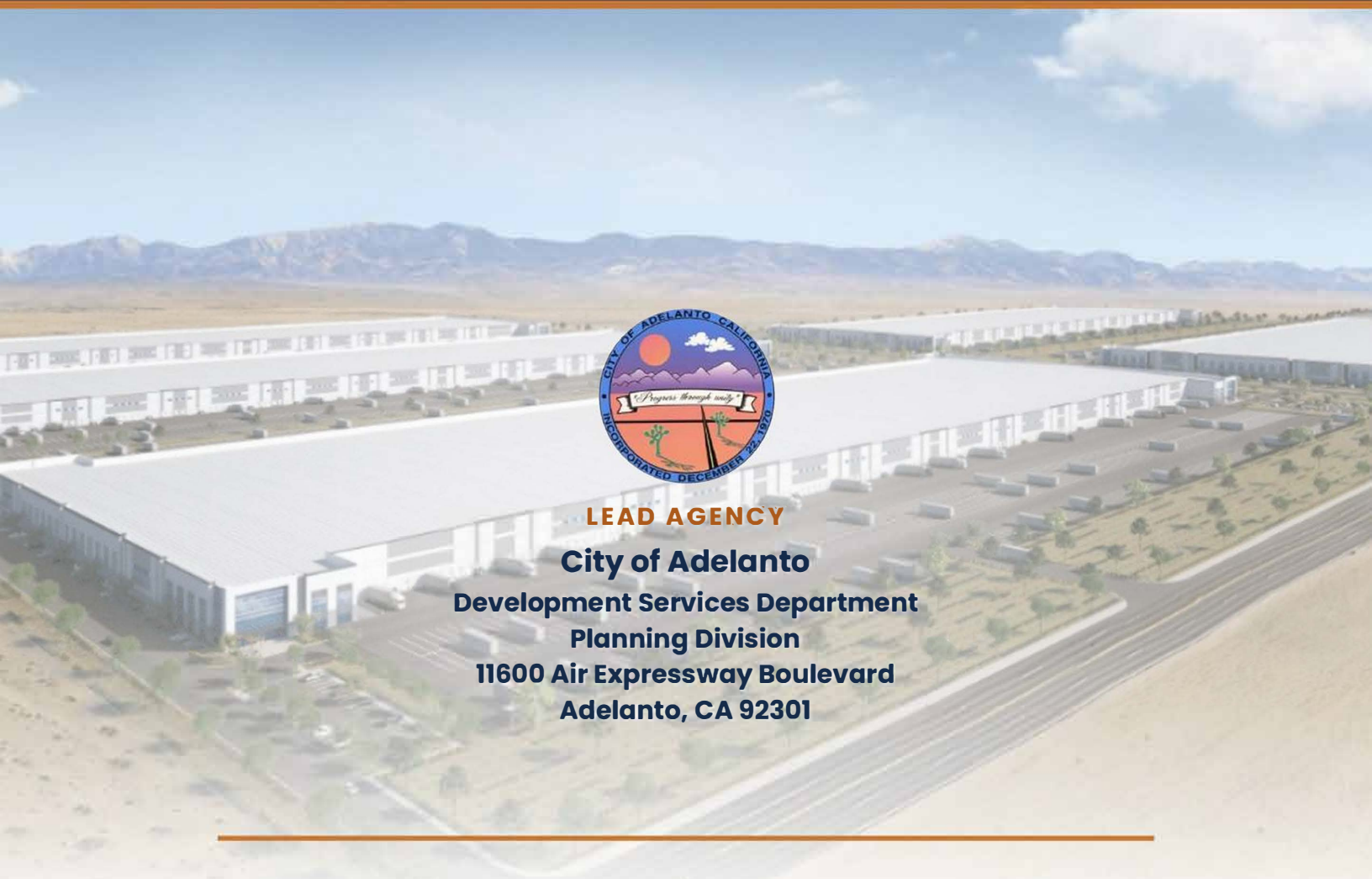
ADELANTO GATEWAY

LOGISTICS CENTER

Subsequent Environmental Impact Report

SCH No. 2008071129 | Land Development Plan No. 25-02 | Tentative Parcel Map No. 20837



LEAD AGENCY

City of Adelanto
Development Services Department
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SEPTEMBER 21, 2026

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Executive Summary

ES.1 Purpose and Scope

The City of Adelanto prepared this Subsequent Environmental Impact Report (SEIR) as lead agency under the California Environmental Quality Act (CEQA). The SEIR evaluates revisions to the Adelanto Gateway Logistics Center Project approved in 2009. It uses the certified 2009 EIR where that analysis remains applicable and provides updated analysis where the Project, environmental conditions, regulations, or analytical methods have changed. The SEIR is an informational document for public and agency review and for the City's consideration of the requested approvals.

ES.2 Project Location and Existing Conditions

The Project site is in southeastern Adelanto, south of Air Expressway, east of U.S. Highway 395, and directly south of Southern California Logistics Airport. (Assessor's Parcel Numbers: 0459-451-51, 0459-451-62, 0459-841-01 to -15). The approximately 451-net-acre site is vacant desert land designated and zoned for manufacturing and industrial uses. The 2009 pro-ject approvals expired in 2011, and the approved development was not constructed.

ES.3 Project Description

The Project would develop seven industrial warehouse and distribution buildings totaling 8,256,274 square feet, including 8,129,274 square feet of warehouse space and 127,000 square feet of ancillary office space. Proposed uses include high-cube transload, short-term storage, and temperature-controlled warehousing. Site improvements include landscaping, parking and truck courts, internal and off-site road improvements, stormwater retention and infiltration facilities, water and sewer infrastructure, and dry utilities.

Construction is anticipated from October 2027 through December 2030. At buildout, the Project is estimated to generate 12,749 daily vehicle trips and support approximately 7,197 employees. Truck and employee access would be available 24 hours, with most activity during daytime business hours.

ES.4 Objectives and Required Approvals

The Project's underlying purpose is to develop modern logistics and distribution facilities on a large, contiguous site the City has designated for industrial use. The Project objectives are:

- **Objective 1.** Develop Class A industrial warehouses and distribution facilities meeting current standards for clear height, structural bay spacing, dock ratio, and truck court

depth. The buildings would accommodate logistics, e-commerce, and manufacturing tenants without later retrofit.

- **Objective 2**. Achieve sufficient development intensity to fund and support the Project's off-site water, sewer, drainage, and roadway improvements. Make efficient use of a large, contiguous industrial site under single ownership.
- **Objective 3**. Expand economic development, attract businesses, and provide Adelanto employment opportunities. Improve the city's jobs-to-housing balance to reduce the local workforce's need to commute outside the area.
- **Objective 4**. Make full and efficient use of land previously surveyed and analyzed under the certified 2009 Adelanto Gateway Logistics Center EIR, consistent with the site's Manufacturing/Industrial designation.
- **Objective 5.** Implement the infrastructure improvements identified in the City's Mobility Element, Water Master Plan and Sewer Master Plan.
- **Objective 6**. Provide temperature-controlled warehouse capacity to serve regional food and pharmaceutical distribution.
- **Objective 7**. Incorporate energy-efficient and low-emission design consistent with the California Green Building Standards Code, City of Adelanto General Plan policies, and California Air Resources Board guidance.
- **Objective 8.** Develop a logistic/warehouse facility near the Southern California Logistics Airport and US 395 to support regional goods movement.

The City would consider certification of the SEIR, Location and Development Plan No. 25-02, Tentative Parcel Map No. 20837, and related grading, building, and encroachment permits. A conditional use permit would be required only if the applicant elects the temporary on-site natural gas generation option. Other approvals may include permits from the California Department of Fish and Wildlife, Lahontan Regional Water Quality Control Board, Mojave Desert Air Quality Management District, and City of Victorville.

ES.5 Significant and Unavoidable Impacts

Five impacts would remain significant and unavoidable after implementation of all feasible mitigation:

1. **Inconsistent with the Air Quality Plan.** The Project would be inconsistent with the applicable air quality plan because mitigated operational emissions would exceed Mojave Desert Air Quality Management District thresholds.

2. **Operational Emissions Exceed Regional Air Quality Emission Thresholds**. Thresholds for rational emissions of volatile organic compounds, nitrogen oxides, carbon monoxide, particulate matter (PM10) would exceed regional thresholds. PM2.5 would also exceed its threshold while the natural gas generation option is in use.

3. **Cumulative Air Quality Impact.** The Project's mitigated operational emissions would make a cumulatively considerable contribution to regional air quality impacts.

4. **Greenhouse Gas Emissions are Cumulatively Considerable.** The magnitude of annual construction and operational greenhouse gas emissions, together with the natural gas generation option, would make a cumulatively considerable contribution to climate change, even with MM GHG-1.

5. **Inconsistent with GHG Reduction Plans**. The greenhouse gas impact under the applicable plan, policy, or regulation threshold would remain significant and unavoidable. With SCE electricity the Project would be consistent with State and City plans, but on-site generation from natural gas would conflict with the 2022 Scoping Plan and the State's goal of carbon neutrality by 2045 (AB 1279) while it is in use, and no qualified greenhouse gas reduction plan is available for CEQA tiering.

If the City approves the Project, it must adopt findings under CEQA Guidelines Section 15091 and a Statement of Overriding Considerations under Section 15093.

ES.6 Alternatives

The SEIR evaluates four alternatives: No Project/No Development; No Project/Existing Zoning; Reduced Intensity/Previously Approved 2009 Project; and Light Manufacturing/Business Park. Alternative 1, No Project/No Development, is environmentally superior because it would avoid all Project impacts, including the five significant and unavoidable impacts, but it would meet none of the Project objectives.

Alternative 3, Reduced Intensity/Previously Approved 2009 Project, is the environmentally superior development alternative. It would reduce all five significant and unavoidable impacts by known amounts, remove cold-storage emission sources, leave more land ungraded, and reduce energy use, noise, and utility demand. It would not eliminate the significant and unavoidable impacts, would not meet the temperature-controlled warehouse objective, and would only partially meet three other objectives.

ES.7 Areas of Controversy

The Native American Heritage Commission and the California Department of Fish and Wildlife submitted comments on the Notice of Preparation. The Commission addressed tribal consultation and the treatment of cultural resources and human remains (Section 4.3, Cultural Resources, and Section 4.11, Tribal Cultural Resources). The Department requested focused surveys and avoidance-first mitigation for burrowing owl, desert tortoise, Mohave ground squirrel, Crotch's bumble bee, and western Joshua tree, analysis of lighting, noise, and edge effects, and an alternatives discussion, and identified the permits the Project may need (Section 4.2, Biological Resources, and Section 7.0, Alternatives). No comments were received at the June 11, 2025 scoping meeting.

Other issues known to the City include the Project's significant and unavoidable air quality and greenhouse gas impacts (Sections 4.1 and 4.5); the natural gas generation option, would be used only if SCE cannot serve a building when it is ready for occupancy (Section 3.11); the Federal Aviation Administration's preliminary finding that two corners of Building 3 would exceed the Runway 35 approach surface (Section 4.6, Hazards and Hazardous Materials); and development of the land the 2009 project reserved for the High Desert Corridor (Section 3.1).ES.9 Issues to Be Resolved

The City will determine whether to certify the SEIR, adopt the Mitigation Monitoring and Reporting Program and required CEQA findings, and approve the Project or an alternative. Project approval would also require a Statement of Overriding Considerations. MM HAZ-1 separately requires the applicant to resolve the Federal Aviation Administration airspace review and obtain a current Determination of No Hazard for each structure before the City issues a building permit.

ES.8 Summary of Project Impacts

Table ES.1, *Summary of Impacts and Mitigation Measures*, below, presents a summary of the environmental impacts resulting from the Project.

Table ES.1. Summary of Project Impacts

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
4.1 Air Quality			
(a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	No feasible mitigation measures available.	Significant and Unavoidable Impact
(b) Would the Project 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?	Potentially Significant Impact	No feasible mitigation measures available.	Significant and Unavoidable Impact
(c)Would the Project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	No feasible mitigation measures available.	Significant and Unavoidable Impact
(d) Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact

Table ES.1. Summary of Project Impacts

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
(e)Would the Project result in cumulatively considerable impacts related to air quality?	Potentially Significant Impact	No feasible mitigation measures available.	Significant and Unavoidable Impact
4.2 Biological Resources			
(a) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact	MM BIO-1: Conservation of Western Joshua Trees. Mitigation for direct impacts to 11 western Joshua trees one meter or greater but less than five meters in height, and 3 trees less than one meter in height shall be fulfilled through a payment of the elected fees as described in Section 1927.3 of The Western Joshua Tree Conservation Act. In conformance with the fee schedule, the Project Applicant shall pay $1,000 for each western Joshua tree five meters or greater in height, and $200 for each western Joshua tree less than five meters in height. Fees collected will be deposited into the Western Joshua Tree Conservation Fund for appropriation to the California Department of Fish and Wildlife. MM BIO-2: Conservation of Desert Native Plants. Pursuant to Town of Apple Valley Municipal Code Chapter 9.76, prior to the grading permit, the Project Applicant shall submit an application to the Town for	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		removal or relocation of protected native desert plants protected under the Town's Municipal Code Chapter 9.76, as required, and shall schedule a pre-construction site inspection with the appropriate authority. In addition, a plot plan shall be approved by the appropriate Town of Apple Valley Review Authority (County Certified Plant Expert, Planning Commission, or Town Council) indicating exactly which trees or plants are authorized to be removed. The application shall include certification from a qualified western Joshua tree and native desert plant expert(s) to determine that proposed removal or relocation of protected native desert plants are appropriate, supportive of a healthy environment, and in compliance with the Town of Apple Valley Municipal Code. Protected plants subject to Town of Apple Valley Municipal Code Chapter 9.76 may be relocated on site or within an area designated for the species. The application shall include a detailed plan for removal of all protected plants on the Project site. The plan shall be prepared by a qualified western Joshua tree and native desert plant expert(s). The plan shall include the following measures: ▪ Salvaged plants shall be transplanted	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		expeditiously to either their final on-site location or to an approved off-site area. If the plants cannot be expeditiously taken to their permanent relocation area at the time of excavation, they may be transplanted in a temporary area (stockpiled) prior to being moved to their permanent relocation site(s). ▪ Western Joshua trees shall be marked on their north-facing side prior to excavation. Transplanted western Joshua trees shall be planted in the same orientation as they currently occur on the Project site, with the marking on the north side of the trees facing north at the relocation site(s). ▪ Transplanted plants shall be watered prior to and at the time of transplantation. The schedule of watering shall be determined by the qualified tree expert and desert native plant expert(s) to maintain plant health. Watering of the transplanted plants shall continue under the guidance of a qualified tree expert and desert native plant expert(s) until it has been determined that the transplants have become established in the permanent relocation site(s) and no longer require supplemental watering. MM BIO-3: Designated Biologist Authority. In accordance with Section 1927.3 of The Western Joshua Tree Conservation Act obtained for the take of western Joshua tree a designated biologist	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		retained by the Project Applicant or construction contractor shall be on site during all site disturbing activities and shall have authority to immediately stop any activity that does not comply with the biological resource mitigation measures (included in this EIR) and/or to order any reasonable measure to avoid the unauthorized take of an individual western Joshua tree. MM BIO-4: Compliance Monitoring. During site-disturbing activities a designated biologist retained by the Project Applicant or construction contractor shall be on site daily and shall conduct compliance inspections to minimize incidental take of western Joshua trees and impacts to other sensitive biological resources; prevent unlawful take of western Joshua trees; and ensure that signs, stakes, and fencing are intact, and that these areas remain protected during site disturbing activities (see MM BIO-3). Weekly written observation and inspection records that summarize oversight activities and compliance inspections and monitoring activities required by the Incidental Take Permit, if required, shall be prepared by the designated biologist and provided to the California Department of Fish and Wildlife.	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		MM BIO-5: Education Program. An education program (Worker Environmental Awareness Program [WEAP]) for all persons employed or otherwise working in the Project area shall be administered before any ground disturbing activities. The WEAP shall consist of a presentation from a designated biologist retained by the Project Applicant or construction contractor that includes a discussion of the biology and status of protected or special-status plant and animal species including: western Joshua trees, Mohave desert tortoise, burrowing owls, LeConte's thrasher, Bendire's thrasher, loggerhead shrike, American badger, and desert kit fox. Interpretation for non-English-speaking workers shall be provided, and the same instructions shall be provided to all new workers before they are authorized to perform work in the Project area. Upon completion of the WEAP, employees shall sign a form stating they attended the program and understand all protection measures. This training shall be repeated at least once annually for long-term and/or permanent employees who shall be conducting work in the Project area. MM BIO-6: Construction Monitoring Notebook. The designated biologist (see MM BIO-3) shall maintain a construction monitoring notebook on site throughout	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		the construction period that shall include a copy of the biological resources mitigation measures with attachments and a list of signatures of all personnel who have successfully completed the WEAP education program. The Project contractor shall ensure that a copy of the construction monitoring notebook is available for review at the Project site upon request by Town staff, the California Department of Fish and Wildlife, or any agency with jurisdiction. MM BIO-7: Delineation of Property Boundaries. Prior to commencing ground disturbing activities, the Project contractor shall, in consultation with the designated biologist, clearly delineate the boundaries around the entire Project footprint with fencing, stakes, or flags, consistent with the grading plan. All fencing, stakes, and flags shall be maintained until the completion of site disturbing activities in that area. MM BIO-8: Mitigation for Indirect Impacts. The following measures shall be required to avoid/minimize potential indirect impacts to biological resources, including aquatic resources and special-status plant and animal species that may occur outside of the Project boundary.	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		▪ Invasive, non-native plant species listed on the California Invasive Plant Council's Inventory of Invasive Plants (https://www.cal-ipc.org/plants/inventory/) shall not be incorporated in the landscape plans for the Project for areas within 100 feet of undeveloped areas. ▪ Fully covered trash receptacles that are animal-proof shall be installed and used by construction personnel to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Trash contained within the receptacles shall be removed at least once a week from the Project site. ▪ Construction work areas shall be kept clean of debris, such as trash and construction materials. All construction/ contractor personnel shall collect all litter and food waste from the Project site on a daily basis and dispose of such materials in covered trash receptacles. Vehicle fluids and other hazardous waste shall be disposed of in compliance with all applicable federal, state, and local agencies and regulations as described in Section 4.7, Hazards and Hazardous Materials, of this EIR. MM BIO-9: Pre-Construction Burrowing Owl Survey. A qualified biologist retained by the Project Applicant or construction contractor shall conduct two pre-construction presence/ absence surveys for	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		burrowing owls, one no less than 14 days prior to site disturbance, and one within 24 hours of site ground-disturbing activities (e.g., disking, vegetation clearing, clearing and grubbing, equipment staging, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. Surveys for burrowing owl shall be conducted in accordance with protocols established in the California Department of Fish and Wildlife's (CDFW's) 2012 (or most recent version) Staff Report on Burrowing Owl Mitigation. If burrowing owls are not detected during the pre-construction take avoidance surveys, then no additional action is required. If burrowing owls are detected, a Burrowing Owl Relocation and Protection Plan shall be prepared and implemented for the Project. The Burrowing Owl Relocation Plan shall require that disturbance to burrows be avoided during the nesting season (February 1 through August 31). Buffers shall be established around occupied burrows in accordance with guidance provided in CDFW's Staff Report on Burrowing Owl Mitigation. No Project activities shall be allowed to encroach into established buffers without the consent of a monitoring biologist. The buffer shall remain in place	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		until it is determined that occupied burrows have been vacated or the nesting season has completed. Outside of the nesting season, passive owl relocation techniques approved by CDFW shall be implemented by a qualified biologist approved to conduct relocation. Owls shall be excluded from burrows in the immediate Project area and within a buffer zone by installing one-way doors in burrow entrances. These doors shall be in place at least 72 hours prior to ground-disturbing activities. The Project site shall be monitored daily for 1 week to confirm owl departure from burrows prior to any ground-disturbing activities. Compensatory mitigation for permanent loss of owl habitat, if the site is occupied by burrowing owl, shall be provided following the guidance in CDFW's Staff Report on Burrowing Owl Mitigation. Where possible, burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible plastic pipe shall be inserted into the tunnels during excavation to maintain an escape route for any wildlife inside the burrow. An endoscope (fiber optic camera) should also be used to scope the burrow in front of the excavation. Occupied burrows that are excavated need to be	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		replaced at a 2:1 ratio if there are already suitable burrows present nearby. Should burrowing owl be located during the pre-construction survey, mitigation for direct impacts to 198.4 acres shall be fulfilled through conservation of suitable burrowing owl habitat through the purchase of credits at a minimum of 1:1 in-kind habitat replacement of equal or better functions and values to those impacted by the Project, for a total of 198.4 acres. MM BIO-10: Pre-Disturbance Desert Tortoise Clearance Survey. A qualified biologist retained by the Project Applicant or construction contractor shall conduct pre-disturbance desert tortoise clearance surveys within three days of site ground-disturbing activities (e.g., disking, vegetation clearing, clearing and grubbing, equipment staging, etc.) in accordance with current U.S. Fish and Wildlife Service (USFWS) protocol to reevaluate locations of potential Mojave desert tortoise burrows within the Project limits so take of Mojave desert tortoise can be avoided. If no Mojave desert tortoises are found during the pre-disturbance desert tortoise clearance survey, then no additional action or mitigation is required.	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		Should Mojave desert tortoise be located during the clearance survey, USFWS shall be contacted and all work shall cease until further direction from the USFWS is provided. All methods used for handling desert tortoises during the clearance surveys must be in accordance with the USFWS Desert Tortoise Field Manual or Project-specific guidance contained in a biological opinion or Incidental Take Permit. No take of Mojave desert tortoise shall occur without authorization in the form of an Incidental Take Permit pursuant to California Fish and Game Code Section 2081 and a biological opinion or Habitat Conservation Plan. The Project Applicant shall adhere to measures and conditions set forth within the Incidental Take Permit. Anyone who handles desert tortoises during clearance activities must have the appropriate authorizations from USFWS. The area cleared and number of Mojave desert tortoises found within that area shall be reported to the local USFWS and appropriate state wildlife agency. Notification shall be made in accordance with the conditions of the biological opinion or Incidental Take Permit. Should Mojave desert tortoise be located during the clearance survey, the Project would result in the loss of 198.4 acres of suitable habitat for Mojave desert	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		tortoise. Mitigation for direct impacts to 198.4 acres shall be fulfilled through conservation of suitable Mojave desert tortoise habitat through the purchase of credits at a minimum of 1:1 in-kind habitat replacement of equal or better functions and values to those impacted by the Project, for a total of 198.4 acres or as otherwise determined through coordination with the USFWS and/or California Department of Fish and Wildlife. MM BIO-11: Pre-Construction Nesting Bird Survey. If possible, vegetation clearing shall be conducted outside of the nesting season, which is generally identified as February 1 through August 31. If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a pre-construction nesting bird survey within seven days prior to any disturbance of the site, including disking, vegetation clearing, clearing and grubbing, equipment staging, etc. If active nests are identified during the pre-construction nesting bird survey, the biologist shall establish suitable buffers around the nests, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Suitable buffers shall be determined by the biologist based on the species' sensitivity to disturbance (typically 300 feet	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		for passerines and 500 feet for raptors and special-status species). MM BIO-12: Pre-Disturbance American Badger and Desert Kit Fox Clearance Survey. A qualified biologist shall conduct pre-disturbance clearance surveys for the American badger and/or desert kit fox within seven days of ground-disturbing activities (e.g., disking, vegetation clearing, clearing and grubbing, equipment staging, etc.). If the American badger and/or desert kit fox are not detected during the pre-disturbance clearance survey, then no additional action or mitigation is required. If the American badger and/or desert kit fox are detected on site in an active den, then the Project Applicant shall be required to contact CDFW prior to conducting any Project-associated ground-disturbing activities and prepare and implement a relocation plan to avoid/minimize impacts to these species. An avoidance buffer of 300 feet shall be implemented around any active dens until the den is determined to be inactive.	
(b) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or	Potentially Significant Impact	MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, MM BIO-7, MM BIO-8 (listed above)	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			
(c)Would the Project 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?	Potentially Significant Impact	MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, MM BIO-7, MM BIO-8 (listed above) MM BIO-13: Jurisdictional Waters. The Project site supports aquatic resources that are considered jurisdictional under the Regional Water Quality Control Board (RWQCB) and the California Department of Fish and Wildlife (CDFW). Prior to site disturbing activities, the Project Applicant shall coordinate with the Lahontan RWQCB (Region 6) to ensure conformance with the requirements of the Porter–Cologne Water Quality Control Act (waste discharge requirement). Prior to activity within CDFW jurisdictional streambed or associated riparian habitat, the Project Applicant shall coordinate with CDFW (Inland Deserts Region 6) relative to conformance to the Lake and Streambed Alteration permit requirements. The Project shall mitigate to ensure no net loss of waters at a minimum of minimum 1:1 with purchase of credits (1.63 acres RWQCB jurisdiction and 1.63 acres CDFW jurisdiction) for impacts to aquatic	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		resources as part of an overall strategy to	
(d)Would the Project 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 U.S. Fish and Wildlife Service?	Potentially Significant Impact	MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, MM BIO-7, MM BIO-8 (listed above)	Less-than-Significant Impact
(e)Would the Project 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?	Potentially Significant Impact	MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, MM BIO-7, MM BIO-8 (listed above) MM BIO-13: Jurisdictional Waters. The Project site supports aquatic resources that are considered jurisdictional under the Regional Water Quality Control Board (RWQCB) and the California Department of Fish and Wildlife (CDFW). Prior to site disturbing activities, the Project Applicant shall coordinate with the Lahontan RWQCB (Region 6) to ensure conformance with the requirements of the Porter–Cologne Water Quality Control Act (waste discharge requirement). Prior to activity within CDFW jurisdictional streambed or associated riparian habitat, the Project Applicant shall coordinate with CDFW (Inland Deserts Region 6) relative to	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		conformance to the Lake and Streambed Alteration permit requirements. The Project shall mitigate to ensure no net loss of waters at a minimum of minimum 1:1 with purchase of credits (1.63 acres RWQCB jurisdiction and 1.63 acres CDFW jurisdiction) for impacts to aquatic resources as part of an overall strategy to ensure no net loss. Mitigation shall be completed through use of a mitigation bank (e.g., West Mojave Mitigation Bank) or other Applicant-sponsored mitigation (such as restoration, preservation or enhancement of on-site or off-site resources). Final mitigation ratios and credits shall be determined in consultation with RWQCB and/or CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process. Should Applicant-sponsored mitigation be implemented, a Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared in accordance with State Water Resources Control Board guidelines and approved by the agencies in accordance with the proposed program permits. The HMMP shall include a conceptual planting plan including planting zones, grading, and irrigation, as applicable; a conceptual	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		planting plant palette; a long-term maintenance and monitoring plan; annual reporting requirements; and proposed success criteria. Any Applicant-sponsored mitigation shall be conserved and managed in perpetuity. Best management practices shall be implemented to avoid any indirect impacts on jurisdictional waters, including the following: ▪ Vehicles and equipment shall not be operated in ponded or flowing water except as described in permits. ▪ Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional waters or be placed in locations that may be subjected to high storm flows. Spoil sites shall not be located within 30 feet from the boundaries of jurisdictional waters or in locations that may be subject to high storm flows, where spoils might be washed back into drainages. ▪ Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources resulting from Project-related activities shall be prevented from contaminating the soil	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		and/or entering avoided jurisdictional waters. ▪ No equipment maintenance shall be performed within 100 feet of jurisdictional waters, including wetlands and riparian areas, where petroleum products or other pollutants from the equipment may enter these areas. Fueling of equipment shall not occur on the Project site.	
(f) Would the Project 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?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(g) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant	MM BIO-1 and MM BIO-2 (listed above)	Less-than-Significant Impact
(h)Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
4.3 Cultural Resources			
(a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Potentially Significant Impact	**MM CUL-1. Cultural Resources Management Program.** Prior to the issuance of a grading permit, the Project Proponent shall provide evidence to the City of Adelanto Planning Division that a qualified professional archaeologist (Professional Archaeologist) who meets the Secretary of the Interior's Standards has been contracted to implement a Cultural Resources Management Program (CRMP). The CRMP shall identify the details of all ground-disturbing activities and provide procedures that must be followed to avoid or reduce potential impacts to cultural resources. The CRMP shall incorporate MM TCR-1 through MM TCR-4 (Section 4.11, Tribal Cultural Resources). The CRMP shall also provide for a qualified paleontologist to train construction crews to recognize fossils and to evaluate any fossils found during grading. Work shall be redirected away from a find until the paleontologist has evaluated it. **MM CUL-2. Archaeological Monitoring.** Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from	Less Than Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		an Archaeologist who meets the U.S. Secretary of the Interior Standards (SOI) stating that the Property Owner/Developer has retained this individual, and that the Archaeologist shall be onsite during all grading and other significant ground-disturbing activities in native sediments. The Archaeologist shall attend the pre-grade conference and shall inform construction personnel of the potential for encountering unique cultural resources and how to identify these resources if encountered. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected, the type of activities that may result in impacts, and the legal framework of cultural resources protection. All construction personnel shall be instructed to stop work in the vicinity of a potential discovery until the Archaeologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of cultural resources is prohibited." **MM CUL-3. Inadvertent Discovery of Archaeological Resources.** Prior to the issuance of a grading permit,	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		the following note shall be placed on the grading plan: "a) In the event that artifacts of Native American origin are discovered, the Property Owner/Developer and Archaeologist shall notify the City of Adelanto and the Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department, and the Morongo Band of Mission Indians (MBMI). The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA. b) Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts shall be subjected to curation or returned to the Property Owner/Developer, as deemed appropriate. c) Once ground-altering activities have ceased or the Archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Adelanto.	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		d) A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Adelanto, shall signify completion of the program to mitigate impacts to archaeological and/or cultural resources. A copy of the report shall also be filed with the South Central Coastal Information Center (SCCIC). *Note: The Morongo Band of Mission Indians and the Soboba Band of Luiseño Indians, which are on the City's AB 52 notification list, did not request consultation. If either Tribe later asks to participate in monitoring or discovery procedures, it may do so consistent with the intent of these measures. YSMN has no objection.*	
(b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Potentially Significant Impact	MM CUL01 through MM CUL-3 apply.	Less-than-Significant Impact
(c) Would the Project disturb any human remains, including those interred outside of dedicated	Less-than-Significant	No mitigation measures required.	Less-than-Significant

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
cemeteries?	Impact		Impact
4.4 Energy			
(a)Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	Less Than Significant Impact	No mitigation measures required.	Less Than Significant Impact
(b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant Impact	No mitigation measures required.	Less Than Significant Impact
4.5 Greenhouse Gas Emissions			
(a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Potentially Significant Impact	MM GHG-1: Renewable Energy Plan. Future tenants of the Project shall be required to subscribe to the Apple Valley Choice Energy 100% Renewable Energy Plan, which is 100% renewable and 100% carbon-free, for the duration of occupancy as part of the entitlement agreement. At each lease or change of building ownership, the new lessee or owner shall also be automatically enrolled in the Apple Valley Choice Energy 100% Renewable Energy Plan.	Significant and Unavoidable Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
(b)Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Potentially Significant Impact	MM GHG-1 (listed above)	Significant and Unavoidable Impact
4.6 Hazards and Hazardous Materials			
(a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(b)Would the Project 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?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
4.7 Hydrology and Water Quality			
(a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
(b) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(c)Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			
(i) Result in substantial erosion or siltation on or off site?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater	Less-than-Significant	No mitigation measures required.	Less-than-Significant

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
drainage systems or provide substantial additional sources of polluted runoff?	Impact		Impact
(iv) Impede or redirect flood flows?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(d) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
4.8 Land Use and Planning			
(a) Would the Project physically divide an established community?	No Impact	No mitigation measures required.	No Impact
(a) Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
4.9 Noise			
(a) Would the Project result in generation of a substantial temporary	Potentially Significant	No feasible mitigation measures available.	Significant and Unavoidable

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Impact		Impact
(b) Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
4.10 Transportation			
(a) Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(c)Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
equipment)?			
(e) Would the Project result in inadequate emergency access?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(f) Would the Project result in cumulatively considerable impacts related to transportation?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
4.11 Tribal Cultural Resources			
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public	Potentially Significant Impact	MM CUL-1 and MM TCR-1 through MM TCR-4 address any resource discovered during ground disturbance.	Less Than Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
Resources Code section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			
(b)		**MM TCR-1 (Archaeological and Tribal Monitoring).** — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: *"A qualified Archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards, and a San Manuel Tribal Monitor shall be on site during all grading and other significant ground-disturbing activities in native sediments (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation,*	Less Than Significant

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a qualified Archaeologist and a representative from the Yuhaaviatam of San Manuel Nation's Cultural Resources Management Department (YSMN, also known as the San Manuel Band of Mission Indians) stating that the Property Owner/Developer has retained these individuals." **MM TCR-2 (Pre-Grading Conference).** — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: **"***The qualified Archaeologist and Tribal Representative, including a representative from YSMN, shall attend the pre-grade conference and shall inform construction personnel of the potential for encountering unique cultural resources and how to identify these resources if encountered. This shall include providing written materials to familiarize personnel with the range*	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		of resources that might be expected, the types of activities that may result in impacts, and the legal framework for cultural resource protection. All construction personnel shall be instructed to stop work in the vicinity of a potential discovery until the Archaeologist and Tribal Representative assess the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of cultural resources is prohibited." **MM TCR-3 (Inadvertent Discovery of Artifacts During Ground Disturbance).** — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: *"In the event that artifacts of Native American origin are discovered, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The Property Owner/Developer and Archaeologist shall notify the City of Adelanto and the appropriate local Native American tribe, including YSMN. The Project*	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the City shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the tribe. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the Archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the Project, should YSMN elect to place a monitor on site. All items found in association with Native American	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		human remains shall be considered grave goods or sacred in origin and subject to special handling. Native American artifacts that cannot be avoided or relocated at the Project site shall be prepared in a manner for curation, and the Archaeologist shall deliver the materials to an accredited curation facility approved by the City of Adelanto. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts shall be subjected to curation or returned to the Property Owner/Developer, as deemed appropriate. Once ground-altering activities have ceased or the Archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Adelanto. A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Adelanto, shall signify	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		completion of the program to mitigate impacts to archaeological and/or cultural resources. A copy of the report shall also be filed with the South Central Coastal Information Center." **MM TCR-4 (Treatment of Cultural Resources During Project Implementation).** — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: *"It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within or near the original find location during Project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloging and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to the Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial*	

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
		agreement that shall be developed between the landowner and YSMN outlining the determined reburial process and location, and shall include measures and provisions to protect the reburial area from any future impacts." *Note: The Morongo Band of Mission Indians and the Soboba Band of Luiseño Indians, which are on the City's AB 52 notification list, did not request consultation. If either Tribe later asks to participate in monitoring or discovery procedures, it may do so consistent with the intent of these measures. YSMN has no objection.*	
4.12 Utilities and Service Systems			
(a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental	Potentially Significant Impact	The construction mitigation measures in Sections 4.1 (MM AQ-1 through MM AQ-5 and MM AQ-23), 4.2 (MM BIO-1 and MM BIO-3 through MM BIO-12), 4.3 (MM CUL-1 through MM CUL-3), 4.9 (MM NOI-1), and 4.11 (MM TCR-1 through MM TCR-4) apply to construction of the utility improvements.	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
effects?			
(b) Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(c) Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(d) Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
(e) Would the Project comply with federal, state, and local management and reduction statutes and regulations	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
related to solid waste?			
5.0 Effects Found Not to be Significant			
Aesthetics			
Would the Project have a substantial adverse effect on a scenic vista?	No Impact	No mitigation measures required.	No Impact
Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No mitigation measures required.	No Impact
Agriculture and Forestry Resources			
Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No mitigation measures required.	No Impact
Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No mitigation measures required.	No Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No Impact	No mitigation measures required.	No Impact
Would the Project result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No mitigation measures required.	No Impact
Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No mitigation measures required.	No Impact
Geology and Soils			
Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury,	Less-than-Significant	No mitigation measures required.	Less-than-Significant

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
or death involving:	Impact		Impact
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.	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Strong seismic ground shaking?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Seismic-related ground failure, including liquefaction?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Landslides?	No Impact	No mitigation measures required.	No Impact
Mineral Resources			
Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No mitigation measures required.	No Impact
Would the Project result in the loss of	No Impact	No mitigation measures required.	No Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			
Project expose people residing or working in the project area to excessive noise levels?			
Population and Housing			
Would the Project 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)?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	No mitigation measures required.	No Impact
Public Services			
Would the Project result in substantial adverse physical impacts associated with the provision of new or physically			

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
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:			
Police protection?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Schools?	No Impact	No mitigation measures required.	No Impact
Parks?	No Impact	No mitigation measures required.	No Impact
Other public facilities?	No Impact	No mitigation measures required.	No Impact
Recreation			
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?	No Impact	No mitigation measures required.	No Impact

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Impact	No mitigation measures required.	No Impact
Wildfire			
Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Less-than-Significant Impact	No mitigation measures required.	Less-than-Significant Impact
Would the Project expose people or structures to significant risks, including downslope or downstream flooding or	Less-than-Significant	No mitigation measures required.	Less-than-Significant

Environmental Topic	Level of Significance	Mitigation Measures	Level of Significance After Mitigation
landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Impact		Impact

1.0 Introduction

1.1 Background

On July 8, 2009, the Adelanto City Council approved the Adelanto Gateway Logistics Center Project ("2009 Approved Project") and certified its Final EIR (SCH No. 2008071129). It included nine concrete tilt-up warehouses totaling approximately 6.9 million square feet on roughly 400 acres of a 500-acre property. Improvements included parking, internal roads, drainage facilities, and site improvements (Figure 1-1, *Approved Project Site Plan (2009)*). The project was not built, and its approval expired in 2011.

Mileski Holdings, LLC later acquired the property and now proposes seven warehouse and distribution buildings totaling 8,256,274 square feet on 451 net acres, as described in Section 3.0, *Project Description*.

1.2 CEQA Requirements

The City of Adelanto, as Lead Agency, prepared this Subsequent Environmental Impact Report (SEIR) under the California Environmental Quality Act (CEQA; Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.). This SEIR is a complete document. It uses analysis from the 2009 EIR where that analysis is still valid and replaces it where conditions or methods have changed.

Changes from the 2009 Approved Project require further environmental review. Building area increases by approximately 1.3 million square feet. Developable area increases by approximately 52 acres because right-of-way is no longer reserved for the High Desert Multipurpose Corridor Project. Area conditions and methods for evaluating air quality, greenhouse gas emissions, and transportation have also changed since 2009. These substantial changes and new circumstances require a Subsequent EIR under CEQA Guidelines §15162.

Under CEQA Guidelines Section 15162, a subsequent EIR is required when project changes, changed circumstances, or new information would cause a new significant effect or a substantial increase in the severity of an effect identified in the prior EIR. A supplement under Section 15163 is used only when minor additions would make the prior EIR adequate. The City concluded that the Project changes meet the Section 15162 criteria.

Where the 2009 EIR still provides relevant information for a topic, this SEIR relies on it (Friends of the College of San Mateo Gardens v. San Mateo County Community College District (2016) 1 Cal.5th 937). Topics affected by changes in the Project, site conditions, or the regulations and methods used to evaluate them receive new analysis. The expiration of the 2009 approval does

not by itself make the Project a new project under CEQA (Moss v. County of Humboldt (2008) 162 Cal.App.4th 1041).

1.3 Project Location

The Proposed Project site is in southeastern Adelanto, in San Bernardino County's Victor Valley. It lies south of Air Expressway, east of U.S. Highway 395, and directly south of the Southern California Logistics Airport (Assessor's Parcel Numbers: 0459-451-51, 0459-451-62, 0459-841-01 to -15). Figure 2-1, *City Location*, and Figure 2-5, *Surrounding Land Uses*, show the site.

1.4 Comparison of 2009 Approved Project vs. 2026 Proposed Project

The two projects occupy the same land. The 2009 Approved Project covered approximately 502 gross acres, with approximately 400 acres for buildings and yards. Reserved areas included 36.7 acres for the High Desert Corridor, 27.2 acres for detention basins and drainage easements, 1.5 acres for a fire station, and public streets. The site is now approximately 472 gross acres after the sale of 47 acres for the CarMax facility to the south. Public streets leave 451 net acres for development. The Proposed Project remains within the 2009 project boundary. More land is developable because the High Desert Corridor requires substantially less land for rail alone after the freeway component was dropped. The redesigned drainage system includes underground chambers, and land is no longer set aside for the fire station. Table 1-1, Comparison of the 2009 Approved Project and the Proposed Project, compares the projects.

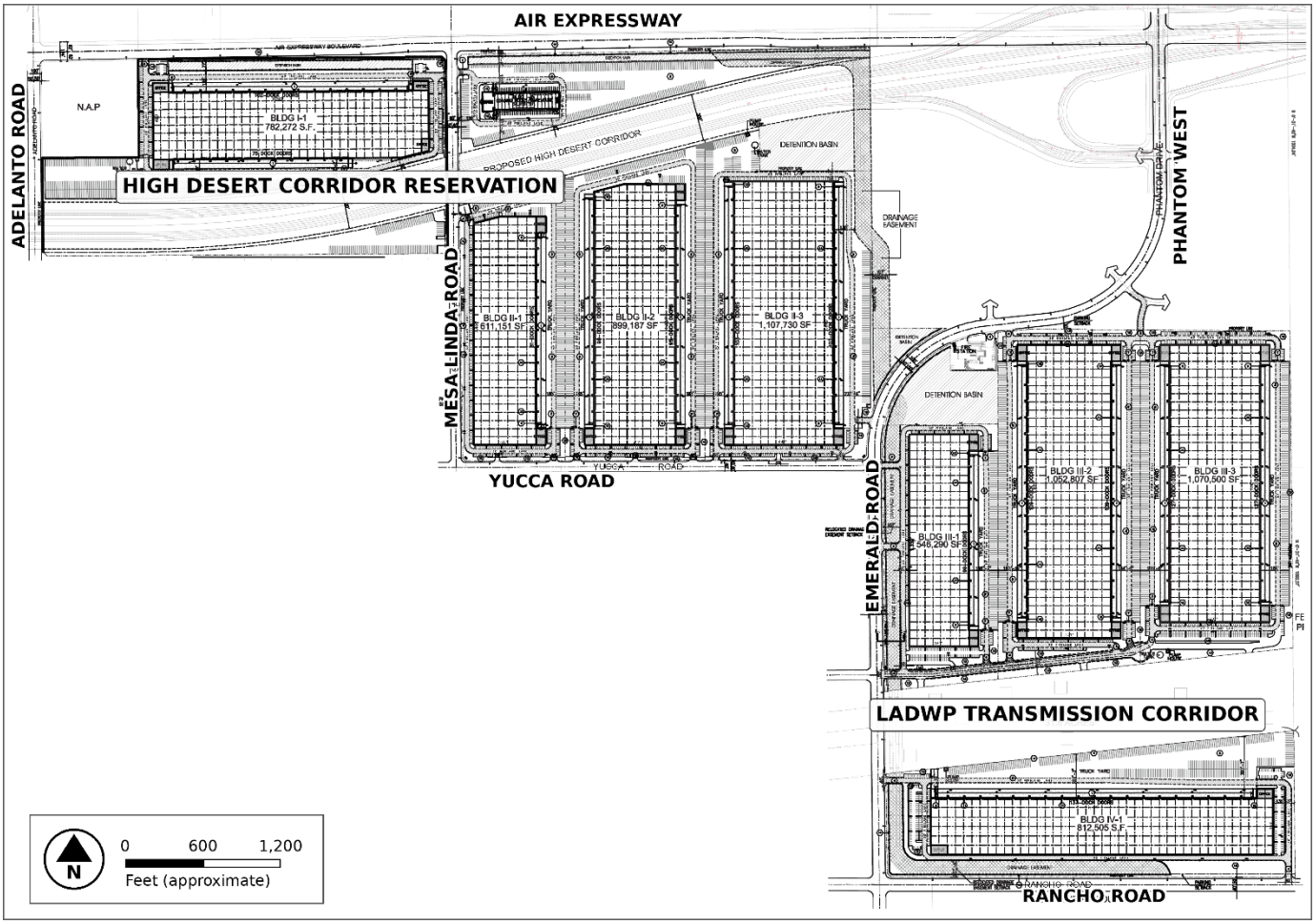
Table 1-1. Comparison of the 2009 Approved Project and the Proposed Project

Characteristic	2009 Approved Project	Project
Site area	≈502 gross acres; ≈400 net developable after HDC reservation, basins, fire station, and streets	≈472 gross acres (after CarMax sale); 451 net developable after streets
Building area	6,935,398 sq ft	8,256,274 sq ft
Buildings	9	7
Use	Warehouse and distribution	Warehouse and distribution, including cold storage
Maximum building height	38 ft	55 ft
Fire station	1.5-acre site dedicated	The Adelanto North 2035 Comprehensive Sustainable Plan (2014) deleted the fire station.

Source: 2009 Final EIR; Section 3.0 of this SEIR.

Figure 1-1. Approved Project Site Plan (2009)

Source: Adelanto Gateway Logistics Center EIR (RBF Consulting, 2009), Figure 3.0-5, Conceptual Site Plan.



1.5 Scope and Organization of the Draft SEIR

The 2009 EIR remains certified and valid. Section 4.0, *Environmental Analysis*, analyzes topics where Project changes, changed circumstances, or new information could cause either of the following:

- A new significant environmental effect; or
- A substantial increase in the severity of an effect previously identified in the 2009 EIR.

Section 5.0, *Effects Not Found to be Significant*, addresses topics that do not meet those conditions and relies on the 2009 EIR. Section 6.4 addresses agriculture and forestry resources and population and housing. Table 1-2, *Environmental Topic Screening*, summarizes the results.

Table 1-2. Environmental Topic Screening

Analyzed in Section 4.0: Environmental Analysis	
4.1 Air Quality	4.7 Hydrology and Water Quality
4.2 Biological Resources	4.8 Land Use and Planning
4.3 Cultural Resources	4.9 Noise
4.4 Energy	4.10 Transportation
4.5 Greenhouse Gas Emissions	4.11 Tribal Cultural Resources
4.6 Hazards and Hazardous Materials	4.12 Utilities and Service Systems
Analyzed in Section 5.0: Effects Found Not to be Significant	
5.1 Aesthetics	5.4 Public Services
5.2 Geology and Soils	5.5 Recreation
5.3 Mineral Resources	5.6 Wildfire

This SEIR is organized as follows:

- **1.0 Introduction** — purpose, background, and organization.
- **2.0 Environmental Setting** — the site and its surroundings.
- **3.0 Project Description** — the Project, its objectives, and the approvals required.
- **4.0 Environmental Analysis** — methodology, then Sections 4.1 through 4.12.

- **5.0 Effects Not Found to be Significant** — the screened-out topics and the basis for reliance on the 2009 EIR.
- **6.0 Other CEQA Considerations** — significant and unavoidable effects, growth inducement, and irreversible changes.
- **7.0 Alternatives** — the alternatives considered and the environmentally superior alternative.
- **8.0 List of Preparers —** persons who contributed to this SEIR.

1.6 Discretionary Approvals

The City of Adelanto is the Lead Agency. Approvals considered with this SEIR are:

- **Certification of the SEIR** by the Planning Commission and adoption of **CEQA Findings of Fact** and a **Mitigation Monitoring and Reporting Program; and approval of Location and Development Plan (LDP) 25-02**, establishing the site plan, building layout, circulation, landscaping, and infrastructure improvements.
- **Tentative Parcel Map (TPM) No. 20837**, dividing the site into seven industrial parcels with public street and utility easements.
- A Conditional Use Permit for on-site electrical generation, if the natural gas generation option is used (Section 3.11).
- **Grading, building, and encroachment permits** follow the discretionary approvals. Table 3-5, *Summary of Anticipated Agency Permits and Approvals* in Section 3.0 lists all anticipated permits and approvals.

