on lands designated for agricultural use.
- c-d) **No Impact.** The subject site does not contain forest land, timberland or timberland zoned for timberland production. Therefore, the project would not rezone forest land or timberland as defined by the Public Resources Code and Government Code. There will be no loss of forest land or conversion of forest land to non-forest use.
- e) **No Impact.** As discussed above, the City does not have any agricultural or forest land, nor any land in active agricultural or timberland production uses. The development of the proposed project will not impact any agricultural or forest land. Given the absence of active farmlands in the City, there would be no indirect impact, due to the location or nature of the use, on conversion of Farmland to non-agricultural use. Given the absence of forest land in the City, the proposed Project would have no indirect impact on conversion of forest land to non-forest use.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: City of Twentynine Palms General Plan; MDAQMD CEQA and Federal Conformity Guidelines; CalEEMod Version 2016.3.2; project materials.

## Environmental Setting

The City of Twentynine Palms, including the project site, is located within the Mojave Desert Air Basin (MDAB) under the jurisdiction of Mojave Desert Air Quality Management District (MDAQMD). MDAQMD is geographically the second largest of the 35 air districts in the State of California. All development within the City is subject to MDAQMD's 2016 "California Environmental Quality Act (CEQA) and Federal Conformity Guidelines." MDAQMD operates and maintains six regional air quality monitoring stations throughout its jurisdiction. The nearest monitoring station to the project site is located on Adobe Road in Twentynine Palms.

Criteria air pollutants are contaminants for which state and federal air quality standards (California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS)) have been established. MDAQMD exceeds state and federal standards for ozone (O<sub>3</sub>) and PM<sub>10</sub>. As a result, MDAQMD has adopted federal attainment plans for ozone and PM<sub>10</sub> under the federal Clean Air Act. Ambient air quality in the MDAQMD, including the project site, does not exceed state and federal standards for carbon monoxide, nitrogen dioxides, sulfur dioxide, lead, sulfates, hydrogen sulfide, or visibility reducing particles.

The project will contribute to an incremental increase in regional ozone and PM<sub>10</sub> emissions during construction and operation. The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to project air quality emissions that will be generated by the proposed project (Appendix A), which are discussed below.

## Discussion of Impacts

- a) **Less than Significant Impact.** According to MDAQMD's 2016 CEQA and Federal Conformity Guidelines, a project is considered non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s), or is directly included in the applicable plan. Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast.

MDAQMD works directly with the San Bernardino County Association of Governments (SANBAG), San Bernardino County Transportation Authority (SBCTA), and local governments, and cooperates actively with all State and Federal government agencies. SBCTA adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) developed by the Southern California Association of Governments (SCAG). The Demographics & Growth Forecast Technical Report of the RTP/SCS forms the basis of land use and transportation controls of air quality management plans. An example of a non-conforming project would be one that increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area relative to the applicable land use plan.

The project proposes a 93-unit cargo container hotel on currently vacant land. The subject property is designated for Service Commercial uses (up to 0.5 floor-area ratio (FAR)) in the City's General Plan. The project would not induce population growth and is allowed under the General Plan land use designation with a conditional use permit. The project is proposed at approximately 0.14 FAR, and therefore is not expected to result in higher number of trips and vehicle miles traveled compared to General Plan buildout in the project area, nor result in emissions higher than those anticipated in land use-based growth forecasts. As demonstrated below, the project will not generate emissions that exceed thresholds for criteria pollutants including pollutants for which the District is in nonattainment. In addition, the 2019 California Building Code will reduce air quality impacts during project operation by imposing more stringent energy efficiency standards. The proposed project will also be subject to rules and guidelines set forth by MDAQMD. Overall impacts with regard to conformity with applicable air quality plans and guidelines will be less than significant.

- b) **Less Than Significant Impact.** Criteria air pollutants will be released during both construction and operational phases of the proposed project, as shown in Tables 1 and 2. **Table 1** summarizes short-term construction-related emissions, and **Table 2** summarizes ongoing emissions generated during operation.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to project air quality emissions that will be generated by the proposed project (Appendix A).

#### Construction Emissions

For purposes of analysis, it is assumed that construction will occur over a 2-year period starting January 2022 with buildout in 2024. The construction period includes all aspects of project development, including site preparation, grading, paving, building construction, and application of architectural coatings.

As shown in **Table 1**, emissions generated by construction activities will not exceed MDAQMD thresholds for any criteria pollutant during construction. The data reflect average daily unmitigated emissions over the 2-year construction period, including summer and winter weather conditions. The analysis assumes that materials are balanced onsite based on the project preliminary grading plan. Applicable standard requirements and best management practices include, but are not limited to, the implementation of a dust control and management plan in conformance with MDAQMD Rule 403.2, phased application of architectural coatings and the use of low-polluting architectural paint and coatings per MDAQMD Rule 1113. Given that criteria pollutant thresholds will not be exceeded, and standard best management practices will be applied during construction, impacts will be less than significant.

<b>Table 1</b>						
<b>Maximum Daily Construction-Related Emissions Summary (pounds per day)</b>						
<b>Construction Emissions<sup>1</sup></b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>ROG</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Daily Maximum	33.50	33.13	133.71	0.06	19.83	11.45
<b>MDAQMD Thresholds</b>	<b>548.00</b>	<b>137.00</b>	<b>137.00</b>	<b>137.00</b>	<b>82.00</b>	<b>65.00</b>
<b>Exceeds?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<sup>1</sup> Average of winter and summer unmitigated emissions. Emission Source: CalEEMod model, version 2016.3.2.						

#### Operational Emissions

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

According to the Institute of Transportation Engineers, Trip Generation Manual (9th Edition), the proposed project will generate 624 daily trips at full buildout (see Section XVIII). **Table 2** provides a summary of projected emissions during operation of the proposed project at build out. As shown below, operational emissions will not exceed MDAQMD thresholds of significance for any criteria pollutants. Impacts related to operational emissions will be less than significant.

<b>Table 2</b>						
<b>Maximum Daily Operational-Related Emissions Summary (pounds per day)</b>						
<b>Operational Emissions<sup>1</sup></b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>ROG</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Daily Maximum	12.07	11.43	5.24	0.06	3.28	1.02
<b>MDAQMD Thresholds</b>	<b>548.00</b>	<b>137.00</b>	<b>137.00</b>	<b>137.00</b>	<b>82.00</b>	<b>65.00</b>
<b>Exceeds?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<sup>1</sup> Average of winter and summer unmitigated emissions. Emission Source: CalEEMod model, version 2016.3.2.						

#### Cumulative Contribution: Non-Attainment Criteria Pollutants

A significant impact could occur if the project would make a considerable cumulative contribution to federal or state non-attainment pollutants. The Mojave Desert portion of the MDAB is classified as a federal “non-attainment” area for PM<sub>10</sub> and ozone. Cumulative air quality impacts are evaluated on a regional scale (rather than a neighborhood scale or city scale, for example) given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM<sub>10</sub>, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM<sub>10</sub>.

Cumulative impacts are similar to direct and indirect impacts of the project, which the project contributes to. In the case of a container hotel project, the proposed project has a cumulative impact with all other development projects, from the standpoint of each type of impact (cumulative construction emissions, operational energy consumption, solvent use, transportation emissions, congestion, etc.). No similar cumulative projects are identified in the project area at this time.

Currently, MDAQMD’s approach to assessing cumulative impacts is based on the fact that the MDAQMD Attainment Plan forecasts attainment of ambient air quality standards in accordance with the requirements of the California Clean Air Act (CCAA), which takes into account the SANBAG forecasted future regional growth. Therefore, if all projects are individually consistent with the growth assumptions within the MDAQMD’s Attainment Plan, future development would not impede the attainment of ambient air quality standards.

As indicated under a), above, the proposed project is not growth-inducing and is consistent with the uses allowed by the General Plan land use designation. Therefore, the project is expected to be consistent with the growth assumptions within the MDAQMD’s Attainment Plan. As discussed above, the proposed project would not generate construction or operational emissions that exceed the MDAQMD’s recommended regional thresholds of significance. Specifically, buildout of the project would not exceed thresholds for PM<sub>10</sub> and ozone precursors for which the Basin is in nonattainment. Therefore, the proposed project will result in incremental, but not cumulatively considerable impacts on regional PM<sub>10</sub> and ozone levels.

### Summary

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

- c) **Less Than Significant Impact.** According to the MDAQMD CEQA and Federal Conformity Guidelines, residences, schools, daycare centers, playgrounds and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The project does not propose any of the above land uses, and therefore further evaluation is not required. As demonstrated above, the proposed project would not generate construction or operational emissions that exceed the MDAQMD's recommended regional thresholds of significance. Therefore, impacts to sensitive receptors will be less than significant.

- d) **Less Than Significant Impact.** In general, typical land use development that pose potential odor problems include wastewater treatment plants, refineries, landfills, composting facilities and transfer stations. The occurrence and severity of odor impacts depend on such factors as the nature, frequency, and intensity of the source, wind speed and direction, and the sensitivity of the receptors. While offensive odors rarely cause physical harm, they can be unpleasant and raise public concern.

The proposed project consists of a cargo container hotel. Compliance with standard hygiene and safety regulations will prevent the project from generating objectionable odors at buildout. The onsite wastewater treatment facility will be self-contained and no treatment process will come in contact with open air. Construction and operation of the treatment facility will be regulated by the Regional Water Quality Control Board (RWQCB). Short-term odors associated with paving and construction activities could be generated; however, any such odors would be localized and quickly disperse below detectable levels as distance from the construction site increases. Therefore, impacts from objectionable odors are expected to be less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Biological Resources Assessment Report & Delineation of Jurisdictional Waters – Project Wander Hotel (Tract No.2810), prepared by Wood Environment & Infrastructure Solutions, Inc., January 2021; Google Earth; City of Twentynine Palms General Plan; City of Twentynine Palms General Plan Update Draft Environmental Impact Report (2010).

## Environmental Setting

The City of Twentynine Palms is located within the Mojave Desert biome in a portion of the western Mojave Desert. The City participates in the West Mojave Plan, which, once adopted, will serve as a habitat conservation plan for both public and private entities in the West Mojave Desert. It will encompass approximately 3.6 million acres of public land and 2.8 million acres of private land that will include deserts throughout San Bernardino,

Kern, Inyo, and Los Angeles Counties. The plan includes requiring focused surveys for Special Status Species, burrowing owl, and sensitive plants where suitable habitat is present.

The project area is characterized by patches of undeveloped, relatively natural open space, rural residential dwellings, and a network of paved and unimproved roadways. The project site remains undeveloped. A dirt road (Hastings Drive) bisects the project site.

The following analysis on potential impacts to biological resources associated with the proposed development is based on the project-specific Biological Resources Assessment and Jurisdictional Delineation conducted by Wood Environment & Infrastructure Solutions, Inc (Appendix B & C), City of Twentynine Palms General Plan and its draft EIR.

### Discussion of Impacts

- a) **Less Than Significant Impact with Mitigation Incorporated.** The project site is undeveloped. Development adjacent to the site include a single-family home on the north and the City's animal shelter and Public Works Department on the west. The project site is bordered by paved roadways on the west (Bullion Avenue) and on the north (Boling Drive), and unpaved roadways on the east (Split Rock Avenue) and on the south (Foothill Drive). East and south of the project site is vacant land. The area is generally flat, sandy with some rocky substrates interspersed throughout the site and intermittent small wash rivulets running from southwest to northeast through the site.

Other than adjacent habitat fragmentation resulting from the development of the existing single-family home, City buildings, and paved and unimproved roads, the project site has received relatively minor disturbance, primarily from off-road vehicular use, dumping and edge effects including vegetation clearing/weed abatement, establishment of dirt trails, trash deposition/accumulation and use by domestic pets.

The dominant vegetation community on the property is *Larrea tridentata* Shrubland Alliance (Creosote bush scrub), also referred to as "Mojave creosote bush scrub". No special status vegetation communities were observed onsite during the field assessment.

The field survey identified fourteen vertebrate species and other small rodents of undetermined species. Vertebrate species detected included one reptile, nine birds, and four mammals; no fish or amphibians were detected.

The only special status species observed during the field surveys on September 17 and November 11, 2020 was the loggerhead shrike (*Lanius ludovicianus*).

Based on literature review and consultation with experts, the project biological report identified 28 special status biological resources known to occur in the vicinity (within an approximate three-mile radius) of the project site, including seventeen

plants, two reptiles, three birds, five mammals, and one sensitive habitat. These include federal and state listed species, species of special concern, Bureau of Land Management (BLM) sensitive species and plant species designated as rare and/or imperiled by the California Native Plant Society (CNPS).

Of the 28 special status biological resources reported in the project vicinity, 19 species and one habitat are considered to be absent from the site due to a lack of suitable habitats and/or the location of the property outside the species' geographic range. Eight special status species have a very low or low potential to occur on the project site and are discussed below.

There is a low potential for parish's club-cholla (*Grusonia parishii*) and jackass-clover (*Wislizenia refracta ssp. refracta*) to occur onsite based on presence of suitable habitat, the desert scrub and associated sandy soils. Neither species is state or federally listed, but both are designated by CNPS as LIST 2B (plants rare, threatened, or endangered in California, but more common elsewhere). Parish's club-cholla prefers sandy soils in desert scrub habitat and the nearest recorded occurrence is seven miles south of the site. Jackass-clover has the potential to occur in a wide variety of desert habitats, including creosote bush scrub, but also occurs in desert dunes or wetland areas (neither of these habitats occur on the proposed project site); the nearest occurrence record is ¼ mile northeast of the site.

