

California Environmental Quality Act (CEQA)

Initial Study/Mitigated Negative Declaration

**Adelanto 35 Development Project
LDP 22-13
SEC of Rancho Road and Adelanto Road**



Lead Agency

City of Adelanto
Development Services – Planning Division
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Adelanto, CA 92301
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Project Proponent:

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September 29, 2022

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1.0 Background Information

1. Project Title: Adelanto 35 Development Project.

2. Lead Agency Name, Address, and Telephone Number: City of Adelanto, Development Services-Planning Division, Adelanto Road and Rancho Road, Adelanto, CA 92301.

3. Description of Project: Construct a 660,925 square foot (sf) warehouse/distribution building of which 640,925 sf is proposed for warehouse use and 20,000 sf for office space, on an approximately 35 - acre vacant parcel. (See Section 3.0, *Project Description*, for additional details).

4. Project Location: Southeast corner of Rancho Road and Adelanto Road (Assessor's Parcel Number 3128-291-03).

5. General Plan and Zoning Designation: Light Manufacturing (LM).

6. Other public agency whose approval is required: Issuance of grading and building permits and completion of structures to current building code is required by the City prior to establishment of the subdivision. Additionally, approvals from the following agencies are required:

- Lahontan Regional Water Quality Control Board (National Pollutant Discharge Elimination System Permit and Report of Waste Discharge).
- Mohave Desert Air Quality Management District (Authority to Construct).

7. Native American Tribal Consultation: The City commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting notification pursuant to Public Resources Code section 21080.3.1. No request for consultation was received by the City. The Project site is located within Serrano ancestral territory and, therefore, is of interest to the San Manuel Band of Mission Indians (SMBMI). As a result, Mitigation Measures TCR-1 through TCR-2 are included in the project/permit/plan conditions.

SIGNIFICANT OR POTENTIALLY SIGNIFICANT ENVIRONMENTAL FACTORS

The environmental factors checked below would be potentially affected by this project, but can be mitigated to a level of “**Less Than Significant with Mitigation Incorporated.**”

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

DETERMINATION

Based on this Initial Study Checklist, the City of Adelanto finds:

That the proposed use COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be recommended for adoption.

☐

That although the proposal 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 Applicant. A **MITIGATED NEGATIVE DECLARATION** will be recommended for adoption.

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That the proposal MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐

That the proposal MAY have a significant effect(s) 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 if the effect is a “potentially significant impact” or “potentially significant unless mitigated.” An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐

That although the proposed Project could have a significant effect on the environment, because all potentially significant effect (a) has been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to all applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including

revisions or mitigation measures are imposed upon the proposed Project, nothing further is required.

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2.0 Introduction

2.1-Purpose of the Initial Study/Mitigated Negative Declaration

An Initial Study is a preliminary analysis conducted by the City of Adelanto (City) to determine if a project may have a significant physical effect on the environment. The Initial Study also aids in determining what type of environmental document to prepare:

- **Negative Declaration:** If the initial study concludes that the project will not cause a significant effect on the environment, the City can prepare a Negative Declaration. (Pub. Res. Code § 21080(c); Guidelines § 15070 et seq. (negative declaration process).) A Negative Declaration is a written statement that an EIR is not required because a project will not have a significant adverse impact on the environment. (Pub. Res. Code §§ 21064, 21080(c).)
- **Mitigated Negative Declaration:** The City may attach conditions to a Negative Declaration for the purpose of mitigating potential environmental effects. This is referred to as a “Mitigated Negative Declaration.” (Guidelines § 15070(b); Pub. Res. Code § 21064.5.) A Mitigated Negative Declaration states that revisions in the project made or agreed to by the applicant would avoid the potentially significant adverse impacts, and that there is no substantial evidence that the revised project will have a significant effect on the environment. (Pub. Res. Code § 21064.5; Guidelines § 15070(b).)
- **Environmental Impact Report:** If the Initial Study determines that there are potentially significant physical effects on the environment that cannot be mitigated to a less than significant level, the City will prepare an Environmental Impact Report. Environmental Impact Reports are reports to inform the public and City decision-makers of significant environmental effects of proposed projects, identify possible ways to minimize those effects, and describe reasonable alternatives to those projects.

Based on the Initial Study prepared for the Project, it is recommended that a **Mitigated Negative Declaration** be adopted.

2.2- Summary of Mitigation Measures

Table 2-1 lists all the Mitigation Measures contained in this ISMND document.

Table 2.1. Summary of Potentially Significant Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures (MM)
4.4 (a) Biological Resources Construction will impact species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	MM BIO-1. Burrowing Owl Pre-Construction Survey. Prior to any ground disturbance, pre-construction surveys for Burrowing Owls on the project site and in the surrounding area in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, shall be conducted no more than 14- prior to the beginning of project activities construction, and a secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains suitable burrowing owl or sign thereof habitat and to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Mitigation Measure BIO-2 shall apply. MM BIO-2. Burrowing Owl Avoidance/Relocation. If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist and shall be no less than 300 feet. If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW. MM BIO-3. Mojave Ground Squirrel Pre-Construction Survey. Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010), or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50- foot buffer zone.

Environmental Impact	Mitigation Measures (MM)
	Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW. MM BIO 4. Desert Tortoise Pre-Construction Survey. A CDFW-approved biologist shall conduct a protocol level presence or absence survey within the Project area and 50-foot buffer no more than 48 hours prior to Project activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained. MM BIO-5. Nesting Bird Pre-Construction Survey. If construction occurs during the non-nesting season (typically September 16 through December 31), a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the Project areas (including access routes) and a 300- foot buffer surrounding the Project areas, within 2 hours prior to initiating Project activities. If project activities are planned during bird nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1) a nesting bird survey shall be conducted by a qualified biologist no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading prevent impacts to birds and their nests. The survey will be conducted by a qualified biologist. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist around each nest. The buffer shall be a minimum of 300 feet for raptors and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. If there is no nesting activity, then no further action is need for this measure. As discussed above, the site contains numerous Joshua trees; these specimens and their associated seed bank (extending out 186 feet from each tree) are protected under state law. The Project will clearly impact WJTs and their

Environmental Impact	Mitigation Measures (MM)
	associate protected seedbank, impacting approximately 25.6 acres (of seedbank). Therefore, the following Mitigation Measure is required: MM BIO-6. Western Joshua Tree Incidental Take Permit. If any western Joshua trees (WJT) are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an incidental take permit (ITP) from the California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), prior to the relocation, removal, or take. (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of western Joshua tree, a Candidate for Threatened CESA-listed species. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof the document has been circulated.
<u>4.4 (d) Biological Resources</u> Construction will conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Covered by MM BIO-6. Western Joshua Tree Incidental Take Permit.
<u>4.5 (b) Cultural Resources</u> Sub-surface archaeological resources may be encountered during ground disturbance.	MM CR-1. Cultural Resources Discovery. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease, and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the discovery. Work on the other portions of the project outside the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the discovery, to provide Tribal input with regards to significance and treatment. MM CR-2. Monitoring and Treatment Plan. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If significant pre-contact cultural resources, as defined by CEQA, are discovered, and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and

Environmental Impact	Mitigation Measures (MM)
	Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly."
<u>4.7 (f) Geology and Soils</u> Sub-surface paleontological resources may be encountered during ground disturbance.	MM GEO-1: Inadvertent Discovery of Paleontological Resources. If paleontological resources are encountered during implementation of the Project, (including areas impacted by off-site street improvements) ground-disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist (the "Project Paleontologist") shall be retained by the developer to make an evaluation of the find. If the resource is significant, Mitigation Measure GEO-2 shall apply. MM GEO-2: Paleontological Treatment Plan. If a significant paleontological resource(s) is discovered on the property, (including areas impacted by off-site street improvements), in consultation with the Project proponent and the City, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.
<u>4.18 (b) Tribal Cultural Resources</u> Sub-surface tribal cultural resources may be encountered during ground disturbance.	MM TCR-1. Inadvertent Discovery. The following note shall be placed on the grading plan: "If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 50-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period." MM TCR-2. Human Remains. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan. "If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her representative, the MLD may inspect the site of discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD shall make recommendations as the manner in which to treat the human remains and any associated offerings."
<u>4.19 (a) Utilities and Service Systems</u> Construction/installation of utilities and service systems will impact Biological Resources, Cultural Resources, Paleontological	MM BIO-1 through MM BIO-6, MM CR-1, MM CR-2, MM GEO-1, MM GEO-2 and MM TCR -1 and MM TCR-2 described above are required.

Environmental Impact	Mitigation Measures (MM)
Resources, and Tribal Cultural Resources.	

3.0 Project Description/Environmental Setting

3.1 – Project Location

The proposed project site consists of approximately 35 gross acres on the southeast corner of Rancho Road and Adelanto Road (Assessor's Parcel Number 3128-291-03). (See Figure 3.1- *Location Map and Aerial Photo*).

3.2 -Project Description

Construct a 660,925 square foot (sf) warehouse/distribution facility consisting of 660,925 square foot (sf) warehouse/distribution building of which 640,925 sf is proposed for warehouse use and 20,000 sf for office space, on an approximately 35 - acre undeveloped parcel.

3.3-Proposed Improvements

Project activities include site preparation (ground clearing and removal of all vegetation), grading of the entire Project site, construction of buildings, utility lines, and underground infrastructure. The primary components of the proposed improvements include, but are not limited to the following:

Street Improvements and Access

Rancho Road

The ultimate right-of-way is 100-feet. The Project will construct pavement for travel lanes, curb, gutter, sidewalk, and a landscaped parkway within a 50-foot-wide portion of the right-of-way.

Adelanto Road

The ultimate right-of-way is 100-feet. The Project will construct pavement for travel lanes, curb, gutter, sidewalk, and a landscaped parkway within a 50-foot-wide portion of the right-of-way.

Mesa Linda Road

The ultimate right-of-way is 80-feet. The Project will construct pavement for travel lanes, curb, gutter, sidewalk, and a landscaped parkway within a 40-foot-wide portion of the right-of-way.

Water and Sewer Improvements

Water Service

The Project will connect to the existing 12-inch water lines in Rancho Road and Adelanto Road adjacent to the site.

Sewer Service

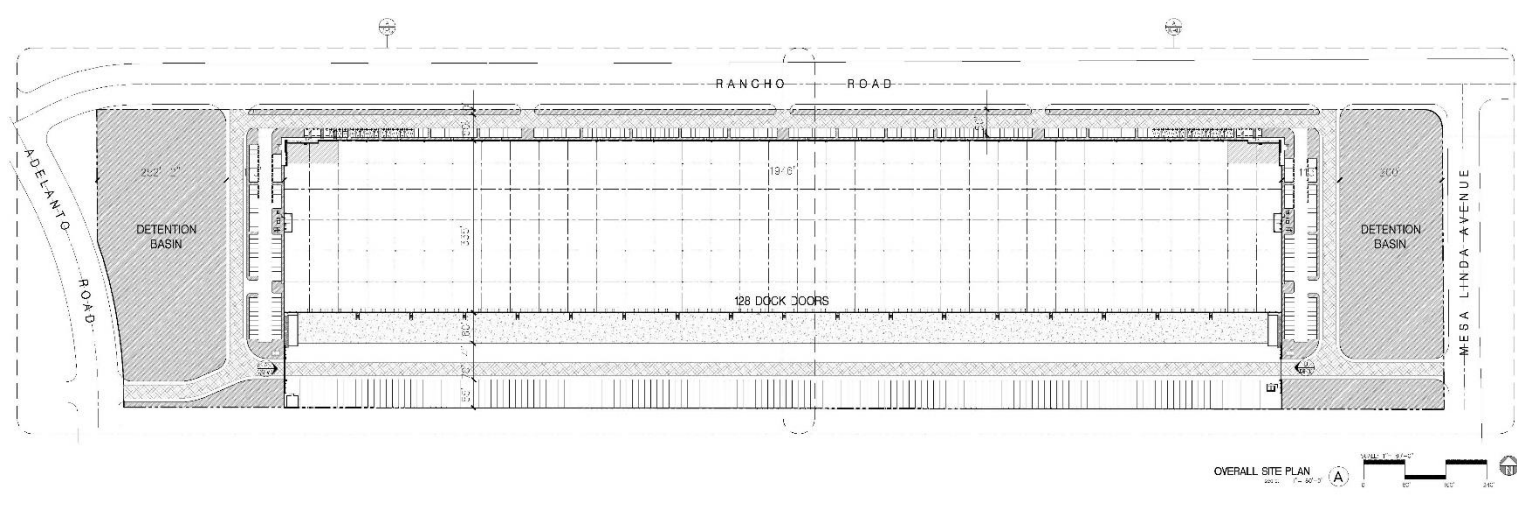
The Project will install a new 12-inch sewer line within the right-of-way of Rancho Road along the site frontage. The sewer line will be extended off-site starting from the western property line traversing westerly approximately 1,000 feet to connect to the existing 12-inch sewer line in Sportsman Park Road. The sewer line will be installed within the existing paved roadway in Rancho Road and Adelanto Road, then within the right-of-way of Old Rancho Road which is a dirt road.

Storm Drainage Improvements

In the proposed condition, on site drainage on the south side of the lot will sheet flow within the proposed driveways into catch basins at various locations on site. Off-site drainage from the south sheet flows on-site across the proposed parking lot driveways and into the proposed catch basins. The drainage is then piped to the detention basin on the east side of the lot. The drainage on the north side of the lot will sheet flow off site onto Rancho Road into catch basins along Rancho Road. Drainage is then piped to the detention basin on the east side of the lot.

Figure 3.1- Location Map/Aerial Photo





3.4-Construction and Operational Characteristics

Construction Schedule

It is expected that the Project would commence construction in 2022-2023 and be constructed in a single phase, with construction activities occurring over a period of 12 months. Physical disturbances would occur throughout the 35-acre property. Off-site improvements are limited to the construction of roadway improvements. All utility connections would occur within existing or proposed improved roadways.

Operational Characteristics

Although the future tenant of the building is not known, it is anticipated that the building would allow for logistics-related uses, including, but not limited to high-cube fulfillment, and general industrial uses. Cold storage use is allowed for up to 25% of the building area. A total of 119 truck dock doors are proposed along the southern side of the building (not facing Rancho Road). At this time, the occupant of the proposed building is unknown. Thus, for purposes of analysis throughout this ISMND, it is assumed the proposed building would be operational 24 hours per day, 365 days per year, with exterior areas lit at night. Lighting would be subject to compliance with the City of Adelanto Municipal Code or CalGreen Code, which both require that lighting fixtures be focused, directed, and arranged to prevent glare or direct illumination on streets or adjoining property.

The building is designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and the loading and unloading of tractor trailers at designated loading bays and trailer parking stalls.

3.5-Environmental Setting

CEQA Guidelines §15125 establishes requirements for defining the environmental setting to which the environmental effects of a proposed project must be compared. The environmental setting is defined as "...the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or if no Notice of Preparation is published, at the time the environmental analysis is commenced..." (CEQA Guidelines §15125[a]). Because a Notice of Preparation was not required, the environmental setting for the Project is **May 2022**, which is the date that the Project's environmental analysis commenced.

Onsite and adjacent land uses, General Plan land use designations, and zoning classifications are shown in Figure 3-1. *Adjoining Land Use, General Plan Land Use Designations, and Zoning Classifications.*

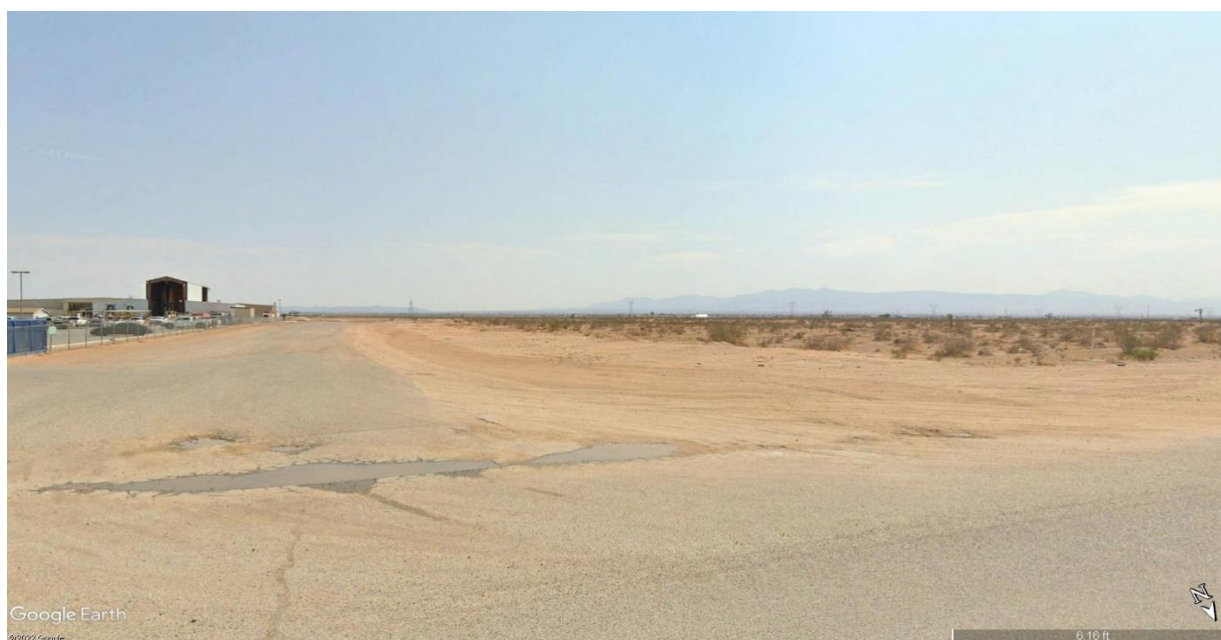
The 35+/- acre project site is relatively flat at an elevation of approximately 2,965 feet above mean sea level and shows heavy signs of frequent human disturbance such as litter, trash dumping, recreational use including tire tracks and off-road vehicle use. Habitat conditions on site are heavily degraded, and likewise subject to frequent disturbance. The site is primarily characterized as disturbed creosote bush scrub and scattered western Joshua tree.

High pressure gas pipeline equipment is located on the northwest corner of the site, within an easement. Petroleum pipeline markers are present along the western site perimeter, and high-pressure gas line markers are present along the northern site perimeter. Both the petroleum and gas pipelines are located beneath adjoining properties to the west and north of the site, respectively, and are not located beneath the site (except for the fenced enclosure containing pipelines and associated equipment at the northwest corner of the site within an easement area).