The Planning Commission is the decision-making body for certification of the SEIR, LDP 25-02 and TPM 20837. Its decisions are appealable to the City Council.

1.7 Responsible and Trustee Agencies

Responsible agencies have approval authority over part of the Project. Trustee agencies are State agencies responsible for natural resources held in trust for the people of California (CEQA Guidelines Sections 15381 and 15386). The City consulted these agencies through the Notice of Preparation (Public Resources Code Section 21153). CDFW is the trustee agency for the site's biological resources and a responsible agency for the permits below. The following agencies may rely on this SEIR for the approvals listed in Table 1-3, Anticipated Permits and Approvals:

- **California Department of Fish and Wildlife** — incidental take permit under the Western Joshua Tree Conservation Act; Lake and Streambed Alteration Agreement if construction alters the bed, bank, or channel of a drainage; incidental take permits

for burrowing owl or Crotch's bumble bee only if focused surveys find them and avoidance is infeasible (Section 4.2, *Biological Resources*).

- **Lahontan Regional Water Quality Control Board** — Clean Water Act Section 401 water quality certification or waste discharge requirements for work affecting jurisdictional waters, and Construction General Permit coverage (Section 4.2, *Biological Resources)*.
- **U.S. Army Corps of Engineers** — Clean Water Act Section 404 permit **if** off-site improvements affect waters of the United States (Section 4.2, *Biological Resources*).
- **City of Victorville —** encroachment permits for improvements within the Victorville halves of Air Expressway and Adelanto Road (traffic signals, frontage, and utilities), and acceptance of drainage discharged to the Air Expressway culverts and the SCLA Master Plan of Drainage facilities.
- **Mojave Desert Air Quality Management District** — dust control plan before ground disturbance and Authority to Construct and Permit to Operate for stationary sources, including emergency generators, cold-storage refrigeration equipment, and, if the on-site generation option described in Section 3.0, *Project Description*, is exercised, the natural gas generators.

Any responsible or trustee agency not listed may also rely on this SEIR.

1.8 Required Permits and Approvals

Table 1-3, *Anticipated Permits and Approvals*, lists the expected permits and approvals that rely on this SEIR, issuing agencies, and triggers. Section 3.0, Table 3-5, repeats the list with the City's implementing approvals.

Table 1-3. Anticipated Permits and Approvals

Agency	Permit or Approval	Trigger
City of Adelanto Planning Commission	Certification of the SEIR; adoption of CEQA Findings, Mitigation Monitoring and Reporting Program; Location and Development Plan LDP 25-02; Tentative Parcel Map TPM 20837; Conditional Use Permit for on-site electrical generation (if exercised in Section 3.0)	Discretionary approvals for the Project; appealable to the City Council
City of Adelanto (ministerial)	Grading, building, and encroachment permits; improvement plan approvals for water, sewer, storm drain, and streets	Follow the discretionary approvals
California	Western Joshua Tree Conservation Act	Western Joshua trees

Agency	Permit or Approval	Trigger
Department of Fish and Wildlife	incidental take permit; Lake or Streambed Alteration Agreement (Fish and Game Code §1602) if construction alters the bed, bank, or channel of a drainage; CESA incidental take permit for burrowing owl or Crotch's bumble bee only if pre-construction surveys find them and avoidance is infeasible	on site; jurisdictional drainages; survey results
Lahontan Regional Water Quality Control Board	Clean Water Act §401 water quality certification or Waste Discharge Requirements for work in waters of the State	Jurisdictional drainages on or adjacent to the site
Lahontan Regional Water Quality Control Board	Coverage under the statewide Construction General Permit (SWPPP)	Disturbance of more than one acre
Mojave Desert Air Quality Management District	Authority to Construct and Permit to Operate for stationary sources (emergency generators, cold-storage refrigeration, and the natural gas generators if the on-site generation option is exercised); Rule 403 dust control compliance	Stationary equipment; ground disturbance
City of Victorville	Encroachment permits for improvements within the Victorville halves of Air Expressway and Adelanto Road; acceptance of drainage discharged to the Air Expressway culverts and the SCLA Master Plan of Drainage facilities	City boundary on the centerlines of Air Expressway and Adelanto Road
Federal Aviation Administration	Determination of No Hazard under 14 CFR Part 77 for structures penetrating the Runway 35 approach surface (Building 3)	Federal action outside CEQA; see MM HAZ-1

1.9 Documents Incorporated by Reference and Technical Appendices

This SEIR incorporates the following documents by reference under CEQA Guidelines §15150. Each is summarized where used and available during business hours at the City of Adelanto Planning Department, 11600 Air Expressway, Adelanto, California 92301.

- Adelanto Gateway Logistics Center Final Environmental Impact Report (SCH No. 2008071129), certified July 8, 2009.
- Adelanto North 2035 Comprehensive Sustainable Plan (General Plan), 2014, and its certified EIR.
- Adelanto Municipal Code.

1.10 Project of Regional Significance

Under CEQA Guidelines §15206, the Project is of regional significance. It proposes more than 650,000 square feet of industrial floor area and may affect air quality and traffic beyond the City (CEQA Guidelines §15206(b)(2)(D)). This Draft SEIR is therefore filed with the State Clearinghouse and circulated to the Southern California Association of Governments and the Mojave Desert Air Quality Management District.

1.11 Notice of Preparation

The City released the Notice of Preparation on May 29, 2025 to the State Clearinghouse, responsible and trustee agencies, and interested parties. The 30-day scoping period ran from May 30 to June 30, 2025, with a virtual scoping meeting on June 11, 2025. The Native American Heritage Commission and California Department of Fish and Wildlife each submitted a comment letter. Table 1-4 summarizes the letters and identifies where this SEIR addresses them. Appendix K reproduces the letters.

Table 1-4. Notice of Preparation Comments Received and Where Addressed

Commenter	Date	Summary of Comments	Where Addressed in the SEIR
Native American Heritage Commission (Andrew Green, Cultural Resources Analyst)	June 6, 2025	Describes AB 52 and SB 18 consultation requirements; recommends early consultation with tribes, checking the Sacred Lands File and Tribal Consultation List from NAHC, records search at	Section 4.3, Cultural Resources (records search, survey, MM CUL-1 to MM CUL-3); Section 4.11, Tribal Cultural Resources (AB 52 consultation, RR TCR-1,

Commenter	Date	Summary of Comments	Where Addressed in the SEIR
		the CHRIS center, cultural survey by a qualified archaeologist, and procedures for inadvertent Native American human remains discovery.	MM TCR-1 to MM TCR-4). SB 18 does not apply because the Project does not amend a general or specific plan.
California Department of Fish and Wildlife, Inland Deserts Region (as Trustee and Responsible Agency)	June 16, 2025	Requests a complete biological assessment, focused surveys for burrowing owl (CESA candidate), desert tortoise, Mohave ground squirrel, Crotch's bumble bee, and western Joshua tree; analysis of direct, indirect, and cumulative impacts, including lighting, noise, and edge effects; an alternatives discussion; avoidance-first mitigation with restoration plans, nesting bird protection, and no reliance on translocation; and notes that CESA incidental take permits, Western Joshua Tree Conservation Act permits, and a Lake and Streambed Alteration Agreement may be required.	Section 4.2, Biological Resources (Appendices B-1 through B-8: 2023 biological resources update, focused surveys for each species named, aquatic resources delineation; RR BIO-1 through RR BIO-8; MM BIO-1 and MM BIO-3 through MM BIO-12); Section 1.7 (CDFW permits); Section 7.0, Alternatives.

Source: Appendix K, Notice of Preparation and Comment Letters.

1.12 Review of the Draft Subsequent Environmental Impact Report

This Draft SEIR is circulated under CEQA Guidelines §15087. Send written comments during the review period to that address or the email below. The Final SEIR will respond to timely written comments. The City will consider it for certification with Findings of Fact and a Mitigation Monitoring and Reporting Program.

The Notice of Availability was mailed to agencies, organizations, and individuals who had requested a copy in writing. This Draft SEIR was distributed to responsible, trustee, and other affected agencies, surrounding cities and municipalities, and interested parties requesting a copy under Public Resources Code §21092(b)(3). It is also filed with the State Clearinghouse for a 45-day public review period (CEQA Guidelines §15105).

The Draft SEIR has been made available on the City website in accordance with CEQA Guidelines Section 15087. The Notice of Completion for the Draft SEIR was also distributed as required by CEQA. During the 45-day public review period, the Draft SEIR and its appendices are available at:

In Person:

Adelanto City Hall, Planning Department
11600 Air Expressway
Adelanto, California 92301

Online: CEQA Process Policy, Environmental Review Notices:

https://adelantoca.gov/services/community_development_services/planning/ceqa_process_policy.php

Project Name: Adelanto Gateway Logistics Center (Adelanto Industrial Park)
File: Location and Development Plan (LDP) 25-02 and Tentative Parcel Map (TPM) No. 20837

Written or email comments on this Draft SEIR should be addressed to:

James Hirsch, Planning Director
City of Adelanto Planning Division
11600 Air Expressway
Adelanto, California 92301
Phone: (425) 652-5539
Email: Jhirsch@adelantoca.gov

After public review, written responses to all substantive environmental comments are prepared and made available before the Planning Commission's public hearing. The Commission considers the Project, Final SEIR, and requested entitlements at the hearing. Its decision is appealable to the City Council. All comments and responses become
part of the Project record for consideration.

1.13 2009 EIR Mitigation Measures

The 2009 EIR adopted 33 mitigation measures (City Council Resolution No. 09-35). Table 1-5 lists each one and states whether it still applies, has been replaced, or is no longer required, and

why. Measures that still apply or have been replaced will be included in the Mitigation Monitoring and Reporting Program adopted with the Project.

Table 1-5. Status of 2009 EIR Mitigation Measures

2009 Measure	Subject	Status in This SEIR
AQ-1	Fugitive dust	Still applies as MM AQ-1.
AQ-2	Haul truck loads	Still applies as MM AQ-2.
AQ-3	Construction equipment maintenance	Still applies as MM AQ-3.
AQ-4	Architectural coatings	Still applies as MM AQ-4.
BIO-1	Nesting birds	Replaced by MM BIO-9.
BIO-2	Special-status plants	Replaced by MM BIO-1 and MM BIO-3, based on the rare plant survey (Appendix B-8).
BIO-3	Joshua trees	Replaced by MM BIO-4. Western Joshua tree is now protected under the Western Joshua Tree Conservation Act, which requires State authorization and fees.
BIO-4	Desert tortoise	No longer required. Protocol surveys in May 2024 found no desert tortoises or sign (Appendix B-5).
BIO-5	Burrowing owl	Replaced by MM BIO-6.
BIO-6	Raptor nests	Replaced by MM BIO-9, which covers all nesting birds, including raptors.
BIO-7	Mohave ground squirrel	Replaced by MM BIO-7.
BIO-8	Landscape plant review	Replaced by MM BIO-10.
CUL-1 to CUL-3	Archaeologist, discoveries, human remains	Replaced by MM CUL-1 through MM CUL-3 (Section 4.3), which are equal to or more protective, keep the paleontological requirements, and reflect the tribal consultation procedures added by AB 52 in 2015.
GEO-1 to GEO-3	Building plans, grading, expansive soils	Still apply (Section 5.2).
HYD-1	Construction stormwater	Now required by law (RR HYD-1).

2009 Measure	Subject	Status in This SEIR
	permit and SWPPP	
HYD-2	Grading and drainage plan review	Now part of City grading and stormwater review (RR HYD-3 and RR HYD-7).
HYD-3	Water Quality Management Plan	Now required by law (RR HYD-2).
HYD-4	Detention basins	Part of the Project design: three surface basins and 22 underground detention systems (Section 3.10).
HYD-5	Hydrology report	Completed. The Preliminary Drainage Study is Appendix F-1; the City Engineer reviews final drainage plans.
HYD-6	Water and sewer fees	Now required by RR UTIL-1.
NOI-1	Construction noise	Still applies (Section 4.9). Where the Municipal Code hours are more restrictive, they apply (RR NOI-2).
TRA-1 to TRA-7	Fair-share payments for roadway and intersection improvements	No longer CEQA mitigation. Since July 1, 2020, traffic delay is not a significant environmental impact under CEQA (Public Resources Code Section 21099(b)(2); CEQA Guidelines Section 15064.3). Roadway improvements and fair-share payments are addressed in the Revised Traffic Impact Study (Appendix H-1) and the conditions of approval.
TRA-8	Driveway configuration	Part of the Project site plan (Section 3.4).

Source: City of Adelanto, Adelanto Gateway Logistics Center Mitigation Monitoring and Reporting Program (April 9, 2009); EPC Environmental, Inc.

2.0 Environmental Setting

2.1 Regional and Citywide Setting

The Project's setting is defined by its relationship to the Southern California Logistics Airport (SCLA) and the City of Victorville across Air Expressway. That relationship affects land use, airport safety, hazardous materials, drainage, traffic, air quality, noise, and utilities. Biological and cultural resources are typical of the western Mojave Desert (Section 4.0). The setting reflects conditions when the Notice of Preparation was published on May 29, 2025 (CEQA Guidelines Section 15125(a)).

Location

Adelanto lies in San Bernardino County's Victor Valley, in the western Mojave Desert, approximately 85 miles northeast of downtown Los Angeles. The Victor Valley includes Adelanto, Victorville, Hesperia, Apple Valley, and surrounding unincorporated communities. Local streets connect the site to Air Expressway, Adelanto Road, and U.S. 395 (Assessor's Parcel Numbers: 0459-451-51, 0459-451-62, 0459-841-01 to -15). (Figure 2-2, Local Vicinity Map). Adelanto has large expanses of undeveloped land as shown in Figure 2-3, *Citywide Land Use – 2024*. Because so much of the city is undeveloped, projects in Adelanto commonly encounter native desert habitat and special-status species, cultural resources, natural drainage courses, and a lack of water, sewer, and road infrastructure.

Figure 2-1. City Location

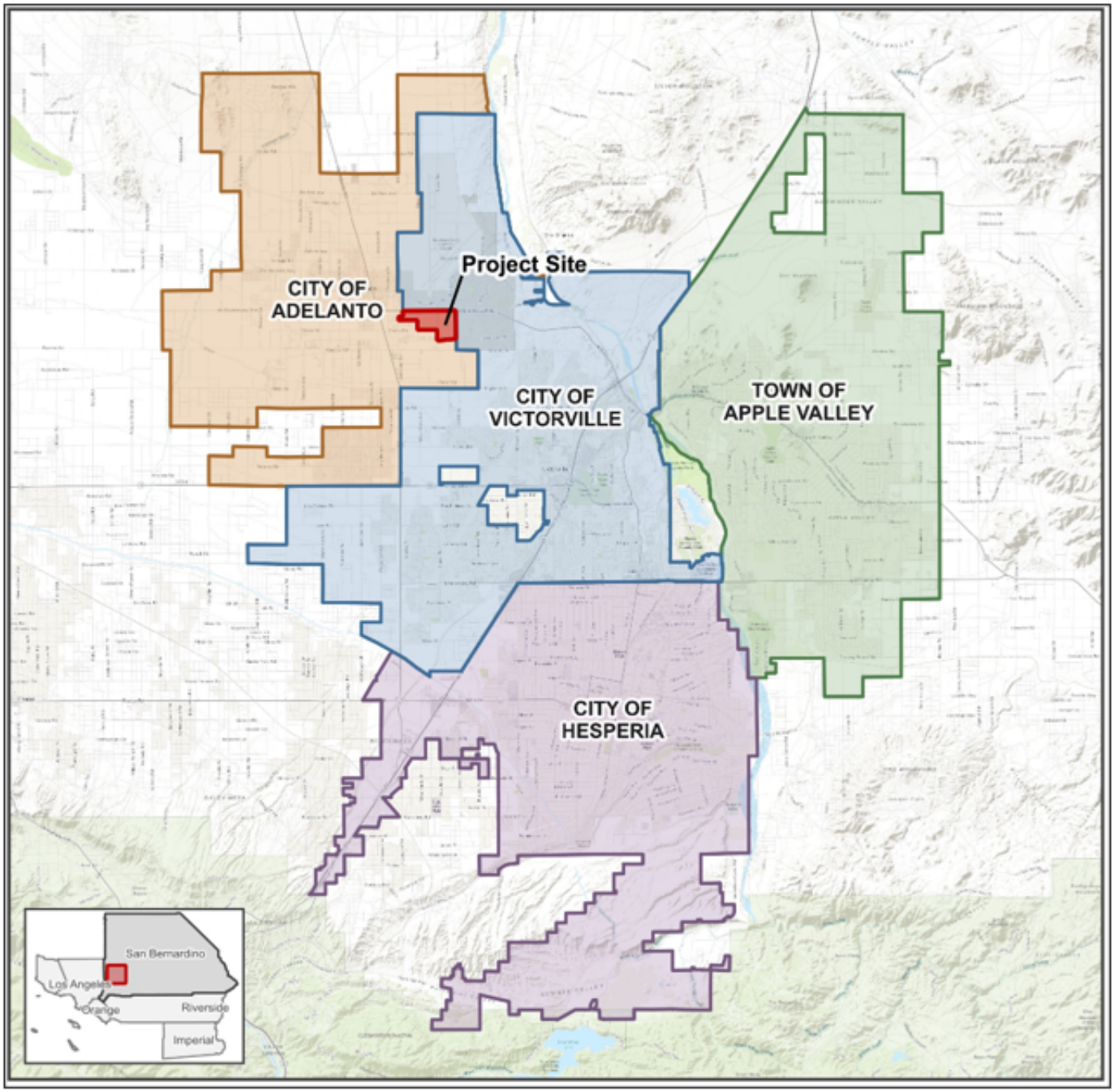


Figure 2-2. Local Vicinity Map

Source: EPC Environmental, Inc.

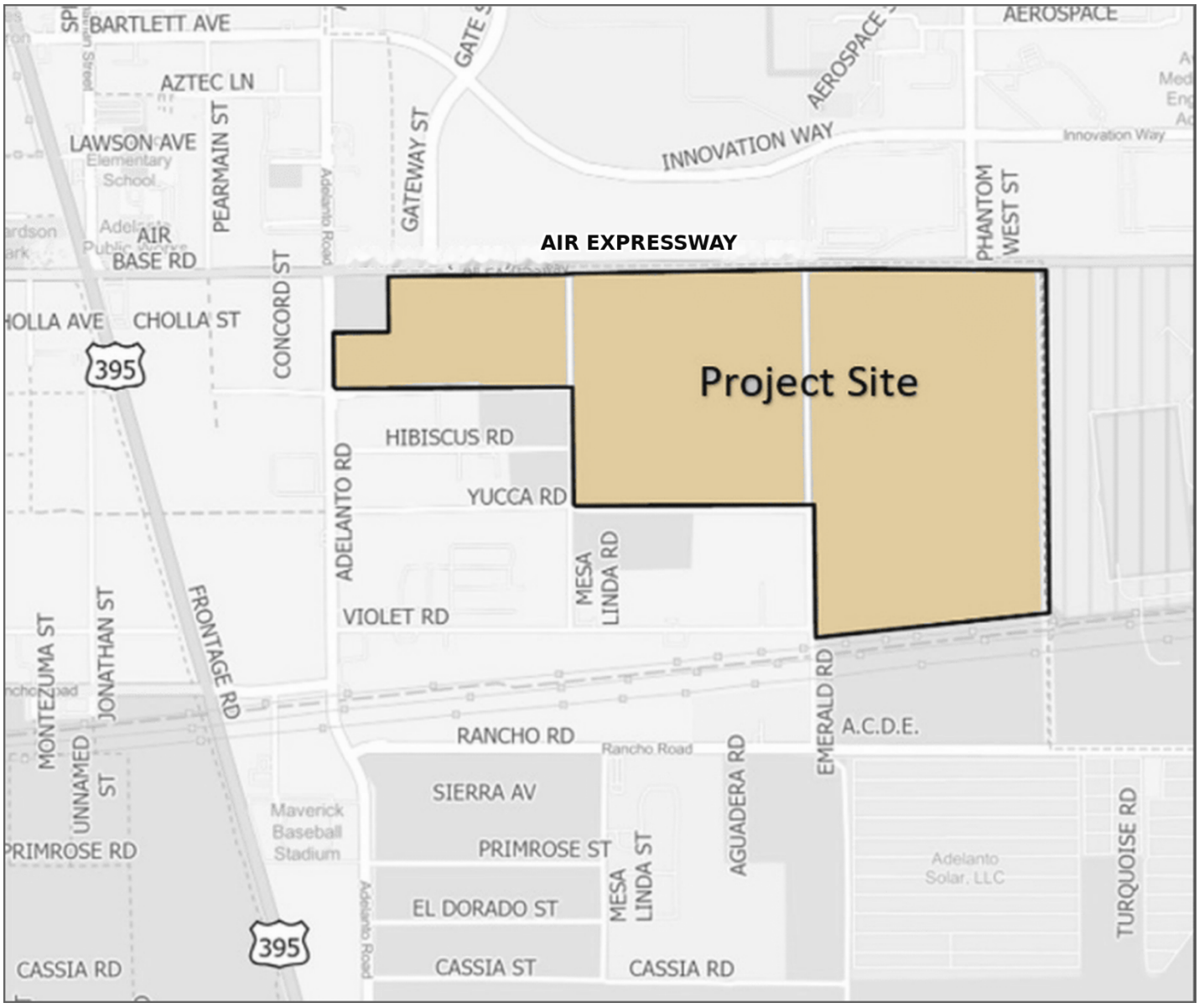
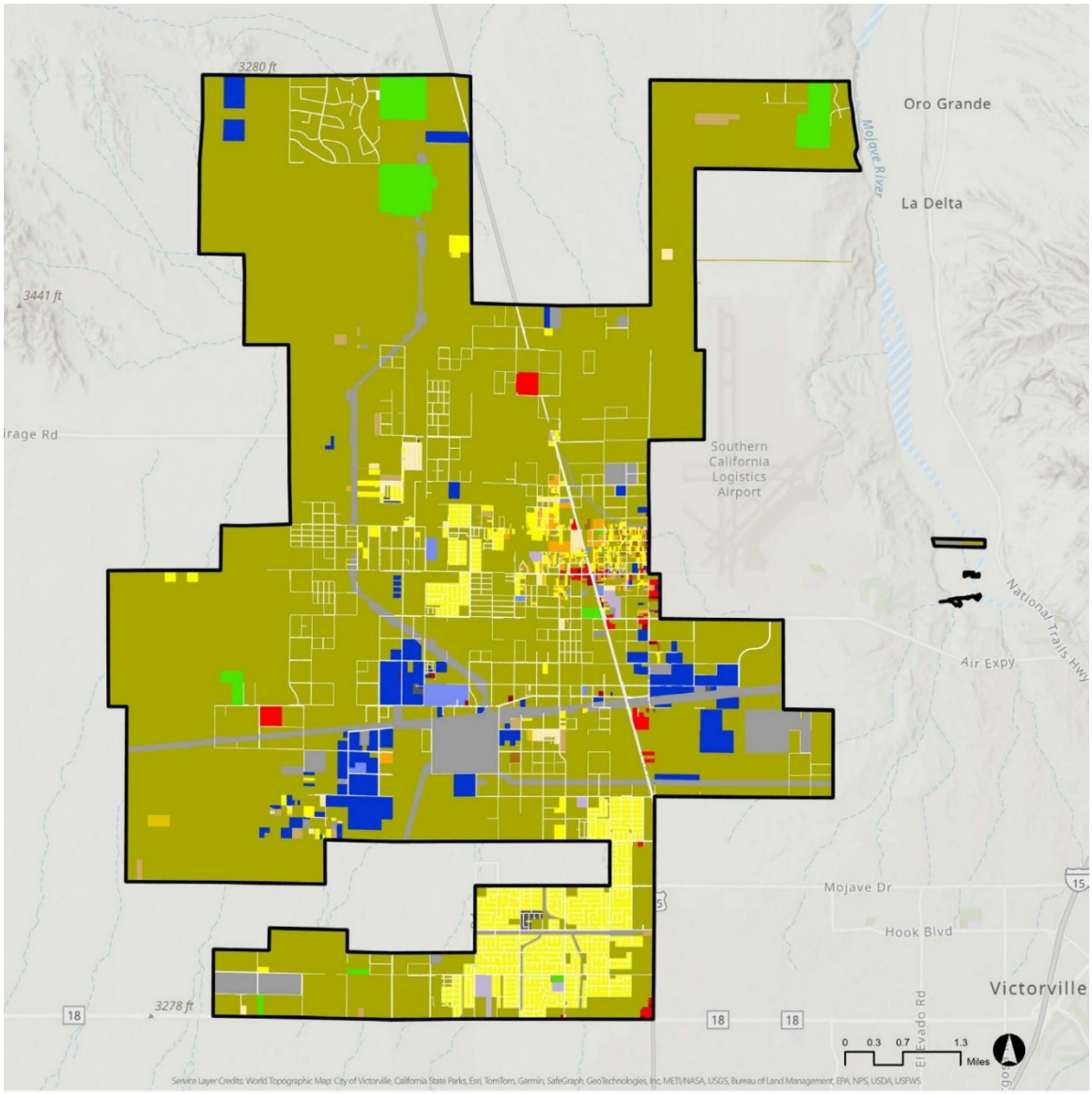


Figure 2-3. Citywide Land Use – 2024



2024 Existing Land Use in City of Adelanto

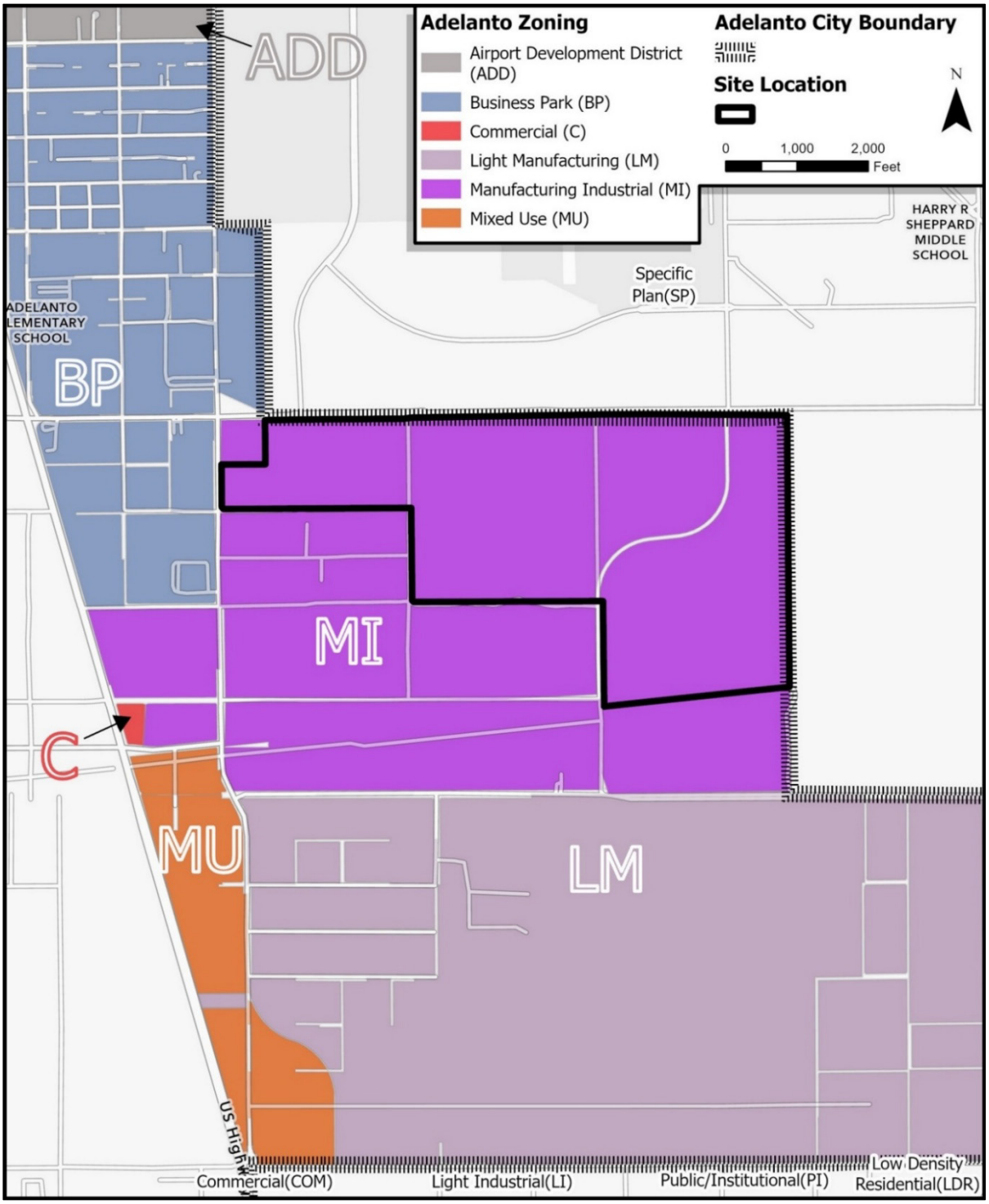
(SCAG Land Use Codes)

- Single Family Residential
- Multi-Family Residential
- Mobile Homes and Trailer Parks
- Mixed Residential
- Rural Residential
- General Office
- Commercial and Services
- Facilities
- Education
- Military Installations
- Industrial
- Transportation, Communications, and Utilities
- Mixed Commercial and Industrial
- Mixed Residential and Commercial
- Open Space and Recreation
- Agriculture
- Vacant
- Water
- Specific Plan
- Under Construction
- Undevelopable
- Unknown

Data Source: City of Adelanto, SCAG | Data Updated: 2024 | Map Created: 3/11/2026

Disclaimer: This map was created as a part of SCAG Data/Map Books to solicit feedback from local jurisdictions during Connect SoCal 2050 Local Data Exchange (LDX) process. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the data sources, methodologies and contents of this map, please refer to the SCAG Data/Map Book or contact LIST@scag.ca.gov. Please note that existing land use data shown in the map represents an approximation of local conditions as of 2024. For authoritative data on these subjects, please contact the respective local jurisdiction directly.

Figure 2-4. General Plan and Zoning



Transportation Network

Interstate 15 and U.S. Highway 395 provide the principal regional connections. Interstate 15 crosses the Cajon Pass and links the Victor Valley with the San Bernardino Valley and destinations in Riverside, Los Angeles, and Orange counties. U.S. Highway 395 serves regional travel and goods movement through the western Victor Valley. Both corridors carry substantial commuter and truck traffic, and limited parallel routes contribute to recurring congestion**.** The City has designated Air Expressway, U.S. 395, Palmdale Road, Rancho Road, Koala Road, and Adelanto Road between Air Expressway and U.S. 395 as truck routes; Adelanto Road north of Air Expressway is not a truck route (Adelanto Municipal Code Section 10.22.030).

2.2 Project Site and Surroundings

Site and Surrounding Uses

The Project site is vacant land in northeastern Adelanto, immediately south of Air Expressway and east of Adelanto Road. The site is designated and zoned Manufacturing/Industrial. Air Expressway separates the site from the SCLA West Side district in Victorville, and the Federal Correctional Complex lies to the east within the SCLA Public Institutional district. Industrial, commercial, storage, and vacant uses occur south and west of the site. Table 2-1, *Adjacent Land Uses and Zoning*, and Figure 2-5, *Surrounding Land Uses*, show the surrounding uses and jurisdictional context.

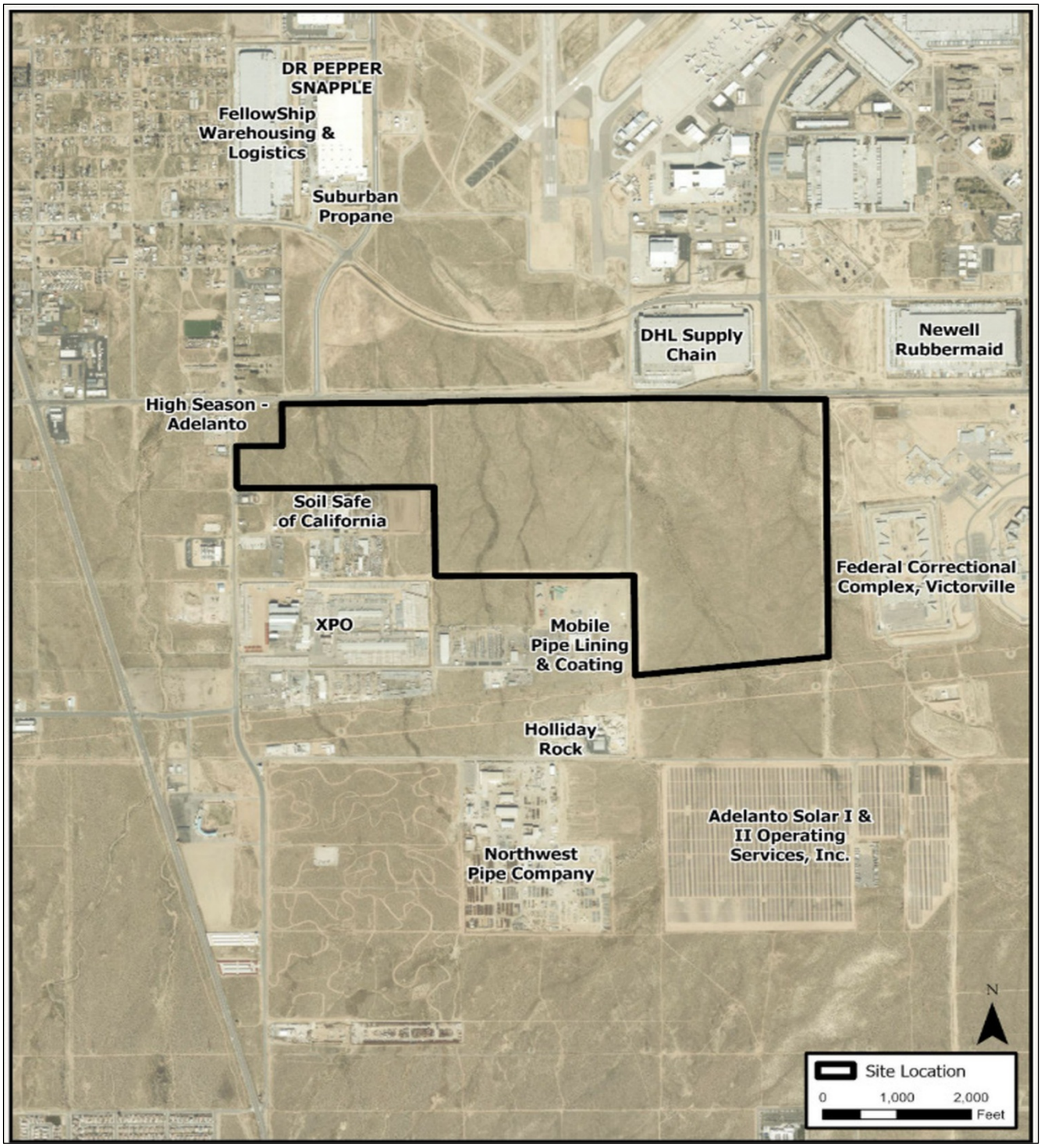
Table 2-1. Adjacent Land Uses and Zoning

Location	Current Land Use	General Plan Designation	Zoning
Site	Vacant land	Manufacturing/Industrial	MI: Manufacturing/Industrial
North	Air Expressway (4-lane major street). City of Victorville; SCLA Specific Plan West Side district; runways less than 1 mile north.	Specific Plan (SCLA)	SP1-92
South	Joshua Avenue, Yucca Road, and Powerline Road, with a mix of office, warehouse storage, and vacant land to the south.	Manufacturing/Industrial	MI: Manufacturing/Industrial
East	City of Victorville; Federal Correctional Complex – Victorville, within the SCLA Specific Plan Public Institutional (PI) district.	Specific Plan (SCLA)	SP1-92

Location	Current Land Use	General Plan Designation	Zoning
West	Adelanto Road (4-lane major boulevard) with a mix of cold storage, warehouse, retail, and vacant land.	Business Park; Manufacturing/Industrial	BP: Business Park; MI: Manufacturing/Industrial

Source: City of Adelanto General Plan Land Use Map and Zoning Map; SCLA Specific Plan, March 2021.

Figure 2-5. Surrounding Land Uses



Site Conditions

The site is undeveloped desert supporting creosote bush scrub, white bursage scrub, and rubber rabbitbrush scrub, with disturbed areas along its southern edges. The nearly flat alluvial fan slopes from approximately 2,920 feet above mean sea level at the southeast corner to approximately 2,895 feet at the northwest corner. Soils are sands and silty sands over Quaternary alluvium. Section 4.2 describes biological resources, and Section 5.2 describes geology and soils.

Drainage and Hydrology

The mostly vacant site contains paved and unpaved roads without gutters. Off-site tributary flow reaches the southern and eastern boundaries as sheet flow and crosses the site toward Air Expressway. Reinforced concrete box culverts beneath Air Expressway carry the combined on-site and off-site flow north into the SCLA Specific Plan area. Section 2.4 describes the downstream connection.

Hazardous Materials

The site adjoins the southern boundary of former George Air Force Base, a National Priorities List site. The former base is generally downgradient of the site. The Phase I Environmental Site Assessment reviewed groundwater depths greater than 100 feet below ground surface and State Water Resources Control Board GeoTracker information. It concluded that releases from the former base are not expected to affect commercial or industrial occupants of the site (Farallon Consulting, May 19, 2026; Appendix E). Section 4.6 evaluates hazardous materials conditions.

Existing Roadways

Air Expressway forms the site's northern boundary. This four-lane east–west road has two lanes in each direction, a striped center lane, and turn pockets at key intersections. The City of Adelanto Circulation Plan designates it a major street. Its posted speed limit in the Project area is 60 mph.

Adelanto Road forms the site's western boundary. This four-lane north–south road has two lanes in each direction, a striped center lane, and turn pockets at key intersections. The City of Adelanto Circulation Plan designates it a major boulevard south of El Mirage Road. Its posted speed limit in the Project area is 40 mph.

Emerald Road is a two-lane local north–south road that crosses the site. The posted speed limit in the Project area is 30 mph.

Joshua, Mesa Linda, Yucca, Cobalt?

Sewer and Water Pipelines

Sewer

No public sanitary sewer serves the site or surrounding area east of Adelanto Road and south of Air Expressway. The Project includes off-site sewer extensions. Section 3.9 describes the system.

Section 4.12 (Utilities and Service Systems) and the Water and Sewer Feasibility Study (Appendix I) analyze it.

Water

Water facilities tributary to the site include 12-inch waterlines in Adelanto Road, Yucca Road, and Rancho Road. Violet Road has an 8-inch waterline, and Emerald Road may also have one. If confirmed, the Emerald Road line would be replaced with a 12-inch line for domestic supply and fire flow. Larger waterlines in Air Expressway carry water from the well field east of the Project area. They use a different pressure zone and cannot serve the Project.

Two 3-million-gallon tanks approximately 4.5 miles southwest of the Project supply the area. The Lower Booster Pump Station approximately one-half mile northwest and a Pressure Reducing Station approximately 1.5 miles southwest also supply it. Section 4.12 (Utilities and Service Systems), the Water Supply Assessment (Appendix J), and the Water and Sewer Feasibility Study (Appendix I) address water demand.

Electricity and Other Utilities

The site has no utility connections. SCE (electricity), Southwest Gas (natural gas), the Adelanto Public Utility Authority (water and sewer), Burrtec (solid waste), and Verizon (telephone) serve adjacent properties. A roughly 32-acre utility easement crosses the site's southern part. LADWP owns and maintains this corridor, which carries the Path 27 high-voltage transmission lines.

SCE would supply Project electricity, and Southwest Gas would extend gas service to the buildings. A natural gas generation option would operate only if SCE cannot serve a building when it is ready for occupancy.

2.3 Southern California Logistics Airport Specific Plan Area

Physical and Planning Relationship

The SCLA Specific Plan area is in the City of Victorville immediately north and east of the Project site. It covers approximately 8,611 acres, and Adelanto borders it on the north, west, and part of the south. Airport runways are less than 1 mile north of the Project site. The Project would add approximately 8.26 million square feet of logistics uses south of Air Expressway, while the SCLA Priority Development Area would allow approximately 26 million square feet north of the roadway over 25 years. The two development areas are governed by different cities but share roadways, drainage systems, the Mojave Desert Air Basin, biological resources, and the regional groundwater basin.

Specific Plan and Land Use Program

The SCLA Specific Plan (SP1-92) took effect in March 1993 and has been amended several times. A 2004 amendment added approximately 3,373 acres, primarily for an unbuilt rail intermodal facility. The current 2021 amendment (SPA-1-92 (A-23)) reduced the industrial area by more than 1,000 acres, expanded the airport area, established a Public Institutional district for the federal

prison, and updated circulation, infrastructure, and design provisions. Table 2-2 and Figure 2-6, *SCLA Specific Plan Land Use Plan*, summarize the land use program.

Table 2-2. SCLA Specific Plan Land Use Program (2021 Amendment)

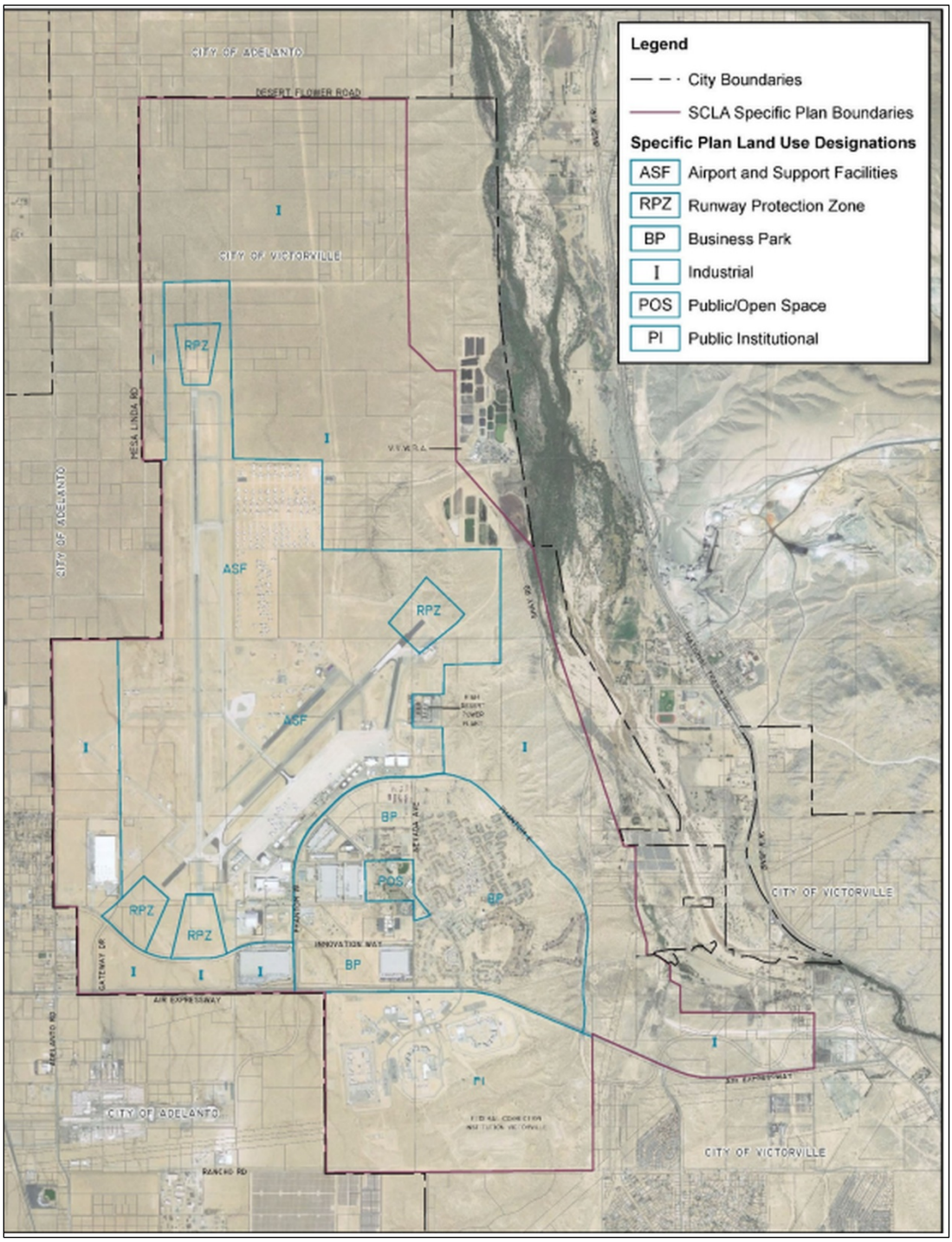
Land Use District	2004 Plan (acres)	2021 Plan (acres)	Net Change (acres)
Airport and Support Facilities (ASF)	2,120	2,525	+405
Business Park (BP)	1,160	1,125	–35
Industrial (I)	4,773	3,767	–1,006
Public/Open Space (P/OS)	350	44	–306
Runway Protection Zone (RPZ)	300	210	–90
Public Institutional (PI)	—	940	+940
Total	**8,703**	**8,611**	**–92**

Cumulative Development Context

The Project and planned development within SCLA would create a substantial concentration of logistics and distribution uses on both sides of Air Expressway. Because the programs were evaluated at different times, each Section 4.0 cumulative analysis in this SEIR considers SCLA buildout together with the Project and other related development.

Figure 2-6. SCLA Specific Plan Land Use Plan

Source: SCLA Specific Plan Land Use Plan, Michael Baker International, March 2021.



2.4 Cross-Jurisdictional Conditions

Adelanto regulates land use on the Project site, while Victorville regulates the SCLA Specific Plan area. Air Expressway forms the principal boundary between them. Several physical systems, transportation facilities, and regional planning programs cross that boundary. This subsection identifies those connections; Section 4.0 evaluates the related environmental impacts and cumulative effects.

Airspace and Airport Operations

Part of the site lies beneath the Runway 35 approach surface for SCLA. Federal Aviation Regulations Part 77 defines imaginary surfaces around runways and requires Federal Aviation Administration review of structures that penetrate them. The SCLA Specific Plan requires Part 77 clearance for structures above 3,035 feet above mean sea level within the plan area. The 2008 SCLA Comprehensive Land Use Plan identifies the Runway Protection Zone, the future 65 dB CNEL contour, the Part 77 horizontal surface, and a broader Airport Planning Area.

Warehouse and manufacturing uses are normally acceptable in the last three areas, subject to an average of 150 persons per gross acre within the horizontal surface. Victorville did not adopt the plan, so it remains advisory (SCLA SEIR, Section 5.8). The Project site is in Adelanto and is not subject to the SCLA Specific Plan, but it is subject to Part 77. Aircraft operations also produce noise and overflights over the site. Section 4.6 (Hazards and Hazardous Materials), Section 4.8 (Land Use and Planning), and Section 4.9 (Noise) address these issues.

Drainage Across the City Boundary

Runoff from the site and tributary areas to the south and east passes through existing box culverts beneath Air Expressway into the SCLA West Side district. The April 2020 SCLA Master Plan of Drainage Update models this flow. Under existing conditions, runoff travels northwest from the culverts, crosses Adelanto Road, and enters the residential neighborhood west of the road as sheet flow. A detention basin constructed with the Dr Pepper/Snapple facility reduces, but does not eliminate, neighborhood flooding (SCLA SEIR, Section 5.9).