There is a very low potential for the desert tortoise (federally/state threatened) and low potential for the red-diamond rattlesnake (state species of special concern) to occur on the proposed project site. Marginally suitable habitat is present onsite for both species; however, the nearest recorded occurrence for the desert tortoise and red-diamond rattlesnake is 11 miles northwest and 5.5 miles north of the site, respectively. Avoidance measures should be taken to minimize any potential impacts to the desert tortoise. Focused surveys for this species are recommended prior to development of the site, as provided in Mitigation Measure BIO-1 below.

Burrowing owl (*Athene cunicularia*) has a low potential to nest and forage onsite due to presence of marginally suitable nesting habitat and suitable foraging habitat. Burrowing owl is a state species of special concern and protected under the Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW) code. No natural burrows with owls and/or owl sign were observed during the field survey; however, other small mammal burrows and man-made structures suitable for the owl were observed on-site and nearby. Burrowing owls are sensitive to excessive noise and activities such as grading and operation of heavy equipment up to 500 feet away and may abandon nests or burrows when such activities occur. Therefore, potential impacts to burrowing owls from nearby off-site areas must also be considered. In order to assure that this impact is mitigated, Mitigation Measure BIO-2 is provided below, which requires pre-construction burrowing owl surveys.

The loggerhead shrike was observed during the field assessment. This species is associated with a variety of desert scrub habitats, including open fields with scattered trees or shrubs, open country with short vegetation, pastures, old orchards, cemeteries, golf courses, riparian areas, and broken and open woodlands. Preferred nesting habitat for this species includes thorny vegetation; and in the absence of thorny trees or shrubs, they sometimes nest in brush piles or tumbleweeds. Nesting habitat is sparsely present on-site and adjacent to the project site. Loggerhead shrike is not listed as threatened or endangered by the USFWS or the CDFW, but is afforded protection under the MBTA.

Bendire's thrasher (*Toxostoma bendirei*) is designated a state species of special concern. This species is associated with a variety of desert scrub habitats, including creosote bush scrub, particularly areas providing creosote bush, yuccas and cholla cactus. For these reasons, there is at least a low potential for Bendire's thrasher to nest and occur on the project site although it was not observed during the field assessment. Like the burrowing owl and the loggerhead shrike above, the Bendire's thrasher is afforded protection under the MBTA. Avoidance of disturbance during the nesting season (generally February 1<sup>st</sup> through August 31<sup>st</sup>) is the most efficient way to avoid potentially impacting nesting birds. If avoidance of the nesting season is not feasible, a pre-construction survey for nesting birds will be required to avoid impacts to any active nests within the project site, as provided in Mitigation Measure BIO-3 below.

Pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*) is not a listed species and has a low probability to occur on-site due to marginally suitable habitat (desert scrub, rocks and coarse gravel) present. The nearest occurrence was recorded in 1946, ½ mile north of the site in a now developed area. No further action is required.

With implementation of the mitigation measures (BIO-1 through BIO-3), project impacts to special status or sensitive species are expected to be less than significant.

- b-c) Less Than Significant Impact with Mitigation.** The dominant vegetation community on the property is Creosote bush scrub. The field survey identified a variety of shrub, succulent and annual plant species, as well as several nonnative and introduced species associated with existing development in the project area. The site survey did not identify any hydric soils on the subject property.

A jurisdictional delineation was conducted for the proposed project in January 2021. Four small, dry, braided desert washes were identified in the project area that contained both bed and bank and ordinary high-water mark (OHWM). **Table 3** summarizes the waterways identified in the project area, and Exhibit 6 shows their mapped locations. The washes onsite did not show differentiation of changes in vegetation indicating areas of inundations. The majority of washes contained little or no vegetation within the OHWM, and no hydric indicator plants or riparian habitats were identified.

All drainages onsite are ephemeral. Under the Navigable Waters Protection Rule in effect on June 22, 2020, ephemeral drainages would not be considered Waters of the United States (WUS). Therefore, none of the onsite drainages are expected to be jurisdictional to the U.S. Army Corps of Engineers.

As shown in **Table 3**, all four drainages onsite meet the requirements for CDFW and Regional Water Quality Control Board (RWQCB) jurisdiction as Waters of the State of California (WSC). Impacts to these drainages would be considered significant if not mitigated. As provided in Mitigation Measure BIO-4, the proposed project will have temporary and permanent impacts to jurisdictional drainages and need to obtain authorizations from the RWQCB and CDFW. With 0.125 acres of project area under CDFW jurisdiction, a 1602 Streambed Alteration Agreement is required for all activities that alter streams and their associated riparian habitat (absent on the subject property). The project proponent shall obtain a Streambed Alteration Agreement by submitting a copy of this Initial Study in addition to the formal application materials and fee.

The project area is located within the jurisdiction of the Colorado River RWQCB (Region 7). The RWQCB regulates impacts on WSC under the Porter Cologne Water Quality Control Act through issuance of a Construction General Permit, State General Waste Discharge Order, or Waste Discharge Requirements, depending upon the level of impact and properties of the waterway. With 0.042 acres of project area under RWQCB jurisdiction, a Water Quality Certification is required for all activities that discharge into the waterways. The project proponent shall obtain a Water Quality Certification by submitting a copy of this Initial Study in addition to the formal application materials and fee (Mitigation Measure BIO-4).

**Table 3**  
**Summary of Jurisdictional Areas**

Drainage ID/ Survey Area	Waters of the US	RWQCB Jurisdiction (acres)	RWQCB Length (feet)	CDFW Jurisdiction (acres)	CDFW Length (feet)	Cowardin Class	Latitude/ Longitude	Class of Aquatic Resource
D-1	N/A	0.019	839	0.057	839	R4SBJ <sup>1</sup>	34.25595/-116.061355	non-section 10-non wetland
D-2	N/A	0.005	213	0.015	213	R4SBJ	34.126178/-116.061247	non-section 10-non wetland
D-3	N/A	0.010	423	0.029	423	R4SBJ	34.125957/-116.060815	non-section 10-non wetland
D-4	N/A	0.008	350	0.024	350	R4SBJ	34.125018/-116.060585	non-section 10-non wetland

<sup>1</sup> R4SBJ – Riverine, Intermittent, Streambed, Intermittently Flooded based on Classification of Wetlands and Deepwater Habitats of the United States (Cowardin, et. al., 1979).

The proposed site design seeks to avoid impacting the drainages as much as possible and maximize landscape/softscape areas. However, the proposed buildings and concrete pavement would overlap with part of D-1 and D-3. The project has the potential to impact waters of the state, which would represent a significant impact, if not mitigated. In order to mitigate the impacts to waters of the State, mitigation measure BIO-4 is provided below. With the implementation of this mitigation measure, impacts to waters of the state will be less than significant.

- d) **Less Than Significant Impact.** The project area is located south of the downtown area in a suburban setting. The project site is surrounded and bisected by roadways and subject to edge effects resulting from adjacent development, dumping, use by domestic pets, and off-road vehicle use. As discussed above, wildlife observed at the site is not abundant or diverse. Although it is used by common species and may provide marginal habitat for migratory birds and some special status species, it is not identified as a nursery site.

Wildlife corridors link together areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. Fragmentation of open space areas by urbanization creates isolated “islands” of wildlife habitat. As a result of a state interagency workshop, the Joshua Tree-Twentynine Palms Connection was designated within and near the City. The connection occurs in an ecological transition zone between the Mojave and Sonoran Desert eco-regions. The linkage connects areas of open space in Joshua Tree National Park and the Marine Base. The connection spans 307,807 acres, of which approximately 71 percent currently receives some level of conservation protection. The majority of the City is outside the connection area (General Plan Exhibit CO-3). Generally, four linkages occur across the City: two in the west, one in the north, and one in the east. The project area is not designated as or near any Wildlife Linkage Areas. Less than significant impacts are expected as a result of the project regarding wildlife corridors and nursery sites.

- e-f) **No Impact.** As noted, the West Mojave Plan is still in development. The City of Twentynine Palms General Plan establishes goals and policies to ensure that natural resources including the Oasis of Mara and desert tortoise within the Mesquite Dunes are protected. The San Bernardino County General Plan designates portions of the City’s Sphere of Influence (SOI) as the RC (Resource Conservation) land use zoning district. The County’s General Plan also includes a Biotic Resources (BR) Overlay to identify areas that include habitat for sensitive species. The project site is identified as Desert Tortoise – Sparse Population habitat on the County BR Overlay map.

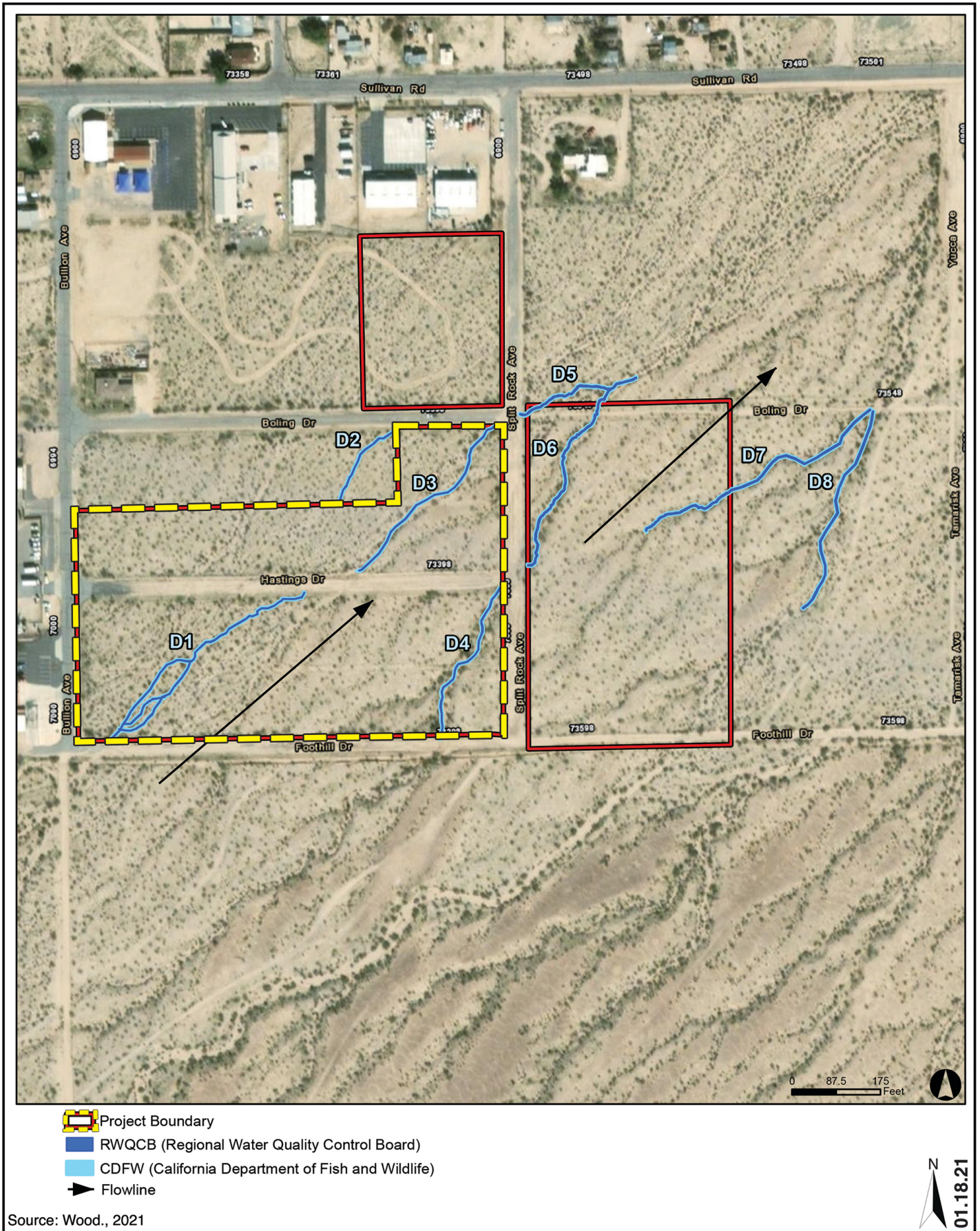
Development of the proposed project will occur within the City of Twentynine Palms (not SOI) and will follow mitigation measures specified in the project-specific biological report, including surveys and potential avoidance measures for desert tortoises. Therefore, it will have no impact on the overlay districts nor any conflict with City or county regulations and plans.