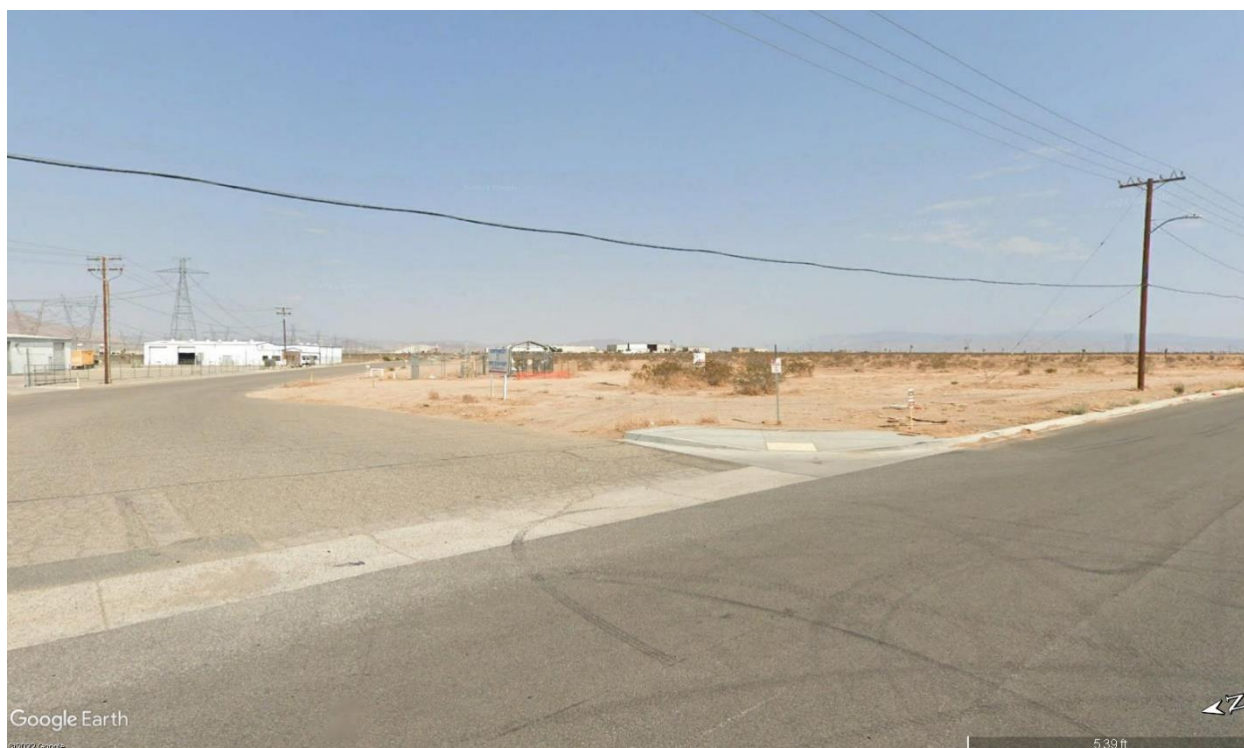
Figure 3.3- Existing Land Use (Aerial View)



Figure 3.4- Site Photos



Looking southwest from the intersection of Rancho Road and Mesa Linda Road



Looking southeast from the intersection of Rancho Road and Adelanto Road

Table 3.1: Adjoining Land Uses

Direction	Current Land Use
North	Rancho Road then commercial buildings (located at 12080 and 12130 Rancho Road) and undeveloped land. Business names/signs were not observed on the commercial buildings.
South	Unpaved road (Mesa Linda Road) then Northwest Pipe Company located at 12351 Rancho Road.
East	Undeveloped land consisting of exposed soil, desert brush, Joshua trees, scattered trash, and unpaved meandering roads that appear to be used by off-road recreational vehicle enthusiasts.
West	Adelanto Road then undeveloped/graded land. Developed land situated approximately 400 feet to the southwest is occupied by Adelanto Stadium located at 12000 Stadium Way. Power lines and petroleum pipeline markers were observed along the eastern shoulder of Adelanto Road.

Source: Phase I Environmental Site Assessment, Appendix F.

Street access to the site is provided by Adelanto Road abutting the site to the east and is a paved four-lane roadway with a painted median and curb and gutter. Rancho Road abutting the site to the north and Mesa Linda Road abutting the site to the west are two-lane paved roadways with no curb, gutter, or sidewalk.

4.0 Environmental Analysis

The Project is evaluated based on its potential effect on twenty-one (21) environmental topics. Each of the above environmental topics are analyzed by responding to a series of questions pertaining to the impact of the Project on the particular topic. Based on the results of the Impact Analysis, the effects of the Project are then placed in one of the following four categories, which are each followed by a summary to substantiate the factual reasons why the impact was placed in a certain category.

Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Significant or Potentially significant impact(s) have been identified or anticipated that cannot be mitigated to a level of insignificance. An Environmental Impact Report must therefore be prepared.	Potentially significant impact(s) have been identified or anticipated, but mitigation is possible to reduce impact(s) to a less than significant category. Mitigation measures must then be identified.	No “significant” impact(s) identified or anticipated. Therefore, no mitigation is necessary.	No impact(s) identified or anticipated. Therefore, no mitigation is necessary.

4.1 Aesthetics

Threshold 4.1 (a). Would the Project (Except as	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Have a substantial adverse effect on a scenic vista?			✓	

Impact Analysis

A scenic vista is defined as a publicly accessible vantage point that provides expansive views of a highly valued landscape. The City of Adelanto General Plan identifies Shadow Hills and Mojave River as scenic vistas. Shadow Hills is located approximately seven (7) miles to the north of the Project site and Mojave River is located approximately five (5) miles east of the Project site. Impacts to scenic vistas are analyzed from points or corridors that are accessible to the public and that provide a view of a scenic vista. Potential public views and vantage points from the Project site to the Shadow Hills and Mojave River would be from the public-rights- of way of Adelanto Road, Rancho Road, and Mesa Linda Road.

Structures within a viewer's line of sight of a scenic vistas may interfere with a public view of a scenic vista, either by physically blocking or screening the scenic vista from view, or by impeding or blocking access to a formerly available viewing position. Those viewers may see the scenic areas prior to development; but would have those views blocked post development. Because of distance to the Shadow Hills and Mojave River and intervening development, public views of these scenic vistas would not be blocked by the Project.

In addition, as required by Adelanto Zoning Ordinance §17.30.080, Table 30-1, the LM maximum building height is limited to three (3) stories (50 ft) and there are required building setbacks for the front, rear, and side lot lines which will serve to create space between structures. As such, the proposed structures would not block or completely obstruct views from surrounding public vantage to the Shadow Hills. The Mojave River is not visible from the Project Site because of the flat topography and because it is approximately five (5) miles east. Impacts are less than significant, and no mitigation measures are required.

Threshold 4.1 (b). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.				✓

Impact Analysis

According to the California Department of Transportation, the Project site is not located within a State scenic highway¹. As such, there is no impact.

Threshold 4.1 (c). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
If located in an Urbanized Area, conflict with applicable zoning and other regulations governing scenic quality?			✓	

Impact Analysis

According to US Census Bureau, Adelanto is located within the Victorville-Hesperia, CA Urbanized Area². As such, the Project subject to the City's applicable regulations governing scenic quality. As required by Adelanto Municipal Code Chapter 17.15 *Design Review*, all residential, commercial and industrial development proposals are subject to the City's Design Review process to ensure that development projects comply with all applicable local design guidelines, standards and ordinances; to minimize adverse effects on surrounding properties and the environment; and are consistent with the General Plan which promotes high aesthetic and functional standards to complement and add to the physical, economic and social character of Adelanto.

¹California Department of Transportation, State Scenic Highway Program, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed June 9, 2022.

² United States Census Bureau, 2010 Census Urban Area Reference Maps, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua90541_victorville--hesperia_ca/DC10UA90541_001.pdf Accessed June 9, 2022.

Figure 4.1. Architectural Elevations



According to Municipal Code §17.15.020, *Projects Requiring Design Review*, a Design Review is required for all residential, commercial and industrial projects involving the issuance of a building permit for new construction on vacant property.

In compliance with the Municipal Code, the Project Proponent filed Location and Development Permit No. LDP 22-13, which is the subject of this Initial Study document. As required by Adelanto Municipal Code §17.15.070, *Industrial Design Standards*, the Project's Location and Development Plan review, included, but was not limited, to the following:

- **Site Design.** To ensure warehouse buildings are designed and oriented to locate the shorter width of the building toward the public rights-of-way; that the office portion of warehouse uses shall be located in the front portion of buildings; and that portions of buildings visible from public rights-of-way shall be architecturally treated to break up the box like look of buildings.
- **Building Design.** To ensure the scale, character and architectural design of the Project is compatible with and shall enhance surrounding development; that the front facade of the building includes architectural features such as reveals, windows and openings,

expansion joints, changes in color, texture, and material to add interest to the building elevation; and where function necessitates a basic, box-like building form, exterior articulation such as change in color, material, or plane is introduced on an outer decorative shell encompassing facades which are visible from public streets.

- **Parking and Circulation.** To ensure the design of parking and circulation layout provided landscape buffers between parking lots and public streets, and parking areas and buildings and to enhance the overall aesthetic quality of the site.
- **Roof Equipment.** To ensure all roof appurtenances including, but not limited to, air conditioning units and mechanical equipment, is fully screened by parapets, roof screens or equipment wells.
- **Lighting.** To ensure exterior light fixture design is compatible with the design and the use of the principal structure on the site and that exterior light fixtures are incorporated into the building design and landscape scheme of the development.
- **Trash Enclosures.** To ensure that the design of the trash enclosures is compatible with the design of the building.

As detailed in Location and Development Plan No. 22-13, the Project meets all applicable development regulations scenic quality.

Threshold 4.1 (d). Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			✓	

Outdoor Lighting and Glare

The Project would increase the amount of light in the area above what is being generated by the vacant site by directly adding new sources of illumination including security and decorative lighting for the proposed structures. All outdoor lighting is required to be designed and installed to comply with §17.90.040- *Lighting*, of the Zoning Ordinance³ which stipulates:

“Except for residential light fixtures using less than a 75-watt bulb, the following shall apply to all outdoor lighting fixtures:

³ Zoning Ordinance.

(a) All on-site lighting shall be energy efficient, stationary, and directed away from adjoining properties and public rights-of-way.

(b) Light fixtures shall be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture.

(c) Light fixtures shall be shielded so no light above 0.5 footcandle spills over onto adjacent properties and rights-of-way. There shall be no spillover (0.0 footcandle) onto adjacent residential used or zoned properties"

Building Material Glare

The building will be constructed of concrete tilt-up panels which do not induce glare. The office portion of the buildings will have tinted glass which will reduce glare. As such, the Project will not adversely affect day or nighttime views in the area as a result of glare.

4.2 Agriculture and Forestry Resources

Threshold 4.2 (a) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓

Impact Analysis

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program.⁴ As such, development of the Project will not convert any type of farmland to a non-agricultural use.

Threshold 4.2 (b) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with existing zoning for agricultural use, or a Williamson Act contract?			✓	

Impact Analysis

Agricultural Zoning

The current zoning classification for the site is Light Manufacturing (LM). The LM zone district is intended for light industrial and manufacturing uses. The LM zone is not intended for agricultural use. Therefore, the proposed project would not conflict with existing zoning as it is not zoned for agricultural use.

⁴ <https://databasin.org/maps/new/#datasets=b83ea1952fea44ac9fc62c60dd57fe48>, accessed on June 9, 2022.

Williamson Act

A Williamson Act Contract enables private landowners to voluntarily enter contracts with local governments for the purpose of establishing agricultural preserves. The Project site is not under a Williamson Act Contract.⁵

Threshold 4.2 (c) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?				✓

Impact Analysis

California Public Resources Code §12220(g) defines forest land as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

§4526 of the Code defines timberland as land, other than land owned by the federal government or land designated by the state as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.

The Project site does not contain any forest lands, timberland, or timberland zoned as Timberland Production, nor are any forest lands or timberlands located on or nearby the Project site. Because no land within the Project site is currently zoned or proposed for forestland or timberland, there is no potential to impact such zoning.

⁵ <https://sbcountyarc.org/wp-content/uploads/arcforms/NPP874-WilliamsonActParcels.pdf>, accessed June 9, 2022.

Threshold 4.2 (d) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in the loss of forest land or conversion of forest land to non-forest use?				✓

Impact Analysis

As noted in the response to Threshold 4.2(c) above, the Project site and surrounding properties do not contain forest lands, are not zoned for forest lands, nor are they identified as containing forest resources by the General Plan. Because forest land is not present within the Project site or in the immediate vicinity of the site, the Project has no potential to result in the loss of forest land or the conversion of forest land to non-forest use.

Threshold 4.2 (e) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				✓

Impact Analysis

As noted under Threshold 4.2 (a), the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program. In addition, the site is not under agricultural production and there is no land being used primarily for agricultural purposes on or in the vicinity of the site.

4.3 Air Quality

The following analysis is based in part on the following:

- *Adelanto 35 Development Project – Air Quality/GHG Assessment Technical Memorandum*. KPC Environmental Inc., dated June 30, 2022, included as Appendix A to this Initial Study.
- *MDAQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*, February 2020, available at: <https://www.mdaqmd.ca.gov/rules/overview>.

Air Quality Setting

Topography and Climate

The Project site is located within the Mojave Desert portion of the Mojave Desert Air Basin (MDAB) is bordered in the southwest by the San Bernardino Mountains, separated from the San Gabriel's by the Cajon Pass (4,200 ft). A lesser channel lies between the San Bernardino Mountains and the Little San Bernardino Mountains (the Morongo Valley). The MDAB is classified as a dry-hot desert (BWh), with portions classified as dry-very hot desert (BWbh), to indicate at least three months have maximum average temperatures over 100.4° F.

Air Pollutants and Health Effects

Air Pollutants are the amounts of foreign and/or natural substances occurring in the atmosphere that may result in adverse effects to humans, animals, vegetation and/or materials. The Air Pollutants regulated by the MDAQMD that are applicable to the Project are described below.

Carbon Monoxide (CO). A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. Carbon monoxide is harmful when breathed because it displaces oxygen in the blood and deprives the heart, brain, and other vital organs of oxygen.

Nitrogen Dioxide NOx. Nitrogen dioxide (NO₂) is a byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO_x can irritate eyes, nose, throat, and lungs, possibly leading to coughing, shortness of breath, tiredness, and nausea.

Particulate Matter (PM 2.5 and PM10): One type of particulate matter is the soot seen in vehicle exhaust. Fine particles — less than one-tenth the diameter of a human hair — pose a serious threat to human health, as they can penetrate deep into the lungs. PM can be a primary pollutant or a secondary pollutant from hydrocarbons, nitrogen oxides, and sulfur dioxides. Diesel exhaust is a major contributor to PM pollution.

Sulfur Dioxide (SO₂). A strong smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of SO₂. Sulfur dioxide irritates the skin and mucous membranes of the eyes, nose, throat, and lungs.

Ozone: Ozone is formed when several gaseous pollutants react in the presence of sunlight. Most of these gases are emitted from vehicle tailpipe emissions. Ozone can reduce lung function worsen bronchitis, emphysema, and asthma.

Volatile Organic Compounds (VOCs): VOCs contribute to the formation of smog and/or may themselves be toxic. VOCs often have an odor, and some examples include gasoline, alcohol and the solvents used in paints. Health effects may include eye, nose and throat irritation, headaches, loss of coordination, and nausea.

Non-attainment Designations and Classification Status

The United States Environmental Protection Agency and the California Air Resources Board have designated portions of the District non-attainment for a variety of pollutants. An “attainment” designation for an area signifies that criteria pollutant concentrations did not exceed the established standard. In contrast to attainment, a “nonattainment” designation indicates that a criteria pollutant concentration has exceeded the established standard.

Table 4.3-1- Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	No Standard
Ozone – 8-hour standard	Nonattainment	Nonattainment
Respirable Particulate Matter (PM ₁₀)	Nonattainment	Attainment
Fine Particulate Matter (PM _{2.5})	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen Dioxide (NO _x)	Attainment	Unclassified/Attainment
Sulfur Dioxide (SO ₂)	Unclassified /Attainment	Unclassified/Attainment
Lead	Attainment	Attainment

Source: California Air Resources Board, 2015.

As shown in Table 4.3-2 above, the MDAB is classified as Nonattainment for Ozone – 1-hour standard, Ozone – 8-hour standard, Respirable Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5}).

Threshold 4.3 (a). Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with or obstruct implementation of the applicable air quality plan?			✓	

Impact Analysis

The following analysis is consistent with the preferred analysis approach recommended by the MDAQMD *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*.

Conformity with Air Quality Management Plans

The Project is located within the Mojave Desert Air Basin and under the jurisdiction of the Mojave Desert Air Quality Management District. Under the Federal Clean Air Act the Mojave Desert Air Quality Management District has adopted a variety of attainment plans (i.e., “Air Quality Management Plans”) for a variety of non-attainment pollutants. A complete list of the various air quality management plans is available from the Mojave Desert Air Quality Management District located at 14306 Park Avenue, Victorville, CA 92392 or on their website at: <https://www.mdaqmd.ca.gov/rules/overview>.

The Mojave Desert Air Quality Management District is responsible for maintaining and ensuring compliance with the various Air Quality Management Plans. Conformity is determined based on the following criteria:

- 1) A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project may also be non-conforming if it 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).
- 2) A project is conforming if it complies with all applicable Mojave Desert Air Quality Management 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).

Consistency with Emission Thresholds

As shown in Tables 4.3.5 and 4.3.6 below, the Project would not exceed Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction or

during long-term operation. Therefore, the Project is consistent with Criterion 1. Accordingly, the Project's air quality emissions are less than significant.

Consistency with Control Measures

The construction contractors are required to comply with rules, regulations, and control measures to control fugitive dust from grading (Rule 403) and the application of architectural coatings during building construction (Rule 1113). Therefore, the Project is consistent with Criterion 1. Accordingly, the Project's air quality emissions are less than significant.

Consistency with Growth Forecasts

The Project site is currently designated as Light Manufacturing (LM) by the General Plan Land Use & Zoning Map. The LM zone district is intended for the development of light industrial and manufacturing uses which benefit from separation from residential, office, and retail uses. The LM land use designation was the land use designation that was used by the MDAQMD to generate the growth forecasts for the air quality plans referenced above and would not change the growth assumptions used in the MDAQMD plans. Therefore, the Project is consistent with Criterion 2. Accordingly, the Project's air quality emissions are less than significant.

Threshold 4.3 (b). Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			✓	

Impact Analysis

The following provides an analysis based on the applicable regional significance thresholds established by the Mojave Desert Air Quality Management District to meet national and state air quality standards.

Table 4.3.2. MDAQMD Air Quality Significance Thresholds

Pollutant	Daily Emissions (pounds/day)
Carbon Monoxide (CO)	548
Oxides of Nitrogen (NOx)	137
Volatile Organic Compounds (VOC)	137
Oxides of Sulphur (SOx)	137
Particulate Matter (PM10)	82
Particulate Matter (PM 2.5)	65

Source: MDAQMD CEQA Guidelines, February 2020, Table 6.