Roadways, Truck Traffic, Air Quality, and Noise

Air Expressway provides frontage for both development areas and carries SCLA traffic west to U.S. Highway 395 and east to Interstate 15. It would also carry Project traffic. Adelanto Road and U.S. Highway 395 serve both areas. The SCLA SEIR forecast buildout traffic on these roads and identified improvements funded through Victorville's development impact fee program.

Both areas are in the Mojave Desert Air Basin and under the jurisdiction of the Mojave Desert Air Quality Management District. Truck activity is a principal source of emissions in both areas. The SCLA SEIR found significant and unavoidable buildout emissions of nitrogen oxides, carbon monoxide, PM10, and PM2.5 and found the program inconsistent with the applicable air quality plan. It found greenhouse gas emissions less than significant under the district threshold then in effect. This SEIR applies the City's 2025 thresholds and identifies the Project's greenhouse gas impact as significant and unavoidable. Section 4.5 explains the different conclusions.

The SCLA SEIR forecast that buildout traffic noise along Air Expressway between U.S. Highway 395 and Adelanto Road would increase from approximately 63.6 to 72.6 dB CNEL. Along U.S. Highway 395 between Air Expressway and Palmdale Road, levels would increase from approximately 67.1 to 74.7 dB CNEL. The SCLA SEIR found these increases significant and unavoidable. Project trucks would use the same road segments (SCLA SEIR, Section 5.11).

Water, Sewer, and Electricity

Different utilities serve the two jurisdictions. The Victorville Water District provides SCLA water and sewer service. Wastewater treatment occurs at the Victorville Wastewater Treatment Facility, which has a capacity of 2.5 million gallons per day, and at the Victor Valley Wastewater Reclamation Authority regional plant. Victorville Municipal Utility Services supplies electricity in the southern Specific Plan area. The Adelanto Public Utility Authority and Southern California Edison would serve the Project. Both areas draw water from the adjudicated Mojave groundwater basin through the Mojave Water Agency. Sections 4.4 and 4.12 evaluate energy and utility capacity.

High Desert Corridor

The High Desert Corridor Joint Powers Agency is pursuing a 54-mile high-speed intercity rail line between Palmdale and the Victor Valley. Caltrans certified an EIR/EIS in 2016 for a multipurpose corridor that included a freeway and rail line, but selected the freeway No Build option in 2020. The California High-Speed Rail Authority became the lead agency for NEPA review in September 2025. The Joint Powers Agency anticipated a Record of Decision in late 2026 or early 2027 (HDC JPA Executive Director Report, July 9, 2026).

The Adelanto General Plan Mobility Element shows the corridor as a rail line along Air Expressway. The SCLA Specific Plan shows the 2018 freeway alignment along its southern edge, with circulation exhibits both including and excluding it. Neither plan designates parcel-specific right-of-way. The Joint Powers Agency's January 2026 preliminary footprint, which remains subject to change, crosses the northern half of the Project site south of Air Expressway.

The corridor is funded only for planning and design. The Joint Powers Agency has no adopted cost estimate or construction schedule and owns no property, and Measure M construction funds are scheduled for fiscal years 2063 to 2067. The 2009 EIR reserved corridor right-of-way across the site; the Project does not. Because the Mobility Element shows the corridor along Air Expressway, Section 4.8 evaluates whether the Project conflicts with the General Plan, and Section 4.10 addresses transportation effects.

References

City of Adelanto. 2012. Adelanto North 2035 Sustainable By Design Technical Report. October.

City of Victorville. 2020. Southern California Logistics Airport (SCLA) Specific Plan Amendment (PLAN19-00004) Subsequent Program Environmental Impact Report, Public Review Draft (SCH No. 2003011008). Prepared by Michael Baker International. December.

City of Victorville. 2021. Southern California Logistics Airport Specific Plan (SPA-1-92 (A-23)). Prepared by City of Victorville Development Department, Michael Baker International, and Stirling Development. March.

City of Victorville. 2022. City of Victorville General Plan Update, Draft Program Environmental Impact Report. September. Prepared by Harris & Associates.

High Desert Corridor Joint Powers Agency. 2026. Board of Directors Meeting Agenda and Board Packet, July 9, 2026 (Executive Director Report and Attachment A). https://highdesertcorridor.org/board-meetings/

High Desert Corridor Joint Powers Agency. 2026. Financial Statements with Independent Auditor's Report, Fiscal Year Ended June 30, 2025. BCA Watson Rice LLP. March 16.

Farallon Consulting. 2026. Phase I Environmental Site Assessment. May 19. (Appendix E)

Leighton Consulting, Inc. 2024. Geotechnical Exploration. February 5. (Appendix D)

San Bernardino County Transportation Authority. 2025. San Bernardino County Long Range Multimodal Transportation Plan, Victor Valley Subarea Plan. February 5.

3.0 Project Description

3.1 Project Overview

The Project proposes seven industrial warehouse/distribution buildings totaling approximately 8.26 million square feet on approximately 451 acres. Buildings would range from approximately 151,000 to 1.5 million square feet, with warehouse and ancillary office space for goods movement and logistics tenants. Improvements include landscaping, parking, stormwater retention and infiltration facilities, water and sewer infrastructure, roadway and intersection improvements, and dry utilities.

All seven buildings would meet Class A industrial standards, with modern materials, interior clear heights of at least 40 feet, and large structural bays. They would include cross-dock configurations, trailer and auto parking, finishes, landscaping, and lighting. Facilities would serve large logistics, e-commerce, and manufacturing tenants requiring energy-efficient space, advanced building systems, and current fire and life-safety compliance. Ancillary offices would support logistics, management, and administration. The Project would develop seven buildings, each on its own parcel (Figure 3-1, Illustrative Site Plan and Building Tabulation).

Changes from the 2009 Approved Project

The Project proposes seven buildings totaling 8,256,274 square feet, compared with nine buildings totaling 6,935,398 square feet under the 2009 Approved Project. Building area increases by 1,320,876 square feet. The property is approximately 472 gross acres after the CarMax parcel sale, compared with approximately 502 gross acres in 2009. More land is developable because the Project omits the 2009 reservations: approximately 36.7 acres for the High Desert Corridor, 27.2 acres for detention and drainage easements, and a 1.5-acre fire station parcel. The City removed the fire station requirement when it adopted the Adelanto North 2035 Comprehensive Sustainable Plan. ADMP Channel 1 and the on-site retention system described in Section 3.10 now handle drainage.

Project Objectives

The Project's underlying purpose is to develop modern logistics and distribution facilities on a large, contiguous site the City has designated for industrial use. The Project objectives are:

- **Objective 1.** Develop Class A industrial warehouses and distribution facilities meeting current standards for clear height, structural bay spacing, dock ratio, and truck court depth. The buildings would accommodate logistics, e-commerce, and manufacturing tenants without later retrofit.

- **Objective 2**. Achieve sufficient development intensity to fund and support the Project's off-site water, sewer, drainage, and roadway improvements. Make efficient use of a large, contiguous industrial site under single ownership.
- **Objective 3**. Expand economic development, attract businesses, and provide Adelanto employment opportunities. Improve the city's jobs-to-housing balance to reduce the local workforce's need to commute outside the area.
- **Objective 4**. Make full and efficient use of land previously surveyed and analyzed under the certified 2009 Adelanto Gateway Logistics Center EIR, consistent with the site's Manufacturing/Industrial designation.
- **Objective 5.** Implement the infrastructure improvements identified in the City's Mobility Element, Water Master Plan and Sewer Master Plan.
- **Objective 6**. Provide temperature-controlled warehouse capacity to serve regional food and pharmaceutical distribution.
- **Objective 7**. Incorporate energy-efficient and low-emission design consistent with the California Green Building Standards Code, City of Adelanto General Plan policies, and California Air Resources Board guidance.
- **Objective 8.** Develop a logistic/warehouse facility near the Southern California Logistics Airport and US 395 to support regional goods movement.

3.2 Project Entitlements

Tentative Parcel Map No. 20837

Tentative Parcel Map No. 20837 would divide the 451-acre site into seven industrial parcels. It establishes boundaries, roadway and utility corridors, and easements for separate financing or ownership and orderly infrastructure installation under the Subdivision Map Act and City standards. The map establishes rights-of-way for Joshua Avenue, a new Project public street, and dedicates required drainage and utility easements for each parcel. The map is on file with the City of Adelanto Planning Division.

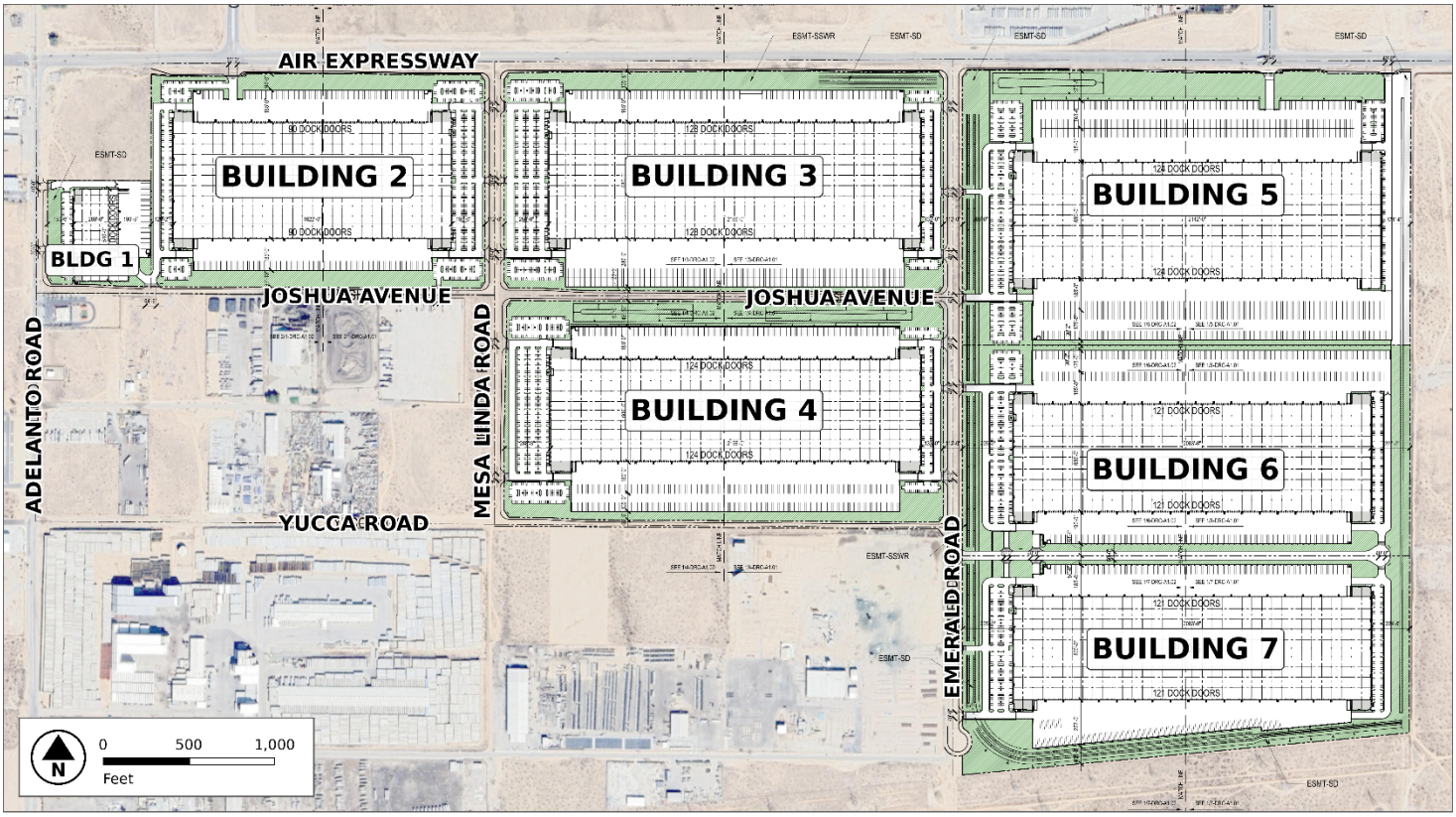
Location and Development Plan No. 25-02

The City requires review and approval of a detailed Location and Development Plan for new development or uses. Review addresses safe, efficient circulation; surrounding-use compatibility; attractive, efficient design; and required landscaping, open space, and other areas. Approval criteria include: (a) The proposed uses align with the General Plan; (b) The impact on adjacent uses, buildings, and structures has been considered, ensuring no significant adverse effects; (c) The site size and shape are adequate for the intended use and structures; and (d) The use complies with all relevant development standards of the Zoning District. (AMC Chapter 17.150).

Figure 3-1, *Illustrative Site Plan and Building Tabulation*, shows site area, building area, and parking by building. The Project includes 8,129,274 square feet of warehouse and 127,000 square feet of ancillary office space, totaling 8,256,274 square feet on 451.00 net acres. Each building has two office floors: 3,500 square feet per floor in Building 1 and 10,000 in Buildings 2 through 7. The floor area ratio is approximately 42 percent.

Figure 3-1. Illustrative Site Plan and Building Tabulation

Source: Steve K. Hong Architect, Adelanto Industrial Park Development Application Package, Sheet DRC-A1.00, Master Site Plan.



Building	Net Site Area (acres)	Warehouse (SF)	Office (SF)	Total (SF)	Auto Parking	Trailer Stalls
1	8.43	144,186	7,000	151,186	86	33
2	55.43	1,119,727	20,000	1,139,727	774	214
3	74.83	1,485,304	20,000	1,505,304	891	475
4	74.64	1,311,796	20,000	1,331,796	891	466
5	95.64	1,473,139	20,000	1,493,139	720	955
6	73.19	1,328,811	20,000	1,348,811	527	484
7	68.84	1,266,311	20,000	1,286,311	405	273
Total	**451.00**	**8,129,274**	**127,000**	**8,256,274**	**4,294**	**2,900**

3.3 Site Planning and Design Features

Site Access and Circulation

Driveways and new streets connect the buildings to Air Expressway and Adelanto Road along the site boundary. Internal circulation includes two main north-south streets from Air Expressway, Emerald Road and Mesa Linda Road, and one east-west street from Adelanto Road, Joshua Avenue.

Three full-access driveways serve Building 1. On Adelanto Road, automobile-only driveway "A" is approximately 260 feet north of Joshua Avenue, and truck-only driveway "B" is approximately 630 feet north. Driveway "C" is on Joshua Avenue, approximately 675 feet east of Adelanto Road. All distances are measured centerline to centerline.

Buildings 2, 3, and 4 are served by three full-access driveways on Air Expressway, seven on Emerald Road, and three on Joshua Avenue. Air Expressway along the Project frontage carries two westbound and two eastbound lanes.

Buildings 5, 6, and 7 are served by two driveways on Air Expressway and six on Emerald Road. Emerald Road is currently unpaved within the Project area and would be improved per City standards.

Development Standards

The site is in the Manufacturing/Industrial (MI) zoning district. Table 3-1 lists applicable MI development standards and Project compliance.

Table 3-1. Manufacturing Industrial (MI) District Development Standards

(1) Standard	MI Requirement	Project
Minimum lot size	20,000 square feet	367,327 square feet (smallest parcel, Building 1)
Front yard — building	25 feet	Varies (meets minimum)
Front yard — parking	10 feet	10 feet
Street side yard — building	25 feet	25 feet
Street side yard — parking	10 feet	10 feet
Side yard, all others	0 feet	0 feet

(1) **Standard**	**MI Requirement**	**Project**
Rear yard abutting residential	25 feet building; 10 feet parking	N/A
Maximum building height	60 feet north of Holly Road	55 foot parapet (1)
Maximum floor area ratio	No maximum	Approximately 42 percent
Landscaping, project area	At least 5 percent of project area	Approximately 13 percent
Landscaping, parking areas	At least 10 percent of parking areas	Verified as prior to building permit issuance
Off-street parking, warehouse	1 space per 1,000 square feet for the first 20,000 square feet; 1 per 2,000 square feet from 20,000 to 40,000; 1 per 4,000 square feet above 40,000 (2,261 spaces required)	Included in total
Off-street parking, office	1 space per 300 square feet (423 spaces required)	Included in total
Total off-street parking	2,684 spaces required	4,294 spaces provided
(2) Building Height and Navigable Airspace. *The FAA has issued preliminary findings that two corners of Building 3 would exceed the Runway 35 approach surface. MM HAZ-1 requires FAA clearance for each structure before a building permit is issued (Section 4.6, Hazards and Hazardous Materials).*		

Source: Adelanto Municipal Code §17.30.040, Table 30-1 (development standards), and §17.65.060 (off-street parking). Project provisions from the Project Tabulation.

Landscaping

Landscaping of varying widths would surround buildings and enclose and screen truck-loading and passenger-parking areas from public view. Drought-tolerant species and efficient irrigation would minimize nutrient and sediment runoff.

Outdoor Lighting

Site lighting consists of low-level light-emitting diode (LED) fixtures that meet the City's outdoor lighting requirements. All outdoor lighting fixtures — including spotlights, electrical reflectors, and other illuminations for signs, structures, landscaping, parking, loading, unloading, and similar areas — shall be focused, directed, and arranged downward to prevent glare or direct illumination on streets or adjoining property. The Project complies with the City's "Dark Sky" requirements.

3.4 Architectural Design

Architectural Features

Buildings would use contemporary architecture with concrete tilt-up panels painted in neutral white, grey, and blue shades. Maximum building height is 55 feet. Entries would feature glass curtain walls with neutral color palettes. Low-reflective windows would minimize glare for on-site and off-site viewers.

Recessed and projecting walls, reveal lines, and panel color changes would break up concrete expanses. Two-story glazing at corner offices would identify primary entries from adjacent streets. The 55-foot parapet would screen roof-mounted mechanical and refrigeration equipment from ground-level view. Where the site plan allows, dock doors and truck courts would face inward, with perimeter landscaping screening them from public rights-of-way. Exterior materials would be painted concrete tilt-up panels, low-reflective glazing, and painted metal trim.

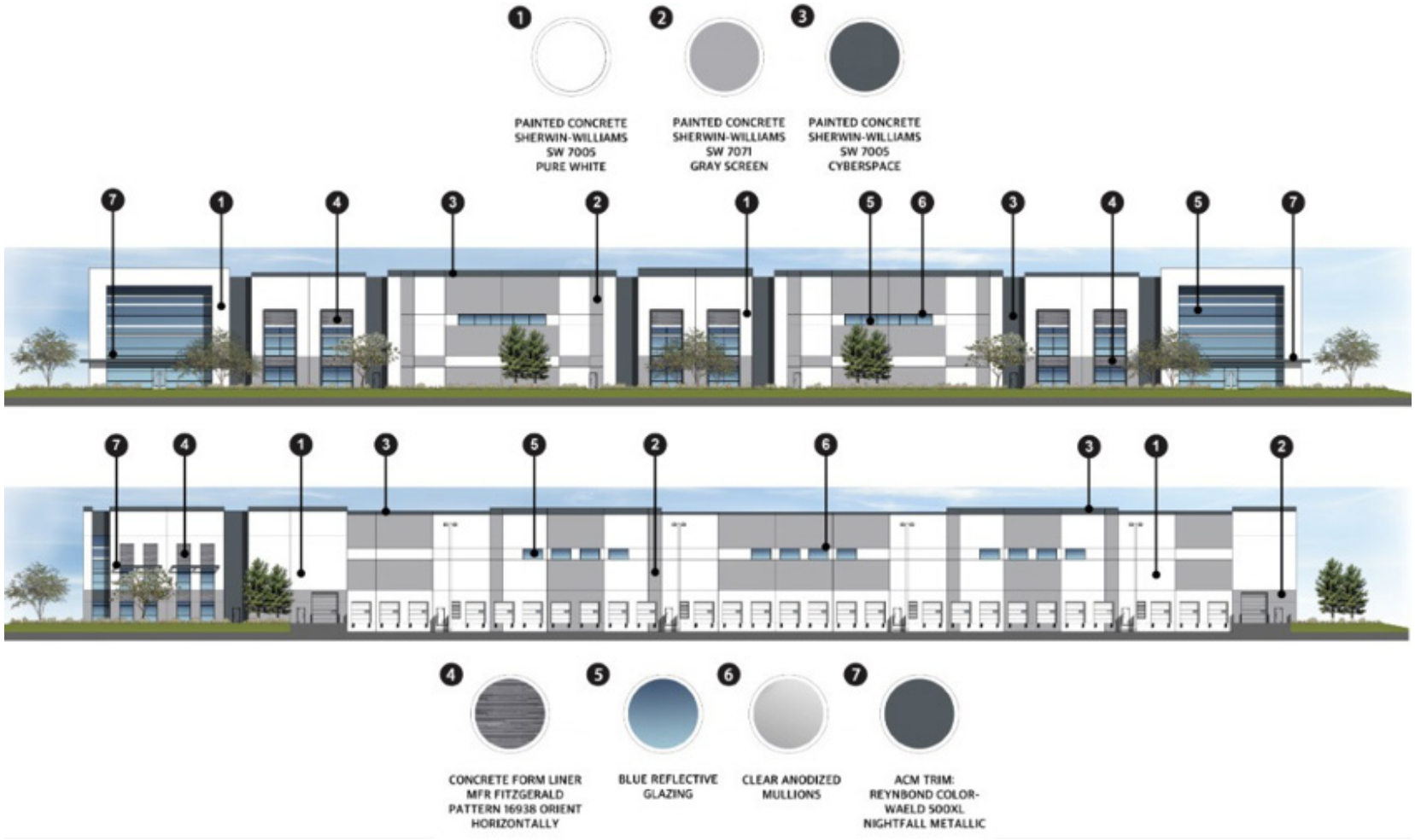
Figure 3-2. Conceptual Site Rendering (View Looking Northeast)

Source: Steve K. Hong Architect, Adelanto Industrial Park Development Application Package.



Figure 3-3. Typical Architectural Design

Source: Steve K. Hong Architect, Adelanto Industrial Park Development Application Package.



3.5 Building Design Features

Energy Efficiency and Sustainability

The Project incorporates high-efficiency, low-emission technologies and construction practices consistent with City of Adelanto General Plan policies and the California Green Building Standards Code (CALGreen). It also follows best management practices recommended by the California Attorney General and the California Air Resources Board (CARB). These features reduce energy demand, support electrification, and improve environmental performance. The following Project Design Features (PDFs) would be implemented through building plan review and permitting:

- **PDF-1: Building Energy Design.** Building heating, water heating, and other building systems are designed to operate on electricity. Natural gas service to the buildings and the natural gas generation option are described below under On-Site Natural Gas Generation Option. Natural gas use is evaluated in Sections 4.1 (Air Quality), 4.4 (Energy), and 4.5 (Greenhouse Gas Emissions) at the levels analyzed in Appendix A-4.
- **PDF-2: Electric Cargo-Handling Equipment.** All on-site operational and cargo-handling equipment (e.g., forklifts, pallet jacks) shall be electric, with dedicated charging infrastructure integrated into the Project's electrical system and storage areas.
- **PDF-3: Electric Vehicle (EV) Charging Infrastructure.** Provide EV chargers and EV-capable parking spaces that exceed California Green Building Standards Code requirements by at least 10 percent. Electrical hookups shall also be installed at loading docks to allow electric trucks to plug in while parked or idling.
- **PDF-4: On-Site Photovoltaic Systems.** Each warehouse building shall include a minimum 45-kilowatt photovoltaic (PV) solar system that exceeds energy code minimum requirements.
- **PDF-5: Optimized Building Envelope.** The Project shall incorporate energy-efficient design measures, including low-emissivity glazing, reduced U-values and solar heat gain coefficients (SHGC), and high solar reflectance index (SRI) roofing and wall materials.
- **PDF-6: High-Efficiency Lighting.** Lighting fixtures will exceed Title 24 efficiency requirements through the use of high-lumen-per-watt technology and advanced lighting controls.
- **PDF-7: Enhanced Indoor Air Filtration.** Mechanical ventilation systems will include Minimum Efficiency Reporting Value (MERV)-8 filters or higher to improve indoor air quality and reduce exposure to airborne particulates.

- **PDF-8: Low-Emission and Carpool Parking.** Under CALGreen Section 5.106.5.2, a minimum of 95 parking spaces will be designated for low-emitting, fuel-efficient, and carpool/vanpool vehicles.
- **PDF-9: EV-Ready Raceways.** Under CALGreen Section 5.106.5.3.2, raceways and electrical infrastructure will be provided in at least 28 standard parking spaces and all accessible spaces to accommodate future EV charging installations.
- **PDF-10: Refrigeration System Efficiency.** Cold storage buildings shall use high-efficiency refrigeration systems incorporating variable-speed compressors, floating head pressure control, and evaporator fan controls, and shall use refrigerants with a global warming potential of 150 or less where permitted by code.

Building Code Characteristics

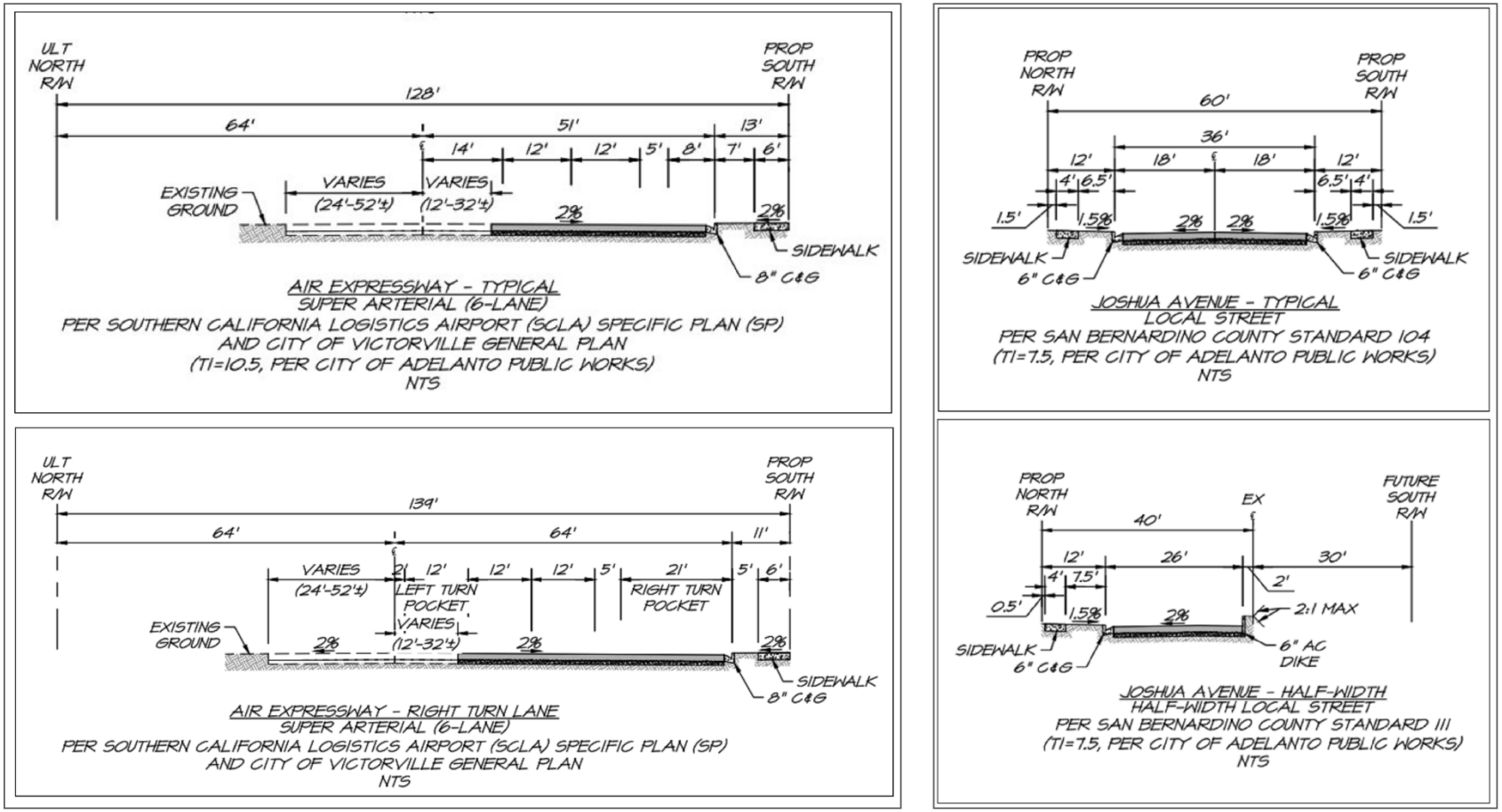
The Type III-B buildings have S-1 warehouse and B office occupancies with no required occupancy separation. Each has one story, a two-story office component, and a 55-foot parapet. Early suppression fast response sprinklers throughout eliminate the draft curtain requirement. Building area is unlimited under California Building Code §506, and maximum travel distance is 400 feet under §1017.2.2.

3.6 Circulation Improvements

Street Improvements

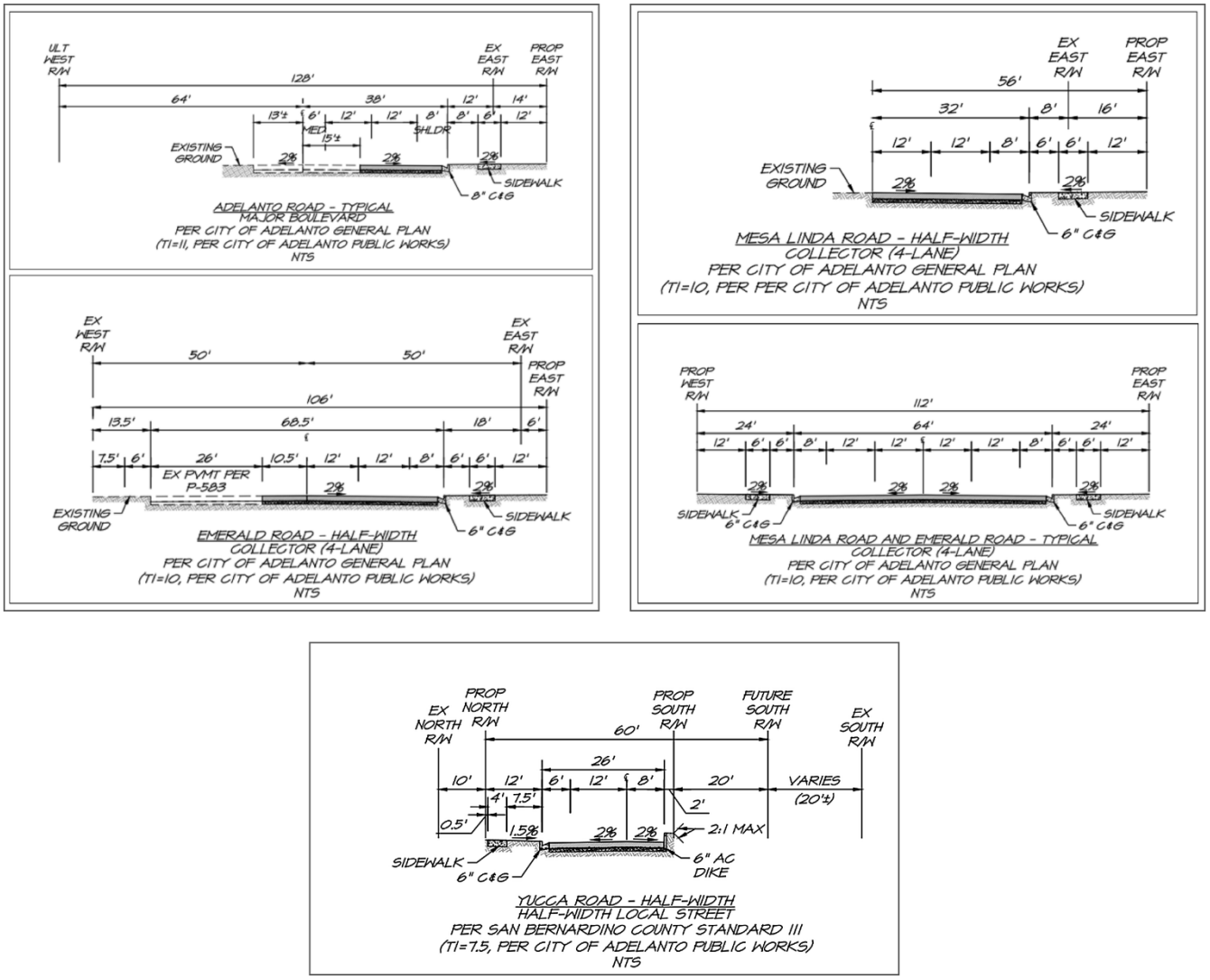
Transportation improvements include standard half-width frontage construction along adjacent public streets and reconstructed intersection approaches at four Air Expressway access points. The Project would also build Joshua Avenue along its southern frontage and internal driveways. Air Expressway and Adelanto Road would retain their existing through-lane cross-sections. Construction outside existing pavement is limited to intersection approaches for added turn lanes and half-width segments along the Project frontage. The Revised Traffic Impact Study (Appendix H-1), including Conceptual Striping Plans, provides the technical basis. Each street would be built to its typical or half-width section (Figure 3-4, Street Cross Sections).

Figure 3-4. Street Cross Sections (Sheet 1 of 2)



Source: Project preliminary street improvement plans.

Figure 3-4. Street Cross Sections (Sheet 2 of 2)



Improvements Constructed Beyond Project Boundaries

Table 3-2 lists street construction areas beyond the 451-acre site. Restriping within existing pavement is excluded because it causes no ground disturbance.

Table 3-2. Off-Site Street Improvements

Improvement	Location	Extent
New intersection legs — Air Expressway	Air Expressway at Gateway Drive, Mesa Linda Road, Emerald Road, and Phantom West	Construction of a new south leg at each of the four Project access intersections, connecting the Project site to Air Expressway. New pavement outside the existing roadway.
Intersection approach widening	Air Expressway at the four Project access intersections, and Adelanto Road at Joshua Avenue	Widening of intersection approaches to accommodate turn lanes. Work occurs outside the existing pavement edge at each approach.
Traffic signals	Air Expressway at Mesa Linda Road and at Emerald Road	Installation of two new traffic signals at currently unsignalized intersections, including poles, foundations, and conduit. Existing signals at Gateway Drive and Phantom West would be modified to eight-phase operation.
Right-in/right-out driveway	Air Expressway, approximately 700 feet east of the south leg at Phantom West	Construction of a right-in/right-out driveway providing supplementary access to the eastern portion of the Project site.

Source: Revised Traffic Impact Study, David Evans and Associates, Inc., August 24, 2026 (Appendix H-1).

3.7 Water Infrastructure Improvements

Off-site waterline extensions and on-site distribution improvements would supply domestic water and fire flow to each building. Improvements include four master-plan components and on-site distribution, described below. (See Figure 3-5, *Proposed Water Infrastructure Improvements*).

Mesa Linda Road and Joshua Avenue Waterline Extension (Portion of Master Plan Improvement W-6)

A 12-inch-diameter waterline extension is required along Mesa Linda Road and Joshua Avenue. On Mesa Linda Road, it extends north from Yucca Road to Building 2's point of connection (POC), just south of Air Expressway. On Joshua Avenue, it extends east from Adelanto Road to Emerald Road.

Emerald Road Waterline Loop (Portion of Master Plan Improvement W-7)

A 12-inch-diameter waterline is needed along Emerald Road from Violet Road to Building 5's POC, just south of Air Expressway. If the possible existing 8-inch-diameter line between Yucca Road and Violet Road is confirmed, it would be replaced with the 12-inch line.

The Feasibility Study identifies a 12-inch-diameter waterline on Emerald Road between Violet Road and Rancho Road as an "Implementing Facility". It was needed before the Project could receive adequate water supply and fire flow, and it has been installed.

U.S. 395 Pressure-Reducing Station and Waterline (Master Plan Improvements W-10 and V-3)

Pressure Zone 3, approximately 1.5 miles southwest of the Project, has a higher hydraulic grade and approximately 15 MG of storage. Connecting the pressure zones requires approximately 2,000 feet of 12-inch-diameter waterline in Adelanto Road and a pressure reducing station (PRS). Multiple PRS valves would meet flow and pressure requirements under varying demand. T The Project would construct or secure them before service begins, subject to City-approved reimbursement.

Adelanto Road 12-Inch Waterline Replacement (W-5)

An 8-inch-diameter waterline of substandard PVC in Adelanto Road between Air Expressway and Yucca Road has reached the end of its service life. The developer would replace it with a 12-inch-diameter pipe along the Project frontage. Reimbursement may cover work beyond the property under the W-5 General Infrastructure Improvement waterline replacement.

On-Site Distribution

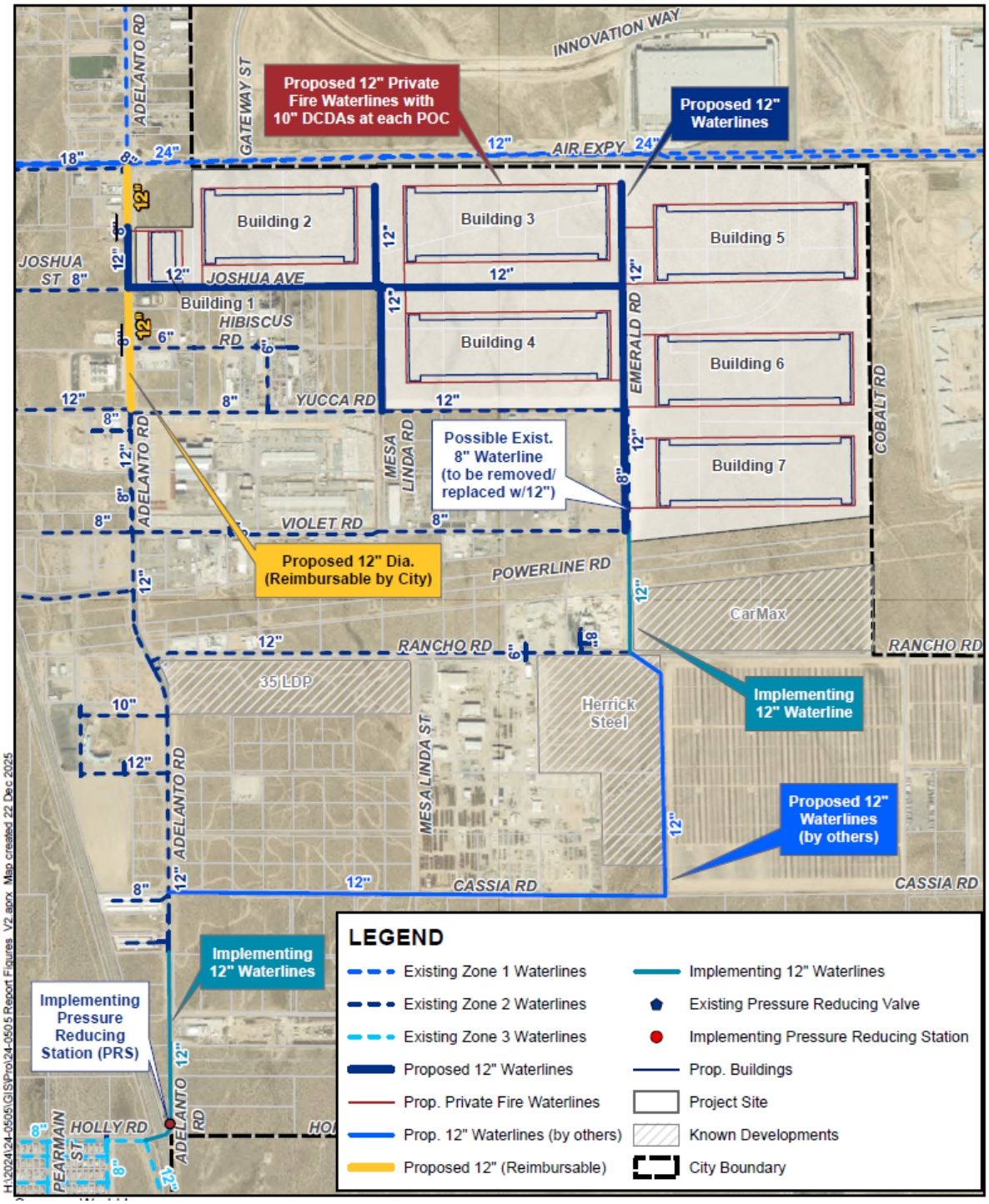
Each building has two connections to the public 12-inch-diameter waterlines. Each POC would have a 10-inch-diameter double check detector assembly (DCDA). Private on-site fire waterlines are expected to be 12-inch-diameter to maintain low head losses. Domestic lines would meet building and plumbing code sizing requirements.

Improvements Constructed Beyond Project Boundaries

Off-site work beyond the 451-acre site includes a pressure-reducing station at Adelanto Road and Holly Road and a 12-inch waterline. The line extends approximately 2,000 feet north within the Adelanto right-of-way to south of Cassia Road, as shown on Figure 3-5*, Proposed Water Infrastructure Improvements*

Figure 3-5. Proposed Water Infrastructure Improvements

Source: Albert A. Webb Associates, Sewer and Water Feasibility Study (Appendix I).



3.8 Sanitary Sewer System Improvements

No public sanitary sewer serves the site. The Project would build on-site collection lines and an off-site extension to the Adelanto Public Utility Authority (APUA) system. Gravity mains of 8-inch diameter or larger in Joshua Avenue, Mesa Linda Road, and other on-site rights-of-way would collect wastewater through building service laterals.

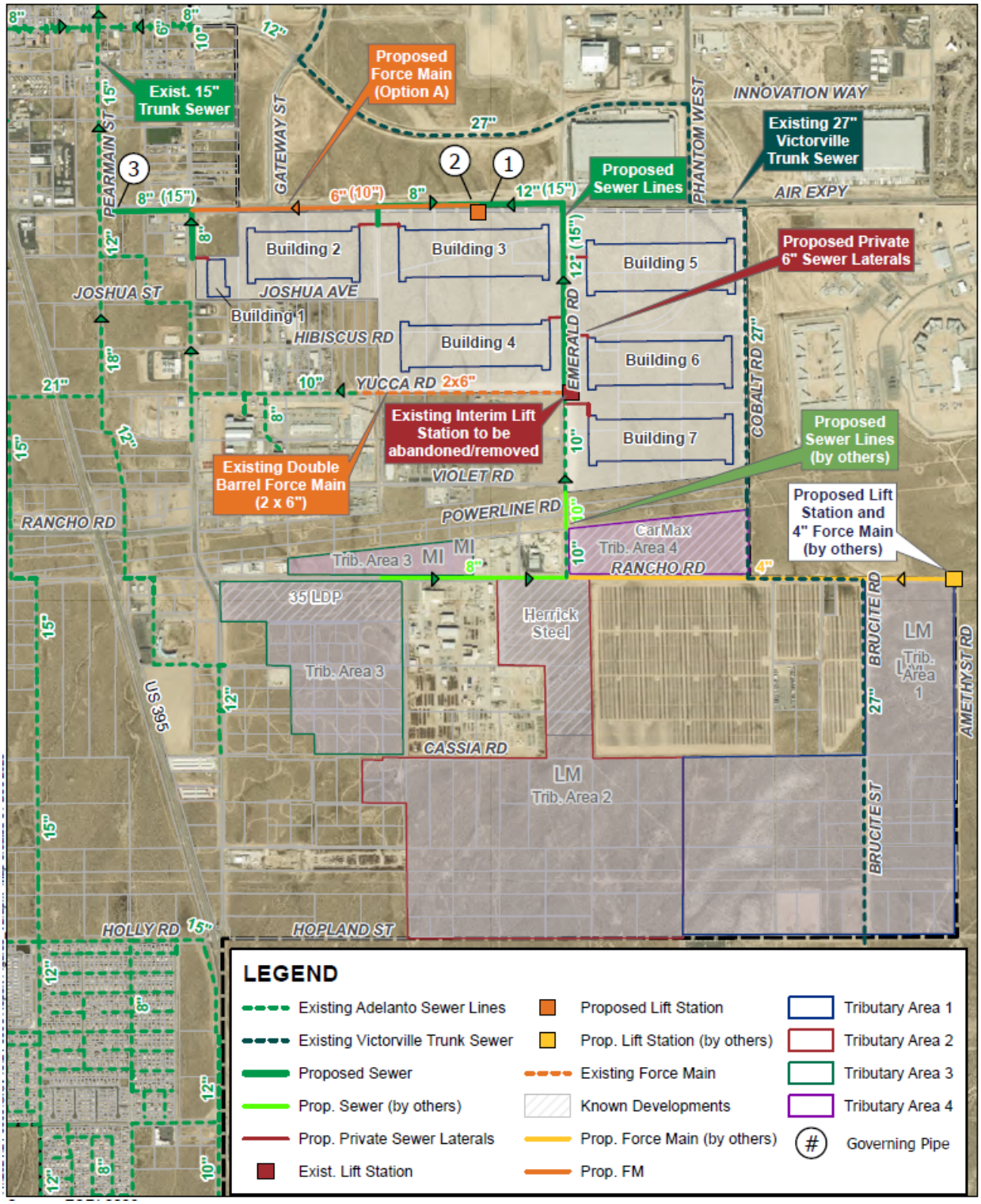
The conventional gravity network slopes to one off-site connection, requiring no on-site lift station. Manholes occur at changes in grade, alignment, and pipe size and at City-required intervals. Individual laterals allow service as each building is occupied. The City-owned system would convey wastewater to the Adelanto Wastewater Treatment Plant at Jonathan Street and Auburn Avenue. Woodard & Curran operates the plant under City contract. Connections require Adelanto Public Utility Authority's Will-Serve verification at building permit. Section 4.12 (Utilities and Service Systems) evaluates treatment capacity.

Improvements Constructed Beyond Project Boundaries

Construction extends beyond the 451-acre site shown in Figure 3-6, *Proposed Sewer Infrastructure Improvements*. The Feasibility Study's Plan A includes a lift station at the Air Expressway low point just west of Emerald Road. A force main extends west in the Air Expressway right-of-way to the existing 15-inch trunk sewer at Pearmain Street. A gravity sewer along Air Expressway serves Buildings 2 and 3. The lift station and force main accommodate sub-area buildout tributary to the low point, including parcels beyond the Project.

Figure 3-6. Proposed Sewer Infrastructure Improvements

Source: Albert A. Webb Associates, Sewer and Water Feasibility Study (Appendix I).



3.9 Drainage and Stormwater Improvements

Regional Drainage — Adelanto Master Plan of Drainage

Regional ADMP Channel 1 conveys flows west from the southern Project boundary to Emerald Road, then south along the street. It then runs west along the northern boundary to an existing Air Expressway culvert. The channel has a 25-foot base width and 7-foot depth. Culverts at driveway crossings would maintain access to Buildings 5, 6, and 7.

An 80-foot-wide easement would be dedicated along Adelanto Road to preserve the future regional ADMP Channel 1A alignment for construction when tributary development occurs.

Stormwater Management

Four main storm drains collect on-site flows and intercept off-site street flows. Line A serves Buildings 1 and 2 along Joshua Avenue. Line B runs south through Mesa Linda Road for Buildings 2B and 2D. Line C runs from Yucca Road for Buildings 3A, 3C, 4A, 4C. Line D follows the eastern boundary for Buildings 5B–7D and collects ditch flows. Lines B, C, and D outlet to Air Expressway culverts.

The Low Impact Development (LID) system retains and infiltrates on-site runoff while conveying off-site tributary flows. Water quality follows the Mojave River Watershed Water Quality Management Plan, Phase II Small MS4 General Permit, and Adelanto stormwater rules. Surface and underground infiltration basins would capture and treat 100% of the required volume.