### **Mitigation Measures:**

- BIO-1** Focused surveys for desert tortoise should be conducted by a qualified biologist prior to construction. Based on the survey findings, additional actions may be required but not limited to: 1) implementation of a Worker Environmental Awareness Program (WEAP), 2) pre-construction clearance surveys, 3) relocation (where necessary and authorized by the USFWS, CDFW and/or BLM, where applicable), 4) construction monitoring, 5) exclusion fencing, 6) trash containment and control to avoid or minimize the likelihood of attracting predators, and possibly a common raven management/control plan.
- BIO-2** A pre-construction survey of all on-site rodent burrows will be conducted by an experienced burrowing owl biologist and confirmed as not having any owls in them, not more than 5 days before ground disturbance. The surveys will be conducted as close to the actual construction initiation date as possible.
- BIO-3** If construction is to occur during the MBTA nesting season (February 1 - August 31), a nesting bird survey should be conducted by a qualified biologist. Additional impact avoidance and minimization measures may be required but not limited to: 1) attendance of and compliance with a project-specific WEAP, 2) biological monitoring, 3) establishment and observance of no disturbance buffer zones around active bird nests found during the daily pre-construction surveys until the young birds have fledged, and 4) trash containment and disposal to avoid attracting potential predators. The CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100–300 feet for songbirds.
- BIO-4** Prior to any ground disturbance on the site, the applicant shall secure a 1602 agreement from the CDFW and a Water Quality Certification from the RWQCB. The permits will include mitigation measures to reduce the impacts of the 0.238 acres of waters of the State on the project site. These measures could include the purchase of land off-site or other measures as determined by the CDFW and the RWQCB.

### **Monitoring:**

- BIO-A** Prior to the issuance of any permit to allow ground disturbance on the site, the City will receive and file all technical surveys and permits in the project file.
- Responsible Parties:** Project applicant, project biologist, Planning Department, City Engineer.



	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

Sources: Twentynine Palms General Plan (2012); Historical/Archaeological Resources Survey Report – Tract No. 2810/Boiling Tract, prepared by CRM TECH, November 29, 2020.

### Environmental Setting

The City is located on the southern edge of the Mojave Desert. Archaeologists generally divide prehistory in the Mojave Desert into five periods marked by changes in archaeological remains that date back some 12,000 years. The Lake Mojave period (ca. 8000-5500 B.C.) is associated with small mobile groups of hunters and gatherers who inhabited the Mojave Desert. These groups continued to inhabit the region during the Pinto Period (ca. 5500-2500 B.C.), and relied more on ground foods, small and large game animals, and the collection of plants. Distinct cultural changes occurred during the Newberry Period (ca. 1500 B.C.-500 A.D.), when small residential groups moved between select localities, established a geographically expansive land-use pattern and engaged in long-distance trade. The two ensuing periods, Saratoga (ca. 500-1200 A.D.) and Tecopa (ca. 1200-1770s A.D.), are characterized by seasonal group settlements near accessible food sources and the intensification of the use of plant foods, as evidenced by groundstone artifacts and the evolution of pottery.

The City is located in an area historically occupied by two Native American groups, the Serrano and the Chemehuevi. The Serrano's homeland was centered in the nearby San Bernardino Mountains but also included lowlands along both flanks of the mountain range. The Chemehuevi, a subgroup of the Southern Paiute, traditionally occupied the Mojave Desert east to the Colorado River. The Serrano settled mostly near where flowing water emerged from the mountains, while the Chemehuevi, with fewer people spread over a much wider area, cultivated, gathered, and hunted in the open deserts, but were also known for their agricultural practices. Members of each tribe gathered at important base camps or villages for annual ceremonies and tribal interaction with neighboring groups.

In the Twentynine Palms area, the Serrano and the Chemehuevi relied on the waters of a desert oasis located approximately 0.81 miles to the northeast of the project location. The Serrano first settled in the oasis and named it *Maara*, “the place of little springs and much grass”. The Chemehuevi began to settle around the oasis in the mid-19th century.

While European contact may have occurred as early as 1771 or 1772, direct European influence on Serrano and Chemehuevi lifeways did not begin until the mission system expanded to the edge of Serrano territory in the 1810s. By the early 20th century, the majority of Serrano and Chemehuevi population was incorporated into the reservation system. Today, most Serrano descendants live on the San Manuel and the Morongo Indian Reservations, while the Chemehuevi are divided among the Chemehuevi, the Colorado River, and the Morongo Reservations.

Non-Native settlement first occurred in the Twentynine Palms area by the late 1800s, when prospectors sought their fortunes in nearby gold camps. The first pioneer homesteaders arrived in 1910, and a small community started to grow. In 1952, the U.S. Defense Department established a marine base north of the oasis for glider training, now known as the U.S. Marine Corps Air Ground Combat Center. The City of Twentynine Palms was incorporated March 23, 1987.

### **Discussion of Impacts**

- a) **No Impact.** Between September and November 2020, CRM TECH performed a cultural resources study on the project site to determine whether the project would cause a substantial adverse change to any “historical resources,” as defined by CEQA, that may exist in or around the project area. The study included a historical/archaeological resources records search, historical background research, a Native American Sacred Lands File search, and an intensive field survey.

The records search was conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System. According to SCCIC records, the project site has not been surveyed for cultural resources in the past, and no historical or archaeological resources have been recorded in the project area. SCCIC records identified at least nine previous studies and four archaeological sites and an isolate within a half-mile radius. Two of the sites (Sites 36-002052 and 36-004199, further discussed in (b) below) had prehistoric Native American components and were recorded roughly a-third mile northeast of the project site. The other two sites dated to the historic period, and both consisted of remnants of former residential properties. These two sites and the isolate, representing five prehistoric ceramic sherds from the same vessel, were all located approximately a half-mile to the southeast of the project site.

Given the distance of these recorded resources from the project site, they will not be impacted by the project development. No other potential historical resources were encountered within the project area during the records search and field survey. Therefore, the study concludes that no potential “historical resource” defined by CEQA exist within or adjacent to the project area that would require further study and formal evaluation, and the project will have no impact on any historical resource as defined in CEQA Section 15064.5.

- b) **Less Than Significant Impact with Mitigation Incorporated.** On September 14, 2020, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the Commission's Sacred Lands File. NAHC reported unspecified Native American cultural resource(s) in the general vicinity of the project area and recommended contacting the San Manuel Band of Mission Indians for further information. NAHC also provided a contact list of eight local Native American groups who may have knowledge of such resources, including the San Manuel Band and the Twenty-Nine Palms Band, whose reservation is located in close proximity to the project area.

On September 17, 2020, CRM TECH sent written requests to the San Manuel Band and the Twenty-Nine Palms Band for their input on any sacred/religious sites or other sites of Native American traditional cultural value that may be present in the project vicinity. The Twenty-Nine Palms Band has not responded formally to the inquiry, but participated in the archaeological field survey with CRM TECH. The San Manuel Band was unable to arrange for a monitor on the day of the survey but provided an email response to the enquiry on September 27, 2020. The San Manuel Band stated that the project area overlapped a Sacred Lands File for the Oasis of Maara (Site 36-002052), which the tribe considers to be the creation site of all Serrano people. The tribe further noted the location of the cemetery (Site 36-004199) near the project location, which contains both Serrano and Chemehuevi burials. The tribe pointed out that there are numerous unmarked burials that have not been located and may potentially be present beyond the current limits of the cemetery and expressed concern about the impacts of the project. The tribe requested that such information be forwarded to the City of Twentynine Palms in preparation for further consultation.

The field survey did not encounter any potential historical resources, either prehistoric or historical in origin, within the project area. Scattered modern refuse, of no historical or archaeological interest, was observed over much of the property, especially along the existing roads. The ground surface has undergone some disturbances, mainly in association with the roads and a few soil test borings found on the property. The only features noted during the survey that predate the modern era were the roads along the project boundaries or Hastings Drive that runs across the project area, which demonstrate little potential for any historic significance despite their historical origin.

Additionally, the City has undertaken independent consultation under AB 52 (see Section XVII). The City met with, and has received correspondence from the San Manuel Band of Mission Indians in response to this consultation. The San Manuel Band's primary concern was with areas on the site where grading would exceed three feet in depth. In response, the project engineer prepared a detailed cut and fill model, which the project archaeologist used to propose the location of trenches for further investigation. The San Manuel Band concurred with the testing program parameters and trench locations, which are included in Mitigation Measure CUL-1 below. This process is described in Section XVII, Tribal Cultural Resources.

As noted, the project area is located in relatively close proximity to the Oasis of Maara (Site 36-002052) and the Chemehuevi Cemetery (Site 36-004419), both of which are designated as Points of Historical Interest by the State of California. The Oasis of Maara is one of the most important prehistoric sites in the Mojave Desert region with a long history of Native American activities throughout the prehistoric, protohistoric, and historic periods, including as the creation site in Serrano convention. The cemetery contains known burials of both Chemehuevi and Serrano tribal members, and human remains are always of the utmost cultural significance to the local Native American community. In light of the presence of these important sites nearby, the project area is considered to be relatively sensitive for subsurface deposits of Native American cultural remains despite the lack of a substantial surface manifestation. As stated above, the San Manuel Band has expressed concern with the proposed project and requested to participate in further consultation with the City of Twentynine Palms. Meanwhile, the subsurface cultural sensitivity of the project area will need to be addressed through additional archaeological investigations, as discussed below in Mitigation Measure CUL-1.

**c) Less Than Significant Impact with Mitigation Incorporated.** Given the project's relatively close proximity to the Chemehuevi Cemetery (Site 36-004419) and that unknown or unmarked burials may be located outside the current cemetery boundary, the project would have the potential to disturb human remains. Further archaeological investigations as detailed in Mitigation Measure CUL-1 should reveal the likelihood of the presence of human remains on the project site and determine if additional steps should be taken to avoid and/or mitigate any potential impacts.

California law requires that should human remains be found on the site during monitored ground disturbing activities, all activity stop, that the coroner be notified to determine the nature of the remains and whether Native American consultation is needed. During consultation with San Manuel Band of Mission Indians as described above and in Section XVII, detailed procedures for inadvertent discoveries of human remains were formulated in Mitigation Measure TCR-2, which will further ensure that any potential impact to human remains will be less than significant.

### **Mitigation Measures:**

**CUL-1** At least one archaeologist with at least 3 years of regional experience in archaeology and a Tribal monitor representing the San Manuel Band of Mission Indians shall conduct subsurface archaeological testing on the project site via the employ of a number of subsurface investigative methods, including shovel test probes, remote sensing, and/or deep testing via controlled units or trenching of appropriate landscapes, with a sample size of at least 25% of the area of concern dug and dry-sifted through 1/8-inch mesh screens, prior to any ground-disturbing activity. A Testing Plan shall be created by the archaeologist and submitted to the San Manuel Band of Mission Indians Cultural Resources

Department (SMBMI) and the Lead Agency for review at least 10 business days prior to implementation, so as to provide time to review/modify the Plan, if needed. The Plan shall outline the protocol of presence/absence testing and contain a Treatment Plan detailing that 1) no collection of artifacts or excavation of features shall occur during testing, and 2) all discovered resources shall be properly recorded and reburied *in situ*.

If the results of testing, as approved by SMBMI, are positive, then SMBMI and the Lead Agency shall, in good faith, consult concerning appropriate treatment of the finding(s), guidance for which is outlined in TCR-1.

If the results of testing, as approved by SMBMI, are negative, then SMBMI will conclude consultation unless any discoveries are made during project implementation. Any and all discoveries made during project implementation shall be subject to the Treatment Plan outlined within the Testing Plan developed as described above and the guidelines contained in Mitigation Measure TCR-1.

If resources are identified during testing as described above, an archaeological monitor and a Tribal monitor from SMBMI with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

### **Monitoring:**

**CUL-A** Prior to any ground disturbing activity on the site, the applicant shall implement the testing program described in CUL-1. A report of findings and subsequent actions shall be provided to the City and consulting Tribes within 30 days of completion of the on-site investigation. The City Planner shall see to completion of actions required in CUL-1 before grading/building permits are issued.

**Responsible Parties:** Project archaeologist, Project engineer, Consulting Tribes, Planning Department.

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

Source: Twentynine Palms General Plan (2012).

## Environmental Setting

Nuclear energy, fossil fuels such as oil, coal and natural gas, and renewable sources such as wind, solar, geothermal and hydropower are various sources of energy. The electrical energy to the City is provided by Southern California Edison (SCE). Natural gas service is provided to the City by Southern California Gas Company (SoCalGas). Natural gas is mainly utilized for water heaters and heating of homes, as well as a broad range of commercial and industrial equipment. In areas where natural gas is not available, propane gas, stored in on-property tanks, is also utilized. Both SCE and SoCalGas offers various programs and incentives for all users to reduce energy consumption.

## Discussion of Impacts

**a, b) Less Than Significant Impact.** The proposed project will utilize energy resources during both construction and operational activities. Construction-related energy demand comes from operation of construction equipment and manufacturing of construction materials. The proposed project consists of a ‘shipping container’ hotel with parking lot, onsite sewage treatment facility, and street improvements. Operational energy demand will come from building and site lighting, HVAC systems, and refrigeration.

All building structures proposed for the hotel will be made from shipping containers and finished with light gauge steel framing and a thermal air layer to improve insulation. The International Code Council released its 2019 Guideline for the Safe Use of repurposed shipping containers. This is a nonmandatory document that provides information and recommendations about using containers and may serve as a precursor to how containers will be covered in the forthcoming 2021 Edition of the International Building Code. Government entities, including the state of California are expected to incorporate the 2021 IBC which will cover container structures, and may provide more specific guidance and regulations on shipping container buildings.