Both construction and operational emissions for the Project were estimated based on a worst-case scenario of a 656,910 square foot (sf) warehouse/distribution facility consisting of 646,910 sf warehouse (485,182 sf non-refrigerated warehouse and 161,728 sf cold storage warehouse), 10,000 sf office space, 340 automobile parking spaces, and 161 trailer stalls on an approximately 34.8 - acre vacant parcel by using the California Emissions Estimator Model (CalEEMod). The CalEEMod program is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model is authorized for use by the Mojave Desert Air Quality Management District.

Construction Emissions

Construction of the Project is assumed to begin in the year 2022-2023 and last approximately 12 months. Construction phases are assumed to consist of site preparation, grading, building construction, paving and architectural coating. The Project is expected to be operational in the year 2025. Construction phases are not expected to overlap. Construction activities produce combustion emissions from various sources (utility engines, tenant improvements, and motor vehicles transporting the construction crew). Exhaust emissions from construction activities envisioned on site would vary daily as construction activity levels change. The Project will be required to comply with several standard fugitive dust control measures, per MDAQMD Rule 403 and were factored into the CalEEMod program. Daily construction emissions based on the above-described parameters are shown in Table 4.3.3 below.

Table 4.3.3. Summary of Construction Emissions

Emissions/Thresholds	Pollutant (pounds/day)					
	NOx	ROG	CO	SOx	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	53.34	40.49	34.16	0.10	9.40	5.46
Regional Threshold	137	137	548	137	82	65
Exceeds Threshold?	NO	NO	NO	NO	NO	NO

Source: Air Quality/Greenhouse Gas (GHG)/Energy Analysis (Appendix A).

Operational Emissions

The Project would be operated as a warehouse with typical operational characteristics including employees traveling to and from the site, truck movements, loading and unloading activity, facility heating ventilation and air conditioning (HVAC) systems, refrigeration system, and maintenance activities. Table 4.3-4 shows the Mojave Desert Air Quality Management District thresholds for operational emissions compared to the Project's maximum daily emissions

Table 4.3.4. Summary of Operational Emissions

Emissions/Thresholds	Pollutant (pounds/day)					
	NOx	ROG	CO	SOx	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	19.82	8.20	39.94	0.09	8.06	2.33
Regional Threshold	137	137	548	137	82	65
Exceeds Threshold?	NO	NO	NO	NO	NO	NO

Source: Air Quality/Greenhouse Gas (GHG)/Energy Analysis (Appendix A).

As shown in Table 4.3.4 above, both construction and operational related emissions would not exceed Mojave Desert Air Quality Management District thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during operation and would not contribute to an existing or projected air quality violation, on a direct or cumulative basis. As such, impacts are less than significant, and no mitigation measures are required.

Threshold 4.3 (d). Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Expose sensitive receptors to substantial pollutant concentrations?			✓	

Impact Analysis

The Project is an industrial warehouse with the site located in an area zoned for Light Manufacturing and Industrial uses. Existing facilities in the proximity to the Project are

manufacturing and industrial and not considered sensitive receptors. According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The nearest sensitive receptor is the Adelanto Medical Clinic located approximately 3,270 to the west of the Project site.

According to the MDAQMD, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*, the following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated⁶ (i.e., prepare a mobile health risk assessment):

- 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; and,
- A gasoline dispensing facility within 300 feet.

The Project is a proposal to construct an industrial warehouse and is anticipated to have approximately 231 trucks per day. However, the Project does not meet the criteria listed above as the nearest sensitive receptor is over 3,000 feet away from the site. As such, impacts are considered less than significant.

Threshold 4.3 (d). Would the Project	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.			✓	

Impact Analysis

Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses.

The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less

⁶ <https://www.mdaqmd.ca.gov/home/showpublisheddocument/8510/637406182097070000>

than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

4.4 Biological Resources

The analysis in this section is based in part on the following technical reports:

- *Natural Resource & Habitat Assessment*, Nexus Environmental, LLC June 4, 2022
- *Joshua Tree Survey*, CalPacific, August 12, 2022

Threshold 4.4 (a) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✓		

Impact Analysis

Methodology

Analysis methods include scientific literature review, site visit, and review of aerial imagery. Nexus Environmental conducted a general habitat assessment of the Project site on May 27, 2022, approximately 8:00 AM. The temperature was approximately 79° F with predominantly clear skies, sparse clouds, with low wind conditions (below 6 mph), and high visibility. Pedestrian survey consisted of 15-meter parallel transect walk of the site, at a pace allowing for careful observation, allowing for 100% visual coverage of the surface area present on site. The habitat assessment included 100% visual coverage of the site. Trimble hand-held global positioning system (GPS) units, previously uploaded with transect route coordinates, were used to maintain each pedestrian survey transect line. Literature and image sources reviewed for this project include:

- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) and Biogeographic Information and Observation System (BIOS) were queried for the Adelanto, California 7.5- minute Quadrangle (CDFW, April 2022).
- The California Native Plant Society (CNPS) Geographic Information System (CNPS, April 2022).

- The United States Fish and Wildlife Service's (USFWS) Information for Planning and Consultation System (IPaC) was queried for an unofficial report of federally listed species and designated critical habitat (USFWS, April 2022).
- The USFWS National Wetlands Inventory (NWI) Wetlands Mapper (April 2022).
- The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey Geographic Information System was queried for a report on all soil series classifications within the study area (NRCS April 2022).
- Google Earth Pro (April 2022).

The study area for this analysis includes a 300-foot buffer beyond the construction footprint to account for potential indirect project related impacts (i.e. - noise, ground vibrations, water quality impacts, artificial lighting, etc.). Literature review for this location identifies three (3) Federal and four (4) State-listed or candidate species as having potential to occur in the project vicinity.

Candidate, Sensitive, or Special Status Species Discussion

Results from the literature search and pedestrian surveys are shown in Table 4.4.1, *Presence of Candidate, Sensitive, or Special Status Wildlife Species*.

Table 4.4.1. Presence/Absence of Candidate, Sensitive, or Special Status Species

Species	Status	Present/Absent
monarch butterfly (<i>Danaus plexippus</i>)	<u>Federal</u> : Endangered <u>State</u> : Greatest Conservation Need	Absent. No milkweed was observed during species habitat assessment surveys, and none have been recorded previously in the study area. Because of the importance of milkweed to monarch habitat, suitable habitat is not present in the study area.
Desert Tortoise	<u>Federal</u> : Threatened <u>State</u> : Threatened	Absent: The site exhibits signs of potential signs of transient desert tortoise presence, and potential juvenile burrow attempts. No active burrows or potential burrows were located on site. The site is not presently occupied by desert tortoise. No scat or carcasses were found.
Mohave Ground Squirrel	<u>Federal</u> : None <u>State</u> : Threatened	Absent: There are no CNDDDB documented occurrences in the study area. Furthermore, the site is surrounded by development and roadway, and habitat connectivity is excluded. The site exhibits copious signs of human disturbance (litter, pedestrian use, off-highway vehicles, etc). This species is deemed absent from this site.

Species	Status	Present/Absent
Swainsain's Hawk	Federal: None State: Threatened	Absent. There is no habitat that the supports the species.
Le Conte's thrasher	Federal: None State: None CDFW: Species of Special Concern	Absent: There are no CNDDDB documented occurrences in the study area. The site is heavily disturbed due to off-highway vehicle usage. Nesting birds were not observed on site during the May 27, 2022, pedestrian survey
Burrowing Owl	Federal: None State: None CDFW: Species of Special Concern	Absent.: There are no CNDDDB documented occurrences in the study area. No signs of burrowing owl were observed during the May 27, 2022 pedestrian survey. One potential burrow site occurs to the east of the project site adjacent to the neighboring driveway. A small mound of dirt evidence burrows of a small mammal such as coyote, or kit fox, and could be used by burrowing owl. This single location exhibits signs of frequent human disturbance. No indicator signs of burrowing owl is found at this single location. No potential or active burrowing owl burrows were located found on site. No signs of white wash, BUOW pellet, BUOW feathers are identified on site. The site contains marginally suitable (highly disturbed) foraging habitat in the form of potential small mammal dens, earthen berms, and rodent burrows
California condor (Gymnogyps californianus)	Federal: Endangered State: Endangered	Absent. The study area does not contain suitable foraging or nesting habitat capable of supporting this species.

As shown in Table 4.4.1 above, with the exception of western Joshua tree, Candidate, Sensitive, or Special Status Species present on the site.

Western Joshua Tree Discussion

Background

On October 21, 2019, the California Fish and Game Commission (Commission) received a petition from the Center for Biological Diversity to list the WJT as Threatened under the California Endangered Species Act (CESA). California Fish and Game Code Section 2073.5 requires that the California Department of Fish and Wildlife evaluate the petition and submit a written evaluation with a recommendation to the Commission, which was received at the Commission's April 2020 meeting.

On September 22, 2020, the Commission determined that Threatened listing may be warranted pursuant to Fish and Game Code (FGC) Section 2074.2 of the, and therefore western Joshua tree became a Candidate species, and the Department undertook a one-year status review. The process is still underway at the time of the preparation of this ISMND. The Fish and Game Commission meets in October of 2022 and may make a determination at that time as to what action (if any) is needed for protection of Joshua trees. Until a final determination is made, the WJT is afforded protection under the California Endangered Act and can only be removed with the approval of a Take Permit issued by the California Department of Fish and Wildlife (CDFW).

Methodology

Prior to the field survey, research was conducted that included the City of Adelanto and California Department of Fish and Wildlife's websites; this was to review current Joshua tree protection guidelines and survey requirements. The survey was conducted with the protocols established by the CDFW. (See Appendix C, *Joshua Tree Survey*, for details.)

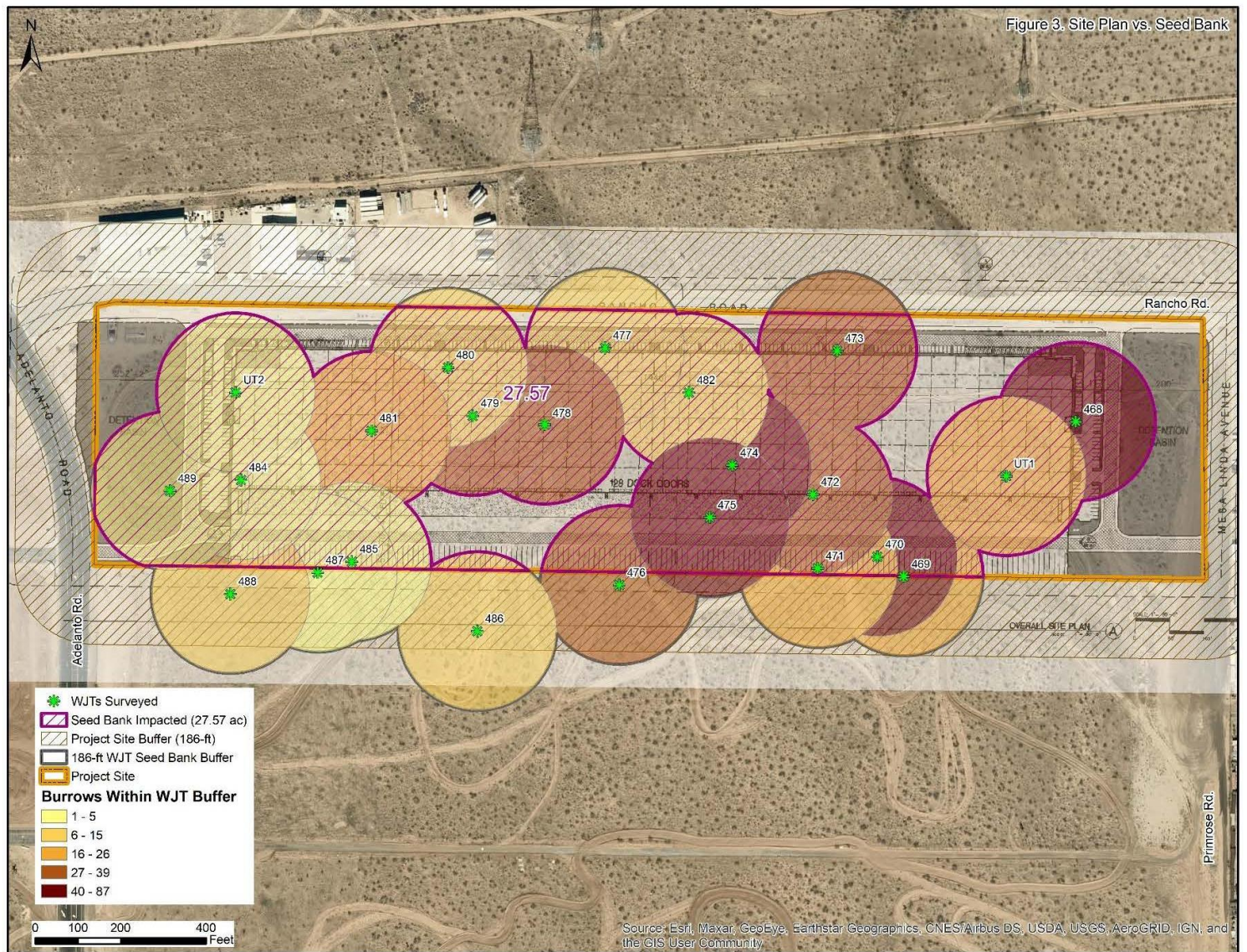
Results of Field Survey

During the field survey, 19 Joshua tree specimens were inventoried within the project boundary, and an additional four were assessed within the 186-foot buffer. These 23 trees were tagged, assessed, and details of the stature were recorded. See Figure 4.4-1, *Location of Joshua Trees*.

The area within the site is highly disturbed with frequent OHV activity, but this is mostly limited to the immediate vicinity near the track. The trees within the site are actively reproducing sexually and asexually, but this is limited in both cases. The stand is producing fruit, but this appears to be reduced this year. Elements for seed dispersal are readily present as evidenced by the active burrows. Evidence of seedbank recruitment was noted with the two juveniles present, and limited clonal reproduction was noted as new growth was limited to the base of stems and not from below-ground rhizomes. The stand is relatively young with the absence of trees with extensive branching canopies or multiple stems. Given the general health of the stand (fair to good) as well as the typical stature of the WJTs (with the maximum height of only 21 feet), as many as 91.3% of the trees are candidates for preservation or relocation.

As shown on Figure 4.4-`, *Western Joshua Tree Impact Area*, preservation or relocation on-site is not a viable option and would essentially prevent development of the site as envisioned under the City's General Plan. Therefore, Mitigation Measure BIO-6 is recommended.

Figure 4.4
Western Joshua Tree Impact Area



As shown above, the site contains numerous Joshua trees; these specimens and their associated seed bank (extending out 186 feet from each tree) are protected under state law. The Project will clearly impact WJTs and their associated protected seedbank, impacting approximately 25.6 acres (of seedbank).

Mitigation Measures

Although **wildlife** species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service were not detected on-site, the site is located within the range of the Burrowing Owl, Mojave Ground Squirrel, Desert Tortoise, and Nesting Birds. Therefore, the following mitigation measures have been included to ensure any impacts are less than significant to these species.

Mitigation Measure BIO-1. Burrowing Owl Pre-Construction Survey. *Prior to any ground disturbance, pre-construction surveys for Burrowing Owls on the project site and in the surrounding area in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, shall be conducted no more than 14- prior to the beginning of project activities construction, and a secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains suitable burrowing owl or sign thereof habitat and to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Mitigation Measure BIO-2 shall apply.*

Mitigation Measure BIO-2. Burrowing Owl Avoidance/Relocation. *If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist and shall be no less than 300 feet. If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, construction activities may*

begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.

Mitigation Measure BIO-3. Mojave Ground Squirrel Pre-Construction Survey. Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010), or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50- foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.

Mitigation Measure BIO 4. Desert Tortoise Pre-Construction Survey. A CDFW-approved biologist shall conduct a protocol level presence or absence survey within the Project area and 50-foot buffer no more than 48 hours prior to Project activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.

Mitigation Measure BIO-5. Nesting Bird Pre-Construction Survey. If construction occurs during the non-nesting season (typically September 16 through December 31), a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the Project areas (including access routes) and a 300- foot buffer surrounding the Project areas, within 2 hours prior to initiating Project activities. If project activities are planned during bird nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1) a nesting bird survey shall be conducted by a qualified biologist no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading prevent impacts to birds and their nests. The survey will be conducted by a qualified biologist. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist around each nest. The buffer shall be a minimum of 300 feet for raptors and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. If there is no nesting activity, then no further action is need for this measure.

As discussed above, the site contains numerous Joshua trees; these specimens and their associated seed bank (extending out 186 feet from each tree) are protected under state law. The Project will clearly impact WJTs and their associated protected seedbank, impacting approximately 25.6 acres (of seedbank). Therefore, the following Mitigation Measure is required:

Mitigation Measure BIO-6. Western Joshua Tree Incidental Take Permit. *If any western Joshua trees (WJT) are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an incidental take permit (ITP) from the California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), prior to the relocation, removal, or take. (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of western Joshua tree, a Candidate for Threatened CESA-listed species. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof the document has been circulated.*

With implementation of Mitigation Measure BIO-6, impacts are less than significant.

Threshold 4.4 (b). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓

Impact Analysis

No riparian vegetation (e.g., cottonwoods, willows, etc.) exist on the site or in the adjacent habitats.

Threshold 4.4 (c) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓

Impact Analysis

The USFWS National Wetland Inventory indicates no blue-line riverine features or wetlands occurring on site. No drainage features with defined bed, bank, channels, or wetland indicators (wetland soils, hydrophytic vegetation, wetland hydrology) were observed during habitat assessment surveys. Ephemeral drainages are not present on site. Therefore, the project would not require regulatory water quality permitting (i.e. – Regional Water Quality Control Board Section 401 of the Clean Water Act (CWA), U.S. Army Corps of Engineers Section 404 of the CWA, or California Department of Fish and Wildlife (CDFW) Section 1602 Lake and Streambed Alteration Agreement).

Threshold 4.4 (d). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			✓	

Impact Analysis

Wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. Corridors effectively act as links between different populations of a species. The Project site is 35-acres in size is adjacent to existing streets on three sides. Currently, wildlife can move freely throughout the Project site and the undeveloped area to the south. However, the project site does not function as a wildlife corridor and there are no adjacent wildlife corridors. The Project site is isolated from other similar habitats by surrounding and forms an "island" with no terrestrial linkages. Therefore, no impacts to wildlife corridors are expected to occur as a result of the proposed Project.