Three surface basins (4A, 4B, and 5A) serve specific building areas. Twenty-two underground detention chamber systems retain stormwater for percolation into native soils. Gravel surrounds the below-grade, geotextile-wrapped chambers. Pumps serve some systems because of limited cover.

Post construction pollution prevention measures include staff training, debris control, catch basin maintenance, vacuum sweeping, and covered loading docks. Stormwater design details are in the Preliminary Drainage Study and Water Quality Management Plan.

3.10 Utilities and Service Systems Improvements

Electrical, natural gas, and telecommunications infrastructure would be extended throughout the Project site to serve all buildings at full buildout.

Electrical Service

Southern California Edison (SCE) would extend service from existing Air Expressway facilities. New lines along Joshua Avenue and Mesa Linda Road would serve the western site, and Emerald Road lines would serve the eastern site. Adelanto Road lines would serve Building 1. All buildings would connect to this network.

Three SCE circuits from two substations serve the area: Portland 33 kV from Victor Substation, and Freightliner and Mack 12 kV from Roadway Substation. Their combined available capacity is approximately 28.5 megawatts, and upgrades may be required (SCE Economic Development listings, June 1, 2026). SCE has not committed to a schedule for building and energizing Project service facilities. SCE is planning capacity projects in the area, and State energization timelines do not cover work that requires upstream capacity upgrades (Section 4.4, Energy).

If SCE cannot serve a building when ready for occupancy, the Applicant may install natural gas generation there, at up to three buildings. On-Site Natural Gas Generation Option below describes the option. Sections 4.1 (Air Quality), 4.4 (Energy), and 4.5 (Greenhouse Gas Emissions) evaluate it.

Existing Petroleum Pipeline

A Kinder Morgan petroleum products pipeline runs within the Air Expressway right-of-way along the northern frontage. Tentative Parcel Map No. 20837 shows its approximate location. No pipeline easement crosses Project parcels. Street, signal, sewer, and storm drain work in Air Expressway would be located and marked through Underground Service Alert. Construction would meet Kinder Morgan's encroachment and clearance requirements, as for other street utilities.

Telecommunication Facilities

Telecommunications infrastructure, including fiber optics, would be installed with frontage improvements. Lines along Joshua Avenue, Mesa Linda Road, Emerald Road, and Adelanto Road would serve the site. Area providers are Verizon and Spectrum.

Natural Gas

Southwest Gas Corporation can supply gas from its 8-inch high-pressure main in Air Expressway. Main extensions and service lines would follow the Southwest Gas line extension rule approved

by the California Public Utilities Commission. Gas and electrical lines would use the same street corridors.

On-Site Natural Gas Generation Option

The Project is designed for Southern California Edison electricity, with electric building systems, including space and water heating. Natural gas generation is a contingency. If SCE cannot serve a building when it is ready for occupancy, the Applicant may install gas engines there until SCE service begins. The option covers up to three buildings, with 22.5 megawatts of combined installed capacity and annual gas use of no more than 747,228 million British thermal units, the levels analyzed in the Natural Gas Emissions Update (Appendix A-4). RR UTIL-6 sets those limits. The air quality, energy, and greenhouse gas analyses assume full capacity at all three buildings and full fuel use. Engines stop when SCE serves the building. Exceeding the limits would change the Project and require further review under CEQA Guidelines Section 15162.

On-site electrical generation is a conditionally permitted use in the Manufacturing/Industrial district and requires a Conditional Use Permit from the City. The generators also require an Authority to Construct and a Permit to Operate from the Mojave Desert Air Quality Management District. Both must be issued before a building permit for any generator. Site-specific requirements, including emission limits and separation from sensitive receptors, are set through those permits.

3.11 Project Construction Activities

Table 3-3, Construction Activity, lists site preparation, grading and infrastructure, building construction, paving, and architectural coating and finishes. Infrastructure and roadway access would serve the site while maintaining safe circulation on adjacent public streets. Construction is expected from October 2027 through December 2030, with an opening year of 2030.

Table 3-3. Construction Activity

Construction Activity	Start	End	Working Days
Site preparation	October 1, 2027	December 2, 2027	45
Grading and site infrastructure	December 3, 2027	December 21, 2028	275
Building construction	December 22, 2028	December 31, 2030	528
Paving and site work	February 21, 2029	December 31, 2030	485
Architectural coating and finishes	February 21, 2029	December 31, 2030	485

Source: Air Quality Impact Analysis, Urban Crossroads, August 14, 2026 (Appendix A-1), Table 3-3, Construction Duration. Working days assume a five-day week. Building construction, paving, and architectural coating overlap; the activities are not sequential.

Earthwork

The site requires fill. The preliminary grading plan estimates approximately 717,500 cubic yards of cut and 2,539,600 cubic yards of fill, for a net import of approximately 1,822,100 cubic yards. The source of the fill has not been selected. Fill would come from a permitted borrow site or from a construction project with surplus soil in the Victor Valley, and would be clean fill meeting the geotechnical engineer's specifications. Haul trucks would use the City's designated truck routes, Air Expressway, Adelanto Road, and U.S. Highway 395, and would enter the site from Air Expressway. Before a grading permit is issued, the Applicant shall identify the fill source and haul route in a haul route plan approved by the City Engineer. The air quality analysis assumes 819 haul truck trips per day during the grading and site infrastructure phase, no haul trips during the other phases, and the model's default haul trip length (Appendix A-1, Table 3-5). The effect of haul trucks on the route is addressed in Sections 4.9 (Noise) and 4.10 (Transportation).

Construction activities would occur between 7:00 a.m. and dusk on weekdays, as allowed by Municipal Code §17.90.020(d), with weekend or holiday work only with the Building Official's consent. Equipment would be maintained in proper working order, and all construction activities would implement dust control and emission-reduction measures consistent with Mojave Desert Air Quality Management District (MDAQMD) Rules 402 and 403.

The Project would be constructed in a single phase. All Project-related street improvements described in Section 3.7 would be installed before the first building is occupied.

3.12 Project Operational Activities

Allowable Uses

Approximately 80 percent of the Project's total floor area would be transload and short-term storage, and approximately 20 percent, approximately 1.65 million square feet, would be cold storage. The cold storage may be concentrated in one or more buildings. Section 4.0 analyses use this split for trip generation, energy demand, refrigeration, and transport refrigeration unit assumptions.

The logistics and distribution center would include High-Cube Transload and Short-Term Storage Warehouses (ITE Land Use Code 154) and High-Cube Cold Storage Warehouses (ITE Land Use Code 157). Facilities would receive, temporarily store, sort, and transship goods for regional and national distribution. Transload warehouses primarily transfer freight between trucks and rail or long-haul and local delivery trucks, with minimal long-term storage. Short-term warehouses hold inventory, usually less than 30 days, before shipment to retailers, distribution centers, or end users.

Cold storage performs these functions at controlled temperatures to preserve food, pharmaceuticals, and other perishables, using insulated envelopes and high-efficiency refrigeration.

Prohibited Uses

The Project does not include data centers. This SEIR analyzes warehouse, distribution, and cold storage uses only. Data center occupancy of any portion of the Project would require separate discretionary approval and separate environmental review.

Vehicle Trips

Truck and employee access would be available 24 hours, with peak activity generally during daytime business hours. Trucks would arrive throughout the day, concentrated during inbound and outbound shipping. Employees would work primarily weekday shifts, with fewer night and weekend staff supporting logistics and refrigeration management.

At buildout, estimated trips are 12,749 daily, 711 AM peak hour, and 859 PM peak hour, as shown in Table 3-4, *Project Trip Generation by Vehicle Type*.

Table 3-4. Project Trip Generation by Vehicle Type

Vehicle Type	Mode Share	Daily Trips	AM In	AM Out	AM Total	PM In	PM Out	PM Total
Passenger cars	74.21%	9,461	406	122	528	178	459	637
2-axle trucks	4.55%	580	25	7	32	11	28	39
3-axle trucks	4.18%	533	23	7	30	10	26	36
4-or-more-axle trucks	17.04%	2,172	93	28	121	41	105	146
Trucks, all types	**25.77%**	**3,285**	**141**	**42**	**183**	**62**	**159**	**221**
Total	**100%**	**12,749**	**547**	**164**	**711**	**240**	**619**	**859**

Source: Revised Traffic Impact Study, David Evans and Associates, Inc., August 24, 2026 (Appendix H-1), Table 5-1. Rates from Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, for High-Cube Transload and Short-Term Storage Warehouse (Land Use 154) applied to 80 percent of floor area and High-Cube Cold Storage Warehouse (Land Use 157) applied to 20 percent. Vehicle mix from South Coast Air Quality Management District, High Cube Warehouse Trip Generation Study (2013-2014). Trips are actual vehicle trips; passenger car equivalents are reported in Appendix H-1 and are used in the intersection operations analysis in Subsection 4.10, Transportation.

Hours of Operation

Buildings would operate up to 24 hours per day, seven days per week. Truck activity would peak during inbound and outbound shipping. Administrative and management staff would primarily work weekday daytime shifts. Cold storage requires continuous refrigeration and staffing across all shifts.

Employment

The VMT Analysis (Appendix H-2) estimates 7,197 employees at buildout. It applies 1,195 square feet per employee to warehouse floor area, using the Southern California Association of Governments Employment Density Study Summary Report (October 31, 2001). The VMT model used 8,599,962 square feet, more than the Project's 8,256,274 square feet, so the employee estimate is conservative.

On-Site Cargo Handling Equipment

Cargo handling equipment moves containers and trailers within the truck courts. The air quality and greenhouse gas analyses model 30 pieces of compressed natural gas cargo handling equipment operating four hours per day, 365 days per year, as the unmitigated condition. MM AQ-12 requires electric cargo handling equipment, which eliminates emissions from that equipment; the mitigated modeling accordingly reflects no on-site equipment emissions. PDF-2 also requires electric cargo handling equipment.

3.13 Required Permits and Approvals

Table 3-5 lists anticipated SEIR-covered approvals and permits, responsible agencies, and the conditions triggering each requirement.

Table 3-5. Summary of Anticipated Agency Permits and Approvals

Agency	Permit or Approval	Trigger or Condition for Requirement
City of Adelanto	Certification of Subsequent EIR	Required for discretionary project approval.
	Location and Development Plan (LDP)	Required for new development in industrial zones.
	Tentative Parcel Map (TPM No. 20837)	Required to subdivide the property into seven industrial parcels.
	Conditional Use Permit (CUP) – On-Site Natural Gas Generation	Required only if the Applicant elects the on-site natural gas generation option described in Section 3.11; issued before a building permit for any generator.
	Grading, Building, and Encroachment Permits	Issued following discretionary approvals for site and infrastructure work.
California	Western Joshua Tree Incidental	Required due to the presence of

Agency	Permit or Approval	Trigger or Condition for Requirement
Department of Fish and Wildlife	Take Permit (ITP)	western Joshua trees on the site.
	Lake and Streambed Alteration Agreement (LSA)	Required if construction modifies the bed, bank, or channel of any drainage.
	Incidental Take Permit (ITP) – Burrowing Owl	Required only if focused surveys confirm the presence, and avoidance is infeasible.
	Incidental Take Permit (ITP) – Crotch's Bumble Bee	Required only if species are confirmed during focused surveys, and avoidance is infeasible.
	(No Action Required) – Desert Tortoise	Not detected during protocol surveys; no permit required.
	(No Action Required) – Mohave Ground Squirrel	Not detected during the 2024 protocol survey; no permit required.
Lahontan Regional Water Quality Control Board	Section 401 Water Quality Certification and/or Waste Discharge Requirements (WDRs)	Required because off-site improvements or utilities affect jurisdictional waters.
Lahontan Regional Water Quality Control Board	Construction General Permit coverage (SWPPP)	Required for construction disturbing more than one acre.
Mojave Desert Air Quality Management District	Dust Control Plan Authority to Construct and Permit to Operate	Required prior to any ground-disturbing activities. Required for stationary emission sources, including the on-site natural gas generators (if the option is elected) and cold-storage refrigeration equipment; issued before a building permit for any generator.
City of Victorville	Encroachment Permits	Required for street, signal, and utility work in the Victorville half of Air Expressway and for the signal modifications at the Gateway Drive, Phantom West, Emerald Road, and Mesa Linda Road intersections. The city boundary runs along the Air Expressway centerline. Victorville acceptance is also required for drainage discharged to the Air Expressway culverts and the SCLA Master Plan of Drainage facilities.

Agency	Permit or Approval	Trigger or Condition for Requirement
U.S. Army Corps of Engineers	Clean Water Act Section 404 Permit	Required only if off-site improvements affect waters of the United States.
Federal Aviation Administration	Determination of No Hazard to Air Navigation (14 CFR Part 77)	Required for each structure before a building permit is issued (MM HAZ-1).

4.0 Environmental Analysis

4.0.1. Scope of the Analysis

The City released the Notice of Preparation on May 29, 2025 for a 30-day scoping period ending June 30, 2025. It held a scoping meeting on June 11, 2025. The Native American Heritage Commission and California Department of Fish and Wildlife each submitted a comment letter (Appendix K). Scoping, the 2009 EIR, and Project technical studies identified twelve topics for detailed analysis in Sections 4.1 through 4.12:

- Section 4.1, Air Quality
- Section 4.2, Biological Resources
- Section 4.3, Cultural Resources
- Section 4.4, Energy
- Section 4.5, Greenhouse Gas Emissions
- Section 4.6, Hazards and Hazardous Materials
- Section 4.7, Hydrology and Water Quality
- Section 4.8, Land Use and Planning
- Section 4.9, Noise
- Section 4.10, Transportation
- Section 4.11, Tribal Cultural Resources
- Section 4.12, Utilities and Service Systems

The City found no potential for significant impacts in eight other topics. These are aesthetics, agriculture and forestry resources, geology and soils, mineral resources, population and housing, public services, recreation, and wildfire. Section 5.0, Effects Not Found to be Significant, and Section 6.4 address them.

Each analysis evaluates full buildout: 8,256,274 square feet of warehouse and distribution floor area on 451 acres, the maximum allowed by Project entitlements. Each section lists its technical studies, which are included as appendices.

4.0.2 Baseline

The baseline is the site and surrounding physical conditions on May 29, 2025, when the Notice of Preparation was published (CEQA Guidelines Section 15125(a)). Section 2.0 and the Environmental Setting subsection of each topic describe those conditions. Project effects are measured against those conditions, not against the 2009 EIR.

The analysis evaluates the Project's effects on the environment, not the environment's effects on the Project. It considers whether the Project would make existing conditions worse, such as flooding, airport hazards, or hazardous materials, for occupants or others (CEQA Guidelines Section 15126.2(a)). Building, safety, and land use standards applied at permitting protect occupants from existing conditions.

4.0.3 Organization of Each Section

Sections 4.1 through 4.12 follow the same outline:

- **Introduction.** Technical reports used and scoping comments on the topic.
- **Environmental Setting.** Relevant physical conditions on and around the site.
- **Regulatory Framework.** Applicable federal, State, regional, and local requirements and the Regulatory Compliance Requirements (RR) drawn from them.
- **Thresholds of Significance.** The threshold questions from Appendix G of the CEQA Guidelines and any City-adopted thresholds.
- **Impact Analysis.** Relevant setting, analysis, Regulatory Compliance Requirements, mitigation measures, and significance determination for each threshold.
- **Cumulative Impacts.** The Project's contribution to the effects of past, present, and reasonably foreseeable future projects.
- **Summary of Impacts and Mitigation Measures.** The determinations and the measures that apply.
- **References.** The sources cited in the section.

4.0.4 Terminology

Each threshold receives one of the following determinations:

- **No Impact.** The Project would not change the environment with respect to the threshold.
- **Less Than Significant.** The Project would change the environment, but not substantially, and no mitigation is required.
- **Less Than Significant with Mitigation.** The Project would cause a substantial adverse change, and mitigation measures reduce it below the threshold.
- **Significant and Unavoidable.** The Project would cause a substantial adverse change, and no feasible mitigation reduces it below the threshold. The City must adopt findings under CEQA Guidelines §15091 and a Statement of Overriding Considerations under §15093 to approve the Project.

Project Design Features (PDF), listed in Section 3.0, are parts of the proposed Project. Regulatory Compliance Requirements (RR) restate existing laws, permits, and conditions. They are not mitigation under CEQA Guidelines §15370 because they require no more than existing law. Mitigation Measures (MM) are additional SEIR commitments to reduce significant impacts, enforced through the Mitigation Monitoring and Reporting Program.

4.0.5 Cumulative Impacts

A cumulative impact is the combined effect of the Project and other past, present, and reasonably foreseeable projects (CEQA Guidelines Section 15355). This SEIR uses both methods CEQA allows for identifying those projects: growth projections in adopted plans and a list of nearby projects (Section 15130(b)(1)).

All topics use projections from the Adelanto North 2035 Comprehensive Sustainable Plan and SCAG Regional Transportation Plan/Sustainable Communities Strategy. Vehicle-related air quality and noise analyses also use a project list because nearby projects would add traffic to the same streets. Each section defines its cumulative study area. Examples include the Mojave Desert Air Basin for air quality and greenhouse gases, SCE and Southwest Gas service areas for energy, and local streets for traffic noise.

The City of Adelanto Planning Division's project list identifies approved and pending development within one-half mile of the site. Table 4.0-1 lists existing baseline development in Part A and four approved or pending projects in Part B. Figure 4.0-1, *Cumulative Setting Within One-Half Mile of the Project Site* maps them.

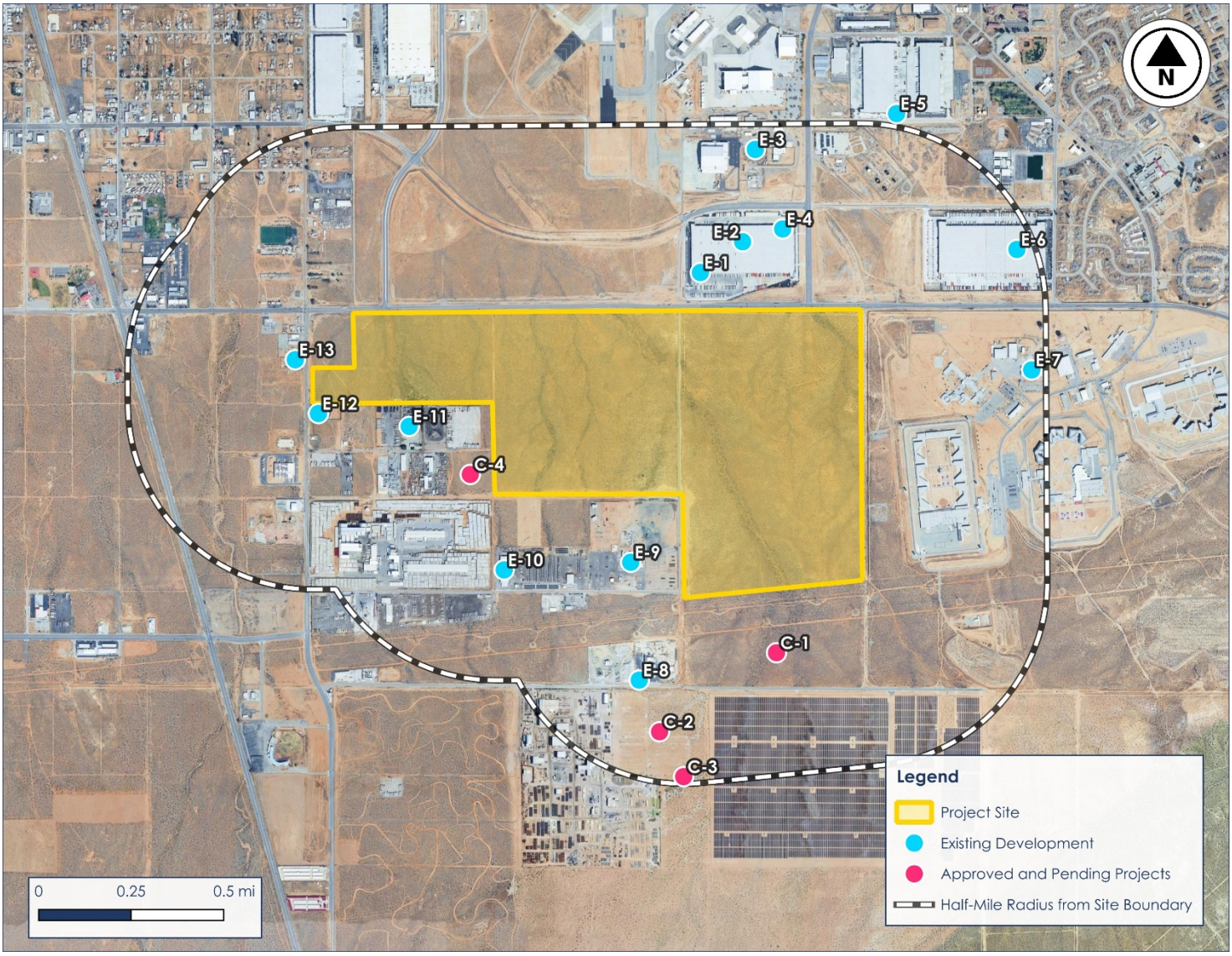
The cumulative analysis does not include the High Desert Corridor Intercity Rail Project, a proposed high-speed line between Palmdale and Victorville. It has no federal Record of Decision, no construction funding, and no construction schedule, so it is not a probable future project (CEQA Guidelines Section 15130(b)(1)(A)).

Table 4.0-1.Cumulative Project List

Cumulative Development				
Existing Development				
Map ID	**Description**	**Location**	**Direction**	**Distance (ft)**
E-1	Victorville DFC (Snack) warehouse	13133 Innovation Way, Victorville	North	540
E-10	Valew Quality Truck Bodies	12522 Violet Road	South	1,070
E-11	Soil Safe of California	12328 Hibiscus Road	South	330
E-12	Jet Room	17499 Adelanto Road	West	140
E-13	GM Precision Metal Spinning	17592 Adelanto Road	West	270
E-2	MWC West Coast Distribution Center	13133 Innovation Drive, Victorville	North	970
E-3	Ray Joye Machine and Fabrication	13059 Aerospace Drive, Bldg. 562, Victorville	North	2,280
E-4	DHL Supply Chain / Mars distribution center	13133 Innovation Drive, Victorville	North	1,150
E-5	Arden Companies (at the ½-mile line)	13364 Aerospace Drive, Victorville	North	2,820
E-6	Newell Brands / Graco warehouse	17182 Nevada Avenue, Victorville	Northeast	2,390
E-7	Federal Correctional Complex – Victorville	13777 Air Expressway, Victorville	East	2,440
E-8	Diversified Minerals	12808 Rancho Road	Southwest	1,330
E-9	Mobile Pipe Lining & Coating	12766 Violet Road	South	750
Approved and Pending Projects				
Map ID	Project Name/File No.	Location	Description	Status

Cumulative Development				
C-1	CarMax Vehicle FacilitCUP 24-01 / LDP 24-02y	NEC Emerald Road and Rancho Road (APNs 0459-841-16, -17), adjoining the site to the south	79,295 SF vehicle auction and preparation facility with carwash and offices / 47 acres	Approved; under construction; ITP NOD February 20, 2025
C-2	Rancho 38LDP 23-01 / MLDP 25-01	SWC Rancho Road and Emerald Road (APN 3128-291-02), ¼ mile south	700,000 SF warehouse distribution center / 38 acres	Planning approved; engineering under review
C-3	Emerald 20 Truck MaintenanceCUP 25-01 / LDP 25-01	NWC Cassia Street and Emerald Road (APNs 3128-301-06, -11, -12), ½ mile south	30,200 SF maintenance facility, 1,000 SF office, 520 trailer stalls / 20.61 acres	Planning approved May 20, 2025
C-4	CUP 26-03	NWC Mesa Linda Road and Yucca Road, adjoining the site	Industrial storage yard / approximately 10 acres	Application submitted March 25, 2026

Figure 4.0-1. Cumulative Setting Within One-Half Mile of the Project Site



4.0.6 References

California Department of Transportation and Los Angeles County Metropolitan Transportation Authority. 2016. High Desert Corridor Final Environmental Impact Report/Environmental Impact Statement. June 2016.

California High-Speed Rail Authority. 2026. Local Agency Sponsored Projects: High Desert Corridor (HDC) Intercity Rail Project. https://hsr.ca.gov/program-areas/environmental-planning/local-agency-sponsored-projects/. Accessed June 2026.

City of Adelanto. 2014. Adelanto North 2035 Comprehensive Sustainable Plan.

City of Adelanto Planning Division. 2026. Current project list.

High Desert Corridor Joint Powers Agency. 2025. HDC High Speed Rail Project Overview. May 2025.

High Desert Corridor Joint Powers Agency. 2026. About Us and Next Steps. https://highdesertcorridor.org/about-us/. Last updated May 22, 2026.

Los Angeles County Metropolitan Transportation Authority. 2016. Measure M Expenditure Plan. Adopted November 8, 2016.

Southern California Association of Governments. 2024. Connect SoCal 2024: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy.

4.1 Air Quality

4.1.1 Introduction

This section evaluates the Project's construction and operational air quality impacts. It describes the environmental and regulatory setting, applies the City's significance thresholds, and identifies applicable mitigation. The analysis relies on the following Urban Crossroads technical reports, incorporated by reference under CEQA Guidelines Sections 15147 and 15150:

Technical Reports

- Appendix A-1 Air Quality Analysis, Urban Crossroads, Inc, August 14, 2026
- Appendix A-2 Construction and Operational Health Risk Assessment, Urban Crossroads Inc, August 14, 2026
- Appendix A-3 Greenhouse Gas Analysis, Urban Crossroads, Inc., August 14, 2026
- Appendix A-4 Natural Gas Emissions Update, Urban Crossroads, Inc., September 15, 2026

Notice of Preparation/Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No comments addressed air quality.

4.1.2 Environmental Setting

Mojave Desert Air Basin (MDAB)

The Project site is in the Mojave Desert Air Basin within the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The District covers the desert portions of San Bernardino County and parts of Riverside and Kern Counties.

Regional Climate

Local emissions, topography, weather, and prevailing winds affect air quality in the Project area. Mountain ranges and broad valleys characterize the basin. Summers are generally hot and dry, winters are mild at lower elevations, and rainfall is limited. Westerly winds can transport pollutants from the South Coast Air Basin, particularly during summer.

Criteria Pollutants

The criteria pollutants evaluated for the Mojave Desert Air Basin are ozone, particulate matter (PM10 and PM2.5), carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. The basin is in nonattainment for ozone and PM10. Each pollutant's sources and health effects are listed in Appendix A-1.

Ambient Air Quality Standards

Federal and state ambient air quality standards establish health-based concentration limits for criteria pollutants. An area that meets a standard is designated attainment; an area that does not is designated nonattainment and must implement measures to attain the standard. Table 4.1-1, *State and Federal Ambient Air Quality Standards* lists the applicable standards.

Table 4.1-1. State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	California Standard	National Primary Standard	National Secondary Standard
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m³)	—	—
	8 Hour	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)	Same as primary
Respirable Particulate Matter (PM10)	24 Hour	50 µg/m³	150 µg/m³	Same as primary
	Annual Mean	20 µg/m³	—	—
Fine Particulate Matter (PM2.5)	24 Hour	—	35 µg/m³	Same as primary
	Annual Mean	12 µg/m³	9.0 µg/m³	15.0 µg/m³
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	—
	8 Hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	—
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m³)	100 ppb (188 µg/m³)	—
	Annual Mean	0.030 ppm (57 µg/m³)	53 ppb (100 µg/m³)	Same as primary
Sulfur Dioxide (SO_2)	1 Hour	0.25 ppm (655 µg/m³)	75 ppb (196 µg/m³)	—
	3 Hour	—	—	0.5 ppm (1,300 µg/m³)
	24 Hour	0.04 ppm (105 µg/m³)	0.14 ppm (certain areas)	—
	Annual Mean	—	0.030 ppm (certain areas)	—
Lead	30-Day Average	1.5 µg/m³	—	—

Pollutant	Averaging Time	California Standard	National Primary Standard	National Secondary Standard
	Calendar Quarter	—	1.5 µg/m³ (certain areas)	Same as primary
	Rolling 3-Month Average	—	0.15 µg/m³	Same as primary
Visibility-Reducing Particles	8 Hour	Extinction of 0.23 per kilometer	No national standard	No national standard
Sulfates	24 Hour	25 µg/m³	No national standard	No national standard
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)	No national standard	No national standard
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m³)	No national standard	No national standard

Source: California Air Resources Board, Ambient Air Quality Standards, July 16, 2024. Measurement methods and footnotes are in Technical Appendix A-1. The Lake Tahoe carbon monoxide standard is omitted.

Regional Air Quality

The basin is designated nonattainment for ozone and PM10 under state and federal standards and attainment or unclassifiable for the other criteria pollutants (Table 4.1-2). The portion containing the Project site is classified Severe-15 for the federal eight-hour ozone standards, with an attainment deadline of July 20, 2027.

Table 4.1-2. Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone, 1-hour standard	Nonattainment	Standard revoked
Ozone, 8-hour standard	Nonattainment	Nonattainment, classified Severe-15
PM10	Nonattainment	Nonattainment, classified Moderate
PM2.5	Attainment	Unclassifiable/Attainment
Carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead	Attainment	Unclassifiable/Attainment

Source: Air Quality Impact Analysis, Urban Crossroads, August 14, 2026 (Technical Appendix A-1), Table 2-4; federal classifications from U.S. EPA. Four pollutants sharing a single designation are combined in the final row.

Local Air Quality

The MDAQMD Victorville-Park Avenue station, approximately 5 miles southeast of the site, is the nearest long-term station monitoring ozone, nitrogen dioxide, PM10, and PM2.5. Table 4.1-3 summarizes the three most recent years of available data.

Table 4.1-3. Monitored Exceedances of the Ambient Air Quality Standards

Pollutant and Standard	2021	2022	2023
Ozone — state and federal 8-hour standard	35	49	32
PM10 — federal 24-hour standard	1	2	1

Source: California Air Resources Board, iADAM Air Quality Data Statistics, Victorville–Park Avenue monitoring station.
Notes: Values are the number of days per year on which the standard was exceeded at the Victorville–Park Avenue station, the monitoring station nearest the Project site. No exceedances of the standards for nitrogen dioxide, sulfur dioxide, carbon monoxide, or lead were recorded during this period.

Table 4.1-3 shows the monitored exceedances from 2021 through 2023.

The state and federal eight-hour ozone standard was exceeded on 32 to 49 days per year, and the federal 24-hour PM10 standard was exceeded on one to two days per year. The station recorded no exceedances of the state or federal one-hour nitrogen dioxide standard. Carbon monoxide is not monitored at this station or the nearest alternative stations. Appendix A-1, Table 2-5, provides the complete monitoring summary.

4.1.3 Regulatory Framework

Federal and state statutes, implementing regulations, and adopted plans establish the air quality requirements that apply to the Project. The requirements are summarized below. They are existing legal requirements, not mitigation.

Federal

Federal Clean Air Act. The U.S. Environmental Protection Agency implements the Act and establishes National Ambient Air Quality Standards for ozone, particulate matter, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead.

State of California

California Clean Air Act. The California Air Resources Board establishes the California Ambient Air Quality Standards for the criteria pollutants.

Mojave Desert Air Quality Management District. MDAQMD regulates stationary sources in the basin and serves as the expert air quality agency under CEQA. Its 2020 CEQA and Federal Conformity Guidelines provide the regional significance thresholds and plan-conformity criteria used in this analysis.

Local

City of Adelanto. The City is the CEQA lead agency, implements General Plan air quality policies, and adopts project-specific mitigation where required.

Regulatory Compliance Requirements

The Project must comply with the following existing federal, State, and MDAQMD requirements. They are not mitigation.

RR AQ-1 (MDAQMD Rule 201, Permit to Construct). — Requires a District permit before equipment that emits air pollutants is installed or altered.

RR AQ-2 (MDAQMD Rule 203, Permit to Operate). — Requires a District permit to operate that equipment and compliance with the permit's conditions.

RR AQ-3 (MDAQMD Rule 204, Permit Conditions). — Allows the District to attach conditions to any permit.

RR AQ-4 (MDAQMD Rule 402, Nuisance). — Prohibits emissions that cause injury, nuisance, or annoyance to a considerable number of people or that endanger public health or safety.

RR AQ-5 (MDAQMD Rule 403, Fugitive Dust Control). — Reduces the amount of PM10 entrained in the ambient air from anthropogenic fugitive dust sources within the District by requiring actions to prevent, reduce, or mitigate fugitive dust during all phases of construction, grading, and operation.

RR AQ-6 (MDAQMD Rule 1113, Architectural Coatings). — Limits the quantity of volatile organic compounds (VOC) in architectural coatings applied during construction of the buildings.

RR AQ-7 (MDAQMD New Source Review, Rules 1300, 1302, 1303, and 1320). — Establishes requirements for the preconstruction review of all new or modified facilities to ensure that construction or modification does not interfere with the attainment and maintenance of Ambient Air Quality Standards, and requires permit conditions ensuring that calculated toxic risk is not exceeded.

RR AQ-8 (CARB Truck and Bus Regulation, 13 CCR section 2025). — Diesel-fueled trucks and buses with a gross vehicle weight rating greater than 14,000 pounds operating in California shall use 2010 or newer model-year engines, with limited exceptions. The Project's haul fleet and operational truck fleet shall comply.

RR AQ-9 (CARB Idling Limit, 13 CCR section 2485). — Limits idling of heavy-duty diesel trucks to no more than five minutes at any location, with limited exceptions. Idling-restriction signage shall be posted on-site at loading and unloading areas.

RR AQ-10 (AB 1346, Small Off-Road Engine Phaseout). — Effective January 1, 2024, prohibits the sale of new gasoline-powered small off-road engines, including landscape

equipment, in California. Project landscape maintenance shall use electric or otherwise zero-emission equipment as required by AB 1346 and 17 CCR section 2750 et seq.

RR AQ-11 (Vehicle Code section 23114, Haul Truck Spillage). — Prohibits operation of vehicles transporting aggregate material on highways unless the vehicle is constructed to prevent contents from dropping, sifting, leaking, blowing, spilling, or escaping. Project haul operations shall comply.

RR AQ-12 (CALGreen, CCR Title 24, Part 11). — Sets mandatory measures for new nonresidential buildings, including EV-capable parking, low-VOC interior coatings, and water-efficient fixtures. The Project shall be designed and built to the CALGreen mandatory measures.

RR AQ-13 (MDAQMD Rule 219, Equipment Not Requiring a Permit). — Lists equipment exempt from District permits. Equipment not listed, including natural gas engines installed under the natural gas generation option, requires an Authority to Construct and Permit to Operate (RR AQ-1 and RR AQ-2).

General Plan Policy Consistency

Table 4.1-4 evaluates the Project against the applicable policies of the Adelanto North 2035 Comprehensive Sustainable Plan, the City's General Plan for the area north of Holly Road.

Table 4.1-4. Project Consistency with Applicable Policies of the General Plan

Policy / Program	Description	Project Consistency
OS 6.1	Pursue efforts to reduce air pollution and greenhouse gas emissions by promoting renewable energy and implementing energy conservation/efficiency measures.	**Consistent.** The Project includes EV charging above CALGreen minimums, rooftop solar, electrical capacity for refrigerated-trailer plug-ins, and Title 24-compliant design.
OS 6.3	Require projects that generate potentially significant levels of air pollutants and odors to incorporate the most effective air quality mitigation into project design, as feasible.	**Consistent.** Construction air quality mitigation (Mitigation Measures AQ-1 through AQ-5) is incorporated into the Project.

Source: City of Adelanto, Adelanto North 2035 Comprehensive Sustainable Plan (2014); Project Design Features, Section 3.0.

4.1.4 Thresholds of Significance

Section III of Appendix G to the CEQA Guidelines uses the following questions to evaluate air quality impacts. Would the Project:

a) *Would the Project conflict with or obstruct implementation of the applicable air quality plan?*
b) *Would the Project 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?*
c) *Would the Project expose sensitive receptors to substantial pollutant concentrations?*
d) *Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

MDAQMD Significance Thresholds

Under the MDAQMD CEQA and Federal Conformity Guidelines, a project may have a significant air quality impact if it meets any of the following criteria. For most projects, comparison with the emissions thresholds is sufficient:

- *Generates total emissions (direct and indirect) in excess of the thresholds given in Table 4.1-5, MDAQMD Regional Significance Numeric Thresholds;*
- *Generates a violation of any ambient air quality standard when added to the local background;*
- *Does not conform with the applicable attainment or maintenance plan(s)*[1]*;*

- *Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.*

Note: 1 A project generally conforms if it is consistent with the land use plan used for the applicable air quality plan. Land use plan changes that do not increase dwelling units, vehicle trips, or vehicle miles traveled also generally conform.

A project with a significant impact must implement feasible mitigation. MDAQMD provides both daily and annual emissions thresholds so that construction, operation, and other phases can be evaluated over their applicable durations.

Table 4.1-5. MDAQMD Regional Significance Numeric Thresholds

Criteria Pollutant	Annual Threshold (short tons)	Daily Threshold (pounds)
Greenhouse Gases (CO2e)	**100,000**	**548,000**
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NOx)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SOx)	25	137
Particulate Matter (PM10)	15	82
Particulate Matter (PM2.5)	12	65
Hydrogen Sulfide (H2S)	10	54
Lead (Pb)	0.6	3

Source: MDAQMD CEQA and Federal Conformity Guidelines, Table 6.

4.1.5 Impacts Analysis

Threshold 4.1 (a): Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Environmental Setting

The analysis uses current regulations, plans, models, and health risk methods:

- Adoption of MDAQMD's updated CEQA and Federal Conformity Guidelines (February 2020), including the current regional significance thresholds.
- CARB adopted the Advanced Clean Trucks Regulation in 2020 and the Advanced Clean Fleets Regulation effective January 1, 2024; the AB 1346 small off-road engine phaseout also took effect in 2024.
- Updated CalEEMod modeling (Version 2022.1.1.x) by Urban Crossroads, Inc., August 14, 2026 (Appendix A-1), including the site-specific construction schedule, operational sources, and truck trip generation.

- Updated Health Risk Assessment by Urban Crossroads, Inc., August 14, 2026 (Appendix A-2), with current OEHHA risk assessment methodology and AERMOD/HARP2 dispersion modeling.
- Federal ozone designations and attainment planning have changed. The area is now classified Severe-15 for the 2008 and 2015 eight-hour ozone standards, and MDAQMD has adopted the 2016 Federal 8-Hour Ozone Attainment Plan and the 2023 Western Mojave Desert 70 ppb Ozone Attainment Plan.

Applicable Air Quality Plans

The following air quality plans apply to the Project site:

- Mojave Desert Planning Area Federal Particulate Matter (PM10) Attainment Plan (1995),
- 2016 Federal 8-Hour Ozone Attainment Plan for the Western Mojave Desert Nonattainment Area, which addresses the 2008 75 ppb ozone standard, and the
- Western Mojave Desert 70 ppb Ozone Attainment Plan, which addresses the 2015 ozone standard.

The Project area is classified Severe-15 nonattainment for the 2008 and 2015 federal eight-hour ozone standards and nonattainment for federal PM10. The attainment deadline for the 2008 ozone standard is July 20, 2027. The criteria below determine plan conformity.

Plan Conformity Criteria

A project conforms if it complies with applicable District rules and proposed plan control measures and is consistent with the growth forecasts used in the applicable plan, or if the plan directly includes the project. A project that conflicts with or delays plan implementation does not conform. Consistency with the land use plan used for the growth forecast can establish consistency with the forecast.

Applicable Regulatory Compliance Requirements

RR AQ-1 through RR AQ-7 apply. The analysis assumes compliance with District permitting, nuisance, fugitive dust, architectural coating, and New Source Review requirements.

Consistency Criterion No. 1 – Local Land Use Plan and/or Population Projections

The General Plan designates the site for Manufacturing/Industrial uses. The Project proposes industrial development consistent with that designation and requires no General Plan amendment or zone change. It therefore meets conformity criterion No. 1 (Appendix A-1, p. 51).

Consistency Criterion No. 2 – All MDAQMD Rules and Regulations

The Project must comply with applicable MDAQMD rules, including Rules 401, 402, 403, and 1113. Compliance with these requirements satisfies conformity criterion No. 2 (Appendix A-1, Section 3.7.4).

Consistency Criterion No. 3 – Demonstrating That the Project Will Not Increase the Frequency or Severity of a Violation in the Federal or State Ambient Air Quality Standards

With MM AQ-5, construction emissions would remain below MDAQMD thresholds. Mitigated operational emissions would exceed the thresholds for VOC, NOx, CO, and PM10 (Table 4.1-7, *Operational Emissions at Buildout Compared to MDAQMD Regional Threshold*s). The Project therefore would not meet conformity criterion No. 3 during operation (Appendix A-1, Section 3.7.3).

The Project meets criteria Nos. 1 and 2 because its land use is consistent with the General Plan and it must comply with District rules. It does not meet criterion No. 3 because mitigated operational emissions exceed regional thresholds and would add emissions not reflected in the attainment-plan projections. The natural gas generation option would add permitted stationary-source emissions but would not change this conclusion.

Mitigation Measures (MM)

MM AQ-1 through MM AQ-5 and MM AQ-23 apply to construction; MM AQ-4 and MM AQ-6 through MM AQ-22 apply to operation (Threshold 4.1(b)). No additional feasible mitigation would reduce operational emissions below MDAQMD thresholds because on-road vehicles are the dominant source and are regulated by CARB at the statewide level.

Significance Determination

Significant and Unavoidable. The Project meets plan-conformity criteria Nos. 1 and 2 but not criterion No. 3. Mitigated operational emissions would exceed MDAQMD thresholds for VOC, NOx, CO, and PM10 and would conflict with the emissions reductions assumed in the applicable air quality plans. PM2.5 would also exceed its threshold while the natural gas generation option is in use.

Threshold 4.1 (b): Would the Project 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?

The basin is designated nonattainment for federal ozone and PM10 standards and state ozone and PM10 standards (Table 4.1-2, *Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin*). The analysis below compares construction and operational emissions with MDAQMD regional thresholds.

Applicable Regulatory Compliance Requirements

RR AQ-1 through RR AQ-12 apply and are reflected in the emissions modeling.

Construction Emissions Impact Analysis

Project construction would emit CO, VOC, NOx, SOx, PM10, and PM2.5 from the following activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Construction would last approximately 3.25 years, from site preparation in October 2027 through paving and coating in December 2030, with overlapping activities. CalEEMod evaluates the worst day of overlapping work and daily disturbance based on the schedule in Table 3-3, *Construction Activity*. A later or longer schedule would generally reduce peak daily emissions because equipment emission factors decline as engine standards tighten.

Table 4.1-6. Construction Emissions Compared to MDAQMD Regional Thresholds

Criteria Pollutant	Without Mitigation (lbs/day)	With Mitigation (lbs/day)	MDAQMD Daily Threshold (lbs/day)	Exceeds Threshold After Mitigation
Volatile Organic Compounds (VOC)	110	38	137	**No**
Oxides of Nitrogen (NOX)	**137.86 (exceeds)**	79.55	137	**No**
Carbon Monoxide (CO)	340	345	548	**No**
Oxides of Sulfur (SOX)	1	1	137	**No**
Particulate Matter (PM10)	68	67	82	**No**
Particulate Matter (PM2.5)	18	17	65	**No**

Source: Air Quality Impact Analysis, Urban Crossroads, August 14, 2026 (Technical Appendix A-1).
Notes: Values are worst-day emissions. Oxides of nitrogen is the only pollutant exceeding a threshold before mitigation; MM AQ-5, requiring United States Environmental Protection Agency Tier 4 Final off-road equipment, reduces it to 79.55 pounds per day. Carbon monoxide increases slightly with mitigation, a characteristic of Tier 4 Final engines, and remains well below the threshold.

Unmitigated worst-day NOx emissions would reach 137.86 pounds per day, slightly above the 137-pound threshold; all other construction pollutants would remain below their thresholds. MM AQ-5 would require Tier 4 Final off-road equipment and reduce NOx to 79.55 pounds per day. Construction emissions would therefore be less than significant with mitigation (Table 4.1-6, *Construction Emissions Compared to MDAQMD Regional Thresholds*). This is lower than the 2009 EIR construction finding for NOx, CO, and PM10.

Mitigation Measures (MM)

MM AQ-23 (Construction Equipment Cap). *— On any single calendar day during construction of the Project, the total number of pieces of construction equipment operating on-site, by equipment type, shall not exceed the maximum quantity assumed for that equipment type in the Air Quality Impact Analysis (Technical Appendix A-1, Table 3-4), regardless of construction*

phase, activity, or schedule. The applicable per-type maximums are: Rubber Tired Dozers (5); Crawler Tractors (2); Graders (2); Excavators (4); Scrapers (8); Forklifts (5); Generator Sets (5); Cranes (1); Welders (4); Tractors/Loaders/Backhoes (4); Pavers (2); Paving Equipment (3); Skip Loaders (4); Trenchers (4); Rollers (3); Aerial Lifts (5); Air Compressors (3). Each piece of equipment shall operate no more than 8 hours per day. The construction manager shall maintain a daily equipment log identifying the type and quantity of equipment operating on-site each day, post the current day's log at the site entrance, and make all logs available to the City of Adelanto and MDAQMD upon request. The Applicant or its designee shall submit a quarterly compliance report to the City of Adelanto Engineering Division documenting compliance with this measure for each day of the preceding quarter. Any day on which the per-type maximum is exceeded shall be reported as a compliance exception, with corrective action and the cause documented in the report.

Operational Emission Analysis

Table 4.1-7 presents buildout emissions for 8,256,274 square feet of warehouse space, modeled as 80 percent transload/short-term storage and 20 percent cold storage. Trip data are from Appendix H-1. The 2030 analysis uses CARB's EMFAC2021 model with EPA-approved adjustments issued November 21, 2025. The adjusted model provides a conservative estimate and shows significant operational emissions of VOC, NOx, CO, and PM10 before and after mitigation.

Project operations would emit VOC, NOx, CO, SOx, PM10, and PM2.5 from the following sources:

Area Source Emissions

- Architectural coatings. Maintenance coatings would emit solvents. CalEEMod estimates these emissions.
- Consumer products. Cleaning and maintenance products can emit organic compounds that contribute to ozone formation. CalEEMod estimates these emissions; substantial on-site use is not expected for the proposed commercial uses.
- Landscape equipment. Fuel combustion and evaporation from landscape equipment can generate emissions. CalEEMod estimates these emissions without credit for reductions from the AB 1346 phaseout of new gasoline-powered small off-road engines.

Energy Source Emissions

- Natural gas and electricity. Criteria-pollutant emissions from off-site electricity generation are generally excluded because generation occurs outside the region or is offset through emission credits. CalEEMod estimates emissions from on-site natural gas use.

Mobile Source Emissions

- Vehicles. Employee and truck trips are the primary operational emission source. CalEEMod uses trip characteristics from Appendix H-1 and a 40-mile average truck trip length consistent with the 2016 SCAG Regional Transportation Plan.
- Paved-road dust. Vehicle travel would generate road dust and tire-wear particulates. CalEEMod estimates these emissions.

On-Site Equipment Emissions

The unmitigated model assumes conventionally fueled cargo-handling equipment in the truck courts. MM AQ-12 would require all outdoor cargo-handling equipment to be electric or non-diesel fueled and all indoor forklifts to be electric. The mitigated model therefore assigns no direct exhaust emissions to this equipment (Table 4.1-7).

Stationary Source Emissions

The model assumes one 300-horsepower diesel fire pump and one 700-horsepower diesel emergency generator at each building. Each unit would operate up to 1 hour per day, 1 day per week, and 50 hours per year for maintenance and testing. CalEEMod estimates these emissions.