The hotel structures will be constructed in accordance with the Building Code, California Green Building Code, and Energy Code in effect at the time that development occurs, to ensure the most efficient construction/building

technologies are used, which will benefit overall hotel operation, ensure energy efficiency, and reduce wasteful and unnecessary consumption of energy resources. These requirements of law assure that the proposed structures on the site will not waste energy.

SCE has actively engaged in renewable power generation and procurement, administers a variety of energy efficiency programs, and encourages rooftop solar energy. The City's General Plan promotes sustainable practices in land use, use of buildings and for development and construction. The project will comply with the 2019 California Building Code and will not interfere with any state or local plan that promotes renewable energy or energy efficiency.

Adherence to the applicable state building standards and those enforced by SCE and SoCalGas will ensure the development is consistent with current energy standards and conservation goals laid out in the City's General Plan (2012). Therefore, impacts related to energy will be less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Percolation/Infiltration Testing for On-Site Storm Water Management, Percolation Testing for Onsite Sewage Disposal Feasibility, Geotechnical Investigation report prepared by Sladden Engineering dated September 2020; Twentynine Palms General Plan Update (2012); City of Twentynine Palms General Plan Update Draft Environmental Impact Report (2010).

## Environmental Setting

The City is located within a wedge-shaped fault block known as the “Mojave Block.” The Mojave Block is located at the junction of two distinct geomorphic provinces: Eastern Transverse Ranges Province, a region of low to moderately high mountains that include Joshua Tree National Park, the Little San Bernardino Mountains, the Pinto Mountains,

and several ranges to the southeast; and Mojave Desert Province, an arid region of alluvial fans, expansive desert plains, dry lakebeds and scattered mountain ranges. The Mojave Block is bounded by the Garlock Fault to the north, the San Andreas fault system to the west and southwest, and the southern Death Valley fault zone, Granite Mountains, and Packard Well faults to the east.

In the Twentynine Palms area, the trace of the Pinto Mountain Fault is recognized by a pressure ridge and divides into two splays. The northern splay of this fault is mostly buried by Quaternary valley fill but emerges where it joins the west splay of the Mesquite Lake Fault east of the City limits.

The region is susceptible to a range of geologic hazards, including ground rupture, major ground shaking, slope instability, and collapsible and expansive soils.

#### Soils

Soils in the City range from wind-blown sand and Playa sands on the valley floor, to igneous and metamorphic rock in the surrounding mountains. The project site contains coarse sandy soils typical of alluvial fans, which in this case have been transported by wind and storm sheet flow from the nearby mountains to the south. The project area is generally flat, occurring at an elevation range of approximately 2,960 feet to 2,995 feet above mean sea level.

### **Discussion of Impacts**

- a) i) **Less Than Significant Impact.** Two main fault zones bisect the City: the Pinto Mountain fault in a westerly direction and the Mesquite Lake fault in a southeasterly direction. Secondary faults to these include several short traces both north and south of the main trace of the Pinto Mountain fault, and the Airfield and East Airfield faults to the east of the Mesquite Lake fault. All of these faults are potential sources of strong ground shaking and surface fault rupture.

According to the project Geotechnical Investigation (Appendix D), known faults are not mapped on or projecting towards the site. In addition, no signs of active surface faulting were observed in photographs of the site and site vicinity (Google Earth, 2020). No signs of active surface fault rupture or secondary seismic effects such as lateral spreading and lurching were identified during the field investigation by project geologists. Therefore, risks associated with surface ground rupture onsite should be low and impacts will be less than significant.

- ii) **Less Than Significant Impact.** The project site is located in a seismically active region where local and regional faults can produce severe ground shaking. The two main faults crossing the City, the Pinto Mountain fault and the Mesquite Lake fault, have the potential of generating earthquakes of up to 7.3 magnitude on the Richter scale. The project geotechnical report estimated the site peak ground acceleration to be 0.796g and developed site-specific ground motion parameters based on the 2019 California Building Code. The project proposes a shipping container hotel and associated infrastructure improvements including a sewage

treatment facility and street improvements. The proposed structures will be required to be constructed in accordance with the most recent edition of the CBC and the City's Municipal Code Section 18.01.020 to provide collapse-resistant design. The Municipal Code includes modifications to the CBC adopted in accordance with local geology. Compliance with the CBC and City regulations will ensure that project-related impacts associated with seismic ground shaking will be less than significant.

- iii) **Less Than Significant Impact.** Earthquakes can cause several types of ground failure including liquefaction and related hazards, collapse and slope failure (see subsection (iv) below).

Liquefaction typically occurs within 50 feet of the ground surface, in areas where fine- to medium-grained sandy to silty soils and shallow groundwater occur together. Lateral spreading, a type of liquefaction-induced failure, is the lateral displacement of surficial blocks of soil atop a liquefied layer often described as shallow landslides. According to the project geotechnical report, because groundwater was not encountered within any exploratory borings up to 30 feet below ground surface, and groundwater levels in the site vicinity exceed 100 feet below ground surface, groundwater should not be a factor during project design and construction. The report concluded that risks associated with liquefaction are considered negligible. Therefore, impacts associated with ground failure including liquefaction will be less than significant.

- iv) **No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The project site is located approximately 0.38 miles north of the Queen Mountain foothills. The project site and surrounding area are characterized by generally flat topography. No signs of slope instability in the form of landslides were observed within the project vicinity during the geotechnical investigation. The project will result in generally flat surfaces onsite in the proposed parking lot and landscape areas. No impact associated with landslides would occur.

- b) **Less Than Significant Impact.** The dry, loose, sandy soils forming the alluvial fans occurring in the City are susceptible to erosion from high wind and flooding due to infrequent thunderstorms. This area is impacted, on average, by two to seven windstorm events per year. At buildout, the site will be covered by structures repurposed from shipping containers, parking lots, and sewage treatment facility as well as hardscape and landscape areas, thus minimizing long-term wind erosion potential.

Grading and construction may require removal of the topsoil; however, project-related impacts are expected to be less than significant because the project will be required to implement measures to control fugitive dust consistent with the requirements of the MDAQMD (see Air Quality, Section III), which will minimize potential adverse impacts associated with wind erosion. The City requires

erosion/dust control plans that include the implementation of best management practices associated with stormwater flows on the project site (see Section X, Hydrology and Water Quality). These standard requirements assure that erosion resulting from storm flows are controlled on and off site. Overall impacts associated with soil erosion will be less than significant.

**c) Less Than Significant Impact with Mitigation Incorporated.**

Landslide

See response to VII.a.iv, above.

Lateral Spreading

See response to VII.a.iii, above.

Subsidence

Ground subsidence is mostly caused by human activities such as water or oil extraction through pumping. In the Twentynine Palms region, groundwater has been naturally recharged by infiltration of stormwater runoff that percolates into the alluvial sediments. During the last few decades, the rate of groundwater extraction has exceeded natural replenishment, resulting in declining water levels and overdraft of the groundwater basin in more densely populated areas. To remedy this condition, local artificial recharge has been developed; the closest recharge sites to Twentynine Palms are percolation ponds in the Yucca Valley-Joshua Tree area. Subsidence has not been studied or detected as of 2012. The City's General Plan includes policies to help maintain groundwater levels and thus reduce the potential for subsidence by maintaining adequate groundwater levels. The General Plan EIR concludes that impacts associated with subsidence will be less than significant in the City. According to the project geotechnical report, no fissures or other surficial evidence of subsidence were observed at or near the subject site, and the potential for subsidence related settlement is considered negligible.

Liquefaction

See response to VII.a.iii, above.

Collapse

Soil collapse (or hydroconsolidation) typically occurs in Holocene-age soils deposited in an arid or semi-arid environment. When saturated, collapsible soils undergo a rearrangement of their grains and a loss of cementation, resulting in substantial and rapid settlement under relatively light loads. The young alluvial fan and aeolian sediments in the Twentynine Palms area are susceptible to this hazard. General soil stabilization techniques can be applied to mitigate collapsible soil, including over-excavation and soil recompaction as recommended by the site-specific geotechnical investigation (Mitigation Measure GEO-1). The ultimate static settlement is estimated to be less than one inch and within an acceptable range following the recommendations included in the geotechnical report. Implementation of project-specific recommendations in the study will ensure that impacts associated with collapse or collapsible soils will be reduced to less than significant levels.

- d) **Less Than Significant Impact.** The majority of the Twentynine Palms area is underlain by silty sand, sand and gravel. Such soils typically have a low expansion potential, although pockets of fine-grained expansive soils may occur. According to the site-specific geotechnical study, the surface soil onsite consists of sand and silty sand. Laboratory testing of borings indicated that the site soils have a very low expansion potential. Impacts associated with expansive soils are expected to be less than significant.
- e) **Less Than Significant Impact with Mitigation Incorporated.** There are currently no sewer facilities in the project area. The project proposes a sewage treatment facility in the northeast corner of the site which will include a tertiary wastewater treatment plant and seepage pits to serve the hotel. Percolation testing was conducted in conjunction with the geotechnical investigation to evaluate onsite sewage disposal feasibility. The seepage pit test results and soil conditions encountered within site borings indicate favorable conditions, and percolation test rates were consistent with the sandy alluvial soil conditions observed. The project engineers concluded that seepage pits may be used for the proposed on-site sewage disposal system in accordance with San Bernardino County guidelines. Compliance with the county guidelines and implementation of project-specific recommendations will ensure impacts are less than significant regarding soil capability of supporting alternative wastewater disposal systems on the project site.
- f) **Less Than Significant Impact with Mitigation Incorporated.** According to the City's General Plan, San Bernardino County, in general, has an extensive record of fossil life starting in Jurassic time, 150 million years ago. Fossilized remains are expected to occur within areas containing finer-grained fluvial, lacustrine, or aeolian deposits. Excavation and other earthmoving activities on the project site within surface and subsurface exposures of Quaternary Alluvium could disturb a unique paleontological resource. Mitigation Measure GEO-2 requires a paleontological survey before grading, consistent with General Plan Implementation Policy CO-2.10. With implementation of this mitigation measure, impacts to paleontological resources will be reduced to less than significant levels.

**Mitigation Measures:**

**GEO-1** The project structural engineer and contractor should follow the recommendations provided in the project Geotechnical Investigation report during project design and construction.

**GEO-2** A field survey shall be conducted by a qualified paleontological professional before grading to determine the need for paleontological monitoring. If paleontological resources are discovered during site development, qualified paleontologic personnel shall prepare recovered specimens to a point of identification and permanent preservation. Appropriate specimens shall be identified and curated into the collections of the Division of Geological Sciences, San Bernardino County Museum, in accordance with the Museum's policies.

**Monitoring:**

**GEO-A** The Building and Safety Division and the City Engineer shall review and approve the project geotechnical study and ensure that all recommendations therein are incorporated in the project design.

**Responsible Parties:** Project geotechnical engineer, Building and Safety Division, City Engineer.

**GEO-B** The City shall review and approve the pre-construction paleontology study prior to the issuance of grading permits, and implement monitoring if determined necessary.

**Responsible Parties:** Project paleontologist, Planning Department.

	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS -- Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Sources: City of Twentynine Palm General Plan; San Bernardino County Regional Greenhouse Gas Reduction Plan (March 2014); MDAQMD CEQA and Federal Conformity Guidelines; CalEEMod Version 2016.3.2; project materials.

## Environmental Setting

Certain gases in the earth's atmosphere, referred to as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. The principal GHGs contributing to the greenhouse effect are CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and fluorinated compounds. GHG sources include both natural and anthropogenic processes. Anthropogenic GHG emissions in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to an overall trend of unnatural warming of the earth's climate, known as global climate change or global warming.

State laws, such as Assembly Bill 32 (AB 32) and Senate Bill 32 (SB 32), require all cities to reduce greenhouse gas emissions to 1990 levels by the year 2020. SB 32 is the extension of AB 32 which requires the state to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030.

In 2014, SANBAG prepared a Regional Greenhouse Gas Inventory and Reduction Plan (March 2014) which included a greenhouse gas inventory and forecast for Twentynine Palms. The City participated in the plan development and set a goal to reduce its community GHG emissions to a level of 15% below 2008 GHG emissions level by 2020. The City is expected to meet and possibly exceed this goal with joint state and local efforts and reduction measures set forth by AB 32. The City's General Plan includes policies and measures to facilitate GHG emission reduction through encouraging alternative transportation, promoting renewable energy, and implementing energy efficient building technologies.

### GHG Thresholds

According to the MDAQMD CEQA and Federal Conformity Guidelines, the annual threshold for greenhouse gases is 100,000 tons CO<sub>2</sub>e annually, and 548,000 pounds daily. As described above in Section III, Air Quality, the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to quantify project air quality emission projections, including greenhouse gas emissions (Appendix A).

## Discussion of Impacts

a, b) **Less Than Significant Impact.** The proposed project will generate GHG emissions during both construction and operation.

### Construction

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commute, material hauling, and other construction activities. The MDAQMD daily threshold for GHG emissions is 548,000 pounds per day. According to the CalEEMod outputs, daily construction related GHG emissions would reach a maximum of 6,133 pounds per day, which is substantially below the established threshold. To determine if construction emissions will result in a cumulative considerable impact, buildout GHG emissions were amortized over a 30-year period and added to annual operational emissions in comparison to applicable GHG thresholds (see **Table 4**, below).