Threshold 4.4 (e) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✓		

Impact Analysis

Please refer to the discussion under Threshold 4.4 (a) regarding the western Joshua tree.

Threshold 4.4 (f) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

Impact Analysis

Regional multiple species conservation plans offer long-term assurances for conservation of covered species at a landscape scale, in exchange for biologically appropriate levels of incidental take and/or habitat loss as defined in the approved plan. California's NCCP Act (FGC §2800 et seq.) governs such plans at the state level, and was designed to conserve species, natural communities, ecosystems, and ecological processes across a jurisdiction or a collection of jurisdictions. Complementary federal HCPs are governed by the Endangered Species Act (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq.) (ESA). Regional conservation plans provide conservation for unlisted as well as listed species. According to the *California Natural Community Conservation Plans Map* maintained by the California Department of Fish and Wildlife, there are no such plans that encompass the Project site.⁷

⁷California Natural Community Conservation Plans Map, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed on June 11, 2022.

4.5 Cultural Resources

The analysis in this section is based in part on the following technical report: *Negative Archaeological Resources Survey Report for the Proposed Adelanto 35 Development City of Adelanto, San Bernardino County, California Assessor's Parcel No. 3128-291-03*, Nexus Environmental, LLC, September 29, 2022, included as Technical Appendix D.

Threshold 4.5 (a) Would the project	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?		✓		

Impact Analysis

The Project site consists of a rectangular-shaped parcel of open desert in the southeastern portion of the City of Adelanto, surrounded by vacant land and commercial developments. Elevations on the project area range from 2,950 feet to 2,960 feet above mean sea level and the landform slopes gently to the northeast. Vegetation on site consists of disturbed Creosote Bush Scrub and Joshua Tree Woodland. The ground surface and vegetation have been degraded by off-highway vehicle use with vehicle tracks and trails visible throughout the parcel. In addition, the parcel contains an unimproved dirt road (Primrose Street) that meanders throughout the project area. Modern dumping of household items such as tires, car parts, and structural debris was observed as well as modern recreational use such as beverage and food preparation/consumption was seen throughout the project area but were concentrated on the north and eastern side of the property near Rancho Road

Records Search

Historic maps including GLO's, and topographic map series were analyzed as well as the Built Environment Resource Directory (BERD) for historic resources. Due to the ongoing conditions brought about by the Coronavirus Pandemic, processing time for the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System. SCCIC is two months or more. The record search was limited to previously documented reports and sites within a ¼ mile of the proposed Project per SCCIC Covid-19 Emergency Protocols for San Bernardino County Record Searches. The record search request was made to the SCCIC on June 7th, 2022 and was completed on September 23, 2022. According to SCCIC records no cultural resources were previously identified within the project boundaries or within a ¼ mile of the

project boundaries. Within the ¼ mile radius study area a total of twelve previous cultural studies have been conducted on various transportation, tract developments and utility corridor projects.

Field Survey

An intensive pedestrian survey was conducted by Nexus Environmental using standard archaeological procedures and techniques. Continuous 15-meter parallel transects were walked in an east-west direction. Transect data was collected with a Trimble hand-held Global Positioning System (GPS) unit. The project area's topography was relatively level, with excellent surface visibility such that 100% of the project area was systematically surveyed. Due to excellent Results: No features or artifacts of prehistoric or historical origin were encountered during the survey or previously recorded within or adjacent to the Project area. Based on these negative findings, Nexus Environmental recommends No Impact to "historical resources" in compliance with the California Environmental Quality Act (CEQA; PRC §15064.5).

Threshold 4.5 (b)	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?		✓		

Impact Analysis

Archaeological Setting

Previous studies suggest that most prehistoric settlement in the area was focused along major waterways, such as the Mojave River watershed, and generally occurred between the 2,260- and 2,970-foot elevation range. Results from surveys and site investigations indicate that most prehistoric sites are lithic scatters, lithic quarries, bedrock milling features, and temporary campsites. Many of the earliest archaeological records in the region have likely been buried beneath alluvium deposited by the Mojave River.

Although no surface cultural resources (including historic-period or prehistoric archaeological resources, or historic-period architectural resources) or cultural resource sensitivity were identified on or near the Project site during the pedestrian survey, future ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Therefore, the following mitigation measures are recommended:

CR-1. Cultural Resources Discovery. *Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If cultural resources are discovered during project activities,*

all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease, and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the discovery. Work on the other portions of the project outside the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the discovery, to provide Tribal input with regards to significance and treatment.

CR-2. Monitoring and Treatment Plan. *Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If significant pre-contact cultural resources, as defined by CEQA, are discovered, and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly."*

Threshold 4.5 (c) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Disturb any human remains, including those interred outside of formal cemeteries?			✓	

Impact Analysis

The Project site does not contain a cemetery and no known formal cemeteries are located within the immediate site vicinity. If human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq.

4.6 Energy

Threshold 4.6 (a) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	

Impact Analysis

Electricity and Natural Gas

Construction

The Project would require the use of electric power tools. The anticipated construction schedule assumes the Project would require approximately 12 months for completion of build-out. The consumption of electricity would be temporary in nature and would not represent a significant demand on available supplies. The use of natural gas is not anticipated to be used during construction.

Operations

Occupancy of the industrial warehouse would result in the consumption of natural gas and electricity. Energy demands are estimated at 9,375,706 kBTU/year of natural gas and 7,819,084 kWh/year of electricity⁸. Natural gas would be supplied to the Project by Southwest Gas Corporation and electricity would be supplied by SCE. The Project proposes a warehouse use reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial land use projects of similar scale and configuration. The Project will also comply with the applicable Title 24 standards.

Motor Vehicle Fuels

Construction

Most activities would use fuel powered equipment and vehicles that would consume gasoline or diesel fuel. Heavy construction equipment (e.g., dozers, graders, backhoes, dump trucks) would be diesel powered, while smaller construction vehicles, such as pick-up trucks and personal vehicles used by workers would be gasoline powered.

⁸ Appendix A, Air Quality/GHG Technical Memorandum.

The consumption of fuel would be temporary in nature and would not represent a significant demand on available supplies. Given the physical characteristics of the site and the type of development proposed, there are no unusual Project characteristics or construction processes that would require the use of equipment that would use more fuel than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). In addition, as required by state law⁹, idling times of construction vehicles is limited to no more than five minutes, thereby minimizing, or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Operations

Fuel that would be consumed by Project-generated traffic is a function of total vehicles miles traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site. The Project will result in 3,641,886 annual VMT¹⁰ and an estimated annual fuel consumption of 147,385 gallons of fuel.¹¹

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands.

Conclusion

As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

⁹ California Code of Regulations Title 13, Motor Vehicles, §2449(d)(3) Idling.

¹⁰ TTM20471 CalEEMod Datasheets.

¹¹ EPA, 2020 *Automotive Trend Report*, <https://www.epa.gov/automotive-trends/explore-automotive-trends-data>, accessed June 11, 2022.

Threshold 4.6(b). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	

Impact Analysis

The regulations directly applicable to the Project are *Building Energy Efficiency Standards*, Title 24, Part 6, CALGreen Title 24, Part 11. As an element of both Part 6 and Part 11 non-residential buildings over 10,000 square feet are required to undergo commissioning which includes design review, commissioning plan, functional performance testing to demonstrate the correct installation and operation of each component system and system-to-system interface prior to occupancy. These regulations include but are not limited to the use of energy efficient heating and cooling systems, water conserving plumbing and water-efficient irrigation systems. The Project is required to demonstrate compliance with these regulations as part of the building permit and inspection process.

4.7 Geology And Soils

The analysis in this section is based in part on the following technical report: *Preliminary Geotechnical Evaluation*, LGC Geotechnical, Inc., July 21, 2022, attached as Appendix E to this ISMND.

Threshold 4.7(a). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
i.) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓

The Alquist-Priolo Earthquake Fault Zoning Act was implemented in 1972 to prevent the construction of urban developments across the trace of active faults. California Geologic Survey Special Publication 42 was created to provide guidance for following and implementing the law requirements. Special Publication 42 was most recently revised in 2018 (CGS, 2018). According to the State Geologist, an “active” fault is defined as one which has had surface displacement within Holocene time (roughly the last 11,700 years). Regulatory Earthquake Fault Zones have been delineated to encompass traces of known, Holocene-active faults to address hazards associated with surface fault rupture within California. Where developments for human occupation are proposed within these zones, the state requires detailed fault evaluations be performed so that engineering-geologists can identify the locations of active faults and recommend setbacks from locations of possible surface fault rupture. According to The California Geological Survey’s Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located within an Alquist-Priolo Earthquake Fault zone.¹²

According to the Preliminary Geotechnical Evaluation (Appendix E), the nearest Holocene-active faults identified are the Helendale Fault, located approximately 13.5 miles northeast of the site and the San Andreas Fault Zone located approximately 19 miles to the southwest of the site. These faults trend northwest-southeast, oblique to the site and not toward the site. Therefore, the possibility of damage due to ground rupture is considered low since no active faults are known to cross the site.

¹² <https://maps.conservation.ca.gov/geologichazards/#dataviewer>, accessed July 22, 2022.

Threshold 4.7(a1). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Strong seismic ground shaking?			✓	

Impact Analysis

The Project site is in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the Southern California area. As a mandatory condition of Project approval, the Project would be required to construct the proposed structures in accordance with the seismic design criteria mandated by the Adelanto Municipal Code Title 14, *Buildings and Construction*. The purpose of this Title is, in part, to provide minimum standards to safeguard life or property by stipulating building and foundation requirement to withstand earthquake.

Threshold 4.7(a2). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Seismic-related ground failure, including liquefaction?			✓	

Impact Analysis

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Liquefaction occurs Project No. 21306-01 Page 7 July 21, 2022, when three general conditions coexist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion. Studies indicate that saturated, loose near surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential. In general, cohesive soils are not considered susceptible to liquefaction, depending on their plasticity and moisture content. Effects of liquefaction on level ground include settlement, sand boils, and bearing capacity failures below structures. Dynamic settlement of dry loose sands can occur as the sand particles tend to settle and densify as a result of a seismic event. Due to the depth of groundwater greater than 50 feet, the generally dense nature of the underlying sandy soils, and the presence of fine-grained cohesive soils, the potential for liquefaction and liquefaction-induced settlement is considered very low.

In addition, according to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located in a liquefaction zone.¹³ Notwithstanding, the Project would be required to comply with Development Code Section 16-5.02.060 (b) (2), *Soils Engineering Report*, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

Threshold 4.7(a3). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Landslides?				✓

Impact Analysis

The site is relatively flat and is not adjacent to any slopes or hillsides that could be potentially susceptible to landslides.

Threshold 4.7(b). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Result in substantial soil erosion or the loss of topsoil?			✓	

Impact Analysis

The Project will not result in substantial soil erosion or the loss of topsoil, because the site will be paved and landscaped after it is developed. To control soil erosion during construction, the Project proponent is required to comply with Chapter 17.93-*Erosion and Sediment Control*, of the Adelanto Municipal Code which serves to implement the National Pollutant Discharge Elimination System requirements applicable to the Project area and prepare a Storm Water Pollution Prevention Plan (SWPPP). In addition, a Water Quality Management Plan (WQMP) is required which addresses post-construction soil erosion. Preparation and implementation of these plans is a mandatory requirement.

The SWPPP will identify potential sources of erosion and sedimentation loss of topsoil during construction and identify erosion control measures to reduce or eliminate the erosion and loss

¹³ <https://maps.conservation.ca.gov/geologic Hazards/#dataviewer>, accessed July 22, 2022.

of topsoils, such as the use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding.

Post construction, much of the site will be covered with paving, structures, and landscaping, which will reduce soil erosion. As detailed in Threshold 4.9 (a), *Hydrology and Water Quality*, storm water will be controlled using a single basin designed to implement water quality and flood control requirements. Stormwater treatment will be provided by the bottom 1-2 feet of the basin, where the required volume will infiltrate into the ground, and any soil erosion materials will be managed. (Also see analysis under Issue 4.9, *Hydrology and Water Quality*).

Threshold 4.7(c). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Be located on a geologic unit or soil that is unstable, or that would become unstable because of the Project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?			✓	

Impact Analysis

Landslide/Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move down-slope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Due to the very low potential for liquefaction, the potential for lateral spreading is also considered very low. In addition, the Project site is relatively flat and thus there are no slopes that may contribute to lateral spreading.

Subsidence

Subsidence is the settlement of the ground surface over large areas (typically on the order of square miles) typically due to the lowering of the groundwater table. Mitigation against such a large-scale groundwater drawdown cannot be performed on a site-specific level, and therefore is not a site-specific geotechnical consideration. The soils encountered in the field evaluation did not indicate the presence of soils susceptible to collapse or excessive settlement. Based on the local site geologic conditions, the potential for subsidence in the site development area is considered low.

Liquefaction or Collapse

Liquefaction may occur during seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause soils to liquefy and temporarily behave as a dense fluid

Collapse occurs in saturated soils in which the space between individual particles is filled with water. This water exerts a pressure on the soil particles that influences how tightly the particles themselves are pressed together. The soils lose their strength beneath buildings and other structures.

Based on the California Geological Survey, the site is not mapped within a zone of potentially liquefiable soils. Based on groundwater data (<http://www.water.ca.gov/waterdatalibrary/>), it is estimated that groundwater is at a depth of 370 feet below existing grade. The site is also not included within the San Bernardino County Geologic Hazards Maps as being located within an area with a liquefaction hazard. Liquefaction is not considered to be a hazard at the subject site due to the great depth to groundwater (greater than 370 feet) and the current geologic hazard mapping. As such, impacts would be less than significant, and no impacts related to subsidence, liquefaction and collapse will occur through compliance with the California Building Standards Code also known as California Code of Regulations Title 24.

Threshold 4.7(d) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?			✓	

Impact Analysis

Expansive soils generally consist of clay that tend to expand (increase in volume) as it absorbs water, and it will shrink (lessen in volume) as water is drawn away. According to the Natural Resources Conservation Service, United States Department of Agriculture, Web Soil Survey, the Project site primarily consists of soils classified as Cajon Sand (82.1%) and Helendale Bryman Loamy Sand (17.9%).¹⁴

Clay soils are generally classified as "expansive." This means that a given amount of clay will tend to expand (increase in volume) as it absorbs water, and it will shrink (lessen in volume) as water is drawn away. The Cajon and Helendale series of soils consists of very deep, moderately well drained soils that formed in mixed alluvium dominantly from granitic sources. Because they are

¹⁴ Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at the following link: <http://websoilsurvey.sc.egov.usda.gov/>. Accessed July 22, 2022.

not clay soils, they are not susceptible to expansion. Based on the results of laboratory testing, site soils are anticipated to have a “Medium” expansion potential.

Notwithstanding, the Project would be required to comply with Adelanto Municipal Code §16.04.050 which sets forth the procedures governing the requirements for soils reports, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

Threshold 4.7(e) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓

Impact Analysis

The Project does not propose the use of septic tanks or alternative wastewater disposal systems. The Project would install domestic sewer infrastructure and connect to the City of Adelanto’s sewer conveyance and treatment system.

Threshold 4.7(f) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

Impact Analysis

Paleontological resources are the preserved fossilized remains of plants and animals. Fossils and traces of fossils are preserved in sedimentary rock units, particularly fine- to medium grained marine, lake, and stream deposits, such as limestone, siltstone, sandstone, or shale, and in ancient soils. They are also found in coarse-grained sediments, such as conglomerates or coarse alluvium sediments. Fossils are rarely preserved in igneous or metamorphic rock units. Fossils may occur throughout a sedimentary unit and, in fact, are more likely to be preserved subsurface, where they have not been damaged or destroyed by previous ground disturbance, amateur collecting, or natural causes such as erosion.

The property is situated in the Mojave Desert geomorphic province. The Mojave Desert province is a wedge-shaped area that is enclosed on the southwest by the San Andreas fault zone, the Transverse Ranges province, and the Colorado Desert province, on the north and northeast by the Garlock fault zone, the Tehachapi Mountains and the Basin and Range province, and on the east by the Nevada and Arizona state lines, and the Colorado River. The area is dominated by broad alluviated basins that are mostly aggrading surfaces that are receiving non-marine continental deposits from the adjacent upland areas. More specific to the subject property, the site is in an area geologically mapped to be underlain by Quaternary Alluvium. Alluvium is deposited as lakes, playas, and terraces and has the potential to contain paleontological resources. Therefore, the following mitigation measures are required.

Mitigation Measures

GEO-1: Inadvertent Discovery of Paleontological Resources. *If paleontological resources are encountered during implementation of the Project, (including areas impacted by off-site street improvements) ground-disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist (the “Project Paleontologist”) shall be retained by the developer to make an evaluation of the find. If the resource is significant, Mitigation Measure GEO-2 shall apply.*

GEO-2: Paleontological Treatment Plan. *If a significant paleontological resource(s) is discovered on the property, (including areas impacted by off-site street improvements), in consultation with the Project proponent and the City, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.*

With implementation of Mitigation Measures GEO-1 and GEO-2, impacts are less than significant regarding paleontological resources.

Unique Geologic Feature

The Project site is relatively flat. The site soils generally consist of Quaternary Alluvium (Cajon Sand and Helendale Bryman Loamy Sand), which are common soil types in Adelanto. As such, the Project does not contain a geologic feature that is unique or exclusive locally or regionally.

4.8 Greenhouse Gas Emissions

The analysis in this section is based in part on the following Technical Report: *Air Quality/GHG Assessment*, KPC EHS Consultants , June 30, 2022.

Threshold 4.8 (a-b) Would the Project:373	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	

Impact Analysis

Greenhouse Gas Emissions and Climate Change

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases. The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). No single land-use project could generate enough greenhouse gas (GHG) emissions to change the global average temperature noticeably. Cumulative GHG emissions, however, contribute to global climate change and its significant adverse environmental impacts. Thus, the primary goal in adopting GHG significance thresholds, analytical methodologies, and mitigation measures is to ensure new land use development provides its fair share of the GHG reductions needed to address cumulative environmental impacts from those emissions.

Mojave Desert Air Quality Management District Thresholds of Significance

According to CEQA Guidelines Section 15064.4, when making a determination of the significance of greenhouse gas emissions, the “lead agency shall have discretion to determine, in the context of a particular project, whether to use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use.” Moreover, CEQA Guidelines section 15064.7(c) provides that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by

experts” on the condition that “the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

The City of Adelanto has not adopted Greenhouse Gas (GHG) thresholds of significance; therefore, the Mojave Desert Air Quality Management District threshold will be utilized. The Mojave Desert Air Quality Management District (MDAQMD) has established GHG significance thresholds on a daily and annual basis. A summary of the projected annual operational greenhouse gas emissions, including amortized construction-related emissions associated with the development of the Project is provided in Table 4.8-1 and daily and annual emissions summarized in Table 4.8.2.