On-Site Natural Gas Generation Option

The Project is intended to receive electricity from Southern California Edison, and all building systems would be electric. If SCE service is unavailable when a building is ready for occupancy, natural gas engines could temporarily serve up to three buildings. The option is limited to 22.5 megawatts and 747,228 million Btu of annual fuel use under RR UTIL-6 and would require a City Conditional Use Permit and MDAQMD Authority to Construct. Appendix A-4 evaluates the maximum option. At that level, the engines would emit approximately 11.0 pounds per day of ROG, 200.7 of NOx, 168.6 of CO, and 15.3 each of PM10 and PM2.5. Added to Table 4.1-7 emissions without credit for displaced grid electricity, mitigated totals would be approximately 434.4 pounds per day of ROG, 714.3 of NOx, 1,006.9 of CO, 229.5 of PM10, and 79.7 of PM2.5. These pollutants would exceed MDAQMD thresholds; SO2 would remain below its threshold. Engine operation would end when SCE service begins.

The engines would require MDAQMD permits under Rules 201 and 203 and New Source Review under Rules 1300, 1302, 1303, and 1320 (RR AQ-1, RR AQ-2, and RR AQ-7). RR UTIL-6 limits installed capacity and annual fuel use. Any proposal to exceed those limits would require further review under CEQA Guidelines Section 15162.

Transport Refrigeration Unit (TRU) Source Emissions

The operational model assumes that 20 percent of the Project's floor area could be used for cold storage and that associated trucks could use transport refrigeration units.

Impact Analysis

At buildout, operations would generate emissions from vehicles, cargo-handling equipment, transport refrigeration units, emergency equipment, building energy use, and area sources. Before mitigation, VOC, NOx, CO, PM10, and PM2.5 would exceed MDAQMD thresholds. MM AQ-6 through MM AQ-22 would reduce emissions, including elimination of direct cargo-handling exhaust under MM AQ-12, but mitigated VOC, NOx, CO, and PM10 would remain above the thresholds (Table 4.1-7). NOx would be approximately 3.7 times the threshold. Because on-road vehicles are the dominant source and are regulated statewide, operational emissions would remain significant and unavoidable.

Table 4.1-7. Operational Emissions at Buildout Compared to MDAQMD Regional Thresholds

Criteria Pollutant	Without Mitigation (lbs/day)	With Mitigation (lbs/day)	MDAQMD Daily Threshold (lbs/day)	Exceeds Threshold After Mitigation
Volatile Organic Compounds (VOC)	435.84	423.33	137	**Yes**
Oxides of Nitrogen (NOX)	524.48	513.63	137	**Yes**
Carbon Monoxide (CO)	1,304.46	838.30	548	**Yes**
Oxides of Sulfur (SOX)	4.05	4.05	137	No
Particulate Matter (PM10)	215.12	214.24	82	**Yes**
Particulate Matter (PM2.5)	65.28	64.47	65	No

Source: Air Quality Impact Analysis, Urban Crossroads, August 14, 2026 (Technical Appendix A-1).

Notes: Carbon monoxide and PM2.5 values are the summer scenario, which is the controlling case; winter carbon monoxide is 391.21 pounds per day, below the threshold.

Mitigation Measures (MM)

The following measures apply to the Project through the Mitigation Monitoring and Reporting Program. They reduce operational emissions to the extent feasible but would not reduce VOC, NOx, CO, or PM10 below MDAQMD thresholds because mobile sources are regulated primarily at the state level.

MM AQ-12 would eliminate direct emissions from on-site cargo-handling equipment, MM AQ-22 would reduce transport refrigeration unit emissions while trailers are docked, and MM AQ-18 would reduce tenant fleet emissions through SmartWay participation.

MM AQ-1 Fugitive Dust Emissions. Before issuance of any Grading Permit, the City Engineer and the Chief Building Official shall confirm that the Grading Plan, Building Plans and specifications stipulate that, in compliance with MDAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the MDAQMD's Rule Book. In addition, MDAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- On-site vehicle speed shall be limited to 15 miles per hour;
- All on-site construction roads with vehicle traffic shall be watered periodically;
- Streets adjacent to the project's reach shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust;
- During grading operations, all material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day;
- All clearing, grading, earth-moving, or excavation activities shall cease during periods of high winds (i.e., greater than 35 miles per hour averaged over one hour) so as to prevent excessive amounts of dust;
- All material transported on-site or off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust;
- The area disturbed by clearing, grading, earth-moving, or excavation operations shall be minimized so as to prevent excessive amounts of dust. And
- These control techniques shall be indicated on project grading plans.
- Compliance with this measure shall be subject to periodic site inspections by the City of Adelanto.

MM AQ-2 All trucks that are to haul excavated or graded material on-site shall comply with State Vehicle Code Section 23114 (Spilling Loads on Highways), with special attention to Sections 23114(b)(F), (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads. Prior to the issuance of grading permits, the Applicant shall demonstrate to the City of Adelanto City Engineer how the project operations subject to that specification during hauling activities shall comply with the provisions set forth in Sections 23114(b)(F), (e)(4).

MM AQ-3 Prior to issuance of any Grading Permit, the City Engineer/Public Works Director shall confirm that the Grading Plan, Building Plans and specifications stipulate that, in compliance with MDAQMD Rule 403, ozone (O3) precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer/Public Works Director. Maintenance records shall be provided to the City. The City Inspector shall be responsible for ensuring that contractors comply with this measure during construction.

MM AQ-4 The following measures shall be implemented to reduce ROG emissions resulting from application of architectural coatings:

- Contractors shall use HPLV paint applicators with a minimum transfer efficiency of at least 50%;

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- When possible, construct/build with materials that do not require painting. And
- Use pre-painted construction materials.

MM AQ-5 Prior to the commencement of any construction activities, the applicant or its designee shall provide evidence to the City of Adelanto that, for off-road equipment with engines rated at 50 horsepower or greater, no construction equipment shall be used that is rated less than Tier 4 Final per CARB/U.S. EPA specifications. An exemption from this requirement may be granted if the applicant documents that equipment with Tier 4 Final engines is not reasonably available and that the corresponding reductions in criteria air pollutant emissions can be achieved from other combinations of construction equipment. Before an exemption may be granted, the applicant's construction contractor shall (1) demonstrate that at least three construction fleet owners or operators within 50 miles were contacted and confirmed that Tier 4 Final equipment could not be located within the region during the desired construction schedule, and (2) demonstrate that the proposed replacement equipment has been evaluated using CalEEMod or another industry-standard emission estimation method, with documentation provided to the City confirming that the necessary Project-generated emission reductions are achieved.

MM AQ-6 *The buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for the future installation of EV truck charging stations on the site. Conduit should be installed from the electrical room to tractor trailer parking spaces in a logical location(s) on the site determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available and the buildings are being served by trucks with electric-powered engines.*

MM AQ-7 The buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed in the future to supply power to trailers with TRUs during the loading/unloading of refrigerated goods. Conduit should be installed from the electrical room to the loading docks determined by the Project Applicant during construction document plan check as the logical location(s) to receive trailers with TRUs.

MM AQ-8 Upon occupancy and annually thereafter, the facility operator shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding:

- Building energy efficiency, solid waste reduction, recycling, and water conservation.
- Vehicle GHG emissions, EV charging availability, and alternate transportation opportunities for commuting.
- Participation in the VICS "Empty Miles" program to improve goods trucking
- Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling.

- The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.

MM AQ-9 Prior to issuance of a building permit, the project proponent shall provide the City with an onsite signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.

MM AQ-10 Prior to the issuance of an occupancy permit, the City shall confirm that signs clearly identifying approved truck routes have been installed along the truck routes to and from the Project site.

MM AQ-11 Prior to the issuance of an occupancy permit, the Project proponent shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Code violations. The tenant's representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant's representative shall endeavor to resolve complaints within 24 hours.

MM AQ-12 All on-site outdoor cargo-handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) shall be electric or non-diesel-fueled. All on-site indoor forklifts shall be electric.

MM AQ-15 Prior to tenant occupancy, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the Project site have been provided informational documentation regarding:

- Information regarding energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs
- Information regarding and a recommendation to use electric or fueled sweepers with HEPA filters.

MM AQ-16 The Project applicant or designee shall provide EV charging infrastructure that meets or exceeds the current California Green Building Standards Code Tier 2 standards to encourage use of EVs.

MM AQ-17 The Project applicant shall implement the following landscape maintenance equipment reduction measures:

- Before the issuance of building permits, the Project applicant or its designee shall provide evidence to the City of Adelanto that the design plans include electrical outlets on the exterior of the structure to facilitate use of electrical lawn and garden equipment.
- The applicant or its designee shall provide tenants with information on the MDAQMD Commercial Electric Lawn and Garden Equipment Exchange Program.

MM AQ-18 Before tenant occupancy, the Project Applicant or successor(s) in interest shall provide documentation to the City demonstrating that occupants/tenants of the Project site

have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. In addition, tenants shall be required to enroll in the U.S. EPA's SmartWay program and use SmartWay carriers.

MM AQ-19 All facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site shall meet or exceed 2010 model year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.

MM AQ-20 Prior to the occupancy of any on-site development, the applicant or its designee shall provide evidence to the City of Adelanto that the applicant/phase developer has developed a Green Cleaning Product and Paint education program to be made available at rental and purchasing offices and/or on websites. The educational program shall include a flyer (hardcopy and/or digital) that includes, at a minimum, an explanation of what VOCs are, how VOCs affect persons, where to find low-VOC alternatives for cleaning supplies and paint, and additional resources for learning more.

MM AQ-21 Prior to the issuance of building permits, the applicant or its designee shall provide evidence to the City of Adelanto that for spaces operated by the applicant or its designee, provisions are in place to ensure only zero- or low-VOC cleaning supplies and super compliant-VOC paints (less than 10 grams per liter VOC) are used during Project operation.

MM AQ-22 Electric plug-ins shall be installed at the loading docks at cold storage facilities to allow for transport refrigeration unit standby electric plug-in.

Health Effects of Regional Emissions

Ozone, PM10, and PM2.5 are regional pollutants. Ozone is not emitted directly. It forms in the air from VOC and NOx released by many sources across the air basin, and its concentration at any location depends on emissions from the whole region, the weather, and pollution carried in from other basins. The Project's emissions above the MDAQMD thresholds would add to the regional pollution that causes the basin's ozone and PM10 exceedances (Table 4.1-2, Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin) and to the health effects of those pollutants, including reduced lung function, aggravated asthma, and more hospital admissions (Appendix A-1).

Existing tools cannot reliably translate one project's regional emissions into a change in ozone or particulate levels at a particular place, or into a number of illnesses. The regional models used for air quality plans work at the scale of the whole basin and are not designed to isolate the effect of a single project, and the MDAQMD has not adopted a method for doing so. The MDAQMD thresholds were set so that the basin can attain the health-based ambient air quality standards. The SEIR therefore treats emissions above those thresholds as a significant and unavoidable impact on air quality and public health (Sierra Club v. County of Fresno (2018) 6

Cal.5th 502). The health risk assessment quantifies localized health effects from diesel particulate matter near the site (Threshold 4.1(c)).

Significance Determination

Significant and Unavoidable.

Threshold 4.1 (c): Would the Project expose sensitive receptors to substantial pollutant concentrations?

Applicable Regulatory Compliance Requirements

RR AQ-4, RR AQ-5, RR AQ-8, and **RR AQ-9** apply to this threshold and are assumed in the health risk analysis below.

- Health Risk Assessment

MDAQMD recommends a mobile-source health risk assessment when a project could affect sensitive receptors, including residences, schools, day care facilities, and hospitals. Appendix A-2 evaluates 11 receptors within or near the study area. Figure 4.1-1, *Sensitive Receptor Locations* shows their locations and distances from the Project boundary.

- **R1** represents the Adelanto State Preschool located at 17927 Jonathan Street, approximately 2,540 feet northwest of the Project site.
- **R2** represents the existing residence at 17767 Adelanto Road, approximately 630 feet northwest of the Project site. Because no private outdoor living areas (backyards) face the Project site, receptor R2 is placed at the building façade.
- **R3** represents the Victorville DFC – Snack warehouse at 13133 Innovation Way, approximately 513 feet north of the Project site.
- **R4** represents the Graco warehouse at 17182 Nevada Avenue, approximately 1,176 feet northeast of the Project site.
- **R5** represents the Federal Correctional Institution – Victorville prison located at 13777 Air Expressway, approximately 658 feet east of the Project site.
- **R6** represents the Diversified Minerals Inc. facility at 12808 Rancho Road, located approximately 929 feet southwest of the Project site.
- **R7** represents the Mobile Pipe Lining & Coating facility located at 12766 Violet Road, located approximately 657 feet west of the Project site.
- **R8** represents the Valew Quality Truck Bodies – 1954 MFG facility at 12522 Violet Road, located approximately 866 feet south of the Project site.
- **R9** represents the Soil Safe of California Environmental Engineer facility at 12328 Hibiscus Road, located approximately 236 feet south of the Project site.

- **R10** represents the Jet Room cannabis store located at 17499 Adelanto Road, approximately 124 feet south of the Project site.
- **R11** represents the GM Precision Metal Spinning, Inc. facility at 17592 Adelanto Road, located approximately 121 feet west of the Project site.

MDAQMD recommends health-risk evaluation for the following project types near existing or planned sensitive receptors:

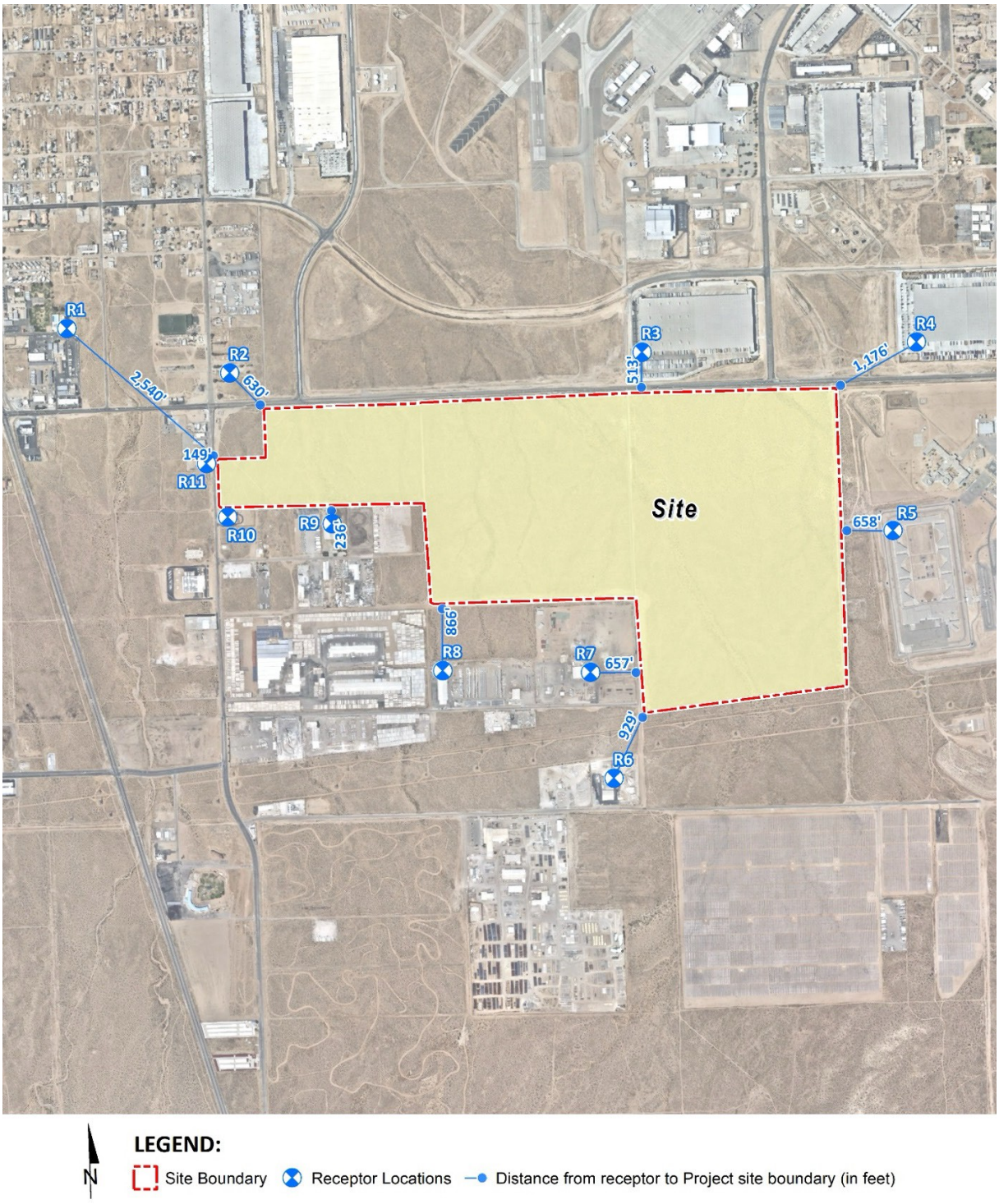
- Any industrial project within 1000 feet;
- A distribution center (40 or more trucks per day) within 1000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The Project would generate 3,285 daily truck trips and includes a distribution center within 1,000 feet of residences. Appendix A-2 therefore evaluates health risk using AERMOD dispersion modeling, current OEHHA methods, and MDAQMD's 10-in-one-million incremental cancer-risk threshold.

MDAQMD also evaluates noncancer risk using a hazard index, which compares modeled exposure with the applicable reference exposure level. A hazard index below 1.0 is less than significant. The analysis applies these thresholds at the nearest sensitive receptors.

Figure 4.1-1. Sensitive Receptor Locations

Source: Health Risk Assessment, Urban Crossroads, Inc., August 2026 (Technical Appendix A-2).



Construction Impacts

The maximally exposed resident is R2, approximately 630 feet northwest of the site. Modeled construction cancer risk is 0.46 in one million. The maximally exposed worker is R5, approximately 658 feet east of the site, with a risk of 0.04 in one million. The maximally exposed schoolchild is R1, approximately 2,540 feet northwest, with a risk of 0.02 in one million. Each value is below the 10-in-one-million threshold, and all noncancer hazard indices are 0.01 or less, below the threshold of 1.0.

Operational Impacts

- Residential exposure. At R2, the maximally exposed residence approximately 630 feet northwest of the site, operational cancer risk would be 1.52 in one million and the noncancer hazard index would be 0.01 or less. Both are below MDAQMD thresholds. Other residential receptors would receive lower exposure.
- Worker exposure. At R5, the maximally exposed worker receptor approximately 658 feet east of the site, operational cancer risk would be 0.60 in one million and the noncancer hazard index would be 0.01 or less. Both are below MDAQMD thresholds. Other worker receptors would receive lower exposure.
- Schoolchild exposure. At R1, the Adelanto State Preschool approximately 2,540 feet northwest of the site, operational cancer risk would be 0.11 in one million and the noncancer hazard index would be less than 0.01. Both are below MDAQMD thresholds. Other school receptors would receive lower exposure.

Construction and operational toxic-air-contaminant risks would remain below MDAQMD thresholds. The impact would be less than significant.

The Applicant has also committed to the following design features to further reduce diesel particulate matter and other emissions. Section 4.5 addresses greenhouse-gas design features.

PDF AQ-1: The Project Applicant/Developer/Operator shall post both interior and exterior facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions to no more than 5 minutes and contact information to report violations to CARB, MDAQMD, and the building manager.

PDF AQ-2: During Project grading operations, Project contractors shall limit the amount of daily grading disturbance area not to exceed the assumptions in the Air Quality Impact Analysis (Appendix A-1).

PDF AQ-3: Project construction plans and specifications shall require on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled, if such equipment is widely available and economically feasible.

PDF AQ-4: The Project shall provide electrical hookups to the power grid, not diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and shall use electric tools whenever feasible.

PDF AQ-5: The construction plans and specifications shall prohibit off-road diesel-powered construction equipment from being in the "on" position for more than 10 hours per day during Project construction.

PDF AQ-6: During Project construction, the Project contractors shall keep all equipment maintenance records and data sheets, including design specifications and emission control tier classifications, onsite or at the contractor's office and shall furnish documents to the Lead Agency or other regulators, upon request.

On-Site Natural Gas Generation Option

Appendix A-2 does not model the natural gas generation option because building and engine locations have not been selected. Under RR UTIL-6, any proposed engine must demonstrate an incremental cancer risk below 10 in one million and a hazard index below 1.0 at every sensitive receptor during MDAQMD permitting. An engine could not be installed unless those standards are met. The risk demonstration may not assume a fixed number of years of engine operation.

CO Hot Spot Impact Analysis

The basin is in attainment for federal and state carbon monoxide standards. Carbon monoxide hot spots typically occur near congested intersections. MDAQMD applies SCAQMD criteria because it has not adopted separate hot-spot criteria. SCAQMD modeling found no exceedance at intersections carrying approximately 100,000 vehicles per day. Appendix H-1 reports 2,700 to 2,800 peak-hour vehicles at the Project study intersections, and vehicle emission standards have become more stringent since the SCAQMD analysis. Detailed hot-spot modeling is therefore not warranted, and localized carbon monoxide impacts would be less than significant.

Exposure to Valley Fever

Valley fever is caused by inhalation of airborne spores of the Coccidioides fungus, which occurs in arid soils of the southwestern United States, including the Mojave Desert. Most infections are mild or asymptomatic, although some become severe.

Construction grading could disturb soil on the 451-acre undeveloped site. San Bernardino County is outside California's high-incidence region, defined as more than 20 cases per 100,000 residents annually.

Dust controls required by MDAQMD Rule 403 and RR AQ-5, including watering, vehicle speed limits, soil stabilization, and suspension of earthmoving during high winds, would also reduce the potential release of spores.

Cal/OSHA regulations separately require worker hazard controls, respiratory protection, and injury-prevention programs.

Mitigation Measures (MM)

No mitigation is required.

Significance Determination

Less Than Significant. Modeled cancer and noncancer risks, localized carbon monoxide concentrations, and Valley fever exposure would remain below applicable thresholds with regulatory requirements and Project design features.

Threshold 4.1 (d): Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Project does not include uses commonly associated with substantial odor complaints, such as the following:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

Applicable Regulatory Compliance Requirements

RR AQ-4 (MDAQMD Rule 402, Nuisance) applies to this threshold.

Potential odors would be limited to construction exhaust, paving and coating materials, and temporary waste storage. Construction odors would be temporary, waste would be covered and removed regularly, and MDAQMD Rule 402 prohibits nuisance odors. Construction and operational odor impacts would be less than significant.

Mitigation Measures (MM)

No mitigation measures are required for odor impacts.

Significance Determination

Less Than Significant.

4.1.6 Cumulative Impacts Analysis

Air quality is a cumulative issue because emissions from past, present, and future development contribute to basin conditions. Regional effects are evaluated against MDAQMD thresholds and

attainment-plan assumptions. Localized effects are evaluated with nearby projects within 0.5 mile.

Construction-Source Emissions

Unmitigated construction NOx would reach 137.86 pounds per day, slightly above the 137-pound threshold. Other construction pollutants would remain below their thresholds.

MM AQ-5 would reduce NOx to 79.55 pounds per day, and all construction pollutants would remain below their thresholds. The Project's construction contribution would not be cumulatively considerable. The cumulative impact would be less than significant with mitigation.

Operational-Source Emissions

Unmitigated operational emissions would exceed MDAQMD thresholds for VOC, NOx, CO, PM10, and PM2.5.

After mitigation, VOC, NOx, CO, and PM10 would remain above the thresholds; PM2.5 would fall below its threshold, and CO would exceed only in the summer scenario. VOC and NOx contribute to ozone formation, and the basin is in nonattainment for ozone and PM10.

Because mitigated operational emissions would exceed the levels assumed in the attainment plans, the Project's contribution would be cumulatively considerable. No additional feasible mitigation is available because on-road vehicles are the dominant source and are regulated by CARB. The natural gas generation option would add permitted stationary-source emissions but would not change this conclusion.

Localized Cumulative Effects

Carbon monoxide. The basin is in attainment for carbon monoxide. Cumulative peak-hour traffic volumes would remain well below the levels at which prior modeling found no exceedance. The Project and nearby cumulative projects would not cause a carbon monoxide hot spot. The cumulative impact would be less than significant.

Health risk. Appendix A-2 evaluates diesel particulate matter from construction equipment, on-site activity, and truck travel over an area extending more than 0.75 mile from the site, including nearby industrial and institutional receptors.

MDAQMD uses a 10-in-one-million incremental cancer-risk threshold and a noncancer hazard-index threshold of 1.0. Combined construction and operational risk at the most exposed receptor would be 1.19 in one million, lower than the 30-year operational value of 1.52 because the 30-year exposure period includes 3.25 years of construction, when operational emissions do not occur (Appendix A-2), with a hazard index of 0.01 or less. The Project's contribution would not be cumulatively considerable, and the cumulative health-risk impact would be less than significant.

Odors. Odors are localized and dissipate with distance. The Project would comply with MDAQMD Rule 402, and nearby land uses would not combine with Project odors to affect a substantial number of people. The cumulative impact would be less than significant.

Fugitive dust. Concurrent construction could affect the same receptors. Each project must comply with MDAQMD Rule 403, and the Project would also implement MM AQ-1. The cumulative impact would be less than significant with mitigation.

Significance Determination

Significant and Unavoidable. The Project's mitigated operational emissions would remain cumulatively considerable. Construction, localized carbon monoxide, health-risk, odor, and fugitive-dust impacts would be less than significant or less than significant with mitigation.

4.2 Biological Resources

4.2.1 Introduction

Purpose and Scope

This section evaluates construction and operational effects on biological resources using current regulations, field surveys, and the technical reports listed below. It identifies mitigation where required.

Technical Studies

The following technical reports are included as SEIR appendices:

- Appendix B-1: Biological Resources Update, Psomas, December 15, 2023
- Appendix B-2: Crotch's Bumble Bee Survey Report First Carbon Solutions, March 14, 2025
- Appendix B-3: Burrowing Owl Survey Report, First Carbon Solutions, March 13, 2025
- Appendix B-4: Aquatic Resources Delineation Report, First Carbon Solutions, December 13, 2024
- Appendix B-5: Desert Tortoise Survey Report, First Carbon Solutions, March 13, 2025
- Appendix B-6: Mohave Ground Squirrel Protocol Survey, Dipodomys, September 4, 2024
- Appendix B-7: Joshua Tree Inventory Report, First Carbon Solutions, March 24, 2025
- Appendix B-8: Rare Plant Survey, First Carbon Solutions, April 9, 2025

Notice of Preparation Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No biological-resources comments were made at the meeting. Appendix K includes the following comment letter:

- California Department of Fish and Wildlife, dated June 16, 2025

4.2.2 Environmental Setting

Regional Context

The site is in the Victor Valley area of the western Mojave Desert in San Bernardino County. The region includes Victorville, Hesperia, Apple Valley, Adelanto, and nearby unincorporated areas

and is characterized by creosote bush scrub, ephemeral drainages, and relatively flat high-desert terrain.

Project Site Conditions

Physical Characteristics

The 451-acre site is relatively flat and undeveloped, at elevations of approximately 2,900 to 2,920 feet above mean sea level. Air Expressway and the Southern California Logistics Airport are to the north; Adelanto Road and industrial and commercial uses are to the west; undeveloped land and the Victorville Federal Correctional Institution are to the east; and a powerline easement, Joshua Avenue, Yucca Road, light industrial uses, and undeveloped land are to the south.

Soils

The site contains Bryman loamy fine sand on 0- to 2-percent slopes. These well-drained soils formed from granite alluvium and are nonsaline to very slightly saline.

Vegetation Communities

Table 4.2-1 summarizes the three vegetation types in the survey area. Figure 4.2-1 shows vegetation communities and land cover.

Hydrology

An unnamed blueline stream north of the site terminates at the northern boundary. No blueline stream crosses the site. One ephemeral drainage occurs in the southern portion, as shown in Figure 4.2-2, *Jurisdictional Waters*.

Table 4.2-1. Vegetation Communities in the Survey Area

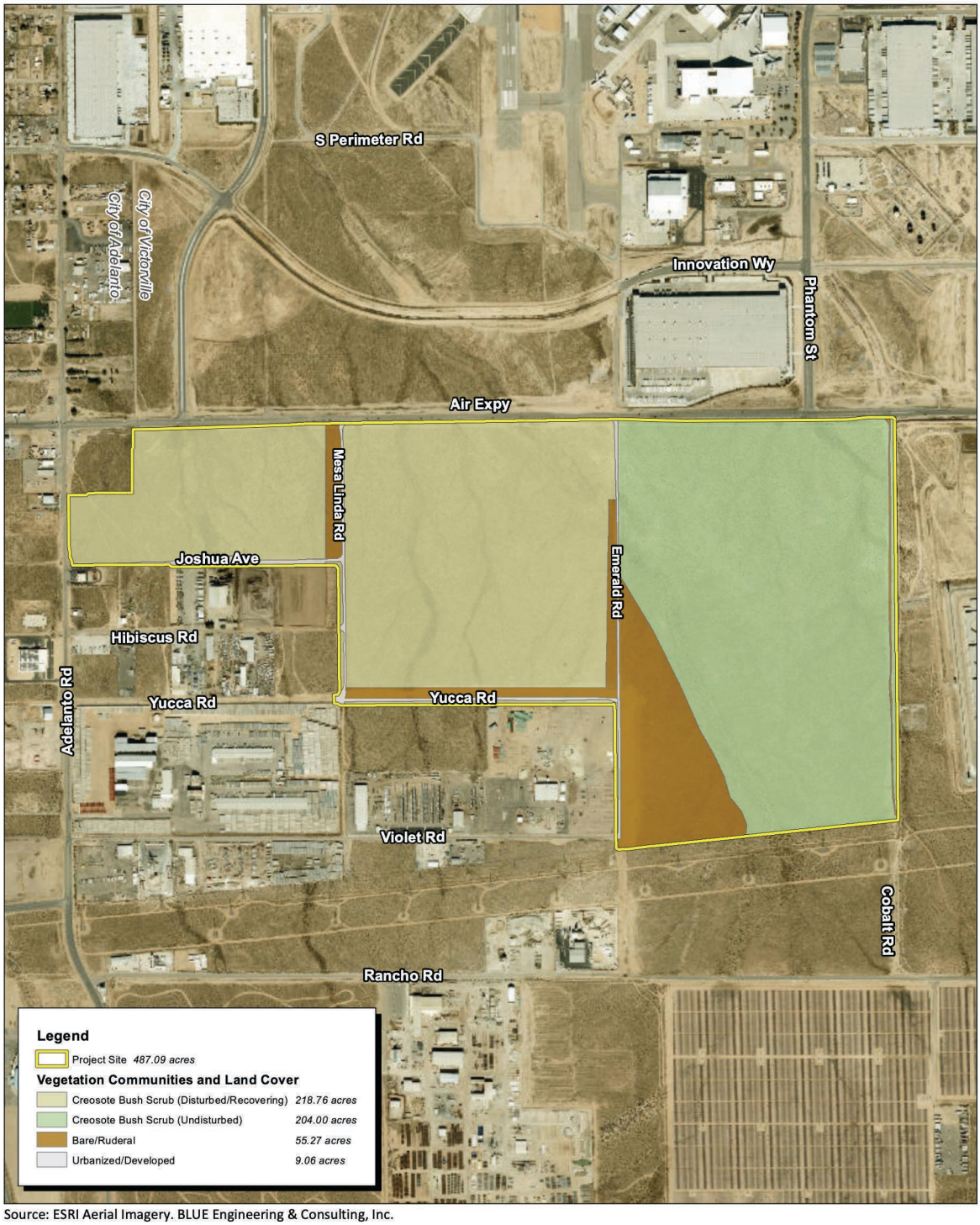
Vegetation Type	Acres	Sensitivity
Creosote Bush Scrub (Disturbed/Recovering)	218.7	G5 S5 (Secure)
Creosote Bush Scrub (Undisturbed)	204.0	G5 S5 (Secure)
Bare/Ruderal	55.27	N/A
Urbanized/Developed	9.06	N/A
Total	**487.09**	

Source: Exhibit 5, Rare Plant Survey Report (Appendix B-8)

Notes: NatureServe ranks global (G) and state (S) conservation status from 1, Critically Imperiled, to 5, Secure. G5 S5 communities are secure globally and in California. S3 communities are vulnerable in California because of restricted range, few occurrences, declines, or similar factors.

White bursage and rubber rabbitbrush occur within creosote bush scrub but were not mapped as a separate alliance in the 2024 site-specific survey. The 2024 mapping supersedes the vegetation classification in the 2023 Biological Resources Update.

Figure 4.2-1. Vegetation Communities and Land Cover



Source: Biological Resources Update, Psomas, December 15, 2023 (Technical Appendix B-1).

Wildlife

Common Wildlife Species

Site vegetation supports common wildlife. Because surface water is scarce and the site's drainage is ephemeral, the site does not provide fish habitat.

Reptiles. No reptiles were observed. Species expected to occur include gopher snake, southern Pacific rattlesnake, and common side-blotched lizard.

Birds. Observed species included American kestrel, Say's phoebe, common raven, horned lark, house finch, white-crowned sparrow, and yellow-rumped warbler.

Mammals. California ground squirrel was observed. Desert cottontail, black-tailed jackrabbit, coyote, and Merriam's kangaroo rat are also expected.

Wildlife Movement and Connectivity

The site may support local wildlife movement but is not within an identified regional corridor. Similar undeveloped habitat occurs to the north and west, while development and infrastructure constrain movement to the east and south.

Special Status Biological Resources

Special-status resources include species recognized by federal or state agencies or conservation organizations and vegetation or habitat types with limited distribution or high wildlife value.

Sensitive Vegetation Types

The 2023 Biological Resources Update identified creosote bush-white bursage-Mojave indigo bush scrub as a sensitive S3 community. The 2024 site-specific survey instead mapped the site as creosote bush scrub, with white bursage as an associated species.

Special Status Plants

Table 4.2-2 summarizes special-status plants reported from the nine USGS quadrangles surrounding the Project area.

Table 4.2-2. Special Status Plants

Scientific Name	Common Name	Potential to Occur
Diplacus mohavensis	Mojave monkeyflower	**Low Potential.** No recent occurrences within 10 miles
Eremothera boothii ssp. boothii	Booth's evening-primrose	**Absent.** Suitable habitat present; not observed.
Loeflingia squarrosa var. artemisiarum	sagebrush loeflingia	**Absent.** Suitable habitat present; not observed.
Mentzelia eremophila	Solitary Blazing star	**Absent.** Suitable habitat present; not observed.
Opuntia basilaris var. brachyclada	short-joint beavertail	**Low Potential.** No recent occurrences within 10 miles
Sclerocactus polyancistrus	Mojave fish-hook cactus	**Absent.** Suitable habitat present; not observed
Muilla coronata	Crowned muilla	**Moderate Potential to Occur.** Survey conducted outside of blooming season; one recent occurrence within 10 miles
Pediomelum castoreum	Beaver Dam breadroot	**Absent.** Suitable habitat present; not observed.
Saltugilia latimeri	Latimer's woodland-gilia	**Absent.** Suitable habitat present; not observed.
Scutellaria bolanderi ssp. austromontana	southern mountains skullcap	**No Potential**. No suitable habitat
Symphyotrichum defoliatum	San Bernardino aster	**No Potential.** No suitable habitat.

Source: Appendix B-8, Rare Plant Survey, 2025

Special Status Wildlife

Table 4.2-3 summarizes special-status wildlife reported from the Project region, their potential to occur, and focused-survey results. The list is based on the California Natural Diversity Database and site habitat conditions.

Table 4.2-3. Special Status Wildlife Species

Species	Potential to Occur
Invertebrates	
Bombus crotchii Crotch's bumble bee	**Absent.** Not observed during 2024 focused surveys; marginally suitable habitat.
Fish	
Siphateles bicolor mohavensis Mohave tui chub	**Absent**. Not expected to occur; no suitable habitat.
Amphibians	
Anaxyrus californicus arroyo toad	**Absent**. Not expected to occur; no suitable habitat.
Rana draytonii California red-legged frog	**Absent.** Not expected to occur; no suitable habitat.
Reptiles	
Actinemys pallida [*Emys marmorata*] southwestern [western] pond turtle	**Absent.** Not expected to occur; no suitable habitat.
Gopherus agassizii desert tortoise	**Absent.** Not expected to occur; not observed during focused surveys.
Birds	
Agelaius tricolor tricolored blackbird	**Absent.** Not expected to occur; no suitable habitat.
Athene cunicularia burrowing owl (burrow sites and some wintering sites)	**Present.** Sign observed at multiple burrow locations; likely overwinters on site. Suitable foraging and burrow habitat present.
Buteo swainsoni Swainson's hawk (nesting)	**Potential.** May occur for foraging; not expected to occur for nesting; suitable foraging and nesting habitat; outside current known nesting range.
Coccyzus americanus occidentalis western yellow-billed cuckoo	**Absent.** Not expected to occur; no suitable habitat.
Empidonax traillii extimus southwestern willow flycatcher	**Absent.** Not expected to occur; no suitable habitat.

Species	Potential to Occur
Vireo bellii pusillus least Bell's vireo	**Absent.** Not expected to occur; no suitable habitat.

Source: Appendix B-1, Psomas 2023. Results of a Biological Resources Update for the Adelanto Gateway Logistics Center Project, December 15, 2023.

Jurisdictional Resources

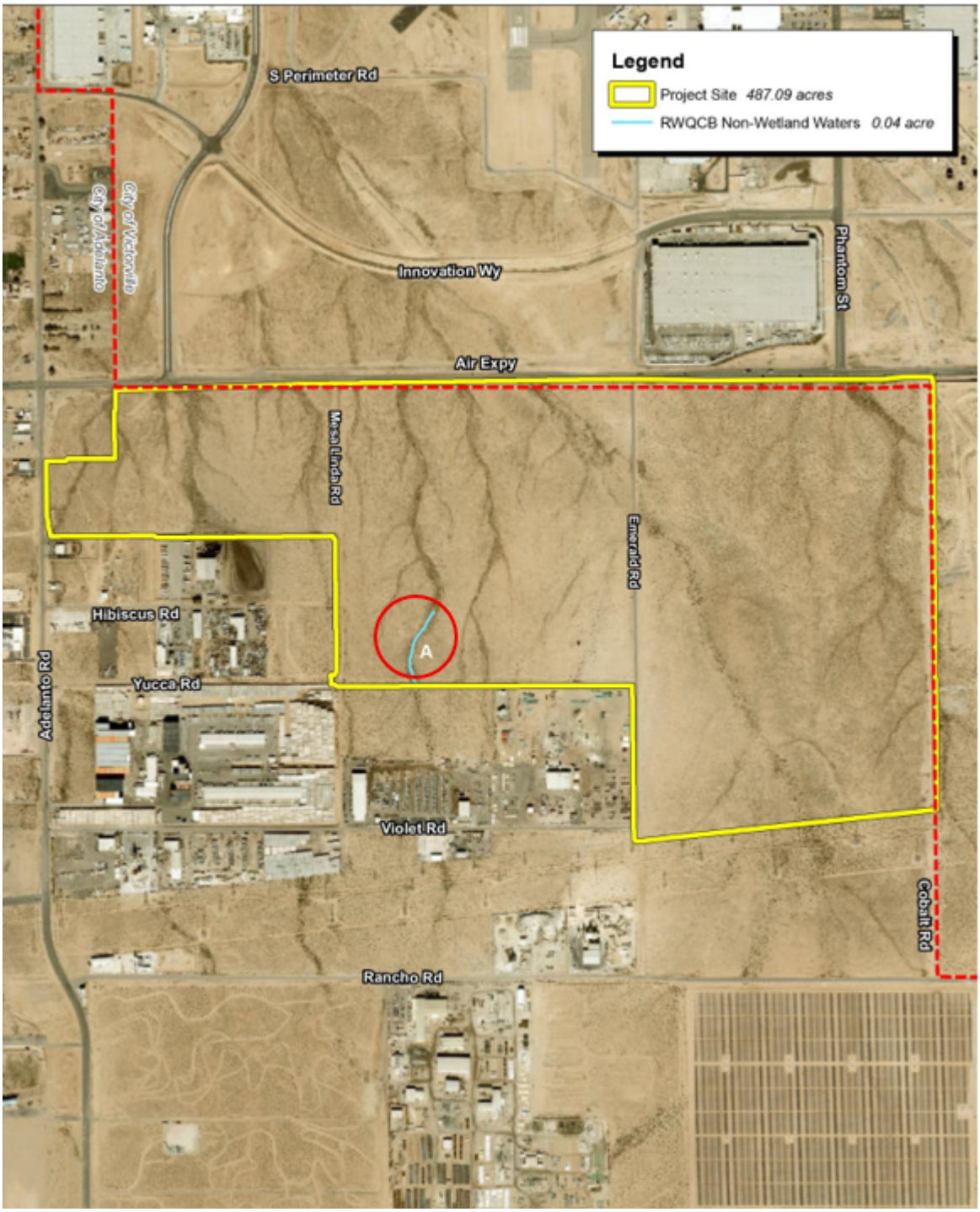
Jurisdictional resources may include waters of the United States regulated by USACE under Clean Water Act Section 404, waters of the state regulated by the Water Boards, and streams regulated by CDFW under Fish and Game Code Sections 1600 through 1616.

One ephemeral drainage occurs in the southern portion of the site.

Figure 4.2-2 shows the drainage.

Figure 4.2-2. Jurisdictional Waters

Source: First Carbon Solutions.



4.2.3 Regulatory Framework

Federal, state, and local laws regulate special-status species, birds, native plants, jurisdictional waters, and habitat conservation. The main requirements are summarized below.

Federal

Federal Endangered Species Act. The Act protects federally listed threatened and endangered species and authorizes recovery planning, interagency consultation, and permits for covered activities. USFWS administers the Act for species addressed in this analysis.

Migratory Bird Treaty Act. The MBTA prohibits unauthorized take or possession of protected migratory birds, nests, and eggs. California law separately protects birds of prey and nongame birds.

Fish and Wildlife Coordination Act. Federal agencies must consult with USFWS, NMFS, and CDFW when projects affect water bodies, including during review of Clean Water Act Section 404 permits.

Clean Water Act Sections 404 and 401. The Act regulates discharges of dredged or fill material to waters of the United States. Section 404 permits are issued by USACE, and Section 401 requires state water-quality certification.

Clean Water Act Section 402. The NPDES program regulates pollutant discharges, including stormwater from construction sites larger than one acre. California's Construction General Permit requires a Storm Water Pollution Prevention Plan and best management practices; Regional Water Boards administer the program.

Porter-Cologne Water Quality Control Act. The State and Regional Water Boards regulate waste discharges to waters of the state, including surface water, groundwater, artificial channels, and waters not subject to federal jurisdiction.

State of California

Lake and Streambed Alteration Program. Fish and Game Code Sections 1600 through 1616 require notification to CDFW before activities that substantially divert or obstruct streamflow, change a bed or bank, or deposit material into a river, stream, or lake. CDFW may issue a Lake or Streambed Alteration Agreement with protective conditions.

Natural Community Conservation Planning Act. The Act authorizes regional plans that conserve biological diversity while allowing compatible development. Covered activities may receive take authorization subject to the plan's conservation requirements.

Native Plant Protection Act. The Act authorizes designation of rare or endangered native plants and generally prohibits their take, subject to specified exceptions and notification requirements.

California Desert Native Plants Act. The Act regulates harvesting, transport, sale, and possession of specified desert plants in designated counties, including San Bernardino County. Required permits, tags, and seals are issued locally.

Local

The City is the CEQA lead agency and issues grading and building permits after determining compliance with applicable laws, General Plan policies, and municipal requirements.

Regulatory Compliance Requirements

RR BIO-1 through RR BIO-8 are existing legal requirements. They are not mitigation.

RR BIO-1 — Federal Endangered Species Act (ESA). *Section 9 of the federal Endangered Species Act (16 USC §1538) prohibits the take of any endangered species. Project activities affecting federally listed species shall comply with Section 7 (federal nexus) or Section 10 (Habitat Conservation Plan / Incidental Take Permit) of the ESA as applicable, in coordination with the U.S. Fish and Wildlife Service.*

RR BIO-2 — California Endangered Species Act (CESA). *Fish and Game Code §§2050–2098 prohibits the take of state-listed endangered, threatened, or candidate species. Project activities affecting state-listed species shall comply with CESA through an Incidental Take Permit issued by CDFW under §2081, where applicable.*

RR BIO-3 — Migratory Bird Treaty Act (MBTA). *16 USC §§703–712 prohibits the take of any migratory bird, including active nests. Pre-construction nesting bird surveys shall be conducted within 14 days prior to vegetation removal or ground disturbance during the breeding season (generally February 1 through August 31), with appropriate buffers established around any active nests until young have fledged.*

RR BIO-4 — California Fish and Game Code §§3503, 3503.5, 3513. *Prohibits take, possession, or destruction of birds, their nests, or eggs; specifically protects birds of prey (raptors) and migratory non-game birds. Pre-construction raptor surveys shall be conducted, and active nests shall be protected with appropriate buffers established in consultation with CDFW.*

RR BIO-5 — Adelanto Municipal Code Chapter 17.57 — Joshua Tree Protections. *Project shall comply with applicable provisions of the Adelanto Municipal Code addressing protection, relocation, and replacement of Joshua trees on-site, consistent with the Western Joshua Tree Conservation Act (Fish and Game Code §§1927–1927.12, effective July 10, 2023).*

RR BIO-6 — Clean Water Act §404 / §401. *Project impacts to Waters of the United States, if any, shall be authorized under a Section 404 permit from the U.S. Army Corps of Engineers (USACE) with corresponding Section 401 Water Quality Certification from the Lahontan Regional Water Quality Control Board (RWQCB), as documented in the Aquatic Resources Delineation.*

RR BIO-7 — California Fish and Game Code §§1600–1616 — Streambed Alteration Agreement. *Any Project activity that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake shall be conducted under a Lake or Streambed Alteration Agreement issued by CDFW.*

RR BIO-8 — Porter-Cologne Water Quality Control Act / Waste Discharge Requirements. *Project impacts to Waters of the State, including isolated waters not subject to federal jurisdiction, shall be authorized under Waste Discharge Requirements (WDRs) issued by the Lahontan RWQCB under Water Code §13260.*

General Plan Policy Consistency Matrix

Table 4.2-5 evaluates the Project against applicable biological-resource policies in the Adelanto North 2035 Comprehensive Sustainable Plan.

Table 4.2-5. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy / Program	Policy Language (summary)	Project Consistency
OS 1.2	Preserve drainages and washes in their natural state or limit concrete-lined channels to protect the community from flooding hazards and enhance conservation.	**Consistent.** The on-site ephemeral drainage is addressed under Mitigation Measure BIO-11, and stormwater is retained and infiltrated on site instead of conveyed in concrete channels.
OS 2.1	Survey and map potential habitat for sensitive biological resources, including special-status plant and wildlife species and sensitive natural communities.	**Consistent.** Habitat surveys and mapping were completed for the site (Appendices B-1 through B-8; Section 4.2).
OS 2.3	Ensure that new development and major transportation projects minimize encroachment into sensitive desert habitats, and minimize direct or indirect impact to sensitive biological resources while optimizing the potential for mitigation.	**Consistent.** Impacts to sensitive biological resources are minimized and mitigated through Mitigation Measures BIO-1 and BIO-3 through BIO-12.