### Operation

At buildout, there are five emission source categories that will be contributing either directly or indirectly to operational GHG emissions, including energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. According to the CalEEMod outputs, daily operational GHG emissions would reach a maximum of 7,941 pounds per day, which is substantially below the established threshold of 548,000 pounds per day. As shown in **Table 4**, the project will emit a total of 2,074.23 tons per year, which includes annual operational emissions and amortized construction emissions and is substantially below the established threshold of 100,000 tons per year.

Overall, the proposed project would be consistent with local, regional and statewide goals and policies aimed at reducing the generation of GHGs. The proposed project's GHG emissions would not constitute a cumulatively considerable contribution, or conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

<b>Table 4 Projected GHG Emissions Summary (Metric Tons)</b>	
<b>Phase</b>	<b>CO<sub>2</sub>e (MT/YR)</b>
<b>Construction (2022)</b>	
Construction Total	407.59
<b>Operation</b>	
Construction: 30 year amortized <sup>1</sup>	13.59
Annual Operation	2,060.65
<b>Total Operation</b>	<b>2,074.23</b>
<b>MDAQMD Threshold</b>	<b>100,000.00</b>
1. Buildout construction GHG emissions were amortized over 30 years then added to buildout operational GHG emissions. 407.59/30 = 13.59	

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Twentynine Palms General Plan Update (2012); State Water Resources Control Board GeoTracker, accessed November 18, 2020.

## Environmental Setting

A variety of products such as gasoline, paint, solvents, commercial cleaning products, refrigerants, and radioactive substances are categorized as hazardous materials. The proper management of hazardous materials is a common concern for all communities. Since the 1970s, governments at the federal, state, and local levels became increasingly concerned about the effects of hazardous materials on human health and the environment. Numerous laws and regulations were developed to investigate and mitigate these effects. As a result, the storage, use, generation, transport, and disposal of hazardous materials are highly regulated by federal, state, and local laws and regulations.

The San Bernardino County Fire Department's Hazardous Materials Division is the state designated Certified Unified Program Agency (CUPA) responsible for permit administration, compliance inspections and enforcement for over 7,000 regulated facilities in San Bernardino County.

The Department of Toxic Substances Control (DTSC) lists 24 sites within the City that are either listed or permitted as hazardous material sites, primarily businesses located on or near Highway 62. Sites associated with cleanup of hazardous materials in and near the City have been primarily, and currently are those associated with the military installations at the Marine Corps base, north of the City.

### Discussion of Impacts

- a, b) **Less Than Significant Impact.** The project proposes a 93-unit shipping container hotel in a commercial/industrial area. Hazardous materials associated with hotels are limited to daily use chemicals stored in small amounts for routine cleaning and landscape maintenance. Storage, use, and disposal of these chemicals will occur in accordance with product labeling and existing regulations, and therefore will not create a significant hazard to the public and the environment.

Construction of the project will involve the temporary use of heavy equipment that could require minor maintenance and/or re-fueling onsite, which may result in fuel and oil spills if not properly managed. The project contractor will be required to identify staging areas for storing materials and equipment and handle, use, and store hazardous materials in accordance with state law.

Given the non-explosive, common nature, and small amounts of hazardous materials associated with the project, it would not create a significant hazard through accidental release of such materials. During project construction and operation, the handling, use, and storage of hazardous materials will be subject to applicable federal, state, and local laws including California Occupational Health and Safety Administration (CalOSHA) requirements. Overall, potential impacts regarding the use, transport and storage of hazardous materials will be less than significant.

- c) **No Impact.** The closest school to the project site is Oasis Elementary School, located approximately 1.1 miles northwest of the site. As discussed above, the project will involve the use and storage of common substances in small amounts and comply with existing laws and regulations. Since the project is not located within ¼ mile of a school, no impact will occur.
- d) **No Impact.** The project site is currently vacant. A single-family residence is located north of the project site. The City's animal shelter and Public Works Department are located on the west of the project site. According to GeoTracker and the City's General Plan, the project site is not listed on governmental databases as a hazardous materials cleanup site, nor are any such sites located in the vicinity of the proposed project. No impact would occur.

- e) **No Impact.** The Twentynine Palms Airport is located more than 8 miles east of the project site. The Marine Corps' airbase is located more than 11 miles northwest of the project site. The project is not located within the boundary of any airport land use plan, nor is it affected by noise from airport activities. No safety hazard will result, nor will excessive noise be experienced by store employees and/or customers as a result of airport operations. No impact will occur.
- f) **No Impact.** The project proposes a new hotel on currently vacant land. The hotel will take access from both Bullion Avenue and Split Rock Avenue, as well as a sewage treatment access on Boling Drive. Bullion Avenue and Boling Drive in the project area are paved; Split Rock Avenue and Foothill Drive are unpaved. The project will be required to construct street improvements concurrent with phase 1 development on part of Bullion Avenue, Split Rock Avenue and Boling Drive including paving, widening with curb and gutter and street lighting. Upon completion of phase 1, the project will have paved access to Sullivan Road, a paved City roadway that connects to the City's primary north-south roadway, Adobe Road. The balance of street improvements will occur with Phase 2, completing paved access around the property. The project will not affect the City's street grid, and thus will not impact emergency response or evacuation plans. No impact would occur.
- g) **No Impact.** According to the General Plan (Exhibit SF-2), the project site is in a Local Responsibility Area and a Moderate Fire Hazard Zone. The site is not located adjacent to forested areas, and the slopes of the mountains to the south of the project site do not support significant vegetation. The site is not in a High Severity Fire Zone, and will therefore not be impacted by wildfires.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Preliminary Drainage Study For Tentative Parcel Map No. 20360 Wander Hotel City of Twentynine Palms, California, 4/19/2021; Twentynine Palms General Plan; Amended Final Urban Water Management Plan for Twentynine Palms Water District (TPWD), December 2016; U.S. Department of the Navy and U.S. Marine Corps, 2015; Twentynine Palms Wastewater Master Plan (2014).

## Environmental Setting

### Domestic Water

Twentynine Palms Water District (TPWD) manages and distributes the local ground water supply in the City of Twentynine Palms and portions of the surrounding unincorporated areas of San Bernardino County. The District's water service area spans 87 square miles, maintaining 200 miles of pipeline and 17 million gallons of water storage capacity. The

District's water supply source is 100 percent local groundwater extracted from four sub-basins south of the Pinto Mountain Fault, which are fed by rainfall in the Pinto Mountains. The District overlays portions of the Indian Cove, Eastern and Fortynine Palms sub-basins of the Joshua Tree Basin, and part of the Twentynine Palms Valley Basin.

As an urban water supplier, TPWD is mandated to prepare an Urban Water Management Plan (UWMP) per the California Water Code, undertaking water supply planning over a 20-year period in five year increments by analyzing existing and projected water supply opportunities including recycled water for existing and future demands, in normal, single-dry and multiple-dry years, and implementing conservation and efficient use of urban water supplies.

The project will result in a 93-unit container hotel with 40,941 square feet building area. State Water Code Section 10910(a) states that any city or county that determines that a "Project," as defined in Water Code Section 10912, shall prepare a water supply assessment. The threshold defined by the Water Code is 500 dwelling units, 500,000 square feet of commercial development, or any project with a water demand in the equivalent of 500 dwelling units. The small size of the project does not require the preparation of a water supply assessment, and its water demand is analyzed below.

#### Wastewater Treatment

The only Wastewater Treatment Plant (WWTP) in the region is located at the Marine Corps Air Ground Combat Center (MCAGCC). The facility treats all wastewater generated from the Mainside area of the MCAGCC. The City, including the project area, does not have a sanitary sewer system and currently operates with septic tanks.

In 2014, the City prepared a Wastewater Master Plan to identify and describe the potential facilities that would be required for a centralized sewer collection system and wastewater treatment plant to replace the septic systems in use. A new centralized system is envisioned to include the City and surrounding unincorporated areas. The City is currently initiating the planning and layout of the sewer system, but sanitary sewage in the City will not be available to the project area in the near term. As a result, the proposed project will build a sewage treatment facility with deep pits onsite.

#### Flood Control/Drainages

The City, including the project site, lies in the southern Mojave Desert. Although annual precipitation averages around 5 inches, infrequent thunderstorms occur in the area and can cause flooding in the City.

Twentynine Palms Channel, the only major drainage structure in the City, was designed and constructed to protect the central business district and downtown area. The natural major drainages of Fortynine Palms Canyon, Twentynine Palms Wash, Indian Cove and Dog Wash, as well as small unnamed drainages in the Pinto Mountains can carry flash floods and impact downstream development in the City.

The San Bernardino County Flood Control District (SBFCD) is responsible for managing regional drainage within and in the vicinity of Twentynine Palms. The City works with SBFCD to manage local drainages in the City, which are divided between well-defined

drainage courses (some have been channelized) and areas of wide sheet flow. Development that may alter the direction of flow onsite are conditioned per standard San Bernardino County practices to maintain the existing site drainage patterns at inlets and outlets.

The project site will be subject to City requirements relating to flood control. The City implements standard requirements for stormwater retention and participates in the National Pollution Discharge Elimination System (NPDES) to protect surface waters from pollution. Development projects must retain the 100-year storm flow onsite.

#### Water Quality

Water quality is regulated by multiple agencies, depending on the source. The TPWD implements the standards of the Regional Water Quality Control Board (RWQCB) in its distribution of domestic water. The RWQCB also regulates septic tanks and alternative wastewater treatment systems, to protect the groundwater basin from pollution from those sources.

Surface water quality in the region is largely under the influence of land uses that affect runoff, such as urban and industrial uses. Runoff from stormwater can transport pollutants that collect on the ground surface and affect water quality of receiving streams, rivers, and channels. Because there is no receiving water body for the Morongo Basin, including the City of Twentynine Palms, RWQCB does not require a water quality management plans (WQMP). However, the City typically requires best management practices (BMPs) similar to those required in a WQMP.

#### **Description of Impact**

- a) **Less Than Significant Impact.** All water providers are required to comply with Regional Water Quality Control Board (RWQCB) standards for the protection of water quality and local aquifers.

The proposed hotel will generate demand for domestic water and limited landscaping irrigation. Construction of on-site connections will be subject to all standard requirements of TPWD. No sanitary sewer service or infrastructure is available within the site vicinity. The project proposes a sewage treatment facility onsite, which will be entirely self-contained and sized to treat the hotel wastewater at full buildout. The wastewater facility will be regulated by the Regional Water Quality Control Board, and will treat project effluent consistent with the Board's standards prior to discharge.

The proposed project will be required to comply with TPWD and RWQCB regulations to minimize the polluted load associated with urban activities. By complying with these standards, the proposed project will not violate water quality standards or waste discharge requirements. The imposition of conditions of approval and adherence to local, state and federal requirements will ensure that impacts associated with water quality standards are less than significant.

- b) **Less Than Significant Impact.** The proposed hotel will connect to an existing 8-inch water main located within Bullion Avenue. The project will require water for guest stays and landscape irrigation. The project proposes a landscape palette with native species that are drought tolerant and require low to moderate water use. **Table 5** provides an analysis of project water demand at buildout, which is approximately 7.26 million gallons per year.

<b>Table 5</b>			
<b>Project Water Demand Projections</b>			
<b>Land Use</b>	<b>Area (square feet)</b>	<b>Water Demand Factor<sup>1</sup> (gallons per day per square foot)</b>	<b>Annual Water Demand (million gallons)</b>
Hotel	16,042	0.145	3.09
Native desert landscaping	215,339	0.053	4.17
<b>Total</b>	-	-	<b>7.26</b>
<sup>1</sup> Water demand factor for discount grocery store based on EPA Energy Star Portfolio Manager Data Trends Water Use Tracking. Water demand factor for irrigation use developed by ACI irrigation.			

In order to prevent overdrafting, the California Department of Water Resources (DWR) has recommended pumping limits for both the Fortynine Palms and Indian Cove subbasins, which results in an overall limited pumping capacity at 6,995 acre-feet per year (AFY). Existing pumping in 2015 (2,404 AFY) represents approximately 30% of the total pumping capacity. The total water demand of the proposed project is 7.26 million gallons per year, equivalent to 22.3 AFY. The project will increase pumping by approximately 0.9% over the 2015 baseline level, and will represent approximately 0.3% of the limited pumping capacity recommended by DWR. The amended 2015 UWMP demonstrates that the District has adequate supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 20-year planning period. In addition, there is sufficient production capacity planned to meet projected future demands with the actions the TPWD is taking to maintain supply availability. Project impacts on groundwater supplies and recharge are expected to be less than significant.

- c i)- iii) **Less Than Significant Impact.** The project site is generally flat and contains four ephemeral drainages that generally flow in a northeasterly direction (Exhibit 6). A Preliminary Drainage Study was prepared for the project in April 2021 (Appendix D).

The Preliminary Drainage Study provided hydrologic analyses of the project site and approximately 223.8 acres of offsite watershed that will impact the existing project site in accordance with the San Bernardino County drainage requirements. Based on the 100-year, 24-hour peak discharge values at the most downstream point for the offsite basin and onsite for pre- and post- development conditions, a total onsite retention volume of 2,046 cubic feet would be required. The proposed project would provide a total volume of 10,353 cubic feet in four retention basins throughout the site.