Table 4.8. 1 Project Greenhouse Gas Emissions

Source	GHG Emissions MT/yr			
	N2O	CO2	CH4	CO2e
Area	0.000	0.02	0.00004	0.02
Energy	0.023	1,887.00	0.127	1,897.13
Mobile Sources	0.066	1,239.75	0.071	1,261.26
Solid Waste	0.000	125.33	7.41	310.49
Water/Wastewater	0.120	399.73	4.96	559.57
30-year Amortized Construction GHG				38.36
TOTAL	<i>Tons/Year / Metric Tons / Year</i>			<i>4,482.9 / 4,066.8</i>
MDAQMD Threshold	<i>100,000 Tons/Year / 90,718.5 MT/Year ¹⁵</i>			100,000/90,718.5
Exceed Threshold?				NO

Table 4.8.2. Project Greenhouse Gas Emissions Summary

GHG Emissions Source	Daily Emissions	Daily Threshold	Annual Emissions Tons / Metric Tons	Annual Threshold Tons/Metric Tons	Exceeds Threshold?
Construction 2022	10,276.1	548,000	420.8 / 381.7	100,000 / 90,718.5	NO
Construction 2023	10,056.3	548,000	1,268.5 / 1,150.8	100,000 / 90,718.5	NO
Construction 2024	9,877.6	548,000	715.4 / 649.0	100,000 / 90,718.5	NO
Operations	11,336.7	548,000	4,440.7 / 4,028.5	100,000 / 90,718.5	NO

As shown on Table 4.8.1 and 4.8.2, the Project’s greenhouse gas emissions on both a daily and annual basis would not exceed the MDAQMD’s significance thresholds. Thus, Project-related emissions would not have a significant direct or indirect impact on greenhouse gas emissions that could impact climate change and no mitigation or further analysis is required.

¹⁵ CalEEMod GHG Emissions for GHG CO2e is calculated in Metric Tons (MT) per year.

Threshold 4.8 (b) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Impact Analysis

In 2006, the California legislature passed Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006. The law establishes a limit on greenhouse gas (GHG) emissions for the state of California to reduce state-wide emissions to 1990 levels by 2020. In 2016, the California Assembly and Senate expanded upon AB 32 with Senate Bill (SB) 32, which mandates a 40% reduction in GHG emissions from 1990 levels by 2030. In January 2017, the California Air Resources Board (CARB) developed a plan (SB 32 Scoping Plan¹) that charted a path towards the GHG reduction goal using all technologically feasible and cost-effective means.

In response to these initiatives, an informal project partnership, led by the San Bernardino Council of Governments (SBCOG), adopted the *San Bernardino County Regional Greenhouse Gas Reduction Plan*.¹⁶ The Reduction Plan summarizes the actions that 23 jurisdictions selected to reduce jurisdictional GHG emissions, as well as state-mandated actions. The Reduction Plan is not mandatory for the partnership jurisdictions. Instead, it provides information that can be used by partnership jurisdictions, if they choose so, to develop individual climate action plans (CAPs).

Pursuant to the Plan, the City of Adelanto selected a goal to reduce its community GHG emissions to a level that is 40% below its 2020 GHG emissions level by 2030. The City will meet and exceed this goal subject to reduction measures that are technologically feasible and cost effective through a combination of state (~60%) and local (~40%) efforts.

At the project level, prior to issuance of a building permit, the Project Proponent is required to submit plans showing that the Project will be constructed in compliance with the most recently adopted edition of the applicable California Energy Code, (Part 6 of Title 24 of the California Code of Regulations) and the California Green Building Standards Code, 2019 Edition (Part 11 of Title 24 of the California Code of Regulations).

Applicable measures for industrial uses include, but are not limited to:

¹⁶ San Bernardino County Regional Greenhouse Gas Reduction Plan ,available at: https://www.gosbcta.com/wp-content/uploads/2019/09/San_Bernardino_Regional_GHG_Reduction_Plan_Main_Text_Mar_2021.pdf, accessed on July 21, 2022.

- *Energy Efficiency:* The Project is required to install energy efficient appliances and HVAC systems, and overall commercial buildings shall meet or exceed the minimum standard design required by the 2019 California Energy Code. Additionally, promote the development and use of alternative energy sources such as passive solar.
- *Waste Diversion:* The Project's waste hauler would be required to comply with all applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the landfills that serve the Project are reduced in accordance with existing regulations. In addition, The Project is required to submit and implement a construction waste management plan to reduce the amount of construction waste transported to landfills.
- *Water Conservation:* Utilize water conservation techniques to conserve water resources, such as the use of low-flow irrigation and plumbing systems.
- *Water-Efficient Landscaping Practices:* Promote low per capita water use using low water consumptive plant materials/desert plants (xeriscape).

Based on the analysis above, the Project will not conflict with regional or State plans to reduce greenhouse gas emissions and will support the 40 percent long-term reduction in greenhouse gas emissions identified in the Reduction Plan.

4.9 Hazards And Hazardous Materials

The analysis in this section is based in part on the following technical report: *Phase I Environmental Site Assessment*, Wood, January 17, 2022, attached as Appendix E to this ISMND.

Threshold 4.9(a) (b)	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	

Impact Analysis

Existing Conditions

The site has been undeveloped from at least 1932 through 2018, with the exception of unpaved roads in the northeastern portion of the site and high-pressure gas line piping and equipment that appears to be within a site easement. Wood's review of historical use information on the site did not identify any historical usage that is considered a REC for the site. Adjoining property to the north was partially developed with commercial businesses by 1980; and, by 1992, adjoining property to the east was developed with a pipe and casing manufacturing business. By 1993, the nearby property to the west was developed with a stadium.

The site is currently undeveloped land with a meandering unpaved road apparently used for off-road vehicle recreational purposes. Scattered trash and debris were observed on the ground. Joshua Trees and other high-desert scrub brush and grasses were observed growing on the site. High pressure gas pipeline equipment was located on the northwest corner of the site, within an easement. Petroleum pipeline markers were observed along the western site perimeter, and high-pressure gas line markers were observed along the northern site perimeter. Based on Wood's research, both the petroleum and gas pipelines are located beneath adjoining properties to the west and north of the site, respectively, and are not located beneath the site (except for the fenced enclosure containing pipelines and associated equipment at the northwest corner of the site within an easement area). There is no evidence of underground storage tanks (USTs), odors, pools of liquid, containers storing unidentified substances, stains or corrosion, pits, ponds, or lagoons.

A review of the federal, state, tribal, local, and other/proprietary records summary provided by EDR revealed no environmental database listings for the site, and 10 database listings for facilities of potential

environmental concern located within the respective ASTM standard search. Based on the distance from the site, the type of listing, and/or the assumed direction of groundwater flow, the database listings are not considered likely to have adversely impacted the site and, accordingly, are not considered as RECs.

Construction Activities

Heavy equipment used during the construction of the proposed Project would be fueled and maintained by substances such as oil, diesel fuel, gasoline, hydraulic fluid, and other liquid materials that would be considered hazardous if improperly stored or handled. In addition, materials such as paints, roofing materials, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. The potential for unintentional releases and spills of hazardous materials during construction is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with future development that would be a reasonable consequence of the proposed Project than would occur on any other similar construction site.

Construction contractors are required to comply with all applicable federal, state, and local laws and regulations regarding hazardous materials, including but not limited requirements imposed by the Environmental Protection Agency, California Department of Toxic Substances Control, Mojave Desert Air Quality Management District, and the Lahontan Regional Water Quality Control Board. As such, impacts due to construction activities would not cause a significant hazard to the public or the environment through the release of hazardous materials to the environment.

Operational Activities

The Hazardous Materials Division of the San Bernardino County Fire Protection District is designated by the State Secretary for Environmental Protection as the Certified Unified Program Agency or “CUPA” for the County of San Bernardino in order to focus the management of specific environmental programs in the City of Adelanto. Any future tenant that handles and/or stores substantial quantities of hazardous materials (as defined by § 25500 of California Health and Safety Code, Division 20, Chapter 6.95) would be required to prepare and submit a Hazards Materials Business Emergency Plan (HMBEP) to the Hazardous Materials Division in order to register the business as a hazardous materials handler. Such business is also required to comply with California’s Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to San Bernardino County Fire Department and State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business.

With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the Project is not expected to pose a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, nor would

the Project increase the potential for accident operations which could result in the release of hazardous materials into the environment. Impacts are regarded as less than significant, and mitigation is not required.

Threshold 4.9 (c) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✓	

Impact Analysis

There are no schools within one-quarter mile of an existing or proposed school. The nearest schools are Victoria Magathan Elementary School located approximately 1 mile southwest on the SWC of Holly Road and Fremontia Avenue and Gus Franklin Jr. Elementary School located approximately 1 mile southeast on the SEC of Hopland Street and Diamond Road.

Threshold 4.9 (d) Would the Project	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓

Impact Analysis

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State and local agencies to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites pursuant to Government Code Section 65962.5. Below are the data resources that provide information regarding the facilities or sites identified as meeting the Cortese List requirements.

- *List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database.*
- *List of Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database.*

- *List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit.*
- *List of “active” CDO and CAO from Water Board.*
- *List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.*

Based on a review of the Cortese List maintained by the California Environmental Protection Agency the Project site is not identified on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.¹⁷ In addition, according to the Phase I Environmental Site Assessment (Appendix F), a review of the federal, state, tribal, local, and other/proprietary records summary provided by Environmental Database Reports (EDR) revealed no environmental database listings for the site, and 10 database listings for facilities of potential environmental concern located within the respective ASTM standard search. Based on the distance from the site, the type of listing, and/or the assumed direction of groundwater flow, the database listings are not considered likely to have adversely impacted the site and, accordingly, are not considered as Recognized Environmental Conditions.

Threshold 4.9 (e) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			✓	

Impact Analysis

The following airports are located in or near Adelanto:

Adelanto Airport – This small airfield is located near the intersection of Holly Road and Beaver Road approximately 3.5 miles southwest of the Project site. This airport has two runways. Adelanto Airport is a privately owned airstrip with two unpaved runways. One extends north south and is 3,930 feet long and 100 feet wide. The other extends east west and is 5,100 feet long and 100 feet wide. Use of this airstrip is exclusively private, and permission is required prior to any aircraft landing. There is irregular attendance at this facility due to irregular use. All flight plans are required to be cleared with SCLA to avoid conflicting traffic. Due to the private nature of the airstrip, the irregularity of flight scheduling, coordination with SCLA, and the distance of

¹⁷ California Environmental Protection Agency, Cortese List Data Resources, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed June 10, 2022.

the east-west runway in relation to the Project site, impacts related to aircraft operations will be minimal.

Southern California Logistics Airport (SCLA)- SCLA is located approximately 1.5 miles to the northeast of the Project site in the City of Victorville. According to the According to San Bernardino Countywide Plan Policy Map HZ-9, *Airport Safety and Planning Areas*, the Project site is not located within the boundaries of the SCLA *Comprehensive Land Use Plan* Compatibility Review Area for land use safety with respect to both occupants of aircraft and to people on the ground, protection of airspace, and general concerns related to aircraft overflight.

Threshold 4.9 (f) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	

Impact Analysis

Access to the Project site is proposed from Adelanto Road, Rancho Road, and Mesa Linda Road. The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles from these roadways.

Threshold 4.9 (g) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓

4.10 Hydrology and Water Quality

The analysis in this section is based in part on the following technical report: *Preliminary Hydrology Study*, Kier + Wright, June 22, 2022, attached as Appendix G to this ISMND.

Threshold 4.10 (a) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	

Impact Analysis

Construction Impacts

Construction of the Project would involve clearing, grading, paving, utility installation, building construction, and the installation of landscaping, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction activities in the absence of any protective or avoidance measures.

Chapter 17.93.050 - *Soil Erosion and Sediment Control Plan* of the Adelanto Municipal Code requires the Project to obtain a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit for construction activities. The permit is required for all Projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area.

Compliance with the permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) will identify construction Best Management Practices (BMPs) that will be implemented to prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. Typical BMPs measures include, but are not limited to, preserving natural vegetation, stabilizing exposed soils, use of sandbags, and installation of temporary silt fencing.

Operational Impacts

Storm water pollutants commonly associated with residential land uses include sediments, nutrients, trash and debris, bacteria and viruses, oil and grease, and pesticides. City of Adelanto Municipal Code Chapter 17.93.060 requires the preparation of a Water Quality Management Plan (WQMP) for managing the quality of storm water or urban runoff that flows from a developed

site after construction is completed. The Project will comply with the City of Adelanto and the Phase II Small MS4 General Permit for the Mojave River Watershed as described below.

In the proposed condition, on site drainage on the south side of the lot will sheet flow within the proposed driveways into catch basins at various locations on site. Off-site drainage from the south sheet flows on-site across the proposed parking lot driveways and into the proposed catch basins. The drainage is then piped to the detention basin on the east side of the site.

The drainage on the north side of the lot will sheet flow off site onto Rancho Road into catch basins along Rancho Road. Drainage is then piped to the detention basin on the east side of the site. storm water will be controlled using a single basin for water quality and flood control. As designed, the basin exceeds the required storage volume.

Threshold 4.10 (b) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	

Impact Analysis

Ground Water Supply Discussion

The Project would be served with potable water by the Adelanto Public Utility Authority. Adelanto has groundwater wells within its distribution system that are actively used to pump groundwater from the Mojave River Groundwater Basin, which lies beneath Victor Valley.¹⁸ The Mojave Basin Area was the subject of a court ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area. The court ordered adjudication of the Mojave Basin Area allocates a variable free production allowance (FPA) to each purveyor that supplies more than 10 AFY, including Adelanto.

Each allocated FPA represents the purveyor's share of the water supply available from the MWA Subarea. FPAs are determined as a percentage of the purveyor's highest verified annual use from 1986 to 1990. The FPA, which is currently set at 80 percent of BAP for agriculture and 60 percent of BAP for municipal and industrial (M&I), can vary from year to year depending on the Watermaster's safe yield projections for the Basin. If Adelanto, or another purveyor, pumps more than its allotted FPA in any year, they are required to purchase replacement water equal to the

¹⁸ 2020 Urban Water Management Plan, Victorville Water District, June 1, 2021, p.6-3, accessed on June 10, 2022.

amount of production in excess of the FPA. Replacement obligations are satisfied by paying MWA and then purchasing unused FPA within the subarea.

Given the City's total reliance on groundwater, the reliability of the City's water supply is thus entirely dependent on the reliability of the groundwater in the Mojave River Basin managed by the Mojave Water Agency. Because almost all of the water used within the Mojave Water Agency's service area is supplied by pumped groundwater, to supplement the local groundwater supplies, the Mojave Water Agency recharges the groundwater basins with State Water Project imported water, natural surface water flows, wastewater imports from outside the Mojave Water Agency's service area, agricultural depletion from storage, and return flow from pumped groundwater not consumptively used. The Mojave Water Agency's sources are only used to recharge the groundwater basins and are not supplied directly to any retailers, except for two power plants, the High Desert Power Project, and the LUZ Solar Plant.

Groundwater Recharge Discussion

Development of the Project would increase impervious surface coverage on the Project site which would in turn reduce the amount of direct infiltration of runoff into the ground. The Project proposes to use roads within the Project site to carry runoff to a proposed water quality basin, designed for both retention and detention. As such, the Project will not interfere substantially with groundwater recharge.

In addition, according to a review of historical groundwater data (California Department of Water Resources and California State Water Resources Control Board groundwater well data [<http://wdl.water.ca.gov> and <http://geotracker.waterboards.ca.gov>]), depth to groundwater is greater than 50 feet below ground surface (bgs) in the general Project site area. As such, the Project will not impact groundwater.

Sustainable Groundwater Management Discussion

California depends on groundwater for a major portion of its annual water supply, particularly during times of drought. This reliance on groundwater has resulted in overdraft and unsustainable groundwater usage in many of California's basins.¹⁹ The Sustainable Groundwater Management Act (SGMA) was enacted to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The City of Adelanto is located within the Upper Mojave River Valley portion of the Mojave River Basin.

The Mojave River is an adjudicated basin (i.e. water rights are determined by court order).²⁰ Adjudicated basins are exempt from the SGMA because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of a basin. No component of the Project would obstruct with or prevent implementation of the management

¹⁹ https://www.waterboards.ca.gov/water_issues/programs/gmp/, accessed on June 10, 2022.

²⁰ <https://gis.water.ca.gov/app/bp-dashboard/final/>, accessed on June 10, 2022.

plan for the Mojave River Basin. As such, the Project would not conflict with any sustainable groundwater management plan. Impacts would be less than significant

Conclusion

Based on the analysis above, the Project is not forecast to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Threshold 4.10 (c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 that would:				
(i) Result in substantial erosion or siltation on- or off-site?			✓	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
(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?			✓	
(iv) Impede or redirect flood flows?			✓	

Existing Condition/Pre-Development

The Project site is undeveloped. The site generally slopes from south to north. There are no existing storm drains within the project site. The slopes within the project site range from flat to mild slopes, ranging from 2% to 10% in some areas. With the majority of the site being type A soils, the drainage percolates into the ground, and the remaining runoff flows to Rancho Road.

Proposed Condition/Post Development

In the proposed condition, on site drainage on the south side of the lot will sheet flow within the proposed driveways into catch basins at various locations on site. Off-site drainage from the south sheet flows on-site across the proposed parking lot driveways and into the proposed catch basins. The drainage is then piped to the detention basin on the east side of the site.

The drainage on the north side of the lot will sheet flow off site onto Rancho Road into catch basins along Rancho Road. Drainage is then piped to the detention basin on the east side of the site. The required capture volume is 221,071 cubic feet of storm water per the unit hydrograph and stage storage calculations. The basin has been sized to store 16.14-acre feet and can hold a total of 703,274.30 cubic feet of storm water. Since the runoff of the proposed development is greater than the existing runoff, detention of the additional runoff is required. Unit hydrograph calculations were prepared to establish the baseline Qs for the 100-year 24-hour storm for the project. In order to mitigate the extra runoff, the basin has been sized to prevent extra runoff from leaving the site during the storm event. The basin drains before 72 hours.

Based on the analysis above, storm water can be mitigated as designed to be compatible with the City of Adelanto Master Plan of Drainage. The development of the subject site will not significantly change area drainage patterns, impact any of the surrounding properties, or change any of the regional master plan facilities.

Threshold 4.10 (d). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓

Impact Analysis

According to the Federal Emergency Management Agency (FEMA), the Project site is not located within a flood hazard zone.²¹ According to the California Department of Conservation, California Official Tsunami Inundation Maps²², the site is not located within a tsunami inundation zone. In addition, the Project would not be at risk from seiche because there is no water body around the Project site capable of producing as seiche.