4.2.4 Thresholds of Significance

Appendix G to the CEQA Guidelines uses the following questions to evaluate biological-resource impacts. Would the Project:

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

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

c) 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;

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.2.5 Impacts Analysis

Threshold 4.2 (a): Would the Project 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?

Environmental Setting

Table 4.2-6. Regulatory and Site Conditions 2009 Status vs. Current Status

Species/Resource	2009 Status	Current Status
Western Joshua Tree	Not listed	Candidate Threatened (CESA); Western Joshua Tree Conservation Act in effect (July 10, 2023)
Burrowing Owl	SSC (Species of Special Concern)	Candidate for CESA listing (October 2024)
Crotch's Bumble Bee	Not addressed	Candidate for CESA listing (September 2022)
White Bursage Scrub (Creosote Bush-White Bursage-Mojave Indigo Bush Scrub)	High priority for inventory; not sensitive	Ranked S3 (Sensitive Natural Community) (June 2023)
Cacti (CDNPA)	Not addressed	Observed on site; permit may be required (November 2023)

Impact Analysis

Special Status Plants

Western Joshua Tree. The site contains 19 living, genetically distinct western Joshua trees and 36 stems consisting of trunks and rhizomes. Figure 4.2-3, *Locations of Western Joshua Trees,* shows their locations.

CDFW concluded in March 2022 that threatened listing was not warranted, and USFWS rejected the federal listing petition on March 9, 2023.

The western Joshua tree is a candidate threatened species under CESA. Removal of 19 trees would be potentially significant and would require CDFW take authorization. MM BIO-4 would reduce the impact to less than significant.

Other Special-Status Plants. Focused floristic surveys in May, June, and July 2024 targeted Booth's evening-primrose, sagebrush loeflingia, solitary blazing star, Beaver Dam breadroot, and Mojave fish-hook cactus during their blooming periods. None was detected. Current records and habitat

conditions indicate low potential for Mojave monkeyflower and short-joint beavertail and no potential for southern mountains skullcap or San Bernardino aster. The impact would be less than significant.

Crowned Muilla. One recent occurrence within 10 miles indicates moderate potential on the site, but the 2024 surveys occurred outside its March-April blooming period. This CNPS Rank 4.2 species is widespread in the Mojave Desert, including the Adelanto area, and is not locally rare or dependent on unusual or declining habitat. The impact would be less than significant.

Cacti. Cacti, including silver cholla, were observed in 2023 and 2024 but were not addressed in the 2009 EIR. A survey is required to determine whether removal would require a California Desert Native Plants Act permit. The impact would be potentially significant; MM BIO-3 would reduce it to less than significant.

Special Status Wildlife

Crotch's Bumble Bee. The site provides potential foraging, nesting, and overwintering habitat, although focused surveys from June through August 2024 detected no individuals. CDFW guidance recommends monitoring during vegetation clearing and ground disturbance within the species' flight and active periods. The impact would be potentially significant; MM BIO-5 would reduce it to less than significant.

Burrowing Owl. The California Fish and Game Commission designated the species as a CESA candidate in October 2024. Surveys identified 124 potentially suitable burrows and one active burrow complex. The impact would be potentially significant; MM BIO-6 would reduce it to less than significant.

Desert Tortoise. Protocol surveys on May 15 and 30, 2024, detected no desert tortoises or sign. The impact would be less than significant.

Mohave Ground Squirrel. This state-listed threatened species may occur on the site. April 2024 trapping found no individuals and identified low-quality habitat because of disturbance, compacted soils, nonnative species, and a poorly developed shrub layer. MM BIO-7 requires updated surveys if grading does not begin within one year. The impact would be less than significant with mitigation.

Desert Kit Fox and American Badger. These species may occur throughout the site. Regional habitat availability would make habitat loss less than significant, but construction vibration could collapse occupied burrows. MM BIO-8 would reduce the potentially significant construction impact to less than significant.

Special-Status Raptors. The site provides Swainson's hawk foraging habitat but no suitable nesting habitat. Loss of approximately 451 acres of foraging habitat would be less than significant given regional habitat availability.

Special-Status Bats. The Project would remove approximately 451 acres of potential foraging habitat. Regional habitat would remain available, and the impact would be less than significant.

Loggerhead Shrike and LeConte's Thrasher. The Project would remove approximately 451 acres of suitable foraging and nesting habitat. Regional habitat would remain available, and active nests are protected by federal and state law. Habitat and active-nest impacts would be less than significant.

Indirect Impacts

Noise and Vibration. Construction could temporarily disrupt wildlife foraging, nesting, roosting, and denning. Similar nearby habitat would remain available. General wildlife impacts would be less than significant, but disturbance of active nests would be potentially significant. MM BIO-9 would reduce nesting-bird impacts to less than significant.

Night Lighting. Lighting could affect nocturnal and crepuscular wildlife behavior but would not reduce regional populations below self-sustaining levels. The impact would be less than significant.

Invasive Plants. Landscaping could introduce invasive species that spread into native habitat. MM BIO-10 would reduce the impact to less than significant.

Mitigation Measures

The following measures replace 2009 EIR Mitigation Measures BIO-1 through BIO-8 and reflect current requirements and survey results.

BIO-1 Pre-construction Rare Plant Clearance Survey: Prior to Project implementation, and during the appropriate season, a qualified biologist shall conduct botanical field surveys within the Project area following protocols outlined in the California Department of Fish and Wildlife's (CDFW) 2018 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special-status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any special-status plants are identified, the Project Applicant shall avoid the plant(s), with an appropriate buffer (i.e., fencing or flagging).

BIO-2 Rare Plant Compensatory Mitigation. If complete avoidance of a special status plant is not feasible, the Project Applicant shall mitigate the loss of the plant(s) through off-site compensation including: 1) permanent protection of an existing off-

site native population; 2) permanent protection of an off-site introduced population; 3) a combination of 1) and 2); or 4) mitigation banking. The ratio of acquisition to loss must in most cases exceed 1:1 for any species. The ratio should be higher for rarer species, particularly for those that occupy irreplaceable habitats.

BIO-3 California Desert Native Plant Act Focused Survey. Prior to the issuance of a grading permit, the Project Applicant shall retain a qualified Biologist to conduct focused surveys for plants protected by the California Desert Native Plant Act on the Project site. This includes species of family Burseraceae (elephant tree); Carnegiea gigantea (saguaro cactus); Ferocactus acanthodes (barrel cactus); Castela emoryi (crucifixion thorn); Dudleya saxosa (Panamint dudleya); Pinus longaeva (bristlecone pine); and Washingtonia filifera (fan palm); all species of the family Agavaceae (century plants, nolinas, yuccas); all species of the family Cactaceae (cacti), except for the plants listed in subdivisions (b) and (c) of Section 80072, which may be harvested under a permit obtained pursuant to that section; all species of the family Fouquieriaceae (ocotillo, candlewood); all species of the genus Prosopis (mesquites); all species of the genus Cercidium (palos verdes); Acacia greggii (catclaw); Atriplex hymenelytra (desert-holly); Dalea spinosa (smoke tree); and Olneya tesota (desert ironwood). If any of the protected species are present in the impact area, the Project Applicant shall obtain the necessary permits, tags, and/or seals, and shall pay the appropriate fees for the removal of any individuals of a species protected by the California Desert Native Plant Act.

BIO-4 Comply with the Western Joshua Tree Conservation Act. Prior to the initiation of western Joshua tree removal, relocation, replanting, trimming, or pruning, or any activity that may result in take of WJT on site, the Project Proponent shall obtain California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Section 2081 of the CESA, or any other appropriate take authorization under CESA or the Western Joshua Tree Conservation Act (WJTCA) (Fish and Game Code §§ 1927-1927.12). The Project Applicant will adhere to the measures and conditions in the Incidental Take Permit, which may consist of mitigation fees, relocation, off-site conservation, a CDFW-approved mitigation bank or a combination thereof.

BIO-5 Crotch's Bumble Bee Survey. Prior to the initiation of project activities, the Project proponent must obtain a qualified biologist to conduct surveys for the candidate bumble bee species.

The qualified biologist will conduct habitat mapping no less than 120 days prior to the initiation of Project activities with the submittal of a complete baseline habitat mapping report encompassing Fish and Game Code 1602 resources. Mapping will identify habitat alliances following Sawyer et al. (2009) and the report will identify species composition for each mapped alliance. If habitat mapping identifies the presence of plants (e.g., genera Antirrhinum, Phacelia, Clarkia, Cordylanthus, Dendromecon, Eschscholzia, Eriogonum Hypericum, Lantana, Lupinus, Salvia,

Asclepias, Cirsium, Monardella, Keckiella, Acmispon, Euthamia, Ehrendorferia, Vicia, and/or Trichostema) or other suitable habitats, then a qualified biologist approved by CDFW shall prepare a draft survey plan and conduct surveys for Crotch's bumble bee. The survey plan will identify the timing, number, and duration of survey efforts and procedures to follow if Crotch's bumble bee is detected within the Project area. The survey methodology shall generally follow the

U.S. Fish and Wildlife Service protocol for the Rusty Patched bumble bee (USFWS 2019). CDFW also recommends completing multiple surveys, coinciding with the peak bloom periods of the plants listed above.

Following the completion of surveys, and no less than 30 days prior to initiation of Project activities, survey results shall be submitted to CDFW for review and comment. If Crotch's bumble bee is detected during surveys, Project activities shall not occur in any occupied habitat areas and the qualified biologist shall immediately notify CDFW.

BIO-6 Burrowing Owl Avoidance and Mitigation Program. Prior to the issuance of a grading permit, the following text shall be included as a note on the grading plan: "Burrowing Owl Avoidance and Mitigation Program:

Focused Survey: Prior to any ground disturbance, a survey for potential burrows followed by four breeding season surveys of areas found to have potential for burrowing owl occupation must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012. The surveys shall include 100 percent coverage of the Project site. A report summarizing the breeding season survey, including all requirements for survey reports (page 30 of the 2012 Staff Report), shall be submitted to CDFW for review and approval, and an approved copy to the City of Adelanto Development Services Department. If no burrowing owl, active burrowing owl burrows, or sign thereof are found, no further action is necessary.

Avoidance, Minimization, Mitigation Measures: If burrowing owl, active burrowing owl burrows, or sign thereof are found, the qualified biologist shall prepare and implement a plan for avoidance, minimization, and mitigation measures to be reviewed and approved by CDFW prior to commencing Project activities. The plan shall include mitigation for permanent loss of occupied burrow(s) and habitat. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. Permanent protection of mitigation land through a conservation easement deeded to a nonprofit conservation organization or public agency with a conservation mission, development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls, and funding for the maintenance and management of mitigation land through the establishment of a long-term

funding mechanism such as an endowment. The ratio of acquisition to loss must in most cases exceed 1:1 for any species, particularly burrowing owl. The ratio should be higher for rarer species, particularly for those that occupy irreplaceable habitats.

Pre-construction Clearance Survey: To ensure that the Project avoids impacts to burrowing owls, a qualified biologist shall complete a take avoidance survey no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the 2012 Staff Report. Burrowing owls may re-colonize a site after only a few days. Time lapses between Project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance."

BIO-7 Mohave Ground Squirrel Avoidance and Mitigation Program. Prior to the issuance of a grading permit, the following text shall be included as **a note on the grading plan: "Mohave Ground Squirrel Avoidance and Mitigation Program:**

1. Mojave Ground Squirrel Focused Trapping Survey. Prior to issuance of a grading permit, the Project Applicant shall retain a qualified Biologist to conduct focused trapping surveys for Mohave ground squirrel on the Project site following CDFW (2023c) guidelines; per these guidelines, negative survey results are valid for only the year they are conducted. A Letter Report shall be prepared and submitted to CDFW documenting the results of the survey within 45 days of completion of the survey effort. If no Mohave ground squirrels are observed, no further mitigation shall be required prior to the next active season (i.e., the following March). If construction is not initiated in the season following the focused surveys (i.e., prior to the next active season the following March), the focused surveys shall be updated per CDFW (2023c) protocol requirements.

2. Section 2081 Incidental Take Permit. If a Mohave ground squirrel is observed on the Project site, the Project Applicant shall provide a Section 2081 Incidental Take Permit (ITP) from the CDFW for the Mohave ground squirrel prior to the issuance of a grading permit. The Project Applicant or its designee shall provide compensatory mitigation for permanently impacting 133.19 acres of habitat for Mohave ground squirrels. The goal of this mitigation is to ensure no net loss of habitat following implementation of the Project. Mitigation ratios (i.e., the amount of mitigation acreage compared to the amount of impacted habitat) shall be negotiated with CDFW but shall be no less than 1:1, replacing each acre of habitat lost with of an acre of equivalent or higher quality habitat. This mitigation may be in the form of habitat preservation, restoration, enhancement, and/or establishment (i.e., creation). The Project Applicant shall implement one or a combination of these options, as approved by CDFW.

   Compensatory mitigation may be in the form of permittee-responsible mitigation, in which the permittee maintains liability for the construction and long-term success of the mitigation site or through mitigation banking/in-lieu fee program, where liability for Project success is transferred to a third party (i.e., a mitigation bank/in-lieu fee sponsor). If the Project Applicant elects to provide mitigation through a

mitigation banking/in-lieu fee program, the mitigation bank/program shall be selected by the Project Applicant and approved by CDFW, and payment shall be made prior to the issuance of a grading permit.

For permittee-responsible mitigation involving establishment, restoration, or enhancement of habitat, the Project Applicant shall retain a qualified Biologist to prepare a Habitat Mitigation Monitoring Plan (HMMP) to mitigate for loss of Mohave ground squirrel habitat. The HMMP shall be reviewed/approved by the CDFW prior to the issuance of a grading permit. The detailed HMMP shall contain the following items: (1) responsibilities and qualifications of the personnel to implement and supervise the plan,

(2) mitigation site selection criteria, (3) site preparation and planting implementation, (4) implementation schedule, (5) maintenance plan/guidelines, (6) monitoring plan, and (7) long-term preservation. The Project Applicant shall implement the Plan as approved.

3. Construction Avoidance and Minimization Measures: If Mohave ground squirrel is observed, the following avoidance and minimization measures shall be implemented during construction activities.

    a. **Biological Monitor**. Prior to the initiation of construction activities, the Project Applicant shall retain a qualified Biologist to oversee compliance with the protection measures for Mohave ground squirrel, and any other special status species. The Biologist shall monitor vegetation clearance and ground-disturbance activities. Once ground disturbance is completed, monitoring shall be conducted at the frequency determined by the Biologist or as specified in the ITP. The Biologist shall have the
    authority to halt activities that violate measures designated to protect the Mohave ground squirrel or other special status species. Work shall proceed only after hazards to Mohave ground squirrel, and/or other special status species are removed, and the species are no longer at risk. The Biologist shall have in his/her possession a copy of all the compliance measures and permits while work is being conducted on-site.

    b. **Worker Environmental Awareness Program Training**. Prior to the initiation of construction activities, and for the duration of construction activities, all new construction workers for the Project shall attend a Worker Environmental Awareness Program (WEAP) training developed and presented by a qualified Biologist. The training shall address Mohave ground squirrel as well as other special status biological resources that may be encountered during construction activities; their legal protections; the definition of "take" under the Endangered Species Act; specific measures that each worker shall employ to avoid taking of the Mohave ground squirrel, and other special status species; reporting requirements; and penalties for violation of the Federal and

State Endangered Species Acts. All workers who attend the WEAP training shall sign a training log, which will also be signed by the qualified Biologist conducting the training.

c. **Entrapment**. At the end of each work day, a qualified Biologist shall survey all trenches, bores, and other excavations to ensure no wildlife is trapped; any wildlife observed shall be relocated to a safe area. Only an Authorized Biologist shall handle Mohave ground squirrel (i.e., one approved by CDFW to handle Mohave ground squirrel). Following this final inspection, the Biologist shall ensure that the construction contractor has backfilled or adequately covered all trenches, bores, and other excavations to prevent wildlife from falling into them. If backfilling or covering the trenches, bores, and/or excavations is not feasible, then wildlife escape ramps shall be provided at least every 50 feet. Additionally, any pipes, culverts, or similar structures shall be inspected before the material is moved, buried, or installed.

d. Pets. The Project Applicant or its designee shall ensure that no pets are allowed at the construction site.

e. Protection of Wildlife. Wildlife shall not be intentionally killed or injured during construction.

f. Pesticides. Use of anticoagulant rodenticides (e.g., difenacoum, brodifacoum, bromadiolone difethialone, warfarin, chlorophaninone, and diphacinone) shall be prohibited from being used on the Project site. If rodent control must be conducted, zinc phosphide should be used.

g. Reporting. For the duration of construction activities, the Biologist shall complete monitoring forms that shall be summarized into monthly monitoring reports, which shall be provided to the CDFW. The monthly monitoring reports shall document compliance with the mitigation measures and shall include WEAP training logs, and CNDDB forms for any special status species observations. Additionally, the Biologist shall prepare a final report summarizing compliance throughout Project construction.

BIO-8 Pre-construction Desert Kit Fox and American Badger Survey. Prior to the issuance of a grading permit, the following text shall be included as a note on the grading plan:

"Pre-Grading Survey. No more than fourteen (14) days and no less than three (3) days prior to the beginning of surface disturbance, the Designated Biologist shall conduct a pre-Project 10-meter transect survey (or reduced

based on topography and vegetation), to attain 100% visual coverage within the Project area and a minimum 200-meter buffer to determine the presence or absence of Desert Kit Fox or American Badger individuals, dens, and sign. The permittee shall

provide the results of the survey to CDFW prior to the start of Project activities.

If potential dens are located, they shall be monitored by the Designated Biologist. Trail cameras may be used to assist with observation but shall not be the sole basis upon which the status is determined. The permittee shall provide a determination if active dens can be avoided and buffered from Project activities to prevent take and disturbance with the survey results.

Should active dens be present within the Project area that cannot be avoided with an adequate buffer, the Permittee shall reschedule Project activities or submit a monitoring and relocation plan for CDFW's review and approval. No disturbance or relocation of active dens may take place when juveniles are present and dependent on parental care. The permittee shall block off inactive dens within the buffer zone with rocks and sticks to discourage use during Project activities and remove them when construction is complete. The Designated Biologist shall periodically check that the inactive burrows remain blocked and are not reoccupied.

BIO-9 Pre-construction Nesting Bird Survey. Migratory Bird Treaty Act Compliance Methods: To avoid violation of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, site-preparation activities(removal of trees and vegetation) for all projects shall be avoided, to the greatest extent possible, of potentially occurring native and migratory bird species. If site-preparation activities for implementing projects are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

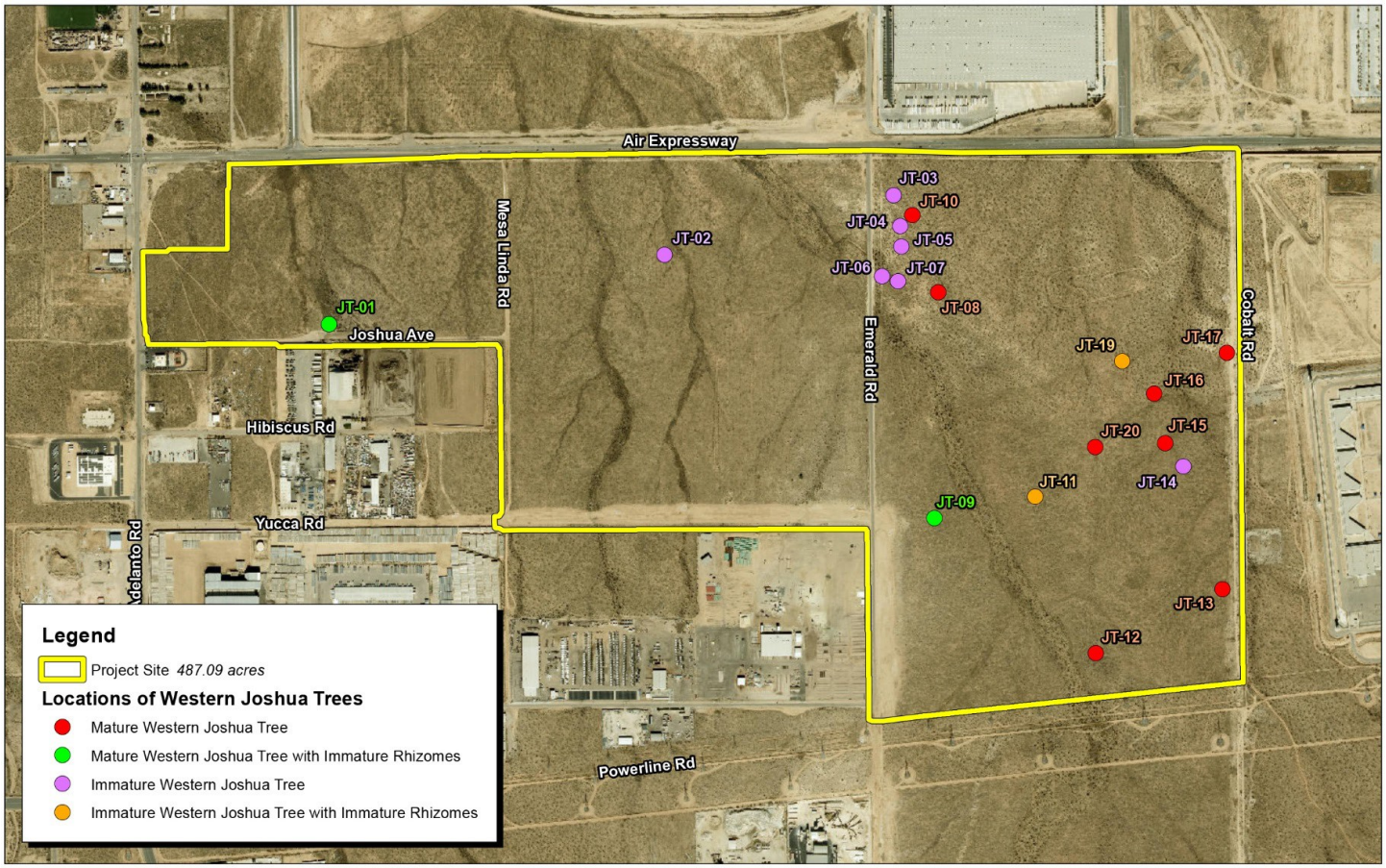
BIO-10 Landscaping Plan Review. Prior to issuance of a grading permit, the project applicant shall submit a Landscaping Plan to the City of Adelanto with a memorandum from a qualified Biologist documenting review for invasive species. Any species on the Cal-IPC invasive plant inventory with a "High" risk rating shall be removed from the plan.

Significance Determination

Less Than Significant with Mitigation. MM BIO-1 through MM BIO-10 would reduce impacts to candidate, sensitive, and special-status species to less than significant.

Figure 4.2-3. Locations of Western Joshua Trees

Source: Exhibit 4, Joshua Tree Inventory Report (Appendix B-7)



Source: ESRI Aerial Imagery. BLUE Engineering & Consulting, Inc.

Threshold 4.2 (b): Riparian Habitat and Sensitive Natural Communities. Would the Project 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 Wildlife or U.S. Fish and Wildlife Service?

Environmental Setting

The 2008 survey and 2023 Biological Resources Update mapped 26.7 and 25.9 acres, respectively, of white bursage scrub in the western and northwestern site. The 2024 site-specific survey instead mapped creosote bush scrub across the site, with white bursage as an associated species rather than a separate alliance. The 2024 mapping is the most current information for the site.

Impact Analysis

Riparian Habitat

No riparian habitat occurs on the site. Drainage A is ephemeral and supports no riparian vegetation. There would be no impact.

Sensitive Natural Communities

The 2024 survey mapped the site as creosote bush scrub, a State Rank S5 community that is not sensitive. White bursage and rubber rabbitbrush occur as associated species but do not form a separately mapped alliance. The site therefore does not contain a mapped sensitive natural community. The impact would be less than significant.

Mitigation Measures

No mitigation is required.

Significance Determination

Less Than Significant. The Project would not affect riparian habitat or a mapped sensitive natural community. No mitigation is required.

Threshold 4.2 (c): State and Federally Protected Wetlands. Would the Project 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?

Environmental Setting

A 2024 aquatic-resources delineation identified jurisdictional features on the site (Appendix B-4). The September 8, 2023 federal definition of waters of the United States excludes certain ephemeral drainages previously treated as jurisdictional.

Impact Analysis

Jurisdictional Determination

No wetlands occur on the site. Drainage A, in the southern portion, has a 2- to 3-foot ordinary high-water mark. Surveys and historic aerial photographs showed no surface water.

Waters of the United States. Drainage A carries flow only in direct response to precipitation and does not meet the current federal definition of a jurisdictional tributary. No USACE-jurisdictional waters occur on the site.

Waters of the State. Drainage A may support beneficial uses and therefore may be regulated by the Regional Water Board. The site contains 0.04 acre of waters of the state.

CDFW Jurisdiction. Drainage A has a defined bed and bank, scour, vegetation disturbance, and sediment sorting. CDFW jurisdiction covers 0.04 acre.

Table 4.2-8. Jurisdictional Resources on the Project Site

Feature	USACE (acres)	RWQCB (acres)	CDFW (acres)
Drainage A	0.00	0.04	0.04
Total	**0.00**	**0.04**	**0.04**

Source: Table 1 and Table 2, Aquatic Resources Delineation prepared by First Carbon Solutions (Appendix B-4)

Construction Impacts

Construction runoff could carry sediment or petroleum residues to nearby areas and affect adjacent habitat. MM BIO-11 and MM BIO-12 would reduce the impact to less than significant.

Permanent Impacts

The preliminary design would permanently fill approximately 0.04 acre of waters of the state and 0.04 acre of CDFW-jurisdictional waters. MM BIO-11 and MM BIO-12 would reduce the impact to less than significant.

Mitigation Measures

BIO-11 **Regulatory Permits-Jurisdictional Waters.** Prior to the issuance of a grading permit, the following text shall be included as a note on the grading plan and the required approvals from the Water Board and CDFW obtained and presented to the City:

"Regulatory Permits-Jurisdictional Waters. Prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), the Project applicant shall obtain all necessary authorizations from the Water Board for discharging fill material into a total of 0.04 acre of ephemeral stream habitat and authorization from the CDFW for discharging fill material into a total of 0.04 acre of ephemeral stream habitat."

BIO-12 **Mitigation and Monitoring Plan-Jurisdictional Waters.** Prior to the issuance of a grading permit, the following text shall be included as a note on the grading plan and the required approvals from the Water Board and CDFW obtained and presented to the City:

"Prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), the applicant shall either purchase agency-authorized mitigation bank credits or prepare a detailed Mitigation and Monitoring Plan-Jurisdictional Waters (MMP) to be submitted to the Lahontan Regional Water Board and CDFW for review and approval as part of the process for obtaining permits from the agencies. The MMP shall address the loss of ephemeral drainage impact due to the proposed project development. The MMP, once implemented, at a minimum shall compensate for impacts to ephemeral drainages at a minimum 1:1 mitigation ratio of 0.04-acre for impacts to Water Board jurisdiction waters and 0.04-acre for impacts to CDFW jurisdictional waters. A copy of the approved MMP shall be provided to the City of Adelanto Community Development Department-Planning Department."

Significance Determination

Less Than Significant with Mitigation. MM BIO-11 and MM BIO-12 would reduce impacts to jurisdictional waters to less than significant.

Threshold 4.2 (d): Wildlife Movement and Corridors. Would the Project 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?

Environmental Setting

Conditions affecting wildlife movement have not materially changed since 2009. Fenced facilities at the Southern California Logistics Airport to the north and the Victorville Federal Correctional Institution to the east limit movement of medium- and large-sized mammals.

Impact Analysis

Wildlife Corridors

The site is not within an identified wildlife corridor or native wildlife nursery. Although the site and nearby land are generally open, fenced facilities to the north and east already constrain local movement of medium- and large-sized mammals.

Development would remove on-site movement habitat, but adjacent areas would remain available for regional movement. The impact would be less than significant.

Migratory Birds

Development would remove 451 acres of nesting and foraging habitat, but substantial vacant land would remain nearby. Construction could take an active nest in violation of federal or state law. This impact would be potentially significant; MM BIO-9 would reduce it to less than significant.

Mitigation Measures

MM BIO-9 (Threshold 4.2(a)) requires nesting-bird surveys and protective buffers when vegetation clearing occurs during the February 1 through August 31 nesting season.

Significance Determination

Less Than Significant with Mitigation. MM BIO-9 would reduce impacts to migratory birds and wildlife movement to less than significant.

Threshold 4.2 (e): Local Policies and Ordinances. Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Environmental Setting

Table 4.2-9. Western Joshua Tree Regulatory Framework, 2009 and Current

Resource	2009 Regulatory Framework	Current Regulatory Framework
Western Joshua Tree	City of Adelanto Zoning Code Chapter 17.57 (local protection)	State CESA Candidate Threatened; Western Joshua Tree Conservation Act (State regulations supersede local ordinance)

Source:

Impact Analysis

City of Adelanto Zoning and Development Code

Chapter 17.57 of the Adelanto Zoning and Development Code protects western Joshua trees. The Project would remove 19 trees.

Because the western Joshua tree is a CESA candidate, state take requirements apply in addition to the City's ordinance. CDFW authorization and the in-lieu fee required by MM BIO-4 would address both state and local protections.

The impact would be potentially significant. MM BIO-4 would reduce it to less than significant by requiring compliance with state and local protections.

Mitigation Measures

MM BIO-4 (Threshold 4.2(a)) requires the Western Joshua Tree Conservation Act in-lieu fee and CDFW take authorization before grading.

Significance Determination

Less Than Significant with Mitigation. MM BIO-4 would reduce conflicts with local biological-resource policies or ordinances to less than significant.

Threshold 4.2 (f): Habitat Conservation Plans. Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Environmental Setting

No adopted habitat conservation plan or natural community conservation plan encompasses the site.

Impact Analysis

Regional conservation plans may authorize incidental take or habitat loss in exchange for landscape-scale conservation. State plans are governed by the Natural Community Conservation Planning Act, and federal habitat conservation plans are governed by the Endangered Species Act.

CDFW's conservation-plan map shows no adopted habitat conservation plan or natural community conservation plan covering the site.

Impact: No Impact.

Mitigation Measures

No mitigation is required.

Significance Determination

No Impact. The Project would not conflict with an adopted habitat conservation plan or natural community conservation plan.

4.2.6 Cumulative Impacts Analysis

For Threshold 4.2(a), the Project would remove Joshua trees and other desert plants and could affect Crotch's bumble bee, burrowing owl, nesting birds and raptors, Mohave ground squirrel, desert kit fox, American badger, drainage habitat, and adjacent habitat through lighting or invasive landscaping. MM BIO-1 through MM BIO-10 would reduce the Project's contribution so it would not be cumulatively considerable.

For Threshold 4.2(b), current vegetation mapping identifies creosote bush scrub, a State Rank S5 community, rather than a sensitive natural community. The Project would not affect riparian habitat or a sensitive natural community and would not contribute to a cumulative impact.

For Threshold 4.2(c), grading would permanently fill approximately 0.04 acre of one ephemeral drainage subject to Regional Water Board and CDFW jurisdiction. MM BIO-11 and MM BIO-12 would reduce the Project's contribution so it would not be cumulatively considerable.

For Threshold 4.2(d), development could affect local wildlife movement and migratory birds. Existing fenced facilities already constrain mammal movement, and MM BIO-9 would protect active bird nests. The Project would remove 451 acres of habitat, but compensatory mitigation identified above would offset the loss.

For Threshold 4.2(e), MM BIO-4 would address removal of western Joshua trees. The Project's contribution would not be cumulatively considerable.

For Threshold 4.2(f), no adopted habitat conservation plan or natural community conservation plan covers the site. Projects in the City must comply with applicable biological-resource policies, ordinances, and the Western Mojave Plan. The Project would not make a cumulatively considerable contribution to conflicts with regional conservation planning. Cumulative impacts would be less than significant.

4.2.7 Summary of Impacts and Mitigation Measures

MM BIO-1 and MM BIO-3 through MM BIO-12 would reduce significant biological-resource impacts to less than significant.

4.2.8 References

California Department of Fish and Wildlife (CDFW). 2012. Staff Report on Burrowing Owl Mitigation. March 7, 2012.

California Department of Fish and Wildlife (CDFW). 2023. California Sensitive Natural Communities List. Vegetation Classification and Mapping Program (VegCAMP).

California Department of Fish and Wildlife (CDFW). 2023. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species.

California Department of Fish and Wildlife (CDFW). 2023. Mohave Ground Squirrel Survey Guidelines.

California Native Plant Society (CNPS). 2025. Inventory of Rare and Endangered Plants of California (online edition).

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129), Section 4.4, Biological Resources.

City of Adelanto. 2014. Adelanto North 2035 Comprehensive Sustainable Plan.

Dipodomys Ecological Consulting. 2024. Mohave Ground Squirrel Protocol Survey, Adelanto Gateway Logistics Center. September 4, 2024. (SEIR Appendix B-6.)

First Carbon Solutions. 2024. Aquatic Resources Delineation Report, Adelanto Gateway Logistics Center. December 13, 2024. (SEIR Appendix B-4.)

First Carbon Solutions. 2025. Burrowing Owl Survey Report, Adelanto Gateway Logistics Center. March 13, 2025. (SEIR Appendix B-3.)

First Carbon Solutions. 2025. Desert Tortoise Survey Report, Adelanto Gateway Logistics Center. March 13, 2025. (SEIR Appendix B-5.)

First Carbon Solutions. 2025. Crotch's Bumble Bee Survey Report, Adelanto Gateway Logistics Center. March 14, 2025. (SEIR Appendix B-2.)

First Carbon Solutions. 2025. Joshua Tree Inventory Report, Adelanto Gateway Logistics Center. March 24, 2025. (SEIR Appendix B-7.)

Psomas. 2023. Results of a Biological Resources Update for the Adelanto Gateway Logistics Center Project. December 15, 2023. (SEIR Appendix B-1.)

First Carbon Solutions. 2025. Rare Plant Survey Report, Adelanto Gateway Logistics Center Project. April 9, 2025 (SEIR Appendix B-8.)

U.S. Environmental Protection Agency and U.S. Army Corps of Engineers. 2023. Revised Definition of "Waters of the United States"; Conforming Rule. 88 Fed. Reg. 61964 (September 8, 2023).

U.S. Fish and Wildlife Service (USFWS). 2019. Preparing for Any Action That May Occur within the Range of the Mojave Desert Tortoise (Gopherus agassizii).

4.3 Cultural Resources

4.3.1 Introduction

This section evaluates the Project's impacts on cultural resources. It relies on the December 2023 Phase 1 Cultural Resources Inventory, which included a records search, a Sacred Lands File search, and a survey of the entire site. Mitigation Measures CUL-1 through CUL-3, adopted with the 2009 EIR, continue to apply.

Technical Appendix

This section relies on current regulations and the following technical report:

- Phase 1 Cultural Resources Inventory, Adelanto Gateway Logistics Center Project, Psomas, December 2023. (Appendix C)

NOP/Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No comments addressed cultural resources.

4.3.2 Environmental Setting

Prehistoric Context

The Victor Valley is within the traditional homeland of the Serrano people. Serrano territory centered on the San Bernardino Mountains and extended into portions of the San Gabriel Mountains, San Bernardino Valley, Mojave River valley, and surrounding desert ranges. The name Serrano derives from a Spanish term for mountain people. Section 4.11, Tribal Cultural Resources, discusses tribal cultural resources.

Historic Context

E.H. Richardson founded Adelanto in 1915 as an early master-planned community. Fruit orchards dominated local land use until the 1930s, when poultry ranches replaced many orchards. Adelanto operated as a community services district before incorporating in 1970.

Project Site Literature and Field Surveys

Records Search

The Phase 1 Inventory included a records search at the South Central Coastal Information Center on October 25, 2023, for the Project site and a 0.5-mile radius. The review included prior cultural resource studies, recorded resources, historic maps and imagery, published literature,

designated landmarks, and properties listed in or evaluated for the National Register of Historic Places, California Register of Historical Resources, or California Historical Resources Inventory.

The records search identified 21 cultural resource studies completed within 0.5 mile of the Project site between 1977 and 2018, including three studies that covered portions of the site. It also identified at least 59 recorded cultural resources within the search area, including 10 on the Project site (Appendix C, Tables 2 and 3). The Phase 1 Inventory relocated or attempted to relocate all 10, which consist of seven historic-era trash scatters and three precontact resources (a rock cairn and two isolated artifacts collected by the 2007 surveyor). It updated their records in December 2023 and found none eligible for the California Register (Appendix C, Table 6).

Sacred Lands File Search

A Sacred Lands File search was requested from the Native American Heritage Commission on October 13, 2023. The search identified sacred lands in the vicinity of the Project site. Section 4.11, Tribal Cultural Resources, evaluates that information.

Field Survey

Archaeologists surveyed the entire Project site from December 5 through December 11, 2023. They walked east-west transects spaced 15 meters (approximately 50 feet) apart and inspected the ground for prehistoric and historical evidence at least 50 years old. Ground visibility was 95 to 100 percent because vegetation was sparse and part of the site had been grubbed. The survey recorded 327 previously undocumented historical-age resources: 308 isolated food or beverage cans and 19 archaeological sites (Appendix C, Table 5).

4.3.3 Regulatory Framework

Federal, state, and local laws protect cultural resources. Applicable requirements include the National Historic Preservation Act, Native American Graves Protection and Repatriation Act, California Register of Historical Resources program, Public Resources Code Sections 5024.1 and 5097 et seq., Health and Safety Code Section 7050.5, and the City's General Plan.

Federal

National Historic Preservation Act. The Act established the National Register of Historic Places, which identifies buildings, structures, objects, sites, and districts significant in American history, architecture, archaeology, engineering, or culture. Resources are evaluated under uniform criteria at the local, state, and national levels.

State of California

California Register of Historical Resources. The California Register identifies resources of architectural, historical, archaeological, and cultural significance for planning, preservation funding, and review under CEQA.

California Health and Safety Code Section 7050.5. If human remains are discovered outside a cemetery, ground disturbance must stop and the County Coroner must be notified. If the remains may be Native American, the Coroner must notify the Native American Heritage Commission within 24 hours.

Local

The Open Space and Conservation Element of the Adelanto General Plan includes the following policies:

> **OS 10.1** Identify, protect, and minimize impacts to archaeological and paleontological resources.
>
> **OS 10.2** Review proposed development for possibility of cultural resources and for compliance with cultural resources program.

The Project must comply with the following existing legal requirements. They are not mitigation.

RR CUL-1 - Public Resources Code Section 5097.5 - Unauthorized Disturbance of Archaeological Resources. Unauthorized disturbance or removal of archaeological, historical, or paleontological resources on public land is prohibited. If Project activities encounter such a resource, work shall stop within 50 feet until a qualified professional evaluates the discovery.

RR CUL-2 - Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5 - Archaeological and Historical Resources. These provisions establish criteria for identifying and evaluating unique archaeological resources and historical resources. Treatment of identified resources shall comply with those standards.

RR CUL-3 - Health and Safety Code Section 7050.5 - Human Remains. If human remains are discovered, disturbance shall stop until the San Bernardino County Coroner completes an evaluation. If the remains are Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours, and the Commission shall identify a Most Likely Descendant under Public Resources Code Section 5097.98.

RR CUL-5 - Secretary of the Interior's Standards for the Treatment of Historic Properties. Treatment of an identified historic property shall comply with the applicable federal standards for preservation, rehabilitation, restoration, or reconstruction (36 CFR Part 68).

General Plan Policy Matrix

Table 4.3-1 evaluates the Project against applicable policies in the Adelanto North 2035 Comprehensive Sustainable Plan.

Table 4.3-1. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy / Program	Description	Project Consistency
OS 10.1	Identify, protect, and minimize impacts to archaeological and paleontological resources.	**Consistent.** A Phase 1 Cultural Resources Inventory was prepared and Mitigation Measures CUL-1 through CUL-3 apply (Section 4.3).
OS 10.2	Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.	**Consistent.** The site was surveyed and the records search completed; the Project complies with the City's cultural resources requirements.

Source: Adelanto North 2035 Comprehensive Sustainable Plan (2014); EPC Environmental, Inc.

4.3.4 Thresholds of Significance

Section V of Appendix G to the CEQA Guidelines uses the following questions to evaluate cultural resource impacts. Would the Project:

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

4.3.5 Impacts Analysis

Threshold 4.3 (a): Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Impact Analysis

CEQA Guidelines Section 15064.5(a) defines historical resources to include properties listed in or eligible for the California Register. The Phase 1 Cultural Resources Inventory (Appendix C) found that none of the 327 newly recorded resources or the 10 previously recorded resources qualifies. The 308 isolates lack the contextual integrity of archaeological sites, and none of the 19 historical-age sites meets California Register criteria. The Project therefore would not materially impair a known historical resource. MM CUL-1 through MM CUL-3 address the potential for unanticipated discoveries during construction.

Mitigation Measures

The 2009 EIR adopted Mitigation Measures CUL-1 through CUL-3. Since then, Assembly Bill 52, effective in 2015, added tribal cultural resources to CEQA. It set procedures for identifying those resources through consultation with California Native American tribes and for adopting measures to avoid or reduce impacts to them (Public Resources Code Sections 21074, 21080.3.1, and 21084.3). MM CUL-1 through MM CUL-3 below replace the 2009 measures. They are equal to or more protective than the 2009 measures, keep the 2009 paleontological training and evaluation, and work together with the tribal cultural resources measures developed through consultation with YSMN (MM TCR-1 through MM TCR-4, Section 4.11).

MM CUL-1. Cultural Resources Management Program. Prior to the issuance of a grading permit, the Project Proponent shall provide evidence to the City of Adelanto Planning Division that a qualified professional archaeologist (Professional Archaeologist) who meets the Secretary of the Interior's Standards has been contracted to implement a Cultural Resources Management Program (CRMP). The CRMP shall identify the details of all ground-disturbing activities and provide procedures that must be followed to avoid or reduce potential impacts to cultural resources. The CRMP shall incorporate MM TCR-1 through MM TCR-4 (Section 4.11, Tribal Cultural Resources). The CRMP shall also provide for a qualified paleontologist to train construction crews to recognize fossils and to evaluate any fossils found during grading. Work shall be redirected away from a find until the paleontologist has evaluated it.

MM CUL-2. Archaeological Monitoring. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan:

"Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from an Archaeologist who meets the U.S. Secretary of the Interior Standards (SOI) stating that the Property Owner/Developer has retained this individual, and that the Archaeologist shall be onsite during all grading and other significant ground-disturbing activities in native sediments. The Archaeologist shall attend the pre-grade conference and shall inform construction personnel of the potential for encountering unique cultural resources and how to identify these resources if encountered. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected, the type of activities that may result in impacts, and the legal framework of cultural resources protection. All construction personnel shall be instructed to stop work in the vicinity of a potential discovery until the Archaeologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of cultural resources is prohibited."

MM CUL-3. Inadvertent Discovery of Archaeological Resources. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan:

"a) In the event that artifacts of Native American origin are discovered, the Property Owner/Developer and Archaeologist shall notify the City of Adelanto and the Yuhaaviatam of

San Manuel Nation (YSMN) Cultural Resources Department, and the Morongo Band of Mission Indians (MBMI).

The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA.

b) Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts shall be subjected to curation or returned to the Property Owner/Developer, as deemed appropriate.

c) Once ground-altering activities have ceased or the Archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Adelanto.

d) A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Adelanto, shall signify completion of the program to mitigate impacts to archaeological and/or cultural resources. A copy of the report shall also be filed with the South Central Coastal Information Center (SCCIC).

Note: The Morongo Band of Mission Indians and the Soboba Band of Luiseño Indians, which are on the City's AB 52 notification list, did not request consultation. If either Tribe later asks to participate in monitoring or discovery procedures, it may do so consistent with the intent of these measures. YSMN has no objection.

Significance Determination

Less Than Significant with Mitigation Incorporated. No known resource on the site qualifies as a historical resource. MM CUL-1 through MM CUL-3 would address unanticipated discoveries during construction.

Threshold 4.3 (b): Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

Impact Analysis

None of the 19 recorded historical-age sites meets California Register criteria or qualifies as a unique archaeological resource under Public Resources Code Section 21083.2. Because a surface survey cannot rule out buried deposits, the site remains potentially sensitive for subsurface resources. MM CUL-3 establishes procedures for evaluating and treating unanticipated archaeological or Native American discoveries.

Mitigation Measures

MM CUL-1 through MM CUL-3, listed under Threshold 4.3(a), apply.

Significance Determination

Less Than Significant with Mitigation Incorporated. No recorded archaeological site is eligible for the California Register or qualifies as a unique archaeological resource. MM CUL-2 and MM CUL-3 would address unanticipated subsurface discoveries.

Threshold 4.3 (c): Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Impact Analysis

Records and surveys identify no formal cemetery or known archaeological resource likely to contain human remains on the Project site. If construction uncovers human remains, work must stop and the requirements of Health and Safety Code Section 7050.5 apply.

RR CUL-3 sets out the Coroner and Native American Heritage Commission procedures. Under MM CUL-2, an archaeologist would be on site during grading, and construction crews would be instructed to stop work at any discovery.

Mitigation Measures

MM CUL-1 through MM CUL-3, listed under Threshold 4.3(a), apply.

Significance Determination

Less Than Significant with Mitigation Incorporated. The site contains no known cemetery or burial location. Mandatory state procedures and MM CUL-2 would govern any discovery of human remains.

4.3.6 Cumulative Impacts Analysis

Cultural resource impacts occur where ground disturbance affects a resource. The cumulative context is the 0.5-mile area used for the Appendix C records search and the cumulative projects listed in Table 4.0-1: CarMax Vehicle Facility, Rancho 38, Emerald 20 Truck Maintenance, and Tom Steeno Industrial Storage Yard.

The records search identified at least 59 cultural resources and 21 prior studies within 0.5 mile of the site. No known on-site resource is eligible for the California Register, so the Project would not contribute to the loss of a known historical resource or unique archaeological resource. The potential cumulative effect is the loss of buried deposits as development proceeds. Mitigation Measures CUL-1 and CUL-2 require worker training, archaeological review, work stoppage, and evaluation of unanticipated discoveries. These measures would reduce the Project's

contribution to that effect so it would not be cumulatively considerable. Other projects remain subject to project-specific CEQA review and applicable state law.

State law (RR CUL-3) requires work to stop and the County Coroner to be notified if human remains are discovered, and MM CUL-2 places an archaeologist on site during grading. These requirements apply to the Project and other development in the cumulative area. The cumulative impact related to human remains would be less than significant with mitigation incorporated.

With Mitigation Measures CUL-1 through CUL-3, the Project's contribution to cumulative cultural resource impacts would not be cumulatively considerable. The cumulative impact would be less than significant with mitigation incorporated.

4.3.7 Summary of Impacts and Mitigation Measures

No known historical resource, California Register-eligible archaeological site, or formal cemetery occurs on the Project site. Mitigation Measures CUL-1 through CUL-3 would govern unanticipated discoveries during ground disturbance. Impacts under all three thresholds and the Project's contribution to cumulative impacts would be less than significant with mitigation incorporated.

4.3.8 References

California Office of Historic Preservation. 1995. Instructions for Recording Historical Resources. March 1995.

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129), Section 4.5, Cultural Resources; Resolution No. 09-35 and Mitigation Monitoring and Reporting Program.

City of Adelanto. 2014. Adelanto North 2035 Comprehensive Sustainable Plan.

Native American Heritage Commission. 2023. Sacred Lands File search response, Adelanto Gateway Logistics Center Project. October 2023.

Psomas. 2023. Phase 1 Cultural Resources Inventory, Adelanto Gateway Logistics Center Project. December 2023. (SEIR Appendix C.)