A final drainage study will be conducted to determine the retention basin design when construction plans are finalized. The proposed retention basins will be oversized to help slow and direct existing offsite flows that go through the project. The proposed entrances on Bullion Avenue and Split Rock Avenue will be elevated to prevent stormwater from entering the site. Offsite flows will be directed to flow around and through the site and then released at pre-development locations. It is expected that best management practices (BMPs) such as biofiltration techniques will be installed on the project site to reduce impacts associated with pollutants, polluted runoff, and erosion/siltation on- or off-site. The site will be developed in a manner that will maintain historical downstream flow patterns, and the project is not expected to increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Implementation of the City's requirements on erosion control and stormwater retention will further ensure that project impacts associated with runoff will be less than significant.

- iv) **Less Than Significant Impact.** According to FEMA's Flood Insurance Rate Maps, the project site is located within Zone X, Area of 0.2% Annual Chance Flood Hazard. As described in subsection (iii) above, the site will be developed in a manner that will maintain historical downstream flow patterns, and the proposed retention basins will be oversized to help slow and direct existing offsite flows that go through the project. As a result, implementation of the proposed onsite drainage retention facilities will ensure that the project will have less than significant impacts on impeding or redirecting flood flows.
- d) **Less Than Significant Impact.** The project site is not located in the vicinity of a water body, a levee or a dam. The City is located inland and would not be subject to tsunami. No hazard from dam failure, tsunami or seiche is possible. As discussed above, the project site is not located within a 100-year floodplain. Impacts would be less than significant given the low likelihood of inundation in the project area.
- e) **No Impact.** The proposed project will be required to comply with all applicable water quality standards and will implement erosion control and other best management practices required by the City and the Regional Water Quality Control Board for both construction activities and long-term operation of the site. The proposed project is consistent with the General Plan land use designation; therefore, it will not conflict with a sustainable groundwater management plan. Adherence to the City's standard requirements related to water quality will ensure there will be no impact to a water quality control plan.

**Mitigation Measures:** None required.

**Monitoring:** None required.

	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X

Sources: Google Earth; City of Twentynine Palms General Plan; project materials.

### Environmental Setting

The City's General Plan designates the project site as Service Commercial. The City operates on a "one map" system, meaning that the General Plan designations are also utilized as zones in the Development Code. The Service Commercial land use designation allows more intensive commercial uses, such as wholesaling operations, auto and truck repair and service, lumberyards, machine shops, light manufacturing and recycling centers. Hotels are allowed in the Service Commercial District with a Conditional Use Permit.

### Discussion of Impacts

- a) **No Impact.** The project site is currently vacant. The area surrounding the project is partially developed with one single-family dwelling across the street to the north, the City Public Works Department and animal shelter across the street to the west, and vacant land on the east and south. There is no established community on or adjacent to the project site. Therefore, the proposed project will not result in the division of an existing community. No impact would occur.
- b) **No Impact.** The proposed project will result in the development of a single-story container hotel. The project is consistent with General Plan land use designation of Service Commercial up to 0.5 floor-area ratio (FAR) and Implementation Policies LU-2.1 and 2.3, which state that development shall be consistent with underlying land use densities and intensities and be sensitive to neighborhood context and development scale. The project also furthers Policies LU-10.3 and 10.4, which facilitate tourist-oriented development adjacent to the Joshua Tree National Park and call for a variety of lodging facilities in the City as a world class tourist destination. The project will be developed consistent with the City's Development Code, Building Code and engineering standards. The proposed project, therefore, will not conflict with any land use plan, policy or regulation of the City, and will not impact such plans.

**Mitigation Measures:** None required.

**Monitoring:** None required.

	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Sources: Google Earth; City of Twentynine Palms General Plan.

### Environmental Setting

The City is not identified as a mineral resource area of significance, although mining has previously occurred in and around the City. The General Plan uses the State mineral resource designations to determine the potential for mineral resources to exist in any given area.

### Discussion of Impacts

**a), b) No Impact.** The project site is designated in the General Plan for Service Commercial land uses, and is surrounded by properties identified for urban uses. The project area is not, nor has it been in the past, a mining site. There are no mines located in the vicinity of the project. The proposed commercial use of the project site will have no impact on mineral resources.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Google Earth; City of Twentynine Palms General Plan.

## Environmental Setting

The main sources of noise in an urban environment include road traffic, aircraft, railroads, construction, industry, noise in buildings, and consumer products. According to the United States Environmental Protection Agency (US EPA), in any city, the main sources of traffic noise are the motors and exhaust systems of autos, trucks, buses, and motorcycles. Temporary noise sources include landscape maintenance activities, home stereo systems, and barking dogs, which are governed by the provisions of the City Noise Ordinance (Chapter 19.80).

The City has established goals, policies, and programs to limit and reduce the effects of noise intrusion on sensitive land uses and set acceptable noise levels for varying types of land uses in its General Plan. The City uses the Community Noise Equivalent Level (CNEL) to guide acceptable noise levels in the community. The CNEL scale represents an average of noise levels over a 24-hour period, and is weighted for the quieter evening and nighttime periods. The CNEL scale establishes normally acceptable noise levels for single family homes at 50 to 60 dBA, and conditionally acceptable levels at 55 to 70 dBA. For hotels, normally acceptable noise levels are 50 to 65 dBA, and conditionally acceptable levels are 60 to 70 dBA.

## Discussion of Impacts

- a) **Less Than Significant Impact.** The site is currently vacant. At buildout, the hotel will generate noise primarily associated with daily activities at the hotel facilities (such as clubhouse and pool, patio, and laundry), arrival and departure of guests and employees, as well as deliveries. With development of the project, noise levels will increase during construction, and over the life of the project.

### Temporary Construction Noise

The development of the proposed hotel, sewage treatment facility and street improvements will result in temporary construction noise generated from the site. The proposed development will consist primarily of grading, installation of the container buildings and self-contained wastewater treatment plant, paving or concrete pouring for the parking lot, driveway and other hard surfaces. The highest noise levels can be expected to be generated by heavy equipment, such as graders, bulldozers and similar vehicles during site grading. Heavy equipment can generate noise levels ranging from 70 to 90 dBA at a distance of 50 feet from the source. This equipment, however, will be mobile and will not create a source of constant noise at any one location on the site.

The Municipal Code exempts construction activities from short-term, short-duration noise standards when they are conducted during permitted time frames. The project would be required to comply with the City's Municipal Code construction hours, between 7 a.m. to 7 p.m. excluding Sundays and Federal holidays. From May through September, construction activities are allowed to begin at 6 a.m.

The project site is surrounded by public buildings across the street on the west, vacant land on the east and south, and a single-family residence across the street to the north. The residence occurs at least 180 feet from the project site on the other side of Boling Drive, and approximately 120 feet from the street improvement area at its closest point. The public buildings are approximately 100 feet from the project boundary, and approximately 70 feet from the street improvement area at its closest point. Noise attenuation of 6 dB can be expected with doubling of distance. Therefore, the single-family home would be expected to experience noise levels slightly lower than the 64 to 84 dBA range, and the public buildings would be expected to experience noise levels of slightly lower than 70 to 90 dBA during construction activities. These noise levels, however, will only last during the limited construction phase and occur during the less sensitive daytime hours, and are exempted from the City's noise ordinance.

In conclusion, although the project's construction could generate short term isolated increases in noise to surrounding sensitive receptors, these impacts would be less than significant.

### Operational Noise Impacts

The proposed project will result in the development of a shipping container hotel. Operations of the hotel will generate noise at the clubhouse and swimming pool, guest rooms with yard and firepit/picnic facilities, as well as the laundry/break room. The hotel would also be expected to generate traffic noise, from guests, employees and occasional delivery trucks arriving and departing. These noise levels are temporary, periodic, and do not exceed City standards, either for short-duration or CNEL noise levels. While the project site is currently vacant, it is surrounded by roadways on most sides, with one single-family residence on the north side of Boling Drive and public buildings on the west side of Bullion Avenue.

The General Plan identified the project site in an area that currently experiences low noise levels of 55 to 60 dBA CNEL. The General Plan further determined that at build out, the noise levels will largely remain in this range in this area. The proposed project will not be subject to excessive noise at the General Plan buildout since the proposed hotel will be subject to noise levels within the normally acceptable noise levels (50 to 65 dBA) for hotel uses.

At project buildout, hotel activity will be primarily during the daytime hours, and the associated noise levels are not expected to increase substantially at build out of the General Plan. The hotel operational noise levels are not expected to raise the area's noise levels to exceed the City's standard of 70 dBA CNEL for the existing residential use in the vicinity. At General Plan buildout, the project will be surrounded by Service Commercial and Public uses on three sides, and low density single-family residential use on the south. The proposed hotel project would serve as a buffer between heavier commercial uses and the residential zone, as project operational noises will be largely consistent with residential noise levels. Noise impacts associated with the build out of the project and its ongoing operation are expected to be less than significant.

- b) **Less Than Significant Impact.** The operation of the proposed hotel will not generate groundborne vibration. Construction activities, however, could generate temporary and short-term vibration from the use of heavy equipment. Groundborne vibration also produces groundborne noise, described as a rumbling sound, that can be heard and felt by adjacent uses. The project will consist of a clubhouse, hotel rooms and other ancillary structures made from cargo containers, as well as a sewage treatment facility and site and street improvements. Construction of the proposed project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The highest degree of groundborne vibration would be generated during the paving phase of construction due to the operation of a vibratory roller.

Based on Federal Transit Administration (FTA) data, vibration velocities from vibratory roller operations are estimated to be approximately 0.1980 inch-per-second PPV at 26 feet from the source of activity. As such, structures located greater than 26 feet from vibratory roller operations would not experience groundborne vibration above the Caltrans significance thresholds (i.e. 0.3 inch-per-second PPV for structures and 0.2 inch-per-second PPV for human annoyance). As the nearest existing structures are located more than 70 feet from any location within the project boundary and the street improvement area where a vibratory roller may be used (such as in preparation for paving parking/driveway areas), the Caltrans significance thresholds would not be exceeded. Therefore, impacts would be less than significant.

- c) **No Impact.** Aircraft noise in the City generally is the result of either general aviation operations or military overflights originating from or destined to the Marine Corps Air Ground Combat Center (Marine Base). The proposed project is

located more than 12 miles southeast of the Marine Base airport and more than 6 miles west of the Twentynine Palms Airport, and well outside the noise contours of these airports. According to the City's General Plan Noise Element, none of the public or private aircraft facilities in and around the City have sufficient operations to generate noise contours (in terms of the CNEL noise scale) that would extend into the City or impact noise sensitive land uses. The airports will have no impact on noise levels at the proposed project.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Google Earth; City of Twentynine Palms General Plan.

### Environmental Setting

In 2020, the City had an estimated population of 29,258 persons, up from 25,048 on 2010 – a 16.8% increase. The City also has 9,681 housing units, consisting primarily of single-family homes.

The project area occurs in the south end of the City. Development densities proposed for this part of the City will result in single family homes on 1 acre lots to the south, service commercial uses to the north and east, and public uses to the west.

### Discussion of Impacts

**a-b) No Impact.** The project site is currently vacant. The project will result in a 93-room shipping container hotel to be developed in two phases. At buildout, the proposed hotel will create new jobs and require employees. New jobs are likely to be filled by existing residents, or new residents to the area who will move based on employment and housing opportunities. The proposed project will not have a direct effect on population growth within the City.

Construction of the proposed project is expected to occur over a 24-month period. Construction labor is expected to be derived from the local work force within the Morongo Basin, with the potential for supplemental workers from the greater San Bernardino County area and the Coachella Valley. Project construction is not expected to induce permanent population growth.

The proposed project occurs on the City's existing street grid, and will tie into existing utility systems. Since existing streets, utilities and public facilities are located adjacent to the project site along Bullion Avenue and Boling Drive as well as the unpaved Foothill Drive and Split Rock Avenue, the project will not result in the construction or expansion of new infrastructure. Overall, no impact is anticipated.

The proposed project will not induce growth or displace existing people or housing. No impacts associated with population or housing will result from the proposed project's implementation.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: City of Twentynine Palms General Plan; Google Earth Pro 7.3.2.5491; Online Resources; Project materials.

## Environmental Setting

### Fire Protection

The San Bernardino County Fire Department (SBCoFD) is responsible for fire protection within the City. SBCoFD operates 57 fire stations in 24 cities and covers 19,200 square miles in the County. SBCoFD has a staff of 1,071 County fire personnel and 683 fire suppression personnel available for each 24-hour period. The nearest fire station to the project site is Station #44 at 6560 Adobe Road, approximately 0.63 miles northeast of the subject property.

### Police Protection

The San Bernardino County Sheriff's Department is responsible for law enforcement in the City. A total of 14 police personnel are assigned to the City and operate out of the Morongo Basin Station located at 63665 Highway 62 in Joshua Tree, approximately 10 miles west of the project site.

### Schools

The City and the project site are located within the boundaries of the Morongo Unified School District (MUSD), which provides public school facilities to accommodate students. The MUSD currently operates nineteen schools and programs within its district, which stretches beyond Twentynine Palms to Yucca Valley and Morongo Valley. The nearest school to the project site is Oasis Elementary School, located approximately 1.1 miles northwest of the site.