Threshold 4.10 (e) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

²¹ <https://www.fema.gov/flood-maps>, accessed on June 10, 2022.

²² California Department of Conservation, *California Official Tsunami Inundation Maps*, <https://www.conservation.ca.gov/cgs/tsunami/maps#:~:text=Coordinated%20by%20Cal%20OES%2C%20California,considered%20tsunamis%20for%20each%20area>, accessed June 10, 2022.

Impact Analysis

As discussed under Threshold 4.10 (a) and 4.10 (c), with implementation of the proposed drainage system improvements and features, the Project will not conflict with or obstruct implementation of the *Lahontan Basin Plan*. In addition, as discussed under Threshold 4.10 (b), the Project site is not subject to a Sustainable Groundwater Water Management program and will not substantially impede sustainable groundwater management of the basin

4.11 Land Use And Planning

Threshold 4.11 (a)	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide a community?				✓

Impact Analysis

An example of a Project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project site is located in an area that consists primarily of vacant undeveloped land. The nearest developed land can be found across the street from the Project site, consisting of a laser cutting shop and a gas and equipment distribution center approximately 0.03 miles (158.4 feet) directly north. The Project site is bordered on the north by Rancho Road (paved road); followed by two family-owned businesses consisting of a laser cutting shop and a gas and equipment distribution center; on the south by Primrose Street (unpaved road) followed by vacant undeveloped land; on the east by Primrose Street, (unpaved road) followed by the Northwest Pipe Company; and to the west Adelanto Road (paved road) followed by vacant undeveloped land. The Project site is planned for Light Manufacturing development by the General Plan. Thus, development of the Project site is a logical continuation of the development pattern in the area as proposed by the General Plan and will not divide an established community.

Threshold 4.11 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

Impact Analysis

The applicable plans and policies relating to a 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, or zoning ordinance) adopted for the purpose of **avoiding or mitigating an environmental effect** are evaluated throughout this Initial Study document as described below.

City of Adelanto General Plan

- *Land Use Element*: The General Plan Land Use and Zoning designation for the Project site is LM (Light Manufacturing) which allows a warehouse/distribution facility.
- *Circulation Element*: Please refer to Section 4.17, Transportation, for the analysis.
- *Conservation/Open Space Element*: Please refer to Sections 4.1, *Aesthetics*, and Section 4.4, *Biological Resources*, for the analysis
- *Noise Element*: Please refer to Section 4.13, *Noise*, for the analysis.
- *Safety Element*: Please refer to Section 4.9, *Hazards and Hazardous Materials*, for the analysis.
- *Community Design Element*: Please refer to Section 4.1, *Aesthetics*, for the analysis.

City of Adelanto Zoning Ordinance

In instances where the Zoning Ordinance applies to an environmental effect, it is identified in the Analysis section for each environmental topic. As detailed in such instances, impacts are less than significant.

Mojave Desert Air Quality Management District Air Quality Management Plan

Please refer to Section 4.3, *Air Quality*, for the analysis

San Bernardino County Regional Greenhouse Gas Reduction Plan

Please refer to section 4.8, *Greenhouse Gas Emissions*, for the analysis

Water Quality Control Plan for the Lahontan Region (Basin Plan)

Please refer to Section 4.10, *Hydrology and Water Quality* for the analysis.

Conclusion

As demonstrated throughout this Initial Study document, the Project would not conflict with any applicable land use plan, policy, or regulation due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, with compliance with mandatory regulatory requirements or mitigation measures.

4.12 Mineral Resources

Threshold 4.12 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓

Impact Analysis

The naturally occurring mineral resources within the Planning Area include sand, gravel or stone deposits that are suitable as sources of concrete aggregate. The Project site that has been designated with a Mineral Land Classification of MRZ-3A, which is an area containing known mineral occurrences of undetermined mineral resource significance. This classification was based on a report by the California Department of Conservation, Division of Mines and Geology, entitled *Mineral Land Classification of Concrete Aggregate Resources in the Barstow - Victorville Area, San Bernardino County, California*. A review of the California Department of Conservation interactive web mapping indicates there is no active mines on the Project site²³. In addition, a review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the Project site.²⁴

Loss of mineral resources could occur if the site was used for mining, or the underlying General Plan/Zoning intended the site to be available for mining. The site is designated LM (Light Manufacturing), which provides for a more limited range of uses, including only light industrial and manufacturing uses which benefit from separation from residential, office, and retail districts. In addition, according to Adelanto Municipal Code, Appendix A: *Regulation of Uses by Zoning District*, mining is not an allowed use in the LM zone.

Threshold 4.12 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓

²³ <https://maps.conservation.ca.gov/mineralresources/>, accessed on June 10, 2022.

²⁴ California, State of. Department of Conservation. California Oil, Gas, and Geothermal Resources Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14>, accessed on June 10, 2022.

Impact Analysis

The Project site is not being used for mineral resource recovery. The Project site is designated as Light Manufacturing (LM). Mining is not an allowed use in the LM land use designation. As such, the Project is not delineated on the General Plan, a specific plan, or other land use plan as a locally important mineral resource recovery site

4.13 Noise

The analysis in this section is based in part on the following Technical Report: *Noise Assessment*, KPC EHS Consultants, July 9, 2022, attached as Appendix H to this ISMND.

Threshold 4.13 (a). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project more than standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	

Impact Analysis

Methodology

In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Case No. S213478, the California Supreme Court stated “*In light of CEQA’s text, statutory structure, and purpose, we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project’s impact on the environment – and not the environment’s impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions.*” Notwithstanding “special CEQA requirements [that] apply to certain airport, school and housing construction projects [,]” the Court held “that ordinary CEQA analysis is concerned with a project’s impact on the environment, rather than with the environment’s impact on a project and its users or residents.”

Exceptions to this are housing projects for agricultural workers, affordable housing, and transit priority projects (a type of development that is either 100% residential or a mixed-use development (where 50% of the project is residential), that has a floor area ratio (ratio of total building square footage to total lot square footage) of 0.75, a minimum net density of at least 20 dwelling units per acre).

Moreover, special CEQA requirements apply to certain airport, school, and housing construction projects. In such situations, CEQA requires agencies to evaluate a project site's environmental conditions regardless of whether the project risks exacerbating existing conditions. The

environmental review must consider—and a negative declaration or exemption cannot issue without considering—how existing environmental risks such as noise, hazardous waste, or wildland fire hazard will impact future residents or users of a project. That these exceptions exist, however, does not alter our conclusion that ordinary CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents.

Existing Ambient Noise Levels

The Project site is in partially developed area of the City with noise generated from the Industrial and Manufacturing uses in the area. The existing noise environment in the Project area is characterized by the area's general level of development. The Project is located in a partially developed with Industrial and Manufacturing uses. Ambient noise levels are therefore increased as a result of roadway traffic, industrial activities, and other human activities. To assess the existing noise level environment short-term noise measurements were obtained from 4 locations in the Project study area. Exhibit 4.13-A Noise Monitoring Map, provides the boundaries of the Project site, a 5,000-foot radius from the center of the site, and the locations of the noise level measurements. Table 4.13.1 *Ambient Noise Level Measurements* summarizes the ambient noise levels based on level of development. Locations 1 and 2 were taken in the vicinity of the Project site and location 3 near the center of the Project site with average noise levels between 55.7 and 57.3 dBA (Leq) and a calculated CNEL between 62.4 and 64.0 dBA. Location 4 is the nearest sensitive receptor to the Project site the Adelanto Medical Clinic located at 11678 Rancho Road, approximately 3,270 feet to the west.

Figure 4.13. Ambient Noise Level Measurements

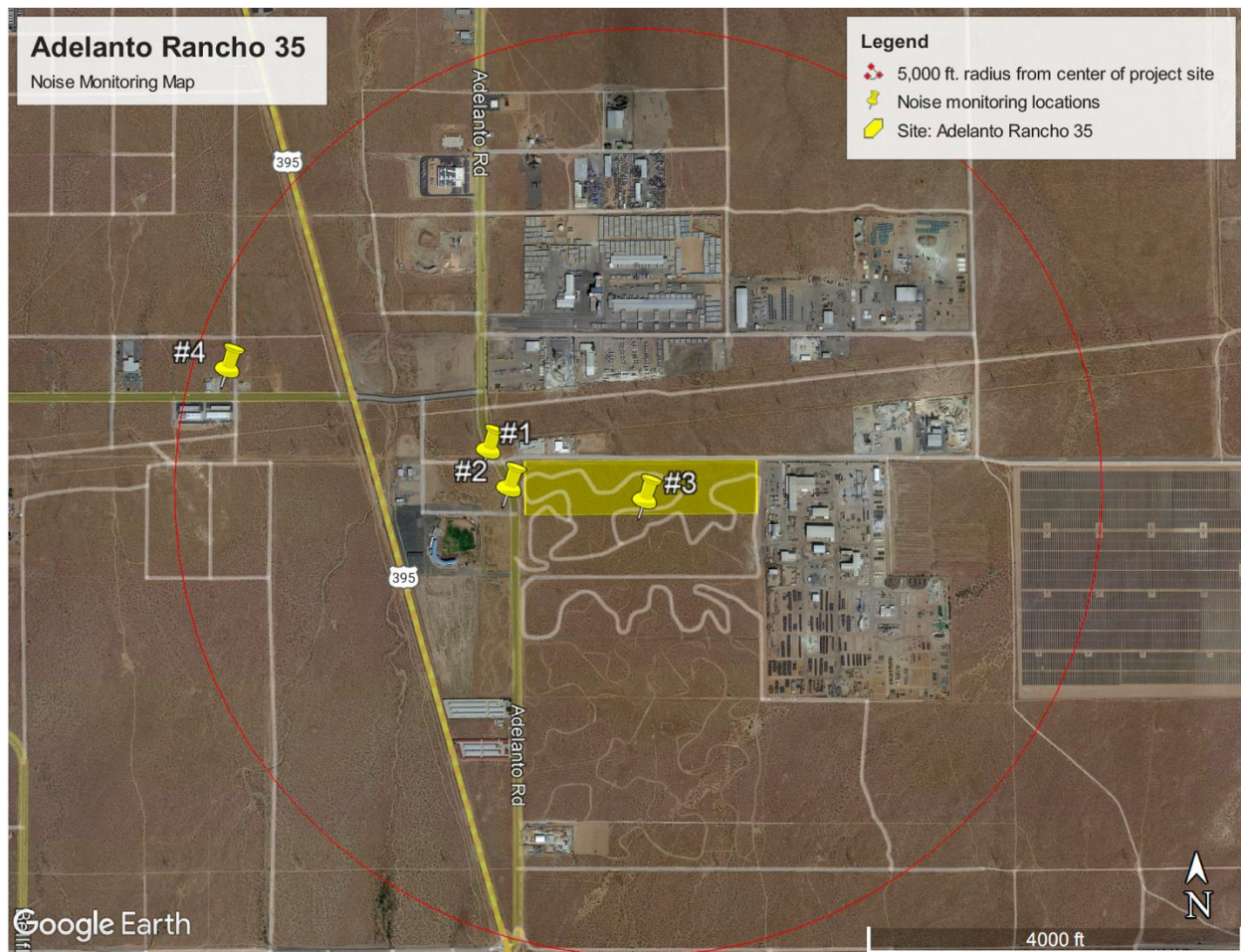


Table 4.13.1 Ambient Noise Level Measurements

Location	Distance to Project Boundary	Description	Average Noise Level dBA (Leq)	CNEL
#1	450 feet	Old Rancho Road & Adelanto Road	57.3	64.0
#2	300 feet	Stadium Way & Adelanto Road	57.1	63.8
#3	285 N/S – 1,300 E/W	Center of Site	55.7	62.4
#4	3,270 feet	Adelanto Medical Clinic (11678 Rancho Road)	61.0	67.7

Source: Adelanto 35 Development Project – Noise Assessment, July 9, 2022.

Short-term Construction Noise Impact Analysis

The most significant source of short-term noise impact resulting from the Project is related to noise generated during construction activities on the Project site. Construction is performed in

discrete steps, each of which has its own mix of equipment and consequently its own noise characteristics. Construction activities that would create noise include site preparation, grading, building construction, paving, and architectural coating. Noise levels associated with the construction will vary with the different types of construction equipment, the duration of the activity, and distance from the source. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing levels within the Project vicinity. The nearest sensitive receptor to the Project site is the Adelanto Medical Clinic, located 3,270 feet west of the property western boundary. To estimate the potential impact of construction noise at the nearest sensitive receptor the Adelanto Medical Clinic, as well as nearby commercial and industrial land uses (current and future), equipment that is expected to be used during construction was input into the Federal Highway Administration Roadway Construction Noise Model (RCNM) to generate anticipated noise levels. The RCNM generates the maximum noise levels (Lmax) and the equivalent continuous sound level (Leq). The Leq is a calculation of the anticipated steady sound pressure level which, over a given time period (day, evening, night) has the same total energy as the actual fluctuating noise. The RCNM also uses an acoustical use factor in the noise calculations. The acoustical use factor is the percentage of time each piece of construction equipment is assumed to be operating at the full power level and is used to estimate the Leq values from the Lmax values. For example, typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels will be loudest during the site preparation and grading phases. Table 4.13.2, *Construction Equipment Noise Levels at the Nearest Receptor*, identifies the level of noise generated by construction equipment

Table 4.13. 1 Construction Equipment Noise Levels at the Nearest Receptor

Source	Approximate Distance to Nearest Receptor ¹ (Property Line to Construction Site) (feet)	Sound Level at Nearest Receptor		
		Lmax	Acoustical Use Factor (%)	Leq
Backhoe	3,270	41.2	40	37.3
Compactor (ground)	3,270	46.9	20	39.9
Compressor (air)	3,270	41.4	40	37.4
Crane	3,270	44.2	16	36.3
Compactor (ground)	3,270	46.9	20	39.9
Concrete Mixer Truck	3,270	42.5	40	38.5
Dozer	3,270	45.4	40	41.4
Dump Truck	3,270	40.1	40	36.2
Excavator	3,270	44.4	40	40.4
Front End Loader	3,270	42.8	40	38.8
Generator	3,270	44.3	50	41.3

Source	Approximate Distance to Nearest Receptor ¹ (Property Line to Construction Site) (feet)	Sound Level at Nearest Receptor		
		Lmax	Acoustical Use Factor (%)	Leq
Grader	3,270	48.7	40	44.7
Offroad Forklift	3,270	47.1	40	43.1
Paver	3,270	40.9	50	37.9
Pickup Truck	3,270	38.7	40	34.7
Roller	3,270	43.7	20	36.7
Scraper	3,270	47.3	40	43.3
Welder / Torch	3,270	37.7	40	33.7

Source: Adelanto 35 Development Project – Noise Assessment Technical Memorandum, July 9, 2022.

The properties immediately adjacent and surrounding the Project site are industrial uses or vacant undeveloped parcels (zoned Mixed Use and Industrial) additionally, the nearest sensitive receptors are located over 1/2 mile away and the Project would be compatible with surrounding land uses and would not adversely impact sensitive receptors.

The City of Adelanto has set restrictions to control noise impacts from construction activities. Section 17.90.020(d)(1) of the Adelanto Municipal Code restricts construction activities between the hours of 7:00 AM to dusk on weekdays, and construction will not occur on weekends or state holidays.

Noise generation related to construction activities is addressed in §17.90.020(d) of the Zoning Ordinance which requires construction projects to list general noise reduction practices as “General Notes” on the construction drawings as part of the Project’s conditions of approval (COA). These mandatory conditions are described as follows:

17.90.020 (d) Construction Practices

To reduce potential noise and air quality nuisances, the following items shall be listed as "General Notes" on the construction drawings:

(1) Construction activity and equipment maintenance is limited to the hours between 7:00 a.m. to dusk on weekdays. Construction may not occur on weekends or State holidays, without prior consent of the Building Official. Non-noise generating activities (e.g., interior painting) are not subject to these restrictions. City and State construction projects, such as road re-building or resurfacing, and any construction activity that is in response to an emergency, shall be exempt from this requirement.

(2) Stationary construction equipment that generates noise in excess of sixty-five (65) dBA at the project boundaries must be acoustically shielded and located at least one hundred feet (100')

from occupied residences. The equipment area with appropriate acoustic shielding shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location throughout construction activities.

(3) Construction routes are limited to City of Adelanto designated truck routes.

(4) Water trucks or sprinkler systems shall be used during clearing, grading, earth moving, excavation, or transportation of cut or fill materials to prevent dust from leaving the site and to create a crust after each day's activities cease. At a minimum, this would include wetting down such areas in the later morning and after work is completed for the day and whenever wind exceeds fifteen (15) miles per hour.

(5) A person or persons shall be designated to monitor the dust control program and to order increased watering as necessary to prevent transport of dust off-site. The name and telephone number of such person(s) shall be provided to the City.

(6) All grading equipment shall be kept in good working order per factory specifications.

With implementation of the above standard conditions of approval, construction noise impacts would be less than significant.

Operational Noise Analysis

Sound levels generated by warehouse operational activities include:

- ☐ Roof top air conditioning (HVAC)
- ☐ Refrigeration units.
- ☐ Truck idling and movement.
- ☐ Backup alarms.
- ☐ Loading and unloading of dry goods.
- ☐ Parking activities and movements.

Table 4.13.2 Reference Noise Level Measurements

Noise Source	Reference Distance (feet)	Reference Noise Level (dBA)	Distance to Receptor (feet)	Noise Level (dBA)
Rooftop HVAC ¹	1 '	88	300 '	38.5
Truck Loading Dock Activity ²	50 '	63.6	300 '	48.0
Truck Backup Alarm ²	50 '	75.0	300 '	59.0
Parking Lot Activity ²	25 '	54.4	300 '	33.0

¹ Reference Level Lennox 10-ton air handler unit (AHU) manufacturer specifications.

² Reference Level collected at Amazon Fulfillment Center ONT-6 (24208 San Michele Rd., Moreno Valley)

The proposed warehouse structure would include dock doors for truck loading and unloading. To determine the noise level impacts of the Project short-term reference noise level measurements

were collect at the Amazon Fulfillment Center located at 24208 San Michele Road in the City of Moreno Valley. The noise measurements represent a typical weekday warehouse loading/unloading operation on a large single building distribution center, approximately 1.2 million square feet with 200 trailer parking spaces and 90 docks. Operations during the noise measurements included multiple trucks being loaded/unloaded, forklift and truck/trailer movement.

The loading/unloading operations noise measurements were taken over a 15 – minute period taken from an area approximately at the center of the docking stations at 50' feet from the building. The reference noise measurement obtained was 63.6 dBA L_{eq} and calculated attenuation for 300- foot distance at 48 dBA L_{eq} . No attenuation for shielding from buildings or walls was calculated as no detailed information on boundary walls/fencing is available for the proposed Project site.