4.4 Energy

4.4.1 Introduction

This section evaluates whether Project construction or operation would use energy wastefully, inefficiently, or unnecessarily or conflict with an applicable renewable-energy or energy-efficiency plan. The analysis relies on current regulations and the following technical reports:

Technical Reports

- Air Quality Analysis, Urban Crossroads, August 14, 2026 (Appendix A-1)
- Greenhouse Gas Analysis, Urban Crossroads, August 14, 2026 (Appendix A-3)
- Natural Gas Emissions Update, Urban Crossroads, September 15, 2026 (Appendix A-4)

NOP/Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No comments addressed energy.

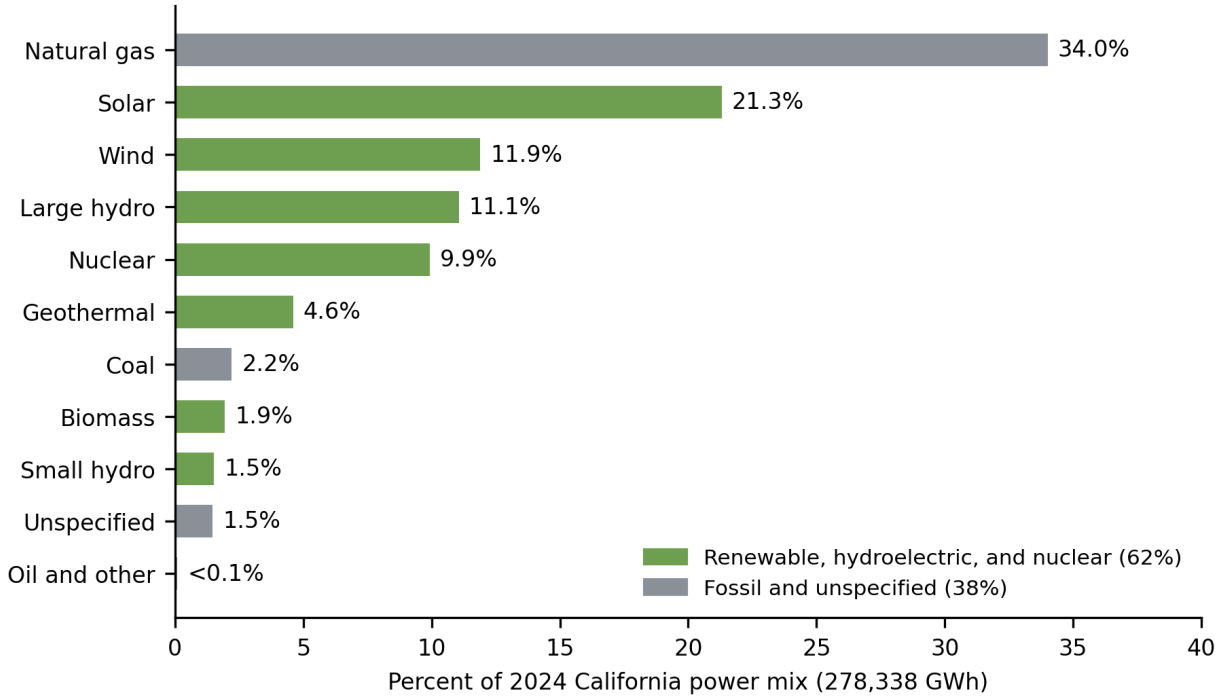
4.4.2 Environmental Setting

The site is vacant and currently consumes no energy. The Project would use electricity from Southern California Edison (SCE), natural gas from Southwest Gas Corporation if the temporary generation option is used, and gasoline and diesel for construction and operational vehicles.

Electricity

California generated or imported 278,338 gigawatt-hours of electricity in 2024, 1 percent less than in 2023. About 78 percent was generated in-state. Natural gas supplied 34 percent, while nuclear, large hydroelectric, and renewable sources supplied 62 percent; solar supplied 21 percent (CEC 2025). Senate Bill 100 requires an increasing share of renewable and zero-carbon electricity.

Figure 4.4-1. California Power Mix, 2024



Source: California Energy Commission, 2024 Total System Electric Generation. Total California power mix, in-state generation plus imports.

SCE serves approximately 15 million people across 15 counties and a 50,000-square-mile service area. In 2023, renewable sources supplied 37.6 percent of its electricity, including 19.8 percent solar, 11.7 percent wind, and 5.2 percent geothermal; large hydro supplied 4.5 percent, and coal supplied none (SCE 2024). The CPUC regulates SCE.

Three SCE circuits from two substations serve the Project area: the Portland 33 kV circuit from Victor Substation, and the Freightliner and Mack 12 kV circuits from Roadway Substation. Their current combined capacity is approximately 28.5 megawatts, and upgrades may be required. SCE has not committed to a Project service schedule.

Service would extend from existing SCE facilities along Air Expressway. New lines would follow Joshua Avenue and Mesa Linda Road to the western site, Emerald Road to the eastern site, and Adelanto Road to Building 1.

New industrial projects in the High Desert depend on SCE extending distribution circuits and, in some cases, upgrading substations before buildings can be energized. The Legislature enacted SB 410 and AB 50 in 2023 to address delays in energizing new customers, and the CPUC adopted energization timelines in 2024 (Decision 24-09-020). Those timelines cover only steps within SCE's control; service that requires upstream capacity upgrades takes longer. SCE is planning several capacity projects in the area, including rebuilding the Kramer–Victor 115 kV line to 220 kV through Adelanto and Victorville to address voltage instability, expected in service in 2033, and new substations in Apple Valley (2030) and Hesperia (2032) to serve forecasted load (SCE,

Quarterly Infrastructure Projects Licensing Update to the CPUC, June 17, 2025). SCE has not committed to a schedule for serving the Project. The natural gas generation option covers the possibility that a building is ready for occupancy before SCE can serve it.

Natural Gas

Southwest Gas serves Adelanto through an 8-inch high-pressure main along the site's Air Expressway frontage and is regulated by the CPUC. The Project could use natural gas engines at up to three buildings to generate electricity temporarily if SCE service is unavailable.

Transportation Fuel

CEC forecasts that statewide gasoline demand will decline from approximately 15.8 billion gallons in 2017 to 12.3-12.7 billion gallons in 2030 as vehicles become more efficient and electrification increases. It forecast truck diesel demand to rise from 3.7 billion gallons in 2015 to 4.7 billion gallons in 2030; actual 2024 diesel use was approximately 3.5 billion gallons (CEC 2017; CEC 2025).

The site generates no vehicle trips under existing conditions. Construction and operation would use gasoline and diesel for equipment, trucks, employee vehicles, and vendor vehicles.

4.4.3 Regulatory Framework

Federal, state, and local requirements regulate Project energy use. The applicable requirements are summarized below as RR Energy-1 through RR Energy-6.

Federal

Federal law establishes the framework for state building, appliance, vehicle, and engine standards. California implements commercial building requirements through the Title 24 Energy Code, appliance standards through Title 20, and vehicle and engine standards through CARB regulations. The Project requires no federal energy permit or approval.

State of California

State law authorizes the CEC to adopt building and appliance efficiency standards and the CPUC to regulate SCE and Southwest Gas. Senate Bill 100 requires SCE to obtain 60 percent of retail electricity sales from renewable sources by 2030 and 100 percent from zero-carbon sources by 2045. CARB regulates vehicle and engine emissions and idling. The following state requirements apply to the Project.

Title 24, Part 6, Building Energy Efficiency Standards. The Energy Code establishes requirements for building envelopes, lighting, heating, ventilation, air conditioning, and water heating. The City reviews each building permit for compliance with the code in effect when the application is submitted.

Title 24, Part 11, California Green Building Standards Code. CALGreen requires measures for new nonresidential buildings, including electric-vehicle infrastructure, low-emission interior finishes, water-efficient fixtures, and construction-waste diversion. The City verifies compliance during plan check.

Title 20 Appliance Efficiency Regulations. These regulations establish efficiency standards for appliances and equipment sold or installed in California, including lighting, motors, and commercial refrigeration.

CARB idling limits. Title 13 limits idling of off-road diesel construction equipment and heavy-duty diesel trucks, including trucks at loading docks, to five minutes.

Senate Bill 100. The renewable-energy and zero-carbon requirements apply to SCE as the electricity supplier.

Regulatory Compliance Requirements

The Project must comply with RR Energy-1 through RR Energy-6. These requirements apply independently and are not mitigation under CEQA Guidelines Section 15370.

RR Energy-1 — Title 24, Part 6 — Building Energy Efficiency Standards (2022 Energy Code). *CCR Title 24, Part 6 (the 2022 Energy Code, effective January 1, 2023) establishes energy and water efficiency requirements for newly constructed buildings, additions, and alterations. Provisions include efficient electric heat pumps, electric-ready requirements, expanded solar photovoltaic and battery storage standards, and strengthened ventilation standards. Project building permits shall comply with the Energy Code in effect at the time of permit application.*

RR Energy-2 — Title 24, Part 11 — California Green Building Standards Code (2022 CALGreen). *CCR Title 24, Part 11 (effective January 1, 2023) is a comprehensive and uniform regulatory code establishing minimum green building standards for residential, commercial, and school buildings. The Project shall comply with the CALGreen mandatory measures for nonresidential buildings, including EV-capable parking, low-VOC interior coatings, and water-efficient fixtures.*

RR Energy-3 — Title 20 — Appliance Efficiency Regulations. *CCR Title 20, Division 2, Chapter 4, Article 4, §§1601–1608 regulates the sale of appliances in California, including 23 categories of federally and state-regulated appliances. Project shall use Title 20-compliant appliances throughout.*

RR Energy-4 — SB 100 — California Renewables Portfolio Standard. *Public Utilities Code §399.30 et seq. (as amended by SB 100, 2018) requires retail sellers of electricity to procure renewable energy resources for 60% of retail sales by 2030 and 100% by 2045. Electricity supplied to the Project by Southern California Edison or successor will comply with this requirement at the utility level.*

RR Energy-5 — AB 1346 — Small Off-Road Engine Phaseout. *Effective January 1, 2024, prohibits sale of new gasoline-powered small off-road engines (including landscape equipment) in California. Project landscape maintenance shall use electric or otherwise zero-emission equipment as required by 17 CCR §2750 et seq.*

RR Energy-6 — Public Resources Code §25402 — California Energy Commission Standards. *Establishes the CEC's authority to adopt building energy efficiency standards and appliance efficiency standards. Project shall comply with all current CEC standards applicable to industrial warehouse and distribution buildings.*

General Plan Policy Matrix

Table 4.4-1 evaluates the Project against applicable energy policies in the Adelanto North 2035 Comprehensive Sustainable Plan.

Table 4.4-1. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy / Program	Description	Project Consistency
OS 3.5	Require all new development to provide site design and building orientation that take into account passive solar design.	**Consistent.** Building orientation would limit afternoon solar exposure on the largest walls, and the envelopes would exceed code requirements (PDF-5).
OS 3.2	Encourage new warehousing, manufacturing, industrial, and large commercial retail buildings to be designed to accommodate future rooftop solar panel systems.	**Consistent. Building roofs are designed to accommodate future rooftop solar systems.**

Source: City of Adelanto, Adelanto North 2035 Comprehensive Sustainable Plan (2014); Project Design Features PDF-1 through PDF-10, Section 3.0 (Project Description).

4.4.4 Thresholds of Significance

Section VI of Appendix G to the CEQA Guidelines uses the following questions to evaluate energy impacts. Would the Project:

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

Appendix F to the CEQA Guidelines identifies factors that may be considered when evaluating whether energy use is wasteful, inefficient, or unnecessary.

Appendix F Energy Considerations

This analysis addresses the following factors relevant to the Project:

- **Energy demand and efficiency.** The Project's energy requirements and efficiency by amount and fuel type for construction and operation, including peak and base demand for electricity and other energy sources.
- **Supply and resources.** The Project's effect on local and regional energy supplies, the need for additional capacity, and energy resources.
- **Regulatory compliance.** The extent to which the Project complies with existing energy standards.
- **Transportation energy.** The Project's transportation energy requirements and its use of efficient transportation alternatives.

4.4.5 Impacts Analysis

Threshold 4.4 (a): Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Environmental Setting

The site is vacant and consumes no energy. SCE circuits and a Southwest Gas main are adjacent to the site.

Impact Analysis

At buildout, the Project would use approximately 148 billion British thermal units (Btu) of energy annually. Truck fuel would account for approximately 83 percent, or 123 billion Btu from 892,464 gallons of diesel. Buildings and site uses would consume approximately 4,851,967 kilowatt-hours of electricity, or 17 billion Btu. Employee vehicles would use approximately 67,224 gallons of gasoline, or 8 billion Btu (Figure 4.4-2, *Project Energy Use at Buildout by Source*).

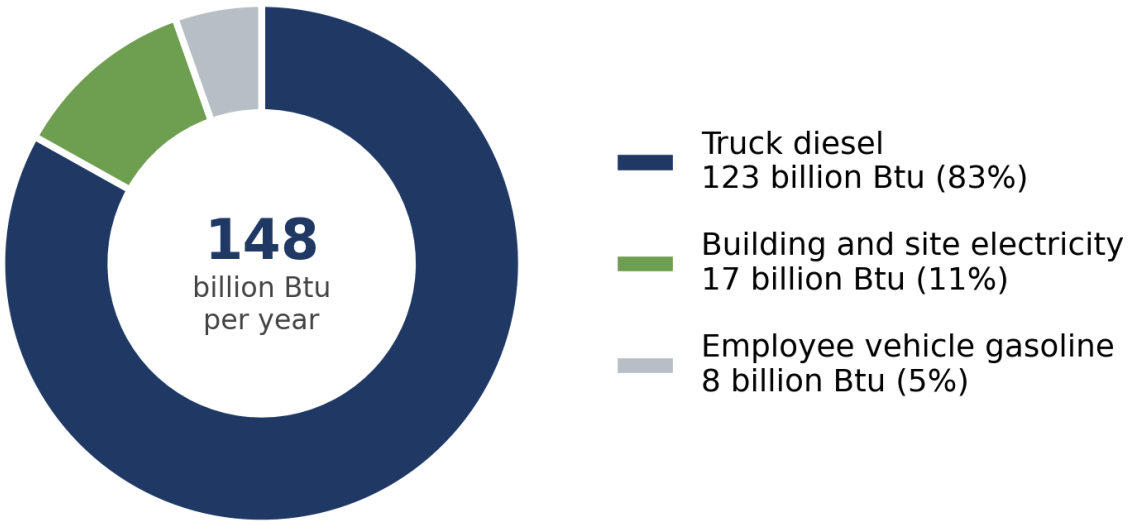
The Project is intended to use SCE electricity, and all building systems would be electric. If SCE service is unavailable when a building is ready for occupancy, natural gas engines could temporarily supply up to three buildings.

The option is limited to 22.5 megawatts and the annual fuel use evaluated in Appendix A-4 and specified in RR UTIL-6. It would require a City Conditional Use Permit and an MDAQMD Authority to Construct.

The air quality, energy, and greenhouse gas analyses evaluate the option at its maximum capacity, with three buildings using up to 747,228 million Btu of natural gas annually. The engines would stop when SCE service begins. The gas is not included in the 148 billion Btu total because

it would generate electricity for the same building loads otherwise served by SCE. Exceeding the option limits would require further review under CEQA Guidelines Section 15162.

Figure 4.4-2. Project Energy Use at Buildout by Source



Source: Appendix A-1 (CalEEMod and EMFAC2021 outputs); heat content from U.S. Energy Information Administration standard factors (120,000 Btu per gallon of gasoline, 138,000 Btu per gallon of diesel, 3,412 Btu per kWh). Building area 8,256,274 square feet.

Appendix F Considerations

Electricity

Criterion 1 - requirements and efficiency. Buildings would consume approximately 4,851,967 kilowatt-hours annually, or 0.6 kilowatt-hours per square foot, based on the CalEEMod estimate in Appendix A-1. The Project would use all-electric building systems, envelopes exceeding Title 24 minimums, high-efficiency lighting and controls, efficient cold-storage systems, and at least 45 kilowatts of rooftop solar per building (PDF-1, PDF-4, PDF-5, PDF-6, and PDF-10). Construction would use a limited amount of temporary electricity.

Criterion 2 - supply and capacity. Three nearby SCE circuits have approximately 28.5 megawatts of combined capacity in their current configuration, and upgrades may be required. SCE has not provided a service schedule. The Project would be served through distribution upgrades rather than new generating capacity. The lack of a service schedule is the basis for the temporary natural gas generation option.

Criterion 3 - peak and base demand. The Project would add to SCE's base load. Rooftop solar would supply part of the daytime load and reduce demand from the grid during peak periods.

Criterion 4 - regulatory compliance. Buildings must comply with the Energy Code, CALGreen, and Title 20 appliance standards in effect when permits are issued (RR Energy-1 through RR Energy-3). The City would verify building energy compliance during plan check.

Criterion 5 - energy resources. Renewable sources supplied 37.6 percent of SCE electricity in 2023, and large hydro supplied 4.5 percent. Senate Bill 100 requires SCE to reach 60 percent renewable electricity by 2030 and 100 percent zero-carbon electricity by 2045. The Project's electricity use would not deplete a limited resource or constitute wasteful, inefficient, or unnecessary use.

Natural Gas

Criterion 1 - requirements and efficiency. Building systems would not use natural gas (PDF-1). If the temporary generation option is selected, engines at up to three buildings could generate electricity until SCE service begins. Appendix A-4 evaluates the maximum 22.5-megawatt capacity and 747,228 million Btu of annual gas use. The engines would serve the same building loads otherwise supplied by SCE and are comparable in efficiency to commercial units evaluated in Appendix A-4.

Criterion 2 - Supplyand Capacity. Southwest Gas serves the area through an 8-inch main along Air Expressway and does not expect a pressure-regulating station to be required. Maximum annual use would equal approximately 5 percent of Southwest Gas's 2024 California deliveries. The 22.5-megawatt cap is below the 50-megawatt CEC licensing threshold; the City would remain the permitting authority.

Criterion 3 - Peak and Base Demand. While operating, the engines would supply up to 22.5 megawatts that the buildings would otherwise draw from SCE. The load would transfer to the grid when SCE service begins.

Criterion 4 - Regulatory Compliance. The engines would require an MDAQMD Authority to Construct, Permit to Operate, and New Source Review under RR AQ-1, RR AQ-2, and RR AQ-7. RR UTIL-6 limits capacity and fuel use to the levels evaluated in Appendix A-4. Exceeding those limits would require further review under CEQA Guidelines Section 15162.

Criterion 5 - Energy Resources. The option would use natural gas for a limited period until SCE service begins. It would serve existing building loads within the 22.5-megawatt cap rather than create additional demand. The temporary use would not be wasteful, inefficient, or unnecessary.

Transportation Fuel

Criterion 1 - Requirements. Construction would use diesel for equipment and haul trucks and gasoline and diesel for worker and vendor trips. At buildout, the Project would generate approximately 5,524,354 truck miles and 2,098,718 automobile miles annually. Using EMFAC2021 fleet averages, annual use would be approximately 892,464 gallons of diesel and 67,224 gallons of gasoline. These estimates reflect the trips needed for a logistics use of this size.

Criterion 4 - Regulatory Compliance. CARB and U.S. EPA standards regulate vehicles and engines. CARB limits off-road construction-equipment idling to five minutes and requires fleet turnover to newer engines. The Truck and Bus Regulation requires 2010 or newer engines for trucks serving the Project (RR AQ-8).

Criterion 5 - energy resources. Project fuel would come from the regional market and represent a small share of county use. CEC forecasts declining statewide gasoline demand through 2030 as efficiency and electrification increase. Project fuel use would not be wasteful, inefficient, or unnecessary.

Criterion 6 - Transportation Efficiency. The following factors would reduce transportation energy use over time:

- Truck efficiency and fleet turnover. State standards and fleet turnover reduce fuel use per mile. MM AQ-18 would also require tenants to use U.S. EPA SmartWay carriers, which meet efficiency specifications for aerodynamics, tires, and idling.
- Zero-emission trucks. State policy targets zero-emission medium- and heavy-duty trucks by 2045 and drayage trucks by 2035. The Advanced Clean Trucks rule increases required manufacturer sales over time. SCAG's 2026 study found substantial fleet interest before 2030 but identified range, cost, and grid capacity as barriers.
- On-site charging readiness. The Project would provide electrical hookups at loading docks, capacity for refrigerated-trailer plug-ins, electric cargo-handling equipment, passenger-vehicle charging above CALGreen minimums, and underground raceways for future chargers (PDF-2, PDF-3, PDF-9, MM AQ-12, and MM AQ-22). As fleets electrify, diesel use would decline and electricity use would increase.
- Grid planning. SCAG projects that zero-emission truck electricity demand in San Bernardino County will increase from approximately 1,700 megawatt-hours per day in 2030 to approximately 4,900 in 2040. Warehouses and private depots are expected to supply much of the early charging demand. SCE distribution upgrades for the Project could also support on-site truck charging.
- Local employment. The Project would create approximately 7,197 jobs. Some Victor Valley residents could replace longer commutes outside the High Desert with local trips. Appendix H-2 finds employee vehicle miles traveled per worker below the regional average.

Measures Considered

Appendix F calls for consideration of feasible energy-conservation measures, including measures evaluated but not incorporated. The Project includes design features and air quality mitigation that reduce energy use. Other measures considered are summarized below.

Incorporated measures include electric cargo-handling equipment (MM AQ-12), SmartWay carriers (MM AQ-18), refrigerated-trailer plug-ins (MM AQ-22), and the Project design features described above.

The following additional measures were considered but are not required:

- **Renewable Natural Gas.** No renewable natural gas supply to Adelanto has been established. The generation option would be conditional and temporary, and the greenhouse gas impact would remain significant and unavoidable with or without this measure.
- **Battery Storage.** The Applicant may install battery storage, but the impact analysis does not rely on it and it is not needed to avoid a significant energy impact.
- **Additional olar**. Roof structure and tenant loads limit the solar capacity that can be committed at this stage. The General Plan encourages but does not require capacity beyond 45 kilowatts per building.

Mitigation Measures

No mitigation measures required.

Significance Determination

Less Than Significant. The Project would comply with current energy codes and incorporate efficient all-electric buildings, rooftop solar, charging infrastructure, and other energy-reduction features. Temporary natural gas generation would be limited to serving building loads until SCE service begins. Transportation fuel use would reflect the logistics activity evaluated for the Project and would decline in intensity as vehicle standards and electrification advance. Construction and operation would not use energy wastefully, inefficiently, or unnecessarily.

Threshold 4.4 (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Environmental Setting

The site is vacant and consumes no energy. SCE circuits and a Southwest Gas main are adjacent to the site.

Impact Analysis

Applicable plans and standards include the Energy Code, CALGreen, Senate Bill 100, and the energy policies of the Adelanto North 2035 Comprehensive Sustainable Plan. The Project must comply with the codes in effect when permits are issued. Table 4.4-2, *Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)* shows consistency with General Plan policies through code compliance, rooftop solar, building orientation, and other design features.

The temporary natural gas generation option would not conflict with these plans. Senate Bill 100 regulates SCE's electricity supply, while the Energy Code and CALGreen apply to the buildings regardless of their temporary power source. The option would be limited to 22.5 megawatts and end when SCE service begins. General Plan Program OS-16 also encourages cogeneration.

Mitigation Measures

No mitigation measures required.

Significance Determination

Less Than Significant. The Project would not conflict with or obstruct an applicable renewable-energy or energy-efficiency plan.

4.4.6 Cumulative Impacts Analysis

The cumulative study area is the SCE and Southwest Gas service region. New development must comply with the Energy Code and CALGreen in effect when permitted. SCE electricity would also become progressively cleaner under Senate Bill 100. The Project's electricity use, combined with other development, would not be wasteful, inefficient, or unnecessary.

The temporary natural gas generation option would replace electricity otherwise supplied by SCE, within the 22.5-megawatt cap, until SCE service begins. It would not create additional cumulative energy demand.

Truck and automobile travel are the principal sources of regional transportation-energy demand. Engine standards, fleet turnover, and zero-emission vehicles would reduce fuel use per mile over time. The Project's fuel use would be typical of the evaluated logistics use and would not be wasteful, inefficient, or unnecessary. Its contribution would not be cumulatively considerable.

4.4.7 Summary of Impacts and Mitigation Measures

Project energy impacts, including cumulative impacts, would be less than significant. No mitigation is required.

4.4.8 References

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Urban Crossroads, Inc. 2026. Adelanto Industrial Park Greenhouse Gas Analysis. August 14, 2026. (SEIR Appendix A-3.)

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4.5 Greenhouse Gas Emissions

4.5.1 Introduction

This section evaluates the Project's greenhouse gas (GHG) emissions and consistency with GHG reduction plans using the thresholds adopted by City of Adelanto Resolution No. 25-03 in January 2025.

Technical Reports

This section is based on current regulations and the following technical reports:

- Adelanto Industrial Park Greenhouse Gas Analysis, Urban Crossroads, August 14, 2026. (Technical Appendix A-3)
- Natural Gas Emissions Update, Urban Crossroads, September 15, 2026. (Technical Appendix A-4)

4.5.2 Environmental Setting

Climate Change and the State's Response

California has determined that GHG emissions from human activities, primarily fossil fuel combustion for transportation, electricity, and industry, are warming the climate. In adopting the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), the Legislature found that global warming threatens California's economy, public health, natural resources, and environment, including the water supplied by the Sierra snowpack (Health and Safety Code Section 38501). The California Air Resources Board (CARB) identifies expected effects, including more extreme heat, longer droughts, larger wildfires, increased flooding, and more heat-related illness.

California's statewide emission limits become progressively more stringent. AB 32 required emissions to return to 1990 levels by 2020. Senate Bill (SB) 32 requires a reduction to 40 percent below 1990 levels by 2030, and AB 1279 requires carbon neutrality and an 85 percent reduction below 1990 levels by 2045. CARB's Scoping Plan describes how the State will meet these limits.

Greenhouse Gases and How They Are Measured

GHGs trap heat in the atmosphere. Development generates carbon dioxide (CO_2), primarily from fuel combustion; methane (CH_4), primarily from landfills and natural gas; nitrous oxide (N_2O), from fuel combustion; and fluorinated gases used as refrigerants. These gases persist for years to centuries and mix globally, so their climate effects are cumulative.

GHGs differ in their heat-trapping capacity. Methane traps substantially more heat per ton than CO_2, and some refrigerants trap thousands of times more. Emissions are converted to

carbon dioxide equivalent (CO_2e) to express their combined warming effect and are reported here in metric tons of CO_2e per year ($MTCO_2e$). One metric ton is approximately 2,205 pounds.

CARB updates its statewide GHG inventory annually to track progress toward the State's emission limits. Transportation is the largest source, followed by industry and electricity generation. Local governments maintain similar community inventories.

How a Project Adds to the Inventory

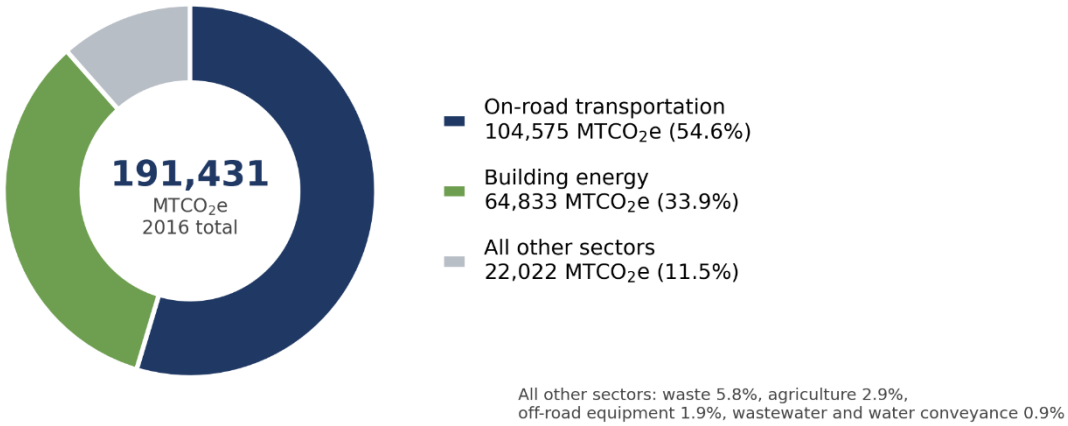
Projects generate direct emissions from vehicle trips, on-site equipment, and refrigerant leaks, and indirect emissions from electricity generation, water pumping and treatment, and waste disposal. Table 4.5-1 estimates the Project's emissions by source; the operational analysis below outlines the assumptions. CEQA evaluates whether a project's contribution to these cumulative emissions is cumulatively considerable.

Greenhouse Gas Emissions in Adelanto

Adelanto encompasses approximately 36,000 acres (56 square miles) in the western Mojave Desert. Nearly 40 percent of City-designated land is planned for manufacturing, industrial, business park, airport, and commercial uses. The San Bernardino Council of Governments created the *Regional Greenhouse Gas Reduction Plan* (March 2021) for Adelanto and 24 other jurisdictions. It inventories emissions and proposes reduction measures. In 2016, Adelanto's emissions were 191,431 $MTCO_2e$, as shown in Figure 4.5-1.

Figure 4.5-1. 2016 Adelanto GHG Emissions

Source: San Bernardino County Regional Greenhouse Gas Reduction Plan, SBCOG, March 2021, Table 3-2. Chart recreated by EPC Environmental, Inc.



In Adelanto, the Regional Plan forecasts population growth from 33,893 in 2016 to 50,081 in 2030, with emissions increasing to 273,216 $MTCO_2e$. The 2030 target is 128,180 $MTCO_2e$, 40% lower than 2020 levels. The Regional Plan details reductions of 90,536 $MTCO_2e$ through state

measures and 59,812 $MTCO_2e$ via local measures. State efforts include vehicle fuel-efficiency standards, the Low Carbon Fuel Standard, and renewable electricity mandates under SB 100 and SB 350. The most significant local measure, PS-1, *GHG Performance Standard for New Development,* aims to cut emissions by roughly 29% below forecasted levels and contributes 25,185 $MTCO_2e$ annually. Together, these measures would reduce projected 2030 emissions to 122,867 $MTCO_2e$, 5,313 $MTCO_2e$ below the target (Regional Plan, Tables 3-2 and 3-3).

The City implements PS-1 through its *Greenhouse Gas Emissions Screening Tables Implementing Performance Standards*. A score of at least 100 points represents implementation of the Regional Plan reductions assigned to new development.

4.5.3 Regulatory Framework

Federal

EPA regulated greenhouse gas emissions under the Clean Air Act from 2009, when it found that greenhouse gases endanger public health and welfare, until February 2026, when it rescinded that finding and the federal greenhouse gas standards for cars and trucks. The rescission took effect April 20, 2026, and is being challenged in court. The California requirements described below continue to apply.

State of California

2022 Scoping Plan for Achieving Carbon Neutrality (AB 32 Scoping Plan). Approved by CARB on December 15, 2022, the plan describes the pathway to carbon neutrality and an 85 percent reduction in human-caused GHG emissions below 1990 levels by 2045, as required by AB 1279.

2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings. These standards reduce energy use and associated GHG emissions in new buildings. They are updated periodically to incorporate feasible technologies and methods.

2022 California Green Building Standards Code. CALGreen (Title 24, Part 11) establishes mandatory measures for planning and design, energy and water efficiency, material conservation, resource efficiency, and environmental quality in new residential and nonresidential buildings.

Local

Mojave Desert Air Quality Management District.

The MDAQMD CEQA and Federal Conformity Guidelines (February 2020) specify annual regional emission thresholds for the Mojave Desert Air Basin. Stationary sources that emit more than 100,000 tons of CO_2e per year (approximately 90,718 metric tons) are considered significant.

Adelanto General Plan Program OS-18. This program directs the City to implement the Regional GHG Reduction Plan strategies needed to meet SB 32 through its Screening Tables.

City of Adelanto Zoning Ordinance. The Zoning Ordinance includes requirements that reduce GHG emissions, including trip reduction and transportation demand management (Chapters 10.36 and 17.67), electric vehicle charging stations (Section 10.40), and landscape water conservation (Chapter 17.60).

4.5.4 Thresholds of Significance

Section VIII of Appendix G to the CEQA Guidelines asks whether the Project would:

a) Generate GHG emissions, directly or indirectly, that may have a significant environmental impact.

b) Conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions.

4.5.5 Impacts Analysis

Threshold 4.5 (a): Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis

The GHG Thresholds of Significance use a three-step process as follows:

Step 1: A project qualifies for a less-than-significant finding if it meets any of the following criteria:

1. Not a Project: The activity is not a "project" under CEQA Guidelines §15378.

2. Statutory Exemptions: The project qualifies for a statutory exemption under CEQA Guidelines §§15260–15285.

3. Categorical Exemptions: The project qualifies for a categorical exemption under CEQA Guidelines §§15300–15332.

4. Transit Priority or Sustainable Community Project: The project qualifies under Public Resources Code §21555.

5. Project GHG Emissions Below 3,000 $MTCO_2e$ Annually: Appendix C of the City's Screening Tables identifies land uses that typically emit no more than this amount and provides a method for calculating project-specific emissions.

Step 2: Achieve 100 Points on the Screening Tables. A project not screened out under Step 1 must earn at least 100 points under Appendix C of the City's Screening Tables to qualify for a less-than-significant individual and cumulative GHG finding.

Step 3: Demonstrate Consistency with the City's GHG Emissions Threshold. A project earning fewer than 100 points must demonstrate consistency with the State goal of reducing emissions 40 percent below 2020 business-as-usual levels by 2030.

The Project does not meet any of the above criteria because it is not exempt and, at full buildout, would generate approximately 89,661.13 $MTCO_2e$ per year before mitigation, including amortized construction emissions. The Project then moves to Step 2, which requires at least 100 Screening Table points.

Project GHG Emissions Analysis

CalEEMod version 2022.1.1.29 was used to estimate construction and operational GHG emissions from direct and indirect sources. Technical Appendix A-3 provides the inputs and outputs. These annual-average runs differ from the summer and winter runs used to evaluate short-term criteria pollutant concentrations in the air quality analysis.

Project Construction Emissions

Construction is assumed to occur from October 1, 2027, through December 31, 2030, with operation beginning in 2030. Sources include site preparation, grading and infrastructure, building construction, paving, and architectural coating (Table 3-3, Construction Activity). The schedule is conservative because construction equipment emission factors decline in later years. Equipment, worker vehicle, and vendor trip assumptions use CalEEMod defaults.

Consistent with air district guidance, total construction emissions are amortized over 30 years, contributing 1,108.56 $MTCO_2e$ to annual operational emissions.

Project Operation Emissions

Operational emissions include CO_2, methane, nitrous oxide, and refrigerants from the following sources:

- **Area Sources** - fuel combustion and evaporative emissions from landscape maintenance equipment.
- **Energy** - building electricity use. All building systems would be electric; the separate on-site natural gas generation option is evaluated below.
- **Mobile Sources** - passenger vehicle and truck trips based on the Focused Traffic Study and VMT Screening Memorandum. Truck emissions use SCAG's 40-mile average trip length, consistent with the SCAQMD WAIRE Program.
- **On-Site Cargo Handling Equipment** - 30 compressed natural gas units operating 4 hours per day, 365 days per year (Technical Appendix A-3, Section 3.5.8).
- **Solid Waste** - methane from decomposition of non-diverted waste in landfills.
- **Water and Wastewater** - electricity for conveyance, treatment, distribution, and management.
- **Refrigeration** - refrigerant leakage during equipment operation and servicing, based on CalEEMod defaults.

- **Stationary Sources** - one 300-horsepower diesel fire pump and one 700-horsepower diesel emergency generator per building, each assumed to operate up to 50 hours annually for maintenance and testing.
- **Transport Refrigeration Units** (TRUs) - units on trucks serving the assumed cold-storage component, which occupies 20 percent of Project floor area. The analysis models approximately 453 TRU-equipped trucks during on-site and off-site travel.

Table 4.5-1 presents annual emissions, including amortized construction emissions. Mobile sources account for approximately two-thirds of the total, and refrigeration is the third-largest source. MM AQ-12 would replace compressed natural gas cargo handling equipment with electric equipment, reducing annual emissions from 89,661.13 to 88,239.88 $MTCO_2e$.

Table 4.5-1. GHG Emissions – Without and With Mitigation

Source	Emissions (MT/yr)	
	Without Mitigation	With Mitigation
Annual construction emissions amortized over 30 years	1,108.56	1,108.56
Mobile	60,633.40	60,633.40
Area	120.99	120.99
Energy	8,241.56	8,241.56
Water	3,908.72	3,908.72
Waste	2,422.77	2,422.77
Refrigeration	7,285.74	7,285.74
Stationary	133.72	133.72
On-site Equipment	1,421.25	0.00
TRUs	4,384.41	4,384.41
Total CO_2e (All Sources)	**89,661.13**	**88,239.88**

Source: Greenhouse Gas Analysis, Urban Crossroads, August 14, 2026 (Technical Appendix A-3), Tables 3-6 and 3-7. CalEEMod results by gas are provided in Appendix 3.2 of that analysis. Table prepared by EPC Environmental, Inc.

City GHG Screening Tables

With MM GHG-1, the Project would earn 160 points (Table 4.5-2, Screening Table Points Earned by the Project). The 20 passenger vehicle chargers required by MM GHG-1 provide 100 points on their own, and the total is 145 points without credit for all-electric buildings. The Project therefore meets Step 2, and Step 3 does not apply.

For logistics, warehousing, and storage facilities, Building Envelope and Indoor Space points

apply only to conditioned areas. For example, if conditioned office space occupies 10 percent of a warehouse, the applicable points are multiplied by 0.1.

Table 4.5-2. Screening Table Points Earned by the Project (Illustrative)

Feature	Feature Selected	Assigned Points	Project Points
Energy: Building Envelope and Indoor Space (prorated to 10 percent conditioned space)			
Windows	Modestly Enhanced Window Insulation (0.4 U-factor, 0.32 SHGC) — PDF-5	4 × 0.1	**0.4**
Cool Roofs	Enhanced Cool Roof (0.2 aged solar reflectance, 0.75 thermal emittance) — PDF-5	8 × 0.1	**0.8**
Artificial Lighting	Very High Efficiency Lights (100 percent high-efficiency fixtures) — PDF-6	8 × 0.1	**0.8**
Energy-3: All-Electric Buildings			
All-Electric Buildings	All building systems electric — PDF-1	15	**15**
Water 1-3: Exceed Water Efficiency Standards			
Landscaping	Only low water using plants — RR UTIL-4	3	**3**
Irrigation	Weather-based controllers with drip irrigation — RR UTIL-4	3	**3**
Toilets	Water efficient toilets and urinals — RR UTIL-4	3	**3**
Faucets	Water efficient faucets (1.28 gpm) — RR UTIL-4	2	**2**
On Road: Alternative Transportation Options			
Preferential Parking	Reserved carpool and low- or zero-emission vehicle spaces — PDF-8	1	**1**
Preferential Parking	Vanpool spaces with loading areas — PDF-8	1	**1**
Install Electric Vehicle Chargers			
Passenger EV Chargers	Level 2 chargers, twenty required by MM GHG-1 — PDF-3, PDF-9	5 per charger	**100**
Truck Chargers	Level 2 AC chargers for Class 8 trucks, two counted — PDF-3	12 per charger	**24**
Reduce Waste to Landfills			
Recycling	Separated recycling bins with central collection — RR UTIL-5	2	**2**
Recycling	Recycle construction waste — RR UTIL-5	4	**4**

Feature	Feature Selected	Assigned Points	Project Points
Total Points (minimum required: 100); 145 without the all-electric line			**160**

Source: Appendix A-5, based on Appendix C of the City of Adelanto Greenhouse Gas Emissions Screening Tables Implementing Performance Standards (December 2024). Because tenants are unknown, the measures are illustrative. At building permit, the Applicant may substitute measures if the total remains at least 100 points and the 20 chargers required by MM GHG-1 are installed. The total is 145 without the all-electric line; the chargers alone provide 100 points. Building Envelope and Indoor Space points assume 10 percent conditioned space. Appendix A-5 provides the complete table.

Mitigation Measures

Operational air quality measures MM AQ-4 and MM AQ-6 through MM AQ-22 would also reduce GHG emissions. Table 4.5-1 credits only the reduction from MM AQ-12, which CalEEMod quantifies; no reduction is assumed for the other measures. MM GHG-1 is also required:

- **MM GHG-1 Screening Table Measures.** Before issuing building permits or approving the site plan, as applicable, the City shall verify that Project plans and site designs include measures totaling at least 100 points under the City of Adelanto GHG Screening Tables Implementing Performance Standards. The Applicant may use replacement measures with equivalent point values or emissions reductions. The measures shall include at least 20 Level 2 (240-volt) electric vehicle chargers for passenger vehicles installed across the seven buildings, which may include chargers required by CALGreen, so that the 100-point standard is met without relying on points for all-electric buildings or building envelope features. Points for all-electric buildings shall not be counted for any building at which natural gas engines are operating under the natural gas generation option. Before issuing any certificate of occupancy, the City shall verify that the measures have been implemented.

Additional Measures Considered

The following measures were also considered and are not included in the Project, for the reasons given.

On-site solar sized to building demand. Building electricity use accounts for approximately 8,242 $MTCO_2e$ annually, or 9 percent of Project emissions (Table 4.5-1, *GHG Emissions – Without and With Mitigation*). Rooftop solar sized to this demand could reduce at most that share, with benefits declining each year as the grid reaches the SB 100 requirement of 100 percent zero-carbon electricity by 2045. PDF-4 provides at least 45 kilowatts of rooftop solar per building. Additional solar would not change the significance finding because trucks and cars generate two-thirds of Project emissions and refrigeration generates another 8 percent.

Carbon offsets. Purchased offsets could potentially cover the remaining approximately 88,240 $MTCO_2e$ annually over the Project's life. However, the City has no adopted offset program, accepted registry, or means to verify offset value. Open-market offsets would reduce

emissions outside Adelanto. The City does not require offsets as mitigation but may consider them in its findings, and the Applicant may propose them.

Zero-emission truck fleets. Trucks generate most Project emissions, but the Applicant would not own or operate them and tenants have not been identified. The State regulates fleets through the Truck and Bus Regulation and its successors. MM AQ-18 requires SmartWay carriers, MM AQ-22 requires plug-ins for refrigerated trailers at cold-storage docks, and PDF-3 provides dock-side electrical hookups for electric trucks. The City cannot impose and enforce a zero-emission fleet requirement on unidentified tenants and does not require one.

Significance Determination

Significant and Unavoidable (Cumulatively Considerable Contribution). Unmitigated emissions of approximately 89,661 $MTCO_2e$ per year equal nearly one-half of Adelanto's 2016 communitywide emissions. MM AQ-12 would reduce this total to approximately 88,240 $MTCO_2e$. Other measures would provide additional reductions that cannot be reliably quantified.

MM GHG-1 would satisfy the screening threshold adopted by Resolution No. 25-03. However, the Screening Tables associate 100 points with approximately 7,266 $MTCO_2e$ in annual reductions for typical new development, and mitigated Project emissions would remain approximately 12 times that amount. Meeting the points requirement would therefore not reduce emissions in proportion to the reductions represented by the Screening Tables.

Given the magnitude of Project emissions and the limits of achievable mitigation, the City finds the contribution cumulatively considerable. MM GHG-1 would reduce emissions but would not reduce the impact below significance. The impact is significant and unavoidable, and approval would require a Statement of Overriding Considerations.

The Greenhouse Gas Analysis (Technical Appendix A-3) concludes that compliance with the adopted screening threshold would result in a less-than-significant impact. The City reaches a different conclusion because it also considers the Project's total emissions.

On-Site Natural Gas Generation Option

The Project's electric building systems would be served by Southern California Edison (SCE). If SCE service is unavailable before occupancy, the Applicant may seek approval for temporary natural gas generation at up to three buildings. RR UTIL-6 limits this option to 22.5 megawatts of total installed capacity and the annual fuel use evaluated in Appendix A-4. A City Conditional Use Permit and an MDAQMD Authority to Construct are also required. At full use across all three buildings, annual consumption of 747,228 million British thermal units of natural gas would generate approximately 39,758 $MTCO_2e$. Generation at each building would cease when SCE service becomes available; its duration therefore depends on service

timing. Proposals exceeding the analyzed limits would require further review under CEQA Guidelines Section 15162.

Adding these emissions to the mitigated total in Table 4.5-1 yields approximately 127,998 $MTCO_2e$ per year. This is a worst-case estimate because no credit is taken for displaced grid electricity. For comparison, the MDAQMD CEQA guidelines identify an annual GHG threshold of 100,000 short tons of CO_2e, approximately 90,718 $MTCO_2e$ (Table 4.1-5, *MDAQMD Regional Significance Numeric Thresholds*). Mitigated emissions with SCE service are below this level; the combined total with natural gas generation exceeds it. The option increases an impact that is significant and unavoidable with or without it.

Threshold 4.5 (b): Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis

State Level Plans, Policies or Regulations

2022 CARB Scoping Plan Consistency

Appendix D of the 2022 Scoping Plan describes local GHG planning and project-level approaches. Projects may tier from a plan meeting CEQA Guidelines Section 15183.5(b). Alternative recommendations for jurisdictions without such a plan focus on residential and mixed-use development and do not address industrial projects.

The City has no adopted climate action plan, and the Regional GHG Reduction Plan was not adopted as a qualified plan under CEQA Guidelines Section 15183.5(b). Consistency with the Regional Plan therefore cannot support tiering or a less-than-significant finding. The City's adopted thresholds, based on the Regional Plan, apply to the significance determination (CEQA Guidelines Section 15064.7(c)).

Regional Level Plans, Policies or Regulations

Consistency with the City's Adopted GHG Thresholds and the Regional GHG Reduction Plan

MM GHG-1 implements Regional Plan Measure PS-1 through the City's 100-point requirement. With SCE electricity, compliance would make the Project consistent with the adopted thresholds, the Regional GHG Reduction Plan, and the 2022 CARB Scoping Plan. Technical Appendix A-3 includes the City's Screening Tables; Table 4.5-2, *Screening Table Points Earned by the Project (Illustrative)*, identifies measures meeting the requirement.

Consistency with State Long-Term Reduction Goals

Adopted state requirements are expected to reduce Project emissions over time toward the SB 32, AB 1279, and Executive Order B-55-18 goals. The Truck and Bus and Advanced Clean Fleets regulations transition heavy-duty vehicles toward zero-emission technologies, and SB 100 requires retail electricity sales to be renewable and zero-carbon by 2045. MM AQ-6, MM AQ-12, and the Screening Table measures would enable the Project to use an increasingly

decarbonized electricity supply. With SCE service, the Project would not conflict with the State's long-term reduction goals.

The Project would not conflict with SCAG's Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy. It is an employment-generating goods-movement use on land designated for industrial development, with access to the City's truck route network and U.S. Highway 395.

While temporary natural gas engines operate, on-site fossil fuel generation would conflict with the 2022 Scoping Plan direction for new buildings and the State's 2045 carbon-neutrality goal under AB 1279. The capacity and duration limits described under Threshold 4.5(a) do not eliminate this conflict during operation. SB 100 applies to retail electricity sellers, not customer-owned generation. The option's emissions are included in the significant and unavoidable impact identified above.

Local Level Plans, Policies or Regulations

General Plan Policies

Table 4.5-3 evaluates the Project's consistency with applicable policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014).