### Parks

There are a total of four existing parks (i.e. Bucklin Park, Luckie Park, Knott's Sky Park, and Veteran's Park) and the proposed Pioneer Park in the City. The City's other major recreational facilities include Theatre 29, the Senior Community Center, Parks and Recreation Community Services Building, and Parks and Recreation Administration Building.

## **Discussion of Impacts**

### Fire Protection

**Less Than Significant Impact.** The development of a shipping container hotel on currently vacant land will marginally impact fire protection services. The proposed use is not at high risk of fire, and all hotel structures will be equipped with sprinklers required by Fire Code. Although the proposed hotel will have the potential to increase fire department calls, it is not expected that the increase will be significant to demand additional facilities or personnel. In addition, the development plans for the project will be reviewed by the Fire Department to assure that they meet Fire Code, access and circulation requirements for emergency response crew and vehicles. Impacts associated with fire protection are expected to be less than significant.

### Police Protection

**Less Than Significant Impact.** The development of the project site could potentially increase the need for police protection services in response to any incidents that may occur onsite. The project is located in a sparsely developed area of the City that currently receives police protection and is accessible by major roadways. The proposed hotel will be served by the existing police force serving the City and is not expected to result in demand for additional police facilities or personnel. The police department will review the project's development plans to assure that they meet current standards for sight distances and safe operations. Impacts associated with police protection are expected to be less than significant.

### Schools

**No Impact.** The proposed hotel will create a limited number of new jobs which are expected to be filled by local residents. Development of the project will not generate permanent population, nor their associated school aged children. The project will be required to pay the developer fee of \$0.277 per square foot to the Morongo School District. No impact to schools will occur.

### Parks / Other Public Facilities

**Less than Significant Impact.** As noted above, the proposed project will not induce population growth. The project will provide lodging for tourists and business travelers with 93 rooms at full buildout, but it is not expected to induce a significant increase in demand and use of parks and other public facilities. The recreational facilities included in the clubhouse will provide an on-site recreational opportunity for guests which will likely offset their need to use City facilities. Impact to parks and other public facilities will be less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
XVI. RECREATION --				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Sources: Google Earth; City of Twentynine Palms General Plan.

## Environmental Setting

The City currently operates Theater 29, Senior Community Center, Parks and Recreation Community Services Building, and Parks and Recreation Administration Building and four existing parks. The City is the gateway to Joshua Tree National Park and surrounded by other natural and historical parks and facilities including the Mojave Trails National Monument.

## Discussion of Impacts

**a, b) Less Than Significant Impact.** The project will result in the development of a shipping container hotel and is not expected to induce population growth. The hotel will include limited onsite amenities including a clubhouse, swimming pool and a break room. Impacts related to construction of the onsite facilities are discussed in other sections of this initial study.

The hotel guests are expected to use both onsite recreational facilities and local and regional parks and recreational facilities. The hotel will provide 93 rooms made of shipping containers at buildout and will expand lodging options in the City. However, development of the project is not expected to induce a significant increase in the demand and use of neighborhood and regional parks and other recreational facilities. The proposed project will have less than significant impacts on recreation.

**Mitigation Measures:** None required.

**Monitoring:** None required.

	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
XVII. TRIBAL 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		X		
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		X		

Source: Twentynine Palms General Plan (2012); Historical/Archaeological Resources Survey Report – Tract No. 2810/Boiling Tract, prepared by CRM TECH, November 29, 2020.

## Environmental Setting

As discussed in the Section V, Cultural Resources, the Mojave Desert, including the City of Twentynine Palms have been home to the Serrano and the Chemehuevi Native Americans for centuries. Today, most Serrano descendants are affiliated with the San Manuel and the Morongo Indian Reservations, while the Chemehuevi are divided among the Chemehuevi, the Colorado River, and the Morongo Reservations.

The City and surrounding areas contain significant cultural resources to the Native American people which are considered non-renewable resources because they provide important information about the past and are of high cultural value to the tribes.

## Discussion of Impacts

**a, b) Less Than Significant with Mitigation Incorporated.** On September 14, 2020, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the Commission's Sacred Lands File. NAHC reported unspecified Native American cultural resource(s) in the general vicinity of the project area and recommended contacting the San Manuel Band of Mission Indians for further information. NAHC also provided a contact list of eight local Native American groups who may have knowledge of such resources, including the San Manuel Band and the Twenty-Nine Palms Band, whose reservations are located in close proximity to the project area.

The San Manuel Band stated that the project area overlapped a Sacred Lands File for the Oasis of Maara, which the tribe considers to be the creation site of all Serrano people. The tribe further noted the location of the cemetery near the project location, which contains both Serrano and Chemehuevi burials. The tribe pointed out that there are numerous unmarked burials that have not been located and may potentially be present beyond the current limits of the cemetery and expressed concern about the impacts of the project. The tribe requested that such information be forwarded to the City of Twentynine Palms in preparation for further consultation.

The City conducted Tribal Consultation in conformance with AB 52 requirements and contacted three tribes in writing on May 24, 2021. The San Manuel Band of Mission Indians requested formal consultation and additional mitigation measures including a testing program and detailed procedures for discovered cultural resources and human remains/funerary objects. The San Manuel Band's primary concern was with areas on the site where grading would exceed three feet in depth. In response, the project engineer prepared a detailed cut and fill model, which the project archaeologist used to propose the location of trenches for further investigation, while also considering the wash areas where scouring would have impacted potential for resources. The San Manuel Band concurred with the testing program and detailed procedures to treat tribal cultural resources and human remains/funerary objects as described in Mitigation Measures CUL-1, TCR-1 and TCR-2. Implementation of the mitigation measures will reduce any potential impacts to Tribal Resources to less than significant levels.

## **Mitigation Measures:**

### **TCR-1 Treatment of Cultural Resources**

If a pre-contact cultural resource is discovered during archaeological presence/absence testing, the discovery shall be properly recorded and then reburied *in situ*. A research design shall be developed by the archaeologist that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI), the archaeologist/applicant, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the archaeological significance of the resource, its potential as a Tribal Cultural Resource (TCR), avoidance (or other appropriate treatment) of the discovered resource, and the potential need for construction monitoring during project implementation. Should any significant resource and/or TCR not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to mitigate impacts, the research design shall include a comprehensive discussion of sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribe, unless otherwise decided by SMBMI. All plans for analysis shall be reviewed and

approved by the applicant and SMBMI prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference of SMBMI that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by SMBMI, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and SMBMI. All reburials are subject to a reburial agreement that shall be developed between the landowner and SMBMI outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.).

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with SMBMI to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

## **TCR-2 Inadvertent Discoveries of Human Remains/Funerary Objects**

In the event that any human remains are discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately who shall notify SMBMI, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98.

Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties.

It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

**Monitoring:**

**TCR-A** All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and SMBMI for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.

**Responsible Parties:** Project archaeologist, Project engineer, Consulting Tribes, Planning Department.

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

Sources: City of Twentynine Palms General Plan; Google Earth; San Bernardino County Transportation Impact Study Guidelines, July 9, 2019; Technical Advisory on Evaluating Transportation Impacts in CEQA, State of California Governor's Office of Planning and Research, December 2018; Traffic Impact Assessment for Wander Hotel, prepared by NV5 Engineers and Consultants, Inc., September 10, 2021.

### Environmental Setting

The City's Circulation Plan classifies roadways into the following types: 6-Lane Expressway, Arterial, Secondary, and Collector. The General Plan (2012) established a LOS "C" minimum service standard for all new streets within the city. While Caltrans targets LOS on State Highway facilities between LOS C and LOS D, they acknowledge that it may not always be feasible and if an existing State highway is operating at less than the target LOS, the existing LOS should be maintained. Traffic studies conducted in Twentynine Palms have generally assumed that Caltrans' region-wide goal for an acceptable LOS on all freeways, road segments and intersections is LOS D.

Currently, the project site is vacant and undeveloped. Existing roadways in the vicinity of the project site include Split Rock Avenue, designated as a 66' Collector, Bullion Avenue, Boling Drive and Foothill Drive, all of which are local streets. Split Rock Avenue and Foothill Drive are unpaved in the project area.

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).

A traffic impact assessment, including a VMT analysis, was prepared for the project in September 2021 (Appendix G). The project trip generation rate is based on Institute of Transportation Engineers, Trip Generation Manual, 10th Edition. Land Use Code 310 (Hotel) was used for the project trip generation analysis.

### Discussion of Impacts

- a) **Less Than Significant Impact.** The project proposes a shipping container hotel on a currently vacant site surrounded by paved and unpaved roads towards the southern end of the Twentynine Palms city limits. The project site is part of a larger area zoned as Service Commercial that may be developed in the future. Boling Drive and Bullion Avenue border the site on the north and west, and both are paved with minimal improvement (curb) on the project side. Foothill Drive and Split Rock Avenue border the site on the south and east, and both are unpaved in the project vicinity. Phase 1 of the project will include street improvements on parts of Boling Drive, Bullion Avenue, and Split Rock Avenue along the project boundary. The street improvements will include paving, widening with curb and gutter and street lighting. Phase 2 will also include street improvements that will complete the paving and improvements of all adjacent streets.

The project will result in the development of a 93-room shipping container hotel. Phase 1 will result in 65 rooms and associated infrastructure improvements; phase 2 will result in 28 rooms, additional parking and street improvements. Traffic impact at full buildout of both phases is analyzed in the project traffic study. The project is forecast to generate 624 daily vehicle trips, with 41 trips during the AM peak hour and 44 trips during the PM peak hour.

**Table 6**  
**Project Trip Generation Summary**

Land Use	Code	Size/Unit	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Hotel	310	93 /rooms	24	17	41	22	22	44	624
Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 10 <sup>th</sup> Edition and project traffic impact assessment.									

The project proposes three access points, the main entry/exit on Split Rock Avenue, another on Bullion Avenue, and a sewage treatment access on Boling Drive. A main driveway is proposed through the phase 1 portion of the project site, connecting the Split Rock and Bullion access points and also serving as the fire access driveway. Phase 2 proposes an additional 34 parking spaces and 28 hotel rooms which are expected to be accessed internally; details of access and internal driveways for Phase 2 are not yet available.

In accordance with the City of Twentynine Palms Traffic Report Guidelines, the project traffic study included analysis of project driveway operations at:

- Bullion Avenue at Driveway 1 (western segment of project main driveway)
- Split Rock Avenue at Driveway 2 (eastern segment of project main driveway)

Both driveway intersections will be stop controlled and are anticipated to operate at an acceptable LOS A. No queuing issues are anticipated to occur at the project driveways.

Intersection analysis was excluded from the analysis based on the peak hour trips generated by the project. The study included a roadway segment evaluation for the Existing, Existing Plus Project, Cumulative (2025), and Cumulative (2025) Plus Project Conditions for the following roadway segments:

1. Bullion Avenue – between Hastings Drive and Boling Drive
2. Split Rock Avenue – between Sullivan Road and Boling Drive
3. Sullivan Road – between Bullion Avenue and Pine Avenue

Under Existing conditions, all study segments operate at LOS D or better.

Under Existing Plus Project conditions, the study roadways are anticipated to continue to operate at acceptable levels of service (D or better), as shown in the following table.

<b>Table 7</b> <b>Existing Plus Project Daily Roadway Segment Levels of Service</b>								
Study Roadway Segment	Classification <sup>1</sup>	Existing			Existing Plus Project			Change in LOS
		ADT	V/C Ratio <sup>2</sup>	LOS <sup>3</sup>	ADT	V/C Ratio	LOS	
1. Bullion Avenue – Boling Drive to Hastings Drive	Local Street	151	0.07	D	619	0.31	D	0.24
2. Split Rock Avenue – Sullivan Road to Boling Drive	Local Street	9	0.01	D	165	0.08	D	0.07
3. Sullivan Road – Bullion Avenue to Pine Avenue	Collector	2,371	0.14	C	2,995	0.17	C	0.03
(1) Local Street capacity thresholds are not available for LOS A through C. LOS D is used for Local Street. However, the ADT for the two study segments is less than the LOS D threshold. (2) V/C = Volume to Capacity (3) LOS = Level of Service								

Under Cumulative (2025) conditions, the study roadways are anticipated to continue to operate at acceptable LOS D or better. As shown in Table 8 below, all study segments will continue to operate at an acceptable LOS D or better under the Cumulative (2025) Plus Project scenario.

<b>Table 8</b> <b>Cumulative (2025) Plus Project Daily Roadway Segment Levels of Service</b>								
Study Roadway Segment	Classification <sup>1</sup>	Existing			Existing Plus Project			Change in LOS
		ADT	V/C Ratio <sup>2</sup>	LOS <sup>3</sup>	ADT	V/C Ratio	LOS	
1. Bullion Avenue – Boling Drive to Hastings Drive	Local Street	157	0.08	D	625	0.31	D	0.24
2. Split Rock Avenue – Sullivan Road to Boling Drive	Local Street	9	0.01	D	165	0.08	D	0.07
3. Sullivan Road – Bullion Avenue to Pine Avenue	Collector	2,467	0.14	C	3,091	0.17	C	0.03
(1) Local Street capacity thresholds are not available for LOS A through C. LOS D is used for Local Street. However, the ADT for the two study segments is less than the LOS D threshold. (2) V/C = Volume to Capacity (3) LOS = Level of Service								

In summary, the project driveways and study roadway segments will perform at a LOS D or better, and no improvements are required. The proposed project will include street improvements concurrent with each phase of the hotel development, consistent with City requirements and standards. The project is not expected to conflict with a program, plan, ordinance or policy addressing the circulation system. Project impacts will be less than significant.