Trucks at the Project site would utilize backup alarms during the loading/unloading activities, which according to ECCO the first manufacturer of backup alarms, depending on the model typically produce a noise level of 87 to 112 dBA at 1 feet²⁵ at 300 feet with no sound barriers (walls or buildings) the noise level would be between 37.5 to 62.5 dBA. Reference noise level measurements taken at 50 feet during truck movement and backup alarm operation were measured at 75 dBA_{max} which would result in a 59.0 dBA noise level at 300 feet with no perimeter walls or buildings as shielding.

Parking lot areas for passenger vehicles are located on the north, west, and east sides of the proposed structure, whereas all trailer parking stalls are located on the south side. Traffic associated with parking lots is typically not at a sufficient level to exceed the community noise standards. The total parking spaces estimated for the Project is 215 stalls, the reference noise levels were taken at a parking lot that can accommodate approximately 1,000 stalls. The Project's parking lots are substantially smaller and no significant noise impacts offsite from the parking lot use would be anticipated.

The USEPA identifies noise levels affecting health and welfare as exposure levels over 70 dBA over a 24-hour period. Noise levels for various levels are identified according to the use of the area. Levels of 45 dbA are associated with indoor residential areas, hospitals, and schools, whereas 55 dBA is identified for outdoor areas where typical residential human activity takes place. According to the USEPA levels of 55 dbA outdoors and 45 dbA indoors are identified as levels of noise considered to permit spoken conversation and other activities such as sleeping, working, and recreation, which are part of the daily human condition.²⁶ Levels exceeding 55 dbA in a residential setting are normally short in duration and not significant in affecting health and welfare of residents. As the Project site is located in an industrialized area that is zoned and planned for future industrial development, the nearest existing sensitive receptor is and the nearest potential future sensitive receptors would be in the Mixed-Use zoned properties to the west (greater than 300 feet from the site), no significant noise impacts are expected.

²⁵ ECCO Backup alarm manufacturer resources:

<https://www.eccoesg.com/us/en/SearchResults?searchText=backup+alarm+noise+levels> accessed July 7, 2022.

²⁶ USEPA "EPA Identifies Noise Levels Affecting Health and Welfare" <https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html> accessed July 7, 2022.

Offsite Traffic Noise Impacts

The primary increase in noise will be the result of adding vehicle traffic generated by the Project to Rancho Road and Adelanto Road. The level of traffic noise depends on three primary factors (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The proposed Project does not propose any uses that would require a substantial number of truck trips and the proposed Project would not alter the speed limits that will be established.

The Project is forecast generate 1,126 daily vehicle trips³⁵. According to Caltrans, the human ear can begin to detect sound level increases of 3 decibels (dB) in typical noisy environments.³⁶ A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable.

The Project is estimated to generate approximately 1,126 average daily vehicle trips, from both passenger cars and trucks, of which 231 (20.5 %) will be from trucks. The morning and afternoon peak hour truck traffic is calculated to be 25 ADT and 27 ADT respectively, which will increase the ambient traffic noise levels in the vicinity of the Project site in comparison to the existing site conditions (industrial and vacant land). The current average daily vehicle trips along Adelanto Drive north of Air Expressway is approximately 1,180 average daily vehicle trips (ADT), assuming all the Project traffic 1,126 ADT take Adelanto Drive, the results would not be a doubling of traffic volume. The anticipated increased traffic would not result in a doubling of the daily vehicle traffic to be generated in the area. Therefore, the proposed Project traffic would not result in a substantial permanent increase in ambient roadway noise levels. Additionally, noise analysis performed as part of the Southern California Logistics Airport Lot 44 Distribution Center indicate that noise levels along Adelanto Drive around Air Expressway have been calculated at 51 dBA CNEL 100 feet from the roadway centerline. Noise impacts created by the Project would be less than significant and mitigation is not required.

Conclusion

Through compliance with mandatory requirements to reduce noise during construction, the Project's construction noise impacts will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project. In addition, as shown above, the Project's operational noise would not be significant either.

³⁵ ITE Trip Generation Manual, 11th Edition.

³⁶ Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.

Threshold 4.13 (b). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Generation of excessive ground borne vibration or groundborne noise levels?			✓	

Impact Analysis

During construction the operation and movement of heavy equipment create seismic waves that radiate along the ground-surface in all directions. These waves are felt as ground vibrations. Vibrations from construction can result in effects ranging from annoyance to people to structure damage. Vibration levels are impacted by geology, distance, and frequencies. According to the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018³⁷, while ground vibrations from construction activities do not often reach the levels that can damage structures, construction vibration may result in building damage or prolonged annoyance from activities such as blasting, piledriving, vibratory compaction, demolition, and drilling or excavation near sensitive structures. The Project does not require these types of construction activities.

Vibration amplitude and impact decreases with distance and perceptible groundborne vibration is generally limited to areas within one to two hundred feet of the construction activity.

The vibration standard used for the City is that no ground vibration shall be allowed that can be felt without the aid of instruments at or beyond the subject property line, nor will any vibration be permitted that produces a particle velocity greater than or equal to two-tenths of an inch per second measured at or beyond the lot line

The closest sensitive receptor to the Project property line is minimally 3,270 feet from the property line. The estimated construction vibration level from a large bulldozer (worst case scenario) measured at 15-feet would create a vibration level of 0.191 in/sec which does not exceed the 0.2 in/sec threshold. Therefore, the vibrations at the nearest sensitive receptor will remain well below the strongly perceptible annoyance criteria and potential residential vibration damage criteria thresholds listed in the City of Adelanto Municipal Code Section 17.90.030 (vibration). This threshold requires that no vibration greater than 0.2 PPV be felt at or beyond the lot line. The proposed Project therefore is not considered to result in exposure of people to excessive ground vibration.

During operations of the Project following construction the primary source of vibration would be from vehicle traffic, primarily truck traffic. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Typical vibration levels from heavy truck

³⁷ <https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123>.

activity at normal traffic speeds are in the order of 0.004 in/sec PPV at 25 feet based on the FTA's Transit Noise Impact and Vibration Assessment (2018). Trucks once on site will be travelling at very low speeds and it is expected that truck vibration impacts off site would not exceed the 0.2 in/sec PPV threshold.

Ground-borne vibration levels from automobile traffic are generally overshadowed by vibration generated by heavy trucks that roll over the same uneven roadway surfaces. However, due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that would cause annoyance to people or damage to buildings in the vicinity.

Threshold 4.13 (c). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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?			✓	

Impact Analysis

The Project site is approximately 1.65 miles west of the Southern California Logistics Airport. According to San Bernardino Countywide Plan Policy Map HZ-9, *Airport Safety and Planning Areas*, the Project site is located within the boundaries of the SCLA *Comprehensive Land Use Plan* Compatibility Review Area for land use safety with respect to both occupants of aircraft and to people on the ground, protection of airspace, and general concerns related to aircraft overflight. Additionally, the eastern approximately ¼ of the Project site is within the 65 LDN Noise Contour. According to the Land Use Compatibility- Airport Safety Review Areas Table B1 of the SCLA *Comprehensive Land Use Plan* and the Adelanto General Plan EIR have determined that manufacturing, industrial, and warehouse uses are considered Normally Acceptable land uses in the AR3 Safety Review Zone. Standard building design and construction methods would provide adequate noise attenuation to comply with the indoor noise standards and thereby not expose occupants of the Project to excessive aircraft noise levels.

4.14 Population And Housing

Threshold 4.14 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	

Impact Analysis

A project could induce population growth in an area, either directly (for example, by proposing new homes and/or businesses) or indirectly (for example, through extension of roads or other infrastructure). No residential uses would be developed as part of the Project. The Project would not result in the development of any new housing, and therefore, would not induce direct population growth in the City through new housing development. The project construction of a distribution facility on vacant and undeveloped land and would employ approximately 460 people. The addition of a new distribution center on a previously vacant site would increase employment within the City. Thus, the Project would lead to an increase in the employee population within the area. The additional employment created by the proposed Project has the potential to result in an indirect growth in the City's population, since the potential exists that future employees (and their families) that currently reside outside of the City could choose to relocate to the City. Estimating the number of future employees who may choose to relocate to the City would be highly speculative, since many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). Additionally, housing opportunities exist for the Project's future employees in the communities surrounding the City. Although uncertainty exists regarding the number of new employees who may choose to relocate to the City, it is not anticipated that implementation of the proposed project would induce substantial population growth within the City either directly or indirectly.

Infrastructure Extensions

The Project site is adjacent to Rancho Road, Adelanto Road, and Mesa Linda Road. No roadway extensions are required to serve the site. The Project would connect to the existing sewer, water, storm drain, electric, gas, and communication facilities located adjacent, or in close proximity to the site. No infrastructure extensions will be needed to serve the Project.

Threshold 4.14 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

Impact Analysis

The Project site consists of undeveloped vacant land. Therefore, implementation of the Project would not displace a substantial number of existing housing, nor would it necessitate the construction of replacement housing elsewhere.

4.15 Public Services

Threshold 4.15 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
1) Fire protection?			✓	
2) Police protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

Fire Protection: The San Bernardino County Fire Department provides fire protection services to the Project area. The Project would be primarily served by the Adelanto Station #322, an existing station located approximately 2.25 roadway miles west of the Project site at 10370 Rancho Road. Development of the Project would impact fire protection services by placing an additional demand on existing County Fire Department resources should its resources not be augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access.

In addition, the City collects a Development Impact Fee to assist the City in providing fire protection facilities. Payment of the Development Impact Fee would be applied to fire facilities and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project. Therefore, the Project would not result in the need to construct new or physically altered fire facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for fire protection.

Police Protection: The San Bernardino County Sheriff's Department provides community policing to the Project area via the Victor Valley Sheriff Station located at 11613 Bartlett Street in Victorville. Because the Project site is in an area near development, it would be routinely patrolled by the Sheriff's Department. The City collects a Development Impact Fee to assist the City in providing for capital improvement costs for police protection facilities. Payment of the Development Impact Fee would be applied to police facilities and/or equipment, to offset the incremental increase in the demand for police protection services that would be created by the Project. Therefore, the Project would not result in the need to construct new or physically altered police facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police protection.

Schools: The project proposes to construct a distribution facility, which would not result in a substantial direct population growth within the City. However, the project would be subject to the requirements of AB 2926 and SB 50, which allows school districts to collect development impact fees to minimize potential impacts to school districts as a result of new development. Pursuant to SB 50, payment of fees to the applicable school district is considered full mitigation for project impacts, including impacts related to 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, or other performance objectives for schools. Thus, upon payment of development fees by the project applicant consistent with existing State requirements, impacts in this regard would be less than significant.

Parks: The nearest public park to the Project site is Richardson Park, approximately 1.50 miles to the northwest. The Project would not directly increase population within the City and therefore would not significantly increase the demand for parkland or other recreational facilities.

Other Public Facilities: As noted above, development of the Project could result in an indirect increase in the population of persons. The current population of the City is 36,357 (assuming all new residents of the Project came from outside the City). It is not anticipated the Project would increase the demand for public services, including public health services and library services to the degree that the construction of new or expanded public facilities would be required based on this small increase in population.

4.16 Recreation

Threshold 4.16 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			✓	

Impact Analysis

The nearest public park to the Project site. The nearest public park to the Project site is Richardson Park, approximately 1.50 miles to the northwest. The Project would not directly increase population within the City. Any indirect increase as a result of employees moving into the City to fill the estimated 460 jobs would not increase the use of parks or recreational facilities to the degree that physical deterioration would occur or be accelerated.

Threshold 4.16 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				✓

Impact Analysis

The Project does not propose the construction or expansion of recreational facilities.

4.17 Transportation

The analysis in this section is based in part on the following Technical Report: *The Addendum to Traffic Impact Study Scoping Agreement – Proposed Warehouse Development Located at Adelanto Road And Rancho Road (East) – Revised VMT Analysis Screening*, David Evans and Associates, Inc., July 13, 2022, attached as Appendix I to this ISMND.

Threshold 4.17(a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			✓	

Impact Analysis

A significant impact would occur if development of the Project would conflict with programs, plans, or ordinances that support transit services, bicycle lanes, sidewalks, and trails. The Project would construct the following circulation system improvements:

Roadway Facilities

For CEQA purposes, roadway facilities are viewed in the context of how they reduce the amount of vehicle miles traveled and promote the use of other non-motorized modes of travel such as transit, bicycle, and pedestrian. The proposed roadway improvements will promote a reduction in VMT by constructing sidewalks to facilitate pedestrians and by improving roadways to improve access for transit service.

Bicycle and Pedestrian Facilities

In October 2020, the City adopted the *Adelanto Active Transportation Plan, Adelanto in Motion, An Active Transportation Plan* ("Plan") which represents a new commitment to walking and biking in Adelanto. The Plan contains recommendations for bike lanes and pedestrian facilities throughout the City. There are no facilities planned adjacent to the Project site. Thus, the Project would not interfere with the recommended bicycle and pedestrian facilities. However, the Project would construct streets that meet City standards that provides sidewalks and pavement that would accommodate bicycle and pedestrian travel.

Public Transit Facilities

Public transportation services within the City of Adelanto are provided by the Victor Valley Transit Authority (VVTA). There is no transit service adjacent to the site. The closest connection point to the VVTA transit system is Route No. 33 (Hwy 395 & Palmdale Rd-Bartlett & Greening), located at the intersection of US Highway, then going westerly to Koala Road. The Project is not proposing any improvements that would conflict with Route No. 33, or any future transit route in the area.

Conclusion

As detailed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Threshold 4.17(b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			✓	

Impact Analysis

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt Vehicle Miles Traveled (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 took effect July 1, 2020. Impacts related to LOS will be evaluated through the City's development review process apart from CEQA.

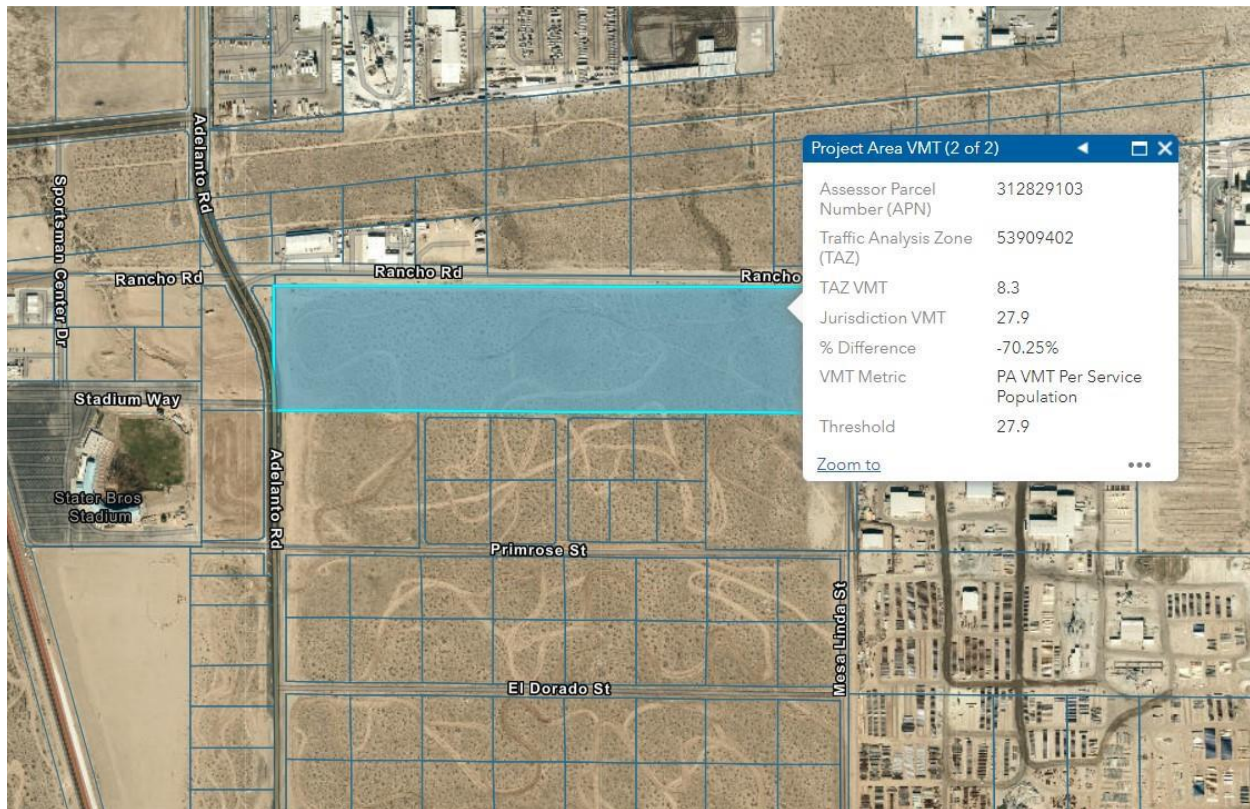
The City of Adelanto City Council adopted Resolution No. 20-41 on June 24, 2020, which approved VMT thresholds for CEQA compliance purposes. A project is considered to have a less than significant impact related to VMT if it is located in a low VMT generating traffic analysis zone (TAZ). As specified within the Adelanto's VMT Guidelines, the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool has been used to determine if the Project site is located within a Low VMT Zone. Results of the Screening Tool are shown on Table 4.17.1, SBCTA VMT Screening Tool Results.

The San Bernardino County Transportation Authority's (SBCTA) VMT screening tool evaluates project sites potentially located within a "low VMT generating area". These are areas in the which the existing land uses (or the projected land uses) generate low levels of VMT due to the characteristic of the land uses in the area or due to the area's geographic location near other areas with a mix of land uses, so people need not drive far for work, shopping, or school. The tool identifies the average VMT for the land uses in each of the SBCTA model's traffic analysis zones

(TAZ's) by horizon year. The average VMT metric for a TAZ is compared against the County's average VMT threshold of 32.7 VMT / service population as adopted by the City of Adelanto. If the land uses in the TAZ in which the proposed project is located generates VMT less than the threshold, the Project is in a low VMT generating area. The Project may then be presumed to have a less-than significant impact on VMT as long as the Project's land use is consistent with the existing and/or planned land use within the TAZ that was found to generate low levels of VMT. If the project land use is substantially different than the land use assumed in the SBCTA model, then the project cannot be presumed to have the same low VMT characteristics. The project property is zoned Light Manufacturing (LM) and the proposed warehouse project is consistent with the other development within the TAZ under this zoning classification.

The visual output of the project area is shown in **Figure A**. The proposed warehouse is located within TAZ 53909402 which, based on the metric PA VMT / Service Population, is a low-VMT generating area producing, on average, 8.3 VMT per service population in the baseline year of 2022.

Figure 4.17. SBCTA Vehicle Miles Traveled Screening Tool Results.