#### Alternative Transportation Planning

Alternative transportation in Twentynine Palms is primarily limited to bus service, as biking and walking are limited to streets with those facilities only. There are no designated bike facilities within ¼-mile of the project site, and ADA compliant sidewalk is limited to the south side of Sullivan Road north of the project site.

Morongo Basin Transit Authority (MBTA) provides transit service in the Morongo Basin, including the City of Twentynine Palms. Bus Route 3B (Twentynine Palms Neighborhood) currently serves the project area; the nearest stop is the Tortoise Rock Casino (near Adobe & Baseline Road) located approximately 0.57 miles southeast of the project site. Another stop, the 29 Palms Transit Center (Adobe Road & Cactus Drive), is located approximately 0.65 miles northeast of the project site and served by both Route 1 (Yucca Valley-Twentynine Palms) and Route 3B. The nearest bike facilities are located on Sullivan Road, approximately 0.12 miles north of the project site.

The project would contribute to the implementation of long-term multi-modal circulation system improvements by paying applicable traffic fees adopted by the City of Twentynine Palms and by installing street improvements. Future project employees and visitors would be able to use alternative transportation modes given the distance to those facilities discussed above. The project will not conflict

with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Project-related impact on alternative transportation is expected to be less than significant.

- b) **Less Than Significant Impact.** SB 743 requires amendments to the CEQA Guidelines (pre-2019) to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Public Resources Code Section 21099(b)(1)). CEQA Guidelines were amended to require all lead agencies to adopt vehicle miles traveled (VMT) as a replacement for automobile delay-based level of service (LOS) for identifying transportation impacts. This statewide mandate went into effect July 1, 2020.

The City of Twentynine Palms adopted VMT Policy Guidance in 2020 utilizing the San Bernardino County Travel Demand Model (SBTAM) to measure VMT and analyze a project’s VMT impact. The VMT Policy Guidance describes specific screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed project level VMT analysis. A land use project need only meet one of the screening thresholds to result in a less than significant impact:

- Transit Priority Area (TPA) screening
- Low VMT area Screening
- Project type screening

The project is not located within a TPA and does not meet the TPA screening criteria. The project exceeds the project type screening thresholds including 110 daily vehicle trips or 12 hotel rooms. Based on the SBTAM screening map, the project is located in a high VMT area and thus warrant the VMT analysis model run.

VMT results for the With Project conditions were determined by running the SBTAM with appropriate socioeconomic data (SED) inputs to account for the land use changes resulting from project development. The SBTAM results indicate that the project traffic analysis zone (TAZ) would generate home-based work VMT at a lower rate than the City of Twentynine Palms overall and County of San Bernardino as a whole. Under the project completion year conditions (2027), the project TAZ would generate VMT at a rate of 9.31 VMT per employee, 11.3% below the baseline without project conditions for the City (10.5 VMT per employee). The project would also generate VMT at a rate substantially lower (44.8%) than the County overall (20.79 VMT per employee). The City refers to the County guidelines for significance thresholds, which consider a project to have a significant impact if the project VMT per person/employee is greater than 4% below the existing VMT per person for the unincorporated County. The project VMT per employee is 44.8% below the existing County level, and 11.3% below the existing City level. Therefore, the project would not result in a significant VMT impact.

Under cumulative (2040) conditions, the project would result in a decrease in overall VMT for the project TAZ, City and County overall. Since the project results in a reduction of VMT, the project will have a less than significant cumulative VMT impact. As discussed in a) and c) of this section, the project's impacts to alternative transportation modes (i.e., pedestrian, bicycle and transit) and to safety are not significant. Therefore, the project would not result in significant transportation impacts under CEQA.

- c) **Less Than Significant Impact.** The project will be developed in accordance with City design standards and will not create a substantial increase in hazards due to a design feature. The three proposed access points will be sited with adequate sight distances. As discussed above, the roadways surrounding the project site are classified as local or Collector streets, not included in the General Plan Traffic Study and are not expected to operate at unacceptable levels of service. The project is not expected to cause traffic delay or risks in the area. No incompatible uses are proposed for the hotel project. Prior to construction, both the Fire Department and Police Department will review the site plan to ensure safety measures are addressed, including geometric design. Therefore, the proposed project will not result in significant impacts on traffic hazards.
- d) **No Impact.** Public access to the project site is proposed via Bullion Avenue and Split Rock Avenue. These roadways are part of the City's existing grid system. Regional access to the project site will be provided via Highway 62 and other roadways. Prior to construction, both the Fire Department and Sheriff Department will review the project site plan to ensure safety measures are addressed, including emergency access. The project will be required to construct street improvements concurrent with phase 1 development on part of Bullion Avenue, Split Rock Avenue and Boling Drive including paving, widening with curb and gutter and street lighting. Upon completion of phase 1, the project will have paved access to Sullivan Road, a paved road that connects to the City's primary north-south roadway, Adobe Road. The proposed project will not result in inadequate emergency access. No impact is anticipated.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Source: Twentynine Palms General Plan; Online Resources; San Bernardino Countywide Plan Draft PEIR, June 2019.

## Environmental Setting

### Domestic Water (please also see Hydrology and Water Resources)

The proposed project site is located within the Twentynine Palms Water District (TPWD) boundaries for domestic water services. The District's water supply source is 100 percent groundwater produced from District-owned and operated wells. The District maintains nearly 8,000 meter services and 200 miles of pipeline within an 87-square mile area.

### Wastewater Treatment

The only Wastewater Treatment Plant (WWTP) in the region is located at the Marine Corps Air Ground Combat Center (MCAGCC). The City, including the project area, does not have a sanitary sewer system and currently operates with septic tanks.

In 2014, the City prepared a Wastewater Master Plan to identify and describe the potential facilities that would be required for a centralized sewer collection system and wastewater treatment plant to replace the septic systems in use. A new centralized system is

envisioned to include the City and surrounding unincorporated areas. The City is currently initiating the planning and layout of the sewer system, but sanitary sewage in the City will not be available to the project area in the near term. As a result, the project proposes a sewage treatment facility and seepage pits onsite.

#### Flood Control/Drainages

The San Bernardino County Flood Control District (SBFCD) is responsible for managing regional drainage within and in the vicinity of Twentynine Palms. The City works with SBFCD to manage local drainages in the City, which are divided between well-defined drainage courses (some have been channelized) and areas of wide sheet flow. Development that may alter the direction of flow onsite are conditioned per standard San Bernardino County practices to maintain the existing site drainage patterns at inlets and outlets.

#### Solid Waste

Burrtec Waste Industries provides solid waste pick up and disposal, as well as recycling services in the City. Solid waste disposal and landfill siting is handled by the County of San Bernardino, Solid Waste Management Division. The project will utilize commercial services provided by Burrtec.

#### Other Utilities

The electrical energy to the City is provided by Southern California Edison (SCE). Natural gas service is provided to the City by Southern California Gas Company (SoCalGas). Telephone service is provided by a number of companies, including both land lines and cellular services.

### **Discussion of Impacts**

- a) **Less Than Significant Impact.** The proposed project will not require the construction of new water, electricity, natural gas or telecommunications facilities. The project will connect to existing utility infrastructure located under the adjacent Bullion Avenue, and as required by the City, all facilities will be undergrounded.

The project proposes a sewage treatment facility onsite for the hotel, which will be regulated by the Regional Water Quality Control Board. This facility will be entirely self-contained, and will treat project effluent consistent with the Board's standards prior to discharge.

The site's existing drainage pattern will be incorporated into the design, which includes retention basins to contain the 100-year 24-hour storm volume and direct and slow down offsite flows. As described above, none of the new facilities will result in significant environmental impacts. Overall, impacts associated with relocation or expansion of existing services or facilities are expected to be less than significant.

- b) **Less Than Significant Impact.** As described in Section X., Hydrology and Water Resources, the proposed project will have a less than significant impact on water demand. The California Department of Water Resources (DWR) has recommended pumping limits for both the Fortynine Palms and Indian Cove subbasins, which result in an overall limited pumping capacity at 6,995 acre-feet per year (AFY). Existing pumping in 2015 (2,404 AFY) represents approximately 30% of the total pumping capacity. The total water demand of the proposed project is approximately 7.26 million gallons per year, equivalent to 22.3 AFY. The project will increase pumping by approximately 0.9% over the 2015 baseline level, and will represent approximately 0.3% of the limited pumping capacity recommended by DWR. The amended 2015 UWMP demonstrates that the TPWD has adequate supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 20-year planning period. In addition, there is sufficient production capacity planned to meet projected future demands with the actions the TPWD is taking to maintain supply availability. The project will have a less than significant impact on water supply and service system.
- c) **No Impact.** As described above, the City operates on septic systems, and although it is planning for a sanitary sewer system, none is anticipated to serve the proposed project in the near term. The proposed project will include a sewage treatment facility on the northeast corner of the site, and will otherwise not require sanitary sewage service. The facility will be sized to meet the demand of the project, and will be regulated by the Regional Water Quality Control Board to assure safe operations. No impact is expected.
- d), e) **Less Than Significant Impact.** The City's solid waste disposal service is provided by Burrtec. Trash generated by the project will be hauled to the Twentynine Palms Transfer Station, east of the City, and then transported to Landers Landfill, a regional landfill located approximately 30 miles northwest of the City. Additional capacity will result from either the expansion of the Landers Landfill or the regional landfill in Barstow, approximately 100 miles north of the City. Twentynine Palms Transfer Station has a permitted throughput of 200 tons per day. Landers Landfill had a remaining capacity of 13,983,500 cubic yards as of 2017 and is estimated to close in 2072. Burrtec and the existing facilities will have sufficient capacity to serve the project. Burrtec is required to meet all local, regional, state and federal standards for solid waste disposal. Impacts associated with solid waste are expected to be less than significant.

**Mitigation Measures:** None required.

**Monitoring:** None required.

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

Sources: Twentynine Palms General Plan; Fire and Resources Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection.

## Environmental Setting

Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. A wildland-urban interface (WUI) is an area where urban development is located in proximity to open space or “wildland” areas. Wildland fires may pose a hazard where development is located in a WUI or within close proximity to unmanaged fuels or designated fire severity zones.

The California Department of Forestry and Fire Protection (CalFire) has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP).

The General Plan identifies the project site as being in a Local Responsibility Area and a Moderate Fire Hazard Zone. The site is not located adjacent to forested areas, and the slopes of the mountains to the south of the project site do not support significant vegetation.

## Discussion of Impacts

**a)-d) No Impact.** The FRAP does not identify any fire hazard severity zone or state responsibility area within the City. The project site is not located adjacent to a state responsibility area or a very high fire hazard severity zone. Because the City, including the proposed project, is not at high risk for wildfire, it is also not at risk for spread of wildfire, or for slope instability, flooding or landslides. Finally, there is no need for installation or maintenance of infrastructure that could exacerbate fire risk. No impacts associated with wildfire will result from development of the proposed project.

**Mitigation Measures:** None required.

**Monitoring:** None required.

	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE --				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
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)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

### Discussion of Impacts

- a) **Less Than Significant Impact with Mitigation Incorporated.** As described above, the proposed project has the potential to impact biological (desert tortoise, burrowing owl, and migratory birds) and cultural resources (archaeological and Tribal). The mitigation measures included in this document, however, will assure that the impacts associated with these resources are reduced to less than significant levels.
- b) **Less Than Significant Impact.** Where appropriate above, the proposed project's impacts have been considered in relation to General Plan build out. Under those cumulative conditions, the project was found to have less than significant impacts. The proposed project consists of a 93-room shipping container/cargo hotel and associated infrastructure. The impacts associated with the project, as mitigated, will be less than significant. When considered in the framework of General Plan build out, the project is consistent with the build out plans envisioned in the General Plan, and will expand the lodging options for visitors in the project area and the City, now and into the future. Cumulative impacts are expected to be less than significant.

- c) **Less Than Significant Impact with Mitigation Incorporated.** As described above, the project may have significant impacts on human beings related to geology and soils, including unstable soil (collapse; supporting alternative wastewater treatment). The mitigation measures included in this document, however, will assure that these impacts are reduced to less than significant levels. Air quality and noise impacts will both be less than significant, and the project will have less than significant impacts on local traffic and transportation.

Appendix A

Air Quality - CalEEMod Output Tables

(Available at City)

Appendix B  
Biological Resources Report  
(Available at City)

Appendix C  
Cultural Resources Survey  
(Available at City)

Appendix D

Geotechnical Study

Percolation/Infiltration Testing for On-Site Storm Water Management

Percolation Testing for Onsite Sewer Disposal Feasibility

Geotechnical Investigation

(Available at City)

Appendix E  
Preliminary Drainage Study  
(Available at City)

Appendix F

AB 52 Tribal Consultation Materials

(Available at City)

Appendix G  
Traffic Impact Assessment  
(Available at City)