Pursuant to the City of Adelanto Guidelines, the proposed project is located in a Low VMT Area and may be presumed to have a less than significant impact to VMT without the need for a detailed VMT modeling analysis. The Project will not require a full VMT analysis and impacts are less than significant.

Threshold 4.17(b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	

Impact Analysis

The proposed roadway improvement will be designed in accordance with the City of Adelanto's *Standard Drawings and Specifications* requirements. In addition, the Project is located in an area planned for industrial uses. As such, the Project would not be incompatible with existing development in the surrounding area to the extent that it would create a transportation hazard because of an incompatible use.

Threshold 4.17(b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in inadequate emergency access?		✓		

Impact Analysis

The Project would improve Rancho Road, Adelanto Road Road, and Mesa Linda Road adjacent to the Project site per City standards. Emergency access would be available from these streets connecting to the citywide circulation system. During the course of the preliminary review of the Project, the Project's transportation design was reviewed by the City's Engineering Department, Fire Department, and Sheriff's Department to ensure that adequate access to and from the site would be provided for emergency vehicles.

4.18 Tribal Cultural Resources

Threshold 4.18 (a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?				✓

Impact Analysis

§21074 of the Public Resources Code describes Tribal Cultural Resources as follows:

(a) “Tribal cultural resources” are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Register of Historical Resources/Local Register of Historical Resources

A historical resource or archaeological resource may also be a tribal cultural resource if it conforms with the criteria described in Public Resources §21084 (a) above. As discussed in Section 4.5 *Cultural Resources*, based on a records search and a pedestrian field survey, no historic or archaeological resources eligible for listing on the California Register of Historical Resources or a local register were encountered on the surface of the Project site. However, grading, utility trenching, and the construction of the water quality basin have the potential to reveal buried deposits below the surface. Therefore, Mitigation Measures CR-1 and CR-2 under Section 4.5, *Cultural Resources* shall apply. These measures require that the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) be contacted, as detailed within TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the discovery, to provide Tribal input with regards to significance and treatment. In addition, if significant pre-contact cultural resources, as defined by CEQA, are discovered, and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment.

Threshold 5.18 (b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		✓		

Assembly Bill (AB) 52

The Legislature added requirements regarding tribal cultural resources for CEQA in Assembly Bill 52 (AB 52) that took effect July 1, 2015. AB 52 requires consultation with California Native American tribes and consideration of tribal cultural resources in the CEQA process. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to

reduce the potential for delay and conflicts in the environmental review process. To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. The City commenced the AB 52 process by sending out consultation invitation letters on June 23, 2022, to the following tribes who previously requested notification pursuant to Public Resources Code section 21080.3.1.

- Morongo Band of Mission Indians
- Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians)
- Agua Caliente Band of Cahuilla Indians
- Soboba Band Luiseño Indians

No tribes requested consultation, however, because the Project site is located within the ancestral territory of Yuhaaviatam of San Manuel Nation (YSMN), the possibility exists that Native American Tribal Cultural Resources may be discovered during ground disturbing activities. Mitigation Measures TCR-1 and TCR-2 are made a part of the project/permit/plan conditions.

Mitigation Measure TCR-1. Inadvertent Discovery. *The following note shall be placed on the grading plan: "If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 50-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period."*

Mitigation Measure TCR-2. Human Remains. *Prior to the issuance of a grading permit, the following note shall be placed on the grading plan. "If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her representative, the MLD may inspect the site of discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD shall make recommendations as the manner in which to treat the human remains and any associated offerings."*

4.19 Utilities And Service Systems

Threshold 4.19 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		✓		

Impact Analysis

The Project would require construction of new utility infrastructure as described below

Water Service

The Project will connect to the existing 12-inch water lines in Rancho Road and Adelanto Road adjacent to the site.

Sewer Service

The Project will install a new 12-inch sewer line within the right-of-way of Rancho Road along the site frontage. The sewer line will be extended off-site starting from the western property line traversing westerly approximately 1,000 feet to connect to the existing 12-inch sewer line in Sportsman Park Road. The sewer line will be installed within the existing paved roadway in Rancho Road and Adelanto Road, then within the right-of-way of Old Rancho Road which is a dirt road.

Storm Drainage Improvements

Storm water drainage on the south side of site will sheet flow within the proposed driveways into catch basins at various locations on site. Off-site drainage from the south sheet flows on-site across the proposed parking lot driveways and into the proposed catch basins. The drainage is then piped to the detention basin on the east side of the lot. The drainage on the north side of the lot will sheet flow off site onto Rancho Road into catch basins along Rancho Road. Drainage is then piped to the detention basin on the east side of the lot.

Electric Power Facilities

The Project will connect to the existing Southern California Edison electrical distribution facilities adjacent to the Project site.

Natural Gas Facilities

The Project will connect to the existing 4-inch Southwest Gas Corporation natural gas distribution line in Rancho Road.

Telecommunication Facilities

Telecommunication facilities include a fixed, mobile, or transportable structure, including, all installed electrical and electronic wiring, cabling, and equipment, all supporting structures, such as utility, ground network, and electrical supporting structures, and a transmission pathway and associated equipment in order to provide cable TV, internet, telephone, and wireless telephone services to the Project site. Services that are not provided via satellite will connect to existing facilities maintained by the various service providers.

Conclusion

Construction or installation of utilities and service systems may impact Biological Resources, Cultural Resources, Paleontological Resources, and Tribal Cultural Resources. With implementation of Mitigation Measures listed in Table 2.1, *Summary of Potentially Significant Impacts and Mitigation Measures*, on page 5, impacts are less than significant.

Threshold 4.19 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple years?			✓	

Impact Analysis

This analysis provides a comparison of water demand vs. water supply based on the General Plan land uses accounted for in the 2020 UWMP, and the project's water demand to demonstrate how the Project compares to the City's demand and supply projections contained in the 2020 UWMP. Because the Project site land use was included in the 2020 UWMP, this is a conservative analysis.

In order to compare the Project's water demand to the projected supply and demands in the 2020 UWMP, the Project's Proposed Site Plan was used to determine acreage of the Project site and multiplied by a water demand factor (WDF) to determine the total projected water demand. WDF's are applied to development units either by acre or square feet (sqft). The WDF was

calculated using the Adelanto 2020 UWMP and Water Master Plan. The 2020 UWMP determined the actual Gallons Per Capita Per Day (GPCD) to be 116 gallons per day (gpd). The City's Water Master Plan established Equivalent Residential Dwelling Units (EDUs) for calculating non-residential usage. The EDU for industrial project is 2 EDU per acre time GPCD. Using this method, the WDF 232 gpd times 2 EDU for a total of 8,120 gpd or 9.1 AFY. The WDF and calculated demand was compared to other WSAs performed in the region for similar land uses to validate the calculations. Using the WDF the on-site Project water demand is estimated to be 9.1 AFY as shown in Table 4.19.1, *Project Water Demand (AFY)*.

Table 4.19.1. Project Water Demand (AFY)

Land Use	Non-Residential (acres)	Demand Factor (gpd)	Demand Factor Unit	Project Demand (AFY)
Warehouse	35	232	gpd/acre	9.1

Tables 4.19.1 through 4.19.4, provide a comparison for the normal year, single-dry year, up to the year 2045 and multiple dry year scenarios up to the year 2040 as documented in the 2020 UWMP with the project demand included.

Table 4.19.2. Normal Year Comparison (AFY)

Water Supply/Use (AFY)	2025	2030	2035	2040	2045
Available Supply 2020 UWMP ¹	64,426	64,429	64,155	64,431	64,433
Estimated Demand 2020 UWMP	5,016	5,283	5,451	5,609	5,793
Project Demand	9.1	9.1	9.1	9.1	9.1
Available Supply Capacity	+59,401	+59,137	+568,695	+58,813	+58,631

¹Includes Projected Available Recycled Water: 2020 UWMP Table ES-2

Table 4.19.3. Single Dry Year Comparison (AFY)

Water Supply/Use (AFY)	2025	2030	2035	2040	2045
Available Supply 2020 UWMP ¹	64,426	64,429	64,155	64,431	64,433
Estimated Demand 2020 UWMP	5,066	5,336	5,505	5,665	5,824
Project Demand	9.1	9.1	9.1	9.1	9.1
Available Supply Capacity	+59,351	+59,084	+58,641	+58,757	+58,573

¹Includes Projected Available Recycled Water: 2020 UWMP Table ES-2

Table 4.19.4. Multiple Dry Year Comparison (AFY)

Water Supply/Use (AFY)		2025	2030	2035	2040	2045
Year 1	Available Supply 2020 UWMP ¹	64,426	64,429	64,155	64,431	64,433
	Estimated Demand 2020 UWMP	5,066	5,336	5,505	5,665	5,824
	Project Demand	9.1	9.1	9.1	9.1	9.1
	Available Leftover Supply Capacity	+59,351	+59,084	+58,338	+58,757	58,573
Year 2	Available Supply 2020 UWMP ¹	64,426	64,429	64,155	64,431	64,433
	Estimated Demand 2020 UWMP	4,766	5,020	5,180	5,330	5,505
	Project Demand	9.1	9.1	9.1	9.1	9.1
	Available Leftover Supply Capacity	+59,643	+59,392	+58,958	+58,084	+58,911
Year 3	Available Supply 2020 UWMP ¹	64,426	64,429	64,155	64,431	64,433
	Estimated Demand 2020 UWMP	4,529	4,770	4,922	5,065	5,231
	Project Demand	9.1	9.1	9.1	9.1	9.1
	Available Leftover Supply Capacity	+59,888	+59,650	+59,224	+59,357	+59,193
Year 4	Available Supply 2020 UWMP ¹	64,426	64,429	64,155	64,431	64,433
	Estimated Demand 2020 UWMP	4,303	4,533	4,677	4,813	4,971
	Project Demand	9.1	9.1	9.1	9.1	9.1
	Available Leftover Supply Capacity	+60,114	+59,887	+59,469	+59,609	+59,453
Year 5	Available Supply 2020 UWMP ¹	64,426	64,429	64,155	64,431	64,433
	Estimated Demand 2020 UWMP	4,089	4,307	4,445	4,573	4,723
	Project Demand	9.1	9.1	9.1	9.1	9.1
	Available Leftover Supply Capacity	+60,328	+60,113	+59,701	+59,849	+59,701

¹Includes Projected Available Recycled Water: 2020 UWMP Table ES-2

Conclusion

As shown in Tables 4.19.1 through 4.19.4, the Project's overall water demand of 9.1 AFY can be accommodated by the Adelanto Public Utility Authority during normal, dry, and multiple years.

Threshold 4.19 (c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the			✓	

Threshold 4.19 (c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
project's projected demand in addition to the provider's existing commitments?				

Impact Analysis

The Adelanto Public Utilities Authority is the sole agency for collecting, treating and discharging wastewater within its service area through the Adelanto Wastewater Treatment Facility. Wastewater from Adelanto's water service area is collected and treated at the City-owned 4.0 MGD activated sludge wastewater treatment facility through an operations and maintenance contract with the PERC Water Corporation.

Municipal wastewater is generated in Adelanto's service area from a combination of residential, commercial, and industrial sources. The quantities of wastewater generated are generally proportional to the population and water usage in the service area. It is estimated that Adelanto's customers generate wastewater roughly proportional to 60 to 70 percent of the City's water demand. Based on a water demand of 9.1 AFY, and based on a 70% wastewater to water calculation the Project is estimated to generate 6.4 AFY (or 5.624 gallons of wastewater per day). The Project's wastewater represents only 0.14 % of the daily treatment capacity of the Adelanto Wastewater Treatment Facility. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Threshold 4.19 (d). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Generate solid waste more than State or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	

Impact Analysis

Construction Related Impacts

The California Green Building Standards Code ("CAL Green") requires all newly constructed buildings to prepare a Waste Management Plan and divert construction waste through recycling and source reduction methods. The City of Victorville Building and Safety Department reviews and approves all new construction projects required to submit a Waste Management Plan. Mandatory compliance with CAL Green solid waste requirements.

Operational Related Impacts

The Project is estimated to generate 617 tons of solid waste per year²⁷. The amount of estimated solid waste generated by the Project is derived from the California Emissions Estimator Model, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. The model also quantifies the amount of solid waste generated by a project. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses.

Although, solid waste may ultimately be disposed of at various landfills, the closest landfill to the Project site is the Victorville Sanitary Landfill located at 18600 Stoddard Wells Road, approximately 10.5 miles to the east. According the CalRecycle website, the Victorville Sanitary Landfill has a daily throughput of 3,000 tons per day and a remaining capacity of 93,400,000 cubic yards. The expected closure is October 1, 2047.²⁸ As such, there is adequate landfill capacity to serve the Project.

Threshold 4.19 (e). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

Impact Analysis

Avco Disposal (Burrtec) currently provides solid waste collection services to the City. Avco is required to provide these services in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

²⁷ Appendix A-TTM20471 CalEEMod Datasheets.

²⁸ <https://www.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652>, accessed on June 11, 2022.

4.20 Wildfire

Threshold 4.20 (e). Wildfire.	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Is the project located in or near state responsibility areas or lands classified as very high fire hazard severity zones?				✓

Impact Analysis

A wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. 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. As stated in the State of California's General Plan Guidelines: *"California's increasing population and expansion of development into previously undeveloped areas is creating more 'wildland-urban interface' issues with a corresponding increased risk of loss to human life, natural resources, and economic assets associated with wildland fires."* To address this issue, the state passed Senate Bill 1241 to require that General Plan Safety Elements address the fire severity risks in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs).

According to the *California Fire Hazard Severity Zone Viewer* maintained by Cal Fire, the Project site is not located within a high wildfire hazard area²⁹. Project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, Thresholds 4.20 (a) through 4.20 (d) below require no response.

- ☐ Substantially impair an adopted emergency response plan or emergency evacuation plan.
- ☐ 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.
- ☐ 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.
- ☐ Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes.

²⁹<https://egis.fire.ca.gov/FHSZ/>, accessed on June 10, 2022.

4.21 Mandatory Findings Of Significance

Threshold 4.21(a) Does the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		✓		

Impact Analysis

As indicated in this Initial Study, biological resources, cultural resources, paleontological resources, transportation, and tribal cultural resources may be adversely impacted by Project development. The following mitigation measures are required to reduce impacts to less than significant levels.

- **MM BIO-1.** Burrowing Owl Pre-Construction Survey.
- **MM BIO-2.** Burrowing Owl Avoidance/Relocation.
- **MM BIO-3.** Mojave Ground Squirrel Pre-Construction Survey
- **MM BIO 4.** Desert Tortoise Pre-Construction Survey.
- **MM BIO-5.** Nesting Bird Pre-Construction Survey.
- **MM BIO-6.** Western Joshua Tree Incidental Take Permit.
- **MM CR-1.** Cultural Resources Discovery.
- **MM CR-2.** Monitoring and Treatment Plan.
- **MM GEO-1:** Inadvertent Discovery of Paleontological Resources.
- **MM GEO-2:** Paleontological Treatment Plan.
- **MM TCR-1.** Inadvertent Discovery.
- **MM TCR-2.** Human Remains.

Threshold 4.21 (b) Does the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?		✓		

Impact Analysis

The cumulative impacts analysis provided here is consistent with Section 15130(a) of the CEQA Guidelines in which the analysis of cumulative effects of a project is based on two determinations: Is the combined impact of this project and other projects significant? If so, is the project’s incremental effect cumulatively considerable, causing the combined impact of the projects evaluated to become significant? The cumulative impact must be analyzed only if the combined impact is significant, and the project’s incremental effect is found to be cumulatively considerable (CEQA Guidelines 15130(a)(2) and (3)).

The analysis of potential environmental impacts in Section 4.0, *Environmental Analysis*, of this Initial Study concluded that the Project would have *no impact* or a *less than significant impact* for all environmental topics, with the exception of Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), Tribal Cultural Resources, and Utilities and Service Systems (installation of facilities that involves disturbance of previously undisturbed land). For these resources, Mitigation Measures are required to reduce impacts to less than significant levels as discussed below.

Biological Resources

As discussed in Section 4.4, *Biological Resources*, of this Initial Study, future development of the site will impact the general biological resources present on the site, and most of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. More mobile species (i.e., birds, large mammals) will be displaced into adjacent areas and will likely experience minimal impacts.

Although wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S.

Fish and Wildlife Service were not detected, the project site is located within the range of the Burrowing Owl, Mojave Ground Squirrel, Desert Tortoise, and Nesting Birds. Therefore, the Mitigation Measures BIO-1 through BIO-5 are included to ensure any impacts are less than significant to these species.

The loss of about 35-acres of disturbed desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitat throughout the surrounding desert region. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Cultural Resources

As discussed in Section 4.5, *Cultural Resources*, of this Initial Study, the records search and field survey did not identify any historical resources or unique archaeological resources within the Project site boundaries. Research results, combined with surface conditions have failed to indicate sensitivity for buried cultural resources. No additional cultural resources work, or monitoring is necessary during proposed activities associated with the development of the earthmoving activities. If previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation, if necessary, as required by Mitigation Measure CR-1. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Geology and Soils (Paleontological Resources)

As discussed in Section 4.7, *Geology and Soils*, of this Initial Study, the property is situated in the Mojave Desert geomorphic province. The Mojave Desert province is a wedge-shaped area that is enclosed on the southwest by the San Andreas fault zone, the Transverse Ranges province and the Colorado Desert province, on the north and northeast by the Garlock fault zone, the Tehachapi Mountains and the Basin and Range province, and on the east by the Nevada and Arizona state lines, and the Colorado River. The area is dominated by broad alluviated basins that are mostly aggrading surfaces that are receiving non-marine continental deposits from the adjacent upland areas. More specific to the subject property, the site is located in an area geologically mapped to be underlain by alluvium. Alluvium has the potential to contain paleontological resources. Therefore, Mitigation Measures GEO-1 and GEO-2 are required. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Tribal Cultural Resources

As discussed in Section 4.18, *Tribal Cultural Resources*, of this Initial Study, construction and operation of the Project could potentially impact tribal cultural resources. Pending results of the AB52 tribal consultation process, Mitigation Measures TCR-1 and TCR-2 are required. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Utilities and Service Systems

As discussed in Section 4.19 *Utilities and Service Systems*, of this Initial Study, the installation and construction of the sewer, water, storm drainage facilities described below will result in earth moving that may impact Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. Potential impacts to these resources are mitigated by Mitigation Measures BIO-1 through BIO-6, CR-1, CR-2, GEO-1 and GEO-2, and TCR-1, and TCR-2. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Threshold 4.21 (c) Does the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?			✓	

Impact Analysis

As indicated by this Initial Study, the Project will not result in potentially significant environmental impacts that directly affect human beings (i.e., Air Quality, Agriculture and Forestry Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Recreation, Transportation, and Utilities and Service Systems).