Table 4.5-3. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy / Program	Description	Project Consistency
LC 3.2	Accommodate industrial, logistics, and warehousing uses to complement SCLA. Ensure sustainable concepts in OS 3.2, OS 3.5, OS 4.5, OS 6.1, OS 6.2, OS 6.3, OS 8.2, OS 9.1 are implemented.	**Consistent.** The site is zoned Manufacturing/Industrial, and the Project includes the applicable sustainability measures.
LC 4.5	Seek energy demand reductions in both residential and large industrial/commercial buildings.	**Consistent.** The Project would comply with the 2022 Energy Code and CALGreen and would implement PDF-5 for the building envelope and PDF-6 for lighting.
OS 3.2	Encourage new warehousing, manufacturing, industrial, and large commercial retail buildings to be designed to accommodate future rooftop solar panel systems.	**Consistent.** Each building would include a rooftop photovoltaic system (PDF-4, Section 3.0).
OS 3.5	Require new development to provide site design and building orientation that take into account passive solar design.	**Consistent.** Plan check would verify compliance with the 2022 Energy Code building-envelope and cool-roof requirements and CALGreen.
OS 4.1	Require water-conserving appliances and fixtures in new development per CALGreen.	**Consistent.** The Project would install water-conserving appliances and fixtures as required by CALGreen (Section 4.12, Utilities

Policy / Program	Description	Project Consistency
		and Service Systems).
OS 6.1	Pursue efforts to reduce air pollution and GHG emissions by promoting renewable energy and energy conservation.	**Consistent.** The Project would comply with the 2022 Energy Code and CALGreen, implement MM AQ-4 and MM AQ-6 through MM AQ-22, and earn at least 100 Screening Table points under MM GHG-1.
OS 8.2	Reduce greenhouse gas emissions caused from electricity and natural gas use by residential, commercial, industrial, and municipal buildings.	**Consistent.** Building energy use would comply with the 2022 Energy Code and CALGreen. SB 100 would apply to electricity supplied to the site, and MM GHG-1 would require at least 100 Screening Table points.
OS 9.1	Encourage and support green building principles in Adelanto.	**Consistent.** The Project would comply with CALGreen.
OS 4.2	Encourage the use of drought-tolerant, desert-friendly, and low-water-consuming landscaping as a means of reducing overall and per capita water demand.	Consistent. Landscaping is drought-tolerant and low-water (RR UTIL-4).

Source: Adelanto North 2035 Comprehensive Sustainable Plan (2014); EPC Environmental, Inc.

Adelanto Municipal Code

The Adelanto Municipal Code reduces GHG emissions through building, energy, transportation, and water requirements. Title 14 adopts the California Building Standards Code, including the Energy Code and CALGreen; Chapter 14.38 expedites rooftop solar permitting. Chapter 10.40 governs electric vehicle charging station permitting and installation, including infrastructure required by MM AQ-6 and the Screening Table measures. Chapters 17.60 and 8.70 require water-efficient landscaping and irrigation, reducing energy used for water conveyance and treatment. Title 17 allows solar and wind energy facilities.

Mitigation Measures

Mitigation Measure GHG-1 applies.

Significance Determination

Significant and Unavoidable. With SCE electricity and MM GHG-1, the Project would implement the City's adopted threshold and General Plan Program OS-18 and would be consistent with the Regional Plan and the State's SB 32 and AB 1279 goals. Temporary natural gas generation would conflict with the 2022 Scoping Plan direction for new buildings and the State's 2045 carbon-neutrality goal while operating; its use and duration depend on SCE service availability. Regional Plan consistency does not support tiering or a less-than-significant finding under CEQA Guidelines Section 15183.5(b), as explained above. The impact remains significant and unavoidable and requires a Statement of Overriding Considerations.

4.5.6 Cumulative Impacts Analysis

Climate change results from combined emissions across sources; the analysis under Threshold 4.5(a) therefore evaluates the Project's cumulative contribution. The Regional Plan accounts for projected population, household, and employment growth through 2030 and applies its 100-point standard to each new project above 3,000 $MTCO_2e$ per year. Although MM GHG-1 would meet that standard, the City finds the Project's contribution cumulatively considerable for the reasons discussed above. Temporary natural gas generation within RR UTIL-6 limits would add to that contribution. The cumulative impact remains significant and unavoidable.

4.5.7 Summary of Impacts and Mitigation Measures

GHG emissions and conflicts with GHG reduction plans would remain significant and unavoidable after mitigation. MM GHG-1 requires at least 100 Screening Table points, including at least 20 Level 2 passenger vehicle chargers, with City verification before building permit issuance or site plan approval, as applicable, and before occupancy. The emissions analysis accounts for quantified reductions under MM AQ-12 and potential natural gas generation under Appendix A-4. Given the magnitude of emissions and the limits of the Screening Tables and quantifiable reductions, the Project's contribution remains cumulatively considerable. Approval would require findings under CEQA Guidelines Section 15091 and a Statement of Overriding Considerations under Section 15093.

4.5.8 References

California Air Pollution Control Officers Association (CAPCOA). 2008. CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.

California Air Resources Board (CARB). 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. December 15, 2022.

California Air Resources Board (CARB). Health & Air Pollution. https://ww2.arb.ca.gov/resources/health-air-pollution.

City of Adelanto. 2014. Adelanto North 2035 Comprehensive Sustainable Plan.

City of Adelanto. 2024. Greenhouse Gas Emissions Screening Tables Implementing Performance Standards. December 2024.

City of Adelanto. 2025. Resolution No. 25-03, adopting greenhouse gas thresholds of significance. January 8, 2025.

City of Adelanto. 2025. 2025 General Plan Land Use Buildout. March 2025.

San Bernardino Council of Governments (SBCOG). 2021. San Bernardino County Regional Greenhouse Gas Reduction Plan. March 2021.

Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy.

Urban Crossroads, Inc. 2026. Adelanto Industrial Park Greenhouse Gas Analysis. August 14, 2026. (SEIR Appendix A-3.)

Urban Crossroads, Inc. 2026. Natural Gas Emissions Update. September 15, 2026. (SEIR Appendix A-4.)

4.6 Hazards and Hazardous Materials

4.6.1 Introduction

This section evaluates the Project's hazards and hazardous materials impacts.

Technical Appendix

The analysis relies on current regulations and the following technical report:

- Phase I Environmental Site Assessment, Farallon Consulting, May 19, 2026. (Appendix E)

NOP/Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No comments addressed hazards or hazardous materials.

4.6.2 Environmental Setting

Site History

The Phase I Environmental Site Assessment found that the site has remained largely undeveloped. A central area appeared graded and possibly used for agriculture in 1953, but was no longer evident by 1968. The Phase I Report found that any remaining agricultural chemicals would be a minor condition, not a recognized environmental condition, because the site is planned for commercial use (Appendix E).

Adjoining Properties

Adjoining land includes undeveloped desert, residences, and industrial and commercial uses. Petroleum-pipeline easements follow Air Base Road and Adelanto Road, and a high-voltage transmission easement crosses the southeast-adjoining property. Kinder Morgan terminals and a DHL facility are north of the site near the former George Air Force Base. Because the pipelines are tested and regulated, the Phase I Report concluded that a nearby release is unlikely and is not a recognized environmental condition.

Former George Air Force Base

The site is near the southern boundary of the former George Air Force Base, a National Priorities List site located downgradient. Groundwater is more than 100 feet below ground surface. Based on this depth and GeoTracker records, the 2007 and 2015 Phase I reports found that releases from the former base are not expected to threaten human health at the Project site.

Regulatory Database Records

The Phase I Report reviewed federal, state, and local environmental databases for the site and surrounding properties within one-half mile. Appendix E maps the records.

4.6.3 Regulatory Framework

Federal, state, and local laws regulate hazardous materials, hazardous waste, workplace safety, transportation, emergency response, and airport compatibility. The principal requirements applicable to the Project are summarized below.

Federal

CERCLA and SARA. The federal Superfund program authorizes investigation and cleanup of uncontrolled or abandoned hazardous-waste sites and responses to spills and other releases.

Resource Conservation and Recovery Act. RCRA regulates hazardous waste from generation through transport, treatment, storage, and disposal and establishes requirements for solid waste and underground storage tanks.

Hazardous and Solid Waste Amendments. The 1984 RCRA amendments address waste minimization, land-disposal restrictions, corrective action, enforcement, hazardous-waste standards, and underground storage tanks.

Toxic Substances Control Act. TSCA authorizes federal reporting, recordkeeping, testing, and restrictions for chemical substances, including PCBs, asbestos, radon, and lead-based paint.

Hazardous Materials Transportation Uniform Safety Act. HMTUSA authorizes U.S. Department of Transportation regulations for the safe transport of hazardous materials in intrastate, interstate, and foreign commerce.

The Act also promotes consistent state and local routing requirements and regulates federal motor-carrier permits and radioactive-material transport.

State of California

California Hazardous Waste Control Law. This law implements RCRA in California and regulates hazardous waste from generation through disposal. It also governs recycling, source-reduction planning, facility permits, and wastes or activities regulated more stringently than under federal law.

State Regulations

California Code of Regulations, Titles 22 and 26. Title 22 establishes requirements for hazardous-waste generators, transporters, and treatment, storage, and disposal facilities. Title 26 compiles related toxics regulations from several titles; the hazardous-waste requirements are commonly called Title 22 regulations.

Regional

Certified Unified Program Agency. The San Bernardino County Fire Department Hazardous Materials Division is the County's CUPA. It administers hazardous-materials and hazardous-waste reporting, permitting, inspection, and enforcement programs. Regulated facilities must obtain required CUPA permits.

Local

City of Adelanto Local Hazard Mitigation Plan. The May 2022 plan identifies local hazards and strategies to reduce risks to life and property.

Southern California Logistics Airport Comprehensive Land Use Plan. Victorville prepared the draft SCLA plan in 2008 but did not adopt it. The plan is used as guidance for aircraft noise, land use safety, airspace protection, and overflight compatibility near the airport.

Airport land use compatibility determinations. Adelanto and Victorville use the alternative process authorized by Public Utilities Code Section 21670.1(c). Each city makes compatibility determinations within its boundaries using the State Airport Land Use Planning Handbook and applicable federal aviation regulations as guidance.

Regulatory Compliance Requirements

RR HAZ-1 through RR HAZ-7 are existing legal requirements. They are not mitigation.

RR HAZ-1 — Hazardous Materials Business Plan. Health and Safety Code Chapter 6.95 (§§25500–25547.8). A business that handles hazardous materials or extremely hazardous substances must submit a Hazardous Materials Business Plan through the California Environmental Reporting System if it stores hazardous materials in quantities at or above 55 gallons (liquid), 500 pounds (solid), or 200 cubic feet (compressed gas), or any quantity of extremely hazardous substances. Future Project tenants storing or handling reportable quantities shall comply.

RR HAZ-2 — Cal/OSHA Construction Safety Orders. 8 CCR §§1500 et seq. Project construction shall comply with the Cal/OSHA Construction Safety Orders, including provisions for excavation, materials handling, hazardous substances, and worker protection.

RR HAZ-3 — Hazardous Waste Control Law. Health and Safety Code §§25100–25249. Generation, handling, transportation, and disposal of hazardous waste during construction and operation shall comply with the state Hazardous Waste Control Law as administered by the Department of Toxic Substances Control and as locally administered by the Certified Unified Program Agency — San Bernardino County Fire Protection District, Office of the Fire Marshal.

RR HAZ-4 — San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan. The Project shall comply with applicable provisions of the current San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan, including hazard avoidance and emergency response coordination.

RR HAZ-5 — Airport Influence Area Development Standards. Adelanto Municipal Code §17.30.040(c). Development within the airport influence area is subject to the height limitations

established by reference to the imaginary surfaces of 14 CFR Part 77, and the City requires an avigation easement for development within that area. MM HAZ-1 requires Part 77 clearance for each structure.

RR HAZ-6 — Emergency Response and Evacuation. The Project site plan shall accommodate emergency vehicle access under the California Fire Code as adopted by the City of Adelanto and the San Bernardino County Fire Protection District, including all-weather access roads, turning radii for District apparatus, and Knox box requirements.

RR HAZ-7 — Asbestos and Lead-Based Paint. Demolition activities, if any, shall comply with MDAQMD Rule 1403 (Asbestos NESHAP) and applicable lead-based paint provisions under federal (40 CFR Part 745) and state (17 CCR Division 1, Chapter 8) standards.

General Plan Policy Consistency

Table 4.6-1 evaluates the Project against applicable hazards and public-safety policies in the Adelanto North 2035 Comprehensive Sustainable Plan.

Table 4.6-1. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy / Program	Policy Language (summary)	Project Consistency
HS 1.2	Enforce the most recent building codes governing seismic safety and structural design to minimize damage from earthquakes.	**Consistent.** Buildings are designed to the current California Building Code.
HS 2.1	Enforce building fire codes and ordinances, and continue to research and adopt best practices pertaining to fire management and fire hazards.	**Consistent.** The Project complies with the California Fire Code and is reviewed by the San Bernardino County Fire Protection District (RR HAZ-6).
HS 4.1	Comply with all applicable local, State, and Federal regulations regarding the transport, use, and disposal of solid and hazardous waste.	**Consistent.** Hazardous materials and waste are handled under RR HAZ-1 through RR HAZ-3 and solid waste under RR UTIL-5.

Source: Adelanto North 2035 Comprehensive Sustainable Plan (2014); EPC Environmental, Inc.

4.6.4 Thresholds of Significance

Section IX of Appendix G to the CEQA Guidelines uses the following questions to evaluate hazards and hazardous materials impacts. Would the Project:

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?

c) emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

d) be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard or excessive noise to the public or the environment?

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

f) impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

g) expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

4.6.5 Impacts Analysis

Threshold 4.6 (a): Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Analysis

Construction

Construction would use fuels, paints, lubricants, solvents, and cleaning products typical of construction sites. RR HAZ-2 and RR HAZ-3 regulate their use, storage, and disposal. Federal and state transportation regulations govern delivery by truck or rail.

Operation

The same requirements would apply during operation. Each tenant that handles hazardous materials above statutory thresholds must prepare and implement a Hazardous Materials Business Plan under RR HAZ-1. Tenant-specific requirements would depend on the materials and quantities handled.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. Construction and operation would use hazardous materials typical of industrial development and would comply with RR HAZ-1 through RR HAZ-3 and RR HAZ-7. No mitigation is required.

Threshold 4.6 (b): Would the Project 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

Foreseeable incidents include spills during delivery or transfer, leaking containers, and fires involving stored materials. RR HAZ-1 requires emergency-response procedures; RR HAZ-2 governs construction handling and worker protection; RR HAZ-3 governs hazardous waste from a release; and RR HAZ-6 requires emergency access. The Project does not propose acutely hazardous materials or quantities outside these programs.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. Applicable business-plan, worker-safety, CUPA, hazardous-waste, and Fire Code requirements would govern reasonably foreseeable releases. No mitigation is required.

Threshold 4.6 (c): Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Analysis

Adelanto State Preschool, approximately 0.60 mile northwest of the site, is the nearest school. No school is within one-quarter mile. The Project does not propose a hazardous-emission source, and hazardous materials would be managed as described under Thresholds 4.6(a) and 4.6(b).

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. No existing or proposed school is within one-quarter mile, and applicable requirements would govern hazardous-materials handling. No mitigation is required.

Threshold 4.6 (d): Would the Project 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 or excessive noise to the public or the environment?

Impact Analysis

The Cortese List identifies hazardous-materials release sites for CEQA review under Government Code Section 65962.5. It consists of the following data sources:

- List of Hazardous Waste and Substances sites from the 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 the Water Board with waste constituents above hazardous waste levels outside the waste management unit.
- List of active cleanup and abatement orders from the Water Board.
- List of hazardous waste facilities subject to corrective action under §25187.5 of the Health and Safety Code, identified by DTSC.

The Project site is not on the Cortese List. The Phase I Environmental Site Assessment found that the former George Air Force Base would not threaten the site or planned industrial development.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The site is not listed under Government Code Section 65962.5, and the Phase I Environmental Site Assessment found no threat from the former George Air Force Base. No mitigation is required.

Threshold 4.6 (e): For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the project area?

Impact Analysis

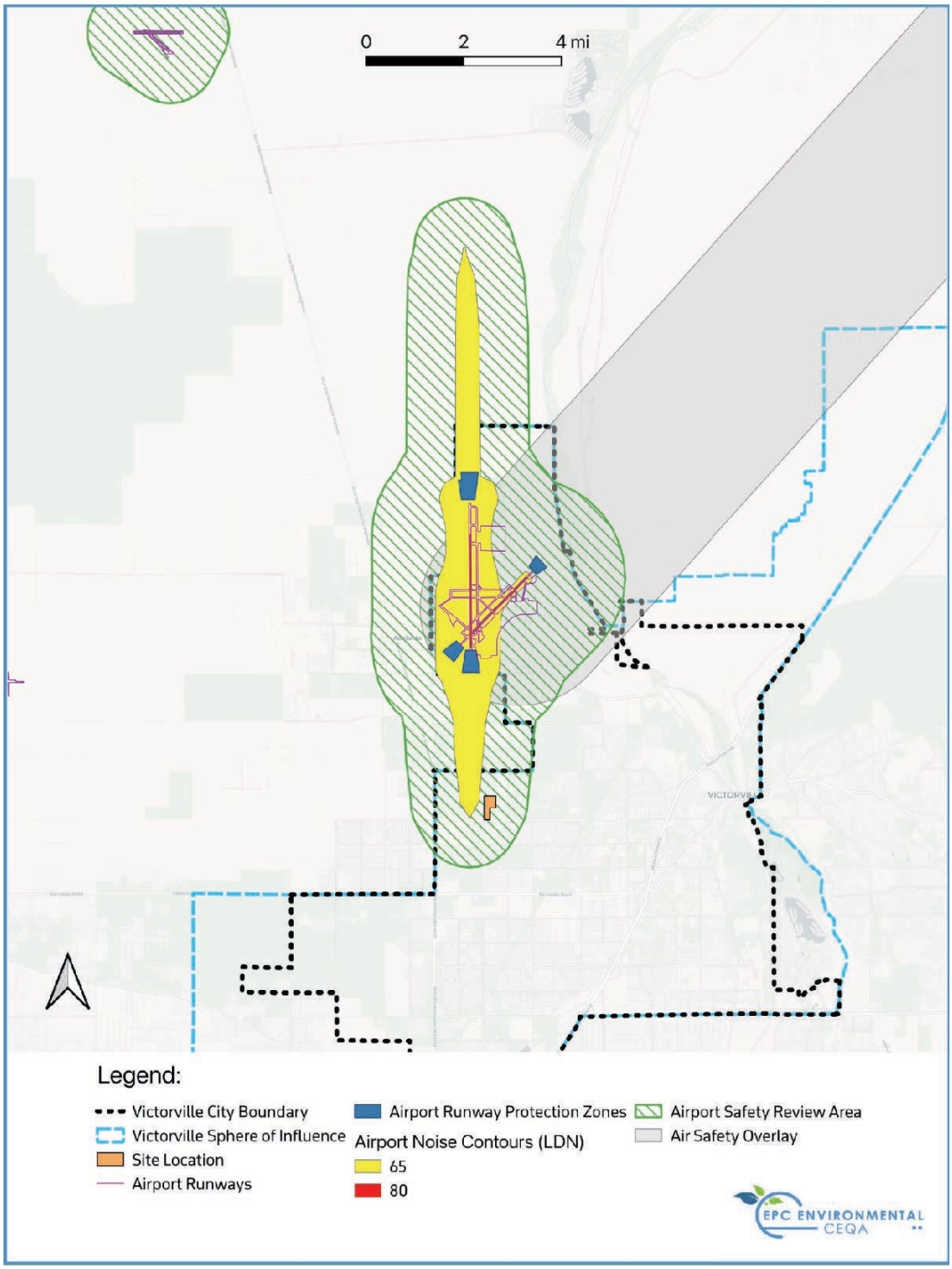
San Bernardino County disbanded its Airport Land Use Commission in 1993. In 1995, the County and the Cities of Adelanto and Victorville adopted the alternative process authorized by Public Utilities Code Section 21670.1(c). Each local agency makes airport compatibility determinations within its jurisdiction. Because the site is in Adelanto, the City is responsible for the Project's

compatibility review. Victorville maintains the SCLA land use plan in cooperation with affected jurisdictions.

Adelanto Resolution No. 95-26 directs the City to use its planning laws and ordinances, the State Airport Land Use Planning Handbook, and applicable federal aviation regulations. Victorville did not adopt the 2008 SCLA Comprehensive Land Use Plan; it is used as guidance only. Applicable standards are the Municipal Code height limit, Part 77 imaginary surfaces, the airport-influence-area avigation easement, and FAA Part 77 review.

The draft SCLA plan places the site in Review Areas 2 and 3, where warehouses are normally acceptable subject to employee-density limits of 100 and 150 employees per acre, respectively. The estimated 7,197 employees are below the 45,100-employee Review Area 2 maximum for the 451-acre site.

Figure 4.6-1. Southern California Logistics Airport Compatibility Review Areas



Source: Southern California Logistics Airport Comprehensive Land Use Plan, City of Victorville, 2008.

The analysis also considers intrusion into protected airspace. The Project's 55-foot maximum building height is permitted under the Manufacturing/Industrial designation, but structures in the airport influence area are also subject to Part 77 imaginary surfaces and an avigation easement.

The site is south of the SCLA Runway 35 landing threshold. The FAA has reviewed Project structures under Part 77.

In 2022, the FAA issued a Determination of No Hazard for a 60-foot structure at this location, at an elevation of 2,999 feet above mean sea level, without marking or lighting. That determination has expired.

On July 27, 2026, the FAA issued preliminary findings for Building 3 (Study No. 2026-AWP-12023-OE). The study evaluated four corners at 55 feet above ground level and 2,964 feet above mean sea level, based on a 2,909-foot site elevation and distances of 0.55 to 0.70 nautical mile south of Runway 35. The FAA found that the northeast and southeast corners would exceed the proposed Runway 35 approach surface by 18 feet and 2 feet, respectively. The notice identified three options: reduce the corners to 37 and 53 feet above ground level; pursue a favorable determination at the proposed height through further FAA review, potentially with marking and lighting; or relocate the structure. The preliminary notice does not authorize construction.

The Applicant has filed notice of proposed construction for the Project with the Federal Aviation Administration.

An unresolved intrusion into the Runway 35 approach surface could create a safety hazard to aircraft and persons on the ground. This impact would be potentially significant. MM HAZ-1 requires a current FAA Determination of No Hazard for each structure before the City issues a building permit. Height reduction, relocation, or a favorable FAA determination would satisfy the measure.

The FAA options would lower two corners of Building 3, relocate it, or keep it at 55 feet. None would add floor area. The air quality, energy, greenhouse gas, and noise analyses are based on the Project's 8,256,274 square feet of floor area, so their results would not change.

The FAA measured the buildings against the planned Runway 35 approach surface in the Airport Layout Plan, the more conservative of the two runway configurations.

The FAA study will still be open while the Draft SEIR circulates. MM HAZ-1 applies whatever the FAA decides, and the Final SEIR will report the study's status.

Mitigation Measures

MM HAZ-1 **Airspace Obstruction Clearance.** Prior to issuance of a building permit for any building or structure within the Project, the applicant shall file FAA Form 7460-1, Notice of Proposed Construction or Alteration, for that structure and shall obtain from the Federal Aviation Administration a Determination of No Hazard to Air Navigation covering the structure as it will be built. Where the FAA identifies a structure as exceeding an obstruction standard of 14 CFR Part 77, the applicant

shall resolve the exceedance prior to issuance of a building permit for that structure by reducing the structure height to the elevation the FAA identifies as eliminating the exceedance, by relocating the structure, or by obtaining a Determination of No Hazard at the proposed height through further FAA study and coordination. The City shall verify that a current, unexpired Determination of No Hazard covering the structure is on file prior to issuing the building permit, and shall verify at certificate of occupancy that the structure as constructed does not exceed the height covered by that determination. Any marking and lighting recommended by the FAA shall be shown on the building plans and installed prior to occupancy.

Significance Determination

Less Than Significant with Mitigation. The Project is compatible with draft SCLA review-area guidance and the Municipal Code height limit. Because the FAA preliminarily found that two Building 3 corners would exceed the proposed Runway 35 approach surface, MM HAZ-1 requires current FAA clearance for each structure before a building permit is issued. The impact would be less than significant with mitigation.

Threshold 4.6 (f): Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Analysis

The site contains no emergency facilities and is not a designated evacuation route. The City and Fire District review Project access and internal circulation for emergency ingress and egress. RR HAZ-6 requires emergency access during construction and operation.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The Project would not interfere with an adopted emergency response or evacuation plan. No mitigation is required.

Threshold 4.6 (g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact Analysis

The site is not within or adjacent to wildland or a CAL FIRE-designated fire hazard severity zone. Development would replace vacant land with graded industrial uses, paving, and landscaping

subject to the California Fire Code and Fire District service. It would not alter fire behavior on adjoining land.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The Project would not expose people or structures to a significant wildfire risk or exacerbate wildfire risk on adjoining land. No mitigation is required.

4.6.6 Cumulative Impacts Analysis

Hazards impacts are generally site-specific. The cumulative study area includes projects within one-half mile: CarMax Vehicle Facility (C-1), Rancho 38 (C-2), Emerald 20 Truck Maintenance (C-3), Tom Steeno Industrial Storage Yard (C-4), and the existing uses listed in Part A of Table 4.0-1, *Cumulative Setting Within One-Half Mile of the Project Site*, including the Federal Correctional Complex-Victorville and the SCLA Specific Plan Area.

The Phase I Environmental Site Assessment identified no recognized or historical recognized environmental conditions at the site. Construction and operation would use materials typical of industrial development. The Project and nearby projects are subject to the same federal, state, and local programs administered by the CUPA, with requirements based on the materials each facility handles.

Other hazards would not combine to create a cumulative effect. No school is within one-quarter mile, the site is not on a Government Code Section 65962.5 list, and neither the site nor surrounding area is in a designated fire hazard severity zone. Airport compatibility and emergency access are reviewed for each project based on its location, height, and site plan.

The Project's contribution would not be cumulatively considerable. Cumulative hazards and hazardous-materials impacts would be less than significant.

4.6.7 Summary of Impacts and Mitigation Measures

Hazards and hazardous-materials impacts would be less than significant, except airport safety, which would be less than significant with mitigation. RR HAZ-1 through RR HAZ-7 govern hazardous-materials handling, emergency access, and other compliance requirements. MM HAZ-1 requires current FAA clearance for each structure before the City issues a building permit. With MM HAZ-1, all impacts would be less than significant.

4.6.8 References

California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zones in State Responsibility Area and Local Responsibility Area.

California Environmental Protection Agency. 2026. Cortese List Data Resources (Government Code §65962.5), including DTSC EnviroStor and State Water Board GeoTracker.

City of Adelanto. 1995. Resolution No. 95-26, Airport Land Use Compatibility Procedure under Public Utilities Code §21670.1(c). April 11, 1995.

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129), Section 4.7, Hazards and Hazardous Materials.

City of Adelanto. 2024. Adelanto North 2035 Comprehensive Sustainable Plan. 2014.

Coffman Associates. 2008. Southern California Logistics Airport Comprehensive Land Use Plan, Final Report. September 2008.

Farallon Consulting. 2026. Phase I Environmental Site Assessment, Adelanto Gateway Logistics Center. May 19, 2026. (SEIR Appendix E.)

Federal Aviation Administration. 2022. Determination of No Hazard to Air Navigation, Aeronautical Study No. 2022-AWP-21161-OE. December 1, 2022.

Federal Aviation Administration. 2026. Notice of Preliminary Findings, Aeronautical Study No. 2026-AWP-12023-OE. July 27, 2026.

San Bernardino County. 2023. Multi-Jurisdictional Hazard Mitigation Plan.

4.7 Hydrology and Water Quality

4.7.1 Introduction

This section evaluates construction and operational effects on hydrology and water quality using current regulations and the following technical reports.

Technical Reports

- Preliminary Drainage Study, Albert A. Webb Associates, May 2025, revised June 2026 (Appendix F-1)
- Water Quality Management Plan, prepared by Albert A. Webb Associates, May 2025 (Appendix F-2)
- Water and Sewer Feasibility Study, Albert A. Webb Associates, December 2025 (Appendix I)
- Water Supply Assessment, Albert A. Webb Associates, September 16, 2025 (Appendix J)

NOP Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No comments addressed hydrology or water quality.

4.7.2 Environmental Setting

Regional Hydrology

The site is within the Mojave River Watershed, which covers more than 5,400 square miles of the San Bernardino County high desert. More than 90 percent of basin recharge originates in the San Gabriel and San Bernardino Mountains. Groundwater leaves the basin through pumping, evaporation, plant transpiration, dry-lake seepage, and discharge to the Mojave River.

Site Hydrology

The undeveloped site is south of Air Expressway and is bordered by paved roads and office and warehouse uses. The site drops approximately 27 feet from south to north. Off-site runoff enters from the south, and on-site flows follow irregular earthen channels north at an average slope of approximately 1 percent. Drainage continues northwest from Adelanto Road to Fremont Wash and the Mojave River. No public storm drains serve the site or adjoining streets.

The Preliminary Drainage Study applies the San Bernardino County Hydrology Manual, NOAA Atlas 14 precipitation estimates, and the NRCS Web Soil Survey classification of the site as Hydrologic Soil Group C.

Flooding and Dam Inundation

The FEMA Flood Insurance Rate Map places the site in Zone X, which has a 0.2-percent annual chance of flooding and is not a special flood hazard area (FEMA 2025).

Water Quality

Clean Water Act Section 303(d) requires identification of waters that do not meet water quality standards. Regional groundwater concerns include arsenic, nitrate, iron, manganese, hexavalent chromium, and total dissolved solids. Some constituents occur naturally; others are associated with human activity. Concentrations above drinking water standards in the Mojave River Basin and Morongo Basin/Johnson Valley Area may require treatment before use (MWA 2014).

4.7.3 Regulatory Framework

The principal federal, state, regional, and local hydrology and water-quality requirements are summarized below.

Federal

Clean Water Act. The Act regulates pollutant discharges to waters of the United States and establishes surface-water quality standards. The NPDES program requires permits for covered point-source discharges, including discharges from industrial and municipal facilities.

State and Regional

Porter-Cologne Water Quality Control Act. The Act protects the beneficial uses of surface water, wetlands, and groundwater and regulates point and nonpoint pollution sources. Its policies require protection of state waters and regulation of activities that affect water quality.

State waters must be protected.

Activities affecting water quality must be regulated to attain the highest reasonable water quality.

The State may exercise its authority to prevent degradation of water quality.

The Act established the State Water Board and nine Regional Water Boards. The State Board provides statewide oversight, funding, and surface-water rights administration. Regional Water Boards issue permits and conduct inspections and enforcement within their hydrologic regions.

The State and Regional Water Boards also monitor and assess nonpoint-source pollution, prepare plans, provide financial assistance, and administer control programs.

Regional Water Boards regulate point-source discharges through NPDES permits and other discharges through waste discharge requirements. A person proposing a discharge that could affect water quality generally must submit a report of waste discharge. The boards may

investigate, require monitoring, and enforce permit conditions through administrative, civil, or criminal remedies.

Porter-Cologne also implements the NPDES program and requires regional basin plans. Basin plans identify beneficial uses, establish water quality objectives, and include implementation and monitoring programs. The Lahontan Regional Water Quality Control Board has jurisdiction over the Project site in the Mojave River Watershed. The Mojave Integrated Regional Water Management Plan guides regional water management.

Other California statutes also protect water quality. The Health and Safety Code addresses hazardous substances; the Fish and Game Code regulates diversions and discharges that could harm fish or wildlife; the Harbors and Navigation Code regulates vessel waste; and the Food and Agricultural Code protects groundwater used for drinking water. CDFW may require an agreement for alteration of a river, stream, or lake under Fish and Game Code Sections 1601 through 1603.

The Regional Water Board protects surface-water quality primarily through discharge permits. The Lahontan Basin Plan establishes objectives needed to protect beneficial uses.

Local

The City reviews grading plans for compliance with NPDES, General Plan, and Municipal Code requirements.

Regulatory Compliance Requirements

RR HYD-1 through RR HYD-8 are existing legal requirements. They are not mitigation.

> ***RR HYD-1 — NPDES Construction General Permit.*** *Project shall comply with the State Water Resources Control Board NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order WQ 2022-0057-DWQ, effective September 1, 2023, CAS000002). Project shall obtain a Notice of Intent (NOI) and shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) addressing construction-phase erosion and sediment control, materials management, and Best Management Practices (BMPs).*
>
> ***RR HYD-2 — Water Quality Management Plan.*** *Adelanto Municipal Code §17.93.060 requires preparation of a Water Quality Management Plan (WQMP) for managing post-construction stormwater quality. Project shall comply with the City of Adelanto and the Phase II Small MS4 General Permit for the Mojave River Watershed. The Project WQMP addresses common industrial stormwater pollutants including sediments, nutrients, trash and debris, bacteria and viruses, oil and grease, and pesticides through Low Impact Development (LID) and source control BMPs.*
>
> ***RR HYD-3 — Adelanto Municipal Code §17.93.050 — Soil Erosion and Sediment Control Plan.*** *Project shall obtain an NPDES Municipal Stormwater Permit for construction activities and*

prepare a Soil Erosion and Sediment Control Plan addressing clearing, grading, and excavation activities disturbing one acre or more.

RR HYD-4 — Lahontan Regional Water Quality Control Board — Basin Plan. *Project shall comply with the Water Quality Control Plan for the Lahontan Region (Basin Plan), including beneficial use designations for the Mojave River Watershed and water quality objectives applicable to receiving waters.*

RR HYD-5 — FEMA Flood Insurance Rate Map (FIRM) Compliance. *Project finished floor elevations and stormwater management facilities shall comply with current FEMA Flood Insurance Rate Map designations for the Project site and applicable Adelanto Municipal Code Title 15 floodplain provisions.*

RR HYD-6 — Adelanto General Plan Policy PF 5.6 — Flood Protection. *Per Policy PF 5.6, the City enforces requirements for new construction's protection against flooding. Implemented through finished floor elevation design and drainage facilities per the Preliminary Drainage Study.*

RR HYD-7 — Adelanto General Plan Policy PF 6.4 — Stormwater Management Compliance. *Per Policy PF 6.4, the City ensures developers comply with current stormwater management standards consistent with State Water Resources Control Board requirements.*

RR HYD-8 — Sustainable Groundwater Management Act (SGMA). *Water Code §10720 et seq. Project water supply is provided from the Mojave Basin, which is managed under the 1996 Mojave Basin Area Adjudication Judgment instead of under SGMA. Project demand is incorporated into the Water Supply Assessment (Appendix J) and is consistent with the Adelanto Public Utilities Authority's adjudicated allocation.*

Table 4.7-1 evaluates the Project against applicable hydrology and water-quality policies in the Adelanto North 2035 Comprehensive Sustainable Plan.

Table 4.7-1. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy / Program	Policy Language (summary)	Project Consistency
PF 4.3	Reduce dependence on private septic tanks; extend public sewer main lines as regulated through State Water Resources Control Board.	**Consistent.** The Project would connect to the City sewer system and would not use septic systems.
PF 5.4	Encourage developers to minimize impervious surfaces to reduce storm water runoff and increase flood protection.	**Consistent.** Project incorporates infiltration basins, vegetated swales, and pervious areas per the Project WQMP and

Policy / Program	Policy Language (summary)	Project Consistency
		Preliminary Drainage Study.
OS 4.1	Require use of water-conserving appliances and fixtures in new development per CALGreen.	**Consistent.** The Project would comply with applicable CALGreen water-efficiency requirements.
OS 5.1	Require new development outside Growth Area 1 to demonstrate adequate water is available before project approval and fund fair-share costs of water service.	**Consistent.** The Water Supply Assessment documents available supply, and the Project would pay applicable development impact fees.
OS 5.2	Access reliable data and information on water use and supply to evaluate water supply impacts.	**Implemented.** The Water Supply Assessment provides Project-specific supply and demand information.
PF 5.4	Encourage developers to minimize impervious surfaces to reduce storm water runoff and increase flood protection.	**Consistent.** Infiltration basins, underground detention chambers, and pervious areas retain and infiltrate runoff on site.
PF 5.7	Require street and parking lot vegetated swales to filter stormwater pollutants and allow stormwater infiltration.	**Consistent.** Parking lot drainage uses vegetated treatment best management practices under the Project WQMP.
PF 6.4	Ensure developers comply with current standards for stormwater management and consistent with State Water Resources Control Board requirements.	**Consistent.** A SWPPP under the Construction General Permit and a WQMP are required (RR HYD-1 and RR HYD-2).

4.7.4 Thresholds of Significance

Section X of Appendix G to the CEQA Guidelines uses the following questions to evaluate hydrology and water-quality impacts. Would the Project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    i) result in a 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; or
iv) impede or redirect flood flows?

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

4.7.5 Impacts Analysis

Threshold 4.7 (a): Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact Analysis

Clean Water Act Section 402 and the NPDES program regulate construction stormwater discharges. Construction sites disturbing at least one acre must prepare a SWPPP and obtain permit coverage. The Project must also comply with the Porter-Cologne Water Quality Control Act and requirements administered by the Lahontan Regional Water Quality Control Board.

Construction Impacts

Clearing, grading, paving, utility work, building construction, and landscaping could release sediment, debris, fuels, paints, solvents, and other pollutants to on-site or downstream waters. Without controls, construction could temporarily affect water quality.

RR HYD-1 requires Construction General Permit coverage, a Notice of Intent, and a SWPPP. The SWPPP would identify pollutants, require inspections, and implement BMPs such as sediment barriers, inlet protection, sediment traps, soil stabilization, and hydroseeding. RR HYD-3 also requires a City erosion and sediment control plan.

Compliance with the SWPPP and erosion-control plan would prevent violations of water quality standards and waste discharge requirements. Construction impacts would be less than significant.

Post-Development Water Quality Impacts

Industrial stormwater can contain sediment, nutrients, trash, bacteria, oil and grease, and pesticides. RR HYD-2 requires a project-specific WQMP under Municipal Code Section 17.93.060 and the Phase II Small MS4 Permit. The WQMP includes detention or infiltration facilities and operational source controls. Permit conditions require long-term maintenance of these BMPs.

Development would add impervious surfaces across the 451-acre site and increase runoff. Three surface infiltration basins and 22 underground detention systems would temporarily store runoff, promote infiltration, reduce peak flows, improve water quality, and limit flooding and erosion.

Future industrial tenants may also require Industrial General Permit coverage, an operational SWPPP, and long-term monitoring. Tenant operations are not yet known, so permit applicability will be determined before occupancy. Compliance with applicable industrial stormwater requirements would reduce operational water-quality impacts.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. Compliance with the Construction General Permit, SWPPP, erosion-control plan, WQMP, and applicable industrial stormwater requirements would prevent substantial degradation of surface water or groundwater. No mitigation is required.

Threshold 4.7 (b): Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact Analysis

Although development would add impervious surfaces, three surface infiltration basins, 22 underground detention systems, and landscaped areas would capture runoff and allow infiltration. The Project therefore would not substantially interfere with groundwater recharge.

The Adelanto Public Utility Authority would provide domestic water service to the Project.

Adelanto obtains water from the Mojave River Groundwater Basin, or Mojave Basin Area. The basin is adjudicated, and the court-appointed Mojave Water Agency serves as Watermaster.

The Mojave Basin Judgment divides the watershed and groundwater basins into the Alto, Baja, Centro, Este, and Oeste subareas. Adelanto is in the Alto Subarea. Local purveyors pump groundwater, and MWA replenishes the basin primarily with imported State Water Project water.

The adjudication assigns each purveyor supplying at least 10 acre-feet per year a variable Free Production Allowance. The allowance changes with the Watermaster's annual safe-yield projection.

Groundwater Recharge Discussion

The Mojave River Groundwater Basin includes 31 groundwater basins and subbasins. State water plans report overdraft since the early 1950s. The Mojave Basin Judgment directs MWA to

manage conservation and recharge with supplemental water. MWA has reduced purveyor allotments and recharged the basin to address overdraft.

MWA also manages the basin through groundwater banking, recharge facilities, and monitoring.

Groundwater banking. MWA can store State Water Project supplies in wet years through spreading, injection, or in-lieu delivery to agricultural users. Stored water can be recovered during shortages or exchanged for later surface-water allocations.

Recharge sources include stormwater, Mojave River and tributary infiltration, imported State Water Project water, wastewater imports, and irrigation and wastewater return flows.

Regional Recharge and Recovery Project. The R3 Project imports and recharges State Water Project water, then recovers and delivers it to local purveyors in place of groundwater pumping. Three downstream recharge and recovery sites deliver water through pipelines and allow recovery of local pumping depressions.

The Watermaster bills pumping above a retailer's Free Production Allowance as Replacement Obligation and meets it through MWA's storage account. R3 deliveries allow participating retailers to reduce pumping at affected wells.

R3 serves Liberty Utilities, Adelanto, Hesperia, Golden State Water Company, San Bernardino County Service Area 64, and the Victorville Water District.

At preliminary design, the infiltration basins and underground detention systems would retain the 100-year, 24-hour storm and infiltrate it within the FAA-recommended 48-hour drawdown period for facilities near airports. The systems also provide hydromodification control for the 10-year storm. Overflow would continue toward Fremont Wash and the Mojave River (Appendix F-1).

The Project proposes no on-site wells or other facilities that would directly increase groundwater pumping and would not interfere with MWA management programs.

Sustainable Groundwater Management Discussion

SGMA requires sustainable management of many California groundwater basins. Adelanto is within the Upper Mojave River Valley portion of the Mojave River Basin.

The Mojave River Basin is adjudicated and therefore managed under its court-ordered judgment rather than SGMA. The Project would not obstruct implementation of the adjudicated management program. The impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The Project would not substantially reduce groundwater supplies, interfere with recharge, or impede management of the adjudicated Mojave River Basin. No mitigation is required.

Threshold 4.7 (c): Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

c)i) result in substantial erosion or siltation onsite or offsite?

Impact Analysis

Erosion or Siltation On-Site or Off-Site

Development would modify on-site drainage but would not cause substantial erosion or siltation. Impervious surfaces would limit exposed soil, and the storm-drain system, detention facilities, and WQMP BMPs would remove sediment and control discharge rates before runoff leaves the site.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The drainage system and water-quality controls would prevent substantial on-site or off-site erosion and siltation. No mitigation is required.

c)ii) substantially increase the rate or amount of surface water runoff in a manner which would result in flooding on or offsite;

Impact Analysis

Runoff and Flooding On-Site or Off-Site

Off-site flows enter from the south and east. Proposed inlets along the southern boundary, an eastern interceptor ditch, and storm drains would convey these flows north to existing culverts at Air Expressway and maintain the current drainage pattern. The Project would construct Drainage Master Plan Channel 1 and dedicate an easement for future Channel 1A along Adelanto Road.

On-site runoff would flow through surface features, catch basins, and storm drains to infiltration basins and underground detention systems. Preliminary designs retain the 100-year, 24-hour

storm. Final engineering would confirm routing, hydromodification control, and runoff requirements.

Because the site is within the SCLA Airport Influence Area, drainage facilities must also meet airport and FAA criteria for drawdown time, vegetation, and design. The proposed system would manage off-site and on-site flows while preserving existing drainage patterns.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The drainage and detention system would control runoff and would not cause on-site or off-site flooding. No mitigation is required.

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c)iii) create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

Impact Analysis

Curbs, gutters, catch basins, and storm drains would convey on-site runoff to infiltration basins and underground detention systems. High-silt soils limit infiltration below 15 feet, so the systems are designed with a maximum bottom depth of 13 feet.

Three basins serving building areas 4A, 4B, and 5A would store approximately 235,000, 227,000, and 255,000 cubic feet, respectively. Each would contain the 100-year, 24-hour storm. Final outlet design would control peak discharge rates.

Underground detention systems would provide additional storage and retain the 100-year, 24-hour storm. Outlet structures would limit mitigated peak flows to no more than 90 percent of existing peak flows for the 2-, 10-, 25-, and 100-year storms, consistent with County Flood Control District criteria (Appendix F-1, Tables 11 and 12).

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The proposed facilities would provide adequate detention and infiltration capacity, comply with geotechnical limits, and control peak discharge rates. No mitigation is required.

c)iv) impede or redirect flood flows?

Impact Analysis

The FEMA map places the site in Zone X, which has a 0.2-percent annual chance of flooding and is not a special flood hazard area. The Project therefore would not impede or redirect flood flows.

Mitigation Measures

No mitigation measures are required.

Significance Determination

No Impact. The site is in a low-hazard flood zone, and the Project would not impede or redirect flood flows. No mitigation is required.

Threshold 4.7 (d): Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Analysis

The site is approximately 75 miles from the Pacific Ocean, is not downstream of a dam or levee, and is outside mapped dam-inundation and special flood hazard areas. It is not subject to inundation by tsunami, seiche, or flood flows. There would be no impact.

Mitigation Measures

No mitigation measures are required.

Significance Determination

No Impact. The site is not within a flood, tsunami, seiche, or dam-inundation hazard area. No mitigation is required.

Threshold 4.7 (e): Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Analysis

The Project must comply with the Lahontan Basin Plan and applicable regional water-management requirements through the SWPPP and WQMP. These controls would prevent conflict with a water quality control plan.

SGMA requires sustainable management of many California groundwater basins. Adelanto is within the Upper Mojave River Valley portion of the Mojave River Basin.

The Mojave River Basin is adjudicated and managed under a court-ordered judgment rather than SGMA. The Project would not obstruct the adjudicated management program and would not conflict with a sustainable groundwater management plan.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The Project would comply with applicable water-quality plans and would not interfere with management of the adjudicated Mojave River Basin. No mitigation is required.

4.7.6 Cumulative Impacts

The cumulative study area is the Mojave River Basin, including the Project and planned development within the basin.

Water Quality

Construction of the Project and other development could release sediment and other pollutants to the Mojave River Watershed. Projects disturbing at least one acre must obtain Construction General Permit coverage and implement a site-specific SWPPP. Compliance with the Lahontan Basin Plan, permit requirements, and erosion and sediment controls would prevent a cumulatively considerable contribution to construction water-quality effects.

During operation, the Project and other development must implement site-specific WQMPs and applicable BMPs. The Project's contribution to cumulative operational water-quality effects would not be cumulatively considerable.

Groundwater Supplies and Management

The Project would use infiltration basins, underground detention systems, and landscaped areas to promote recharge. Other development must also provide required permeable areas and stormwater facilities. The Project would not interfere with basin-management programs, and its contribution to cumulative groundwater effects would not be considerable.

Flooding

The Project and other development must comply with applicable drainage plans and flood-control requirements. Project-specific hydrologic and hydraulic studies must demonstrate protection from extreme storms and avoid increased downstream flooding. The Project would retain major storm volumes and limit peak discharge rates. Its contribution to cumulative flooding effects would not be considerable.

The site is outside a special flood hazard or inundation zone. Development would not impede or redirect flood flows and would not contribute to a cumulative impact.

Cumulative hydrology and water-quality impacts would be less than significant. No mitigation is required.

4.7.7 Summary of Impacts and Mitigation Measures

Project hydrology and water-quality impacts would be less than significant through compliance with RR HYD-1 through RR HYD-8. No mitigation is required.

4.7.8 References

Albert A. Webb Associates. 2025. Water Quality Management Plan, Adelanto Industrial Park. May 2025. (SEIR Appendix F-2.)

Albert A. Webb Associates. 2025. Water Supply Assessment for the Adelanto Gateway Logistics Center. September 16, 2025. (SEIR Appendix J.)

Albert A. Webb Associates. 2025. Sewer and Water Feasibility Study, Adelanto Industrial Park. December 2025. (SEIR Appendix I.)

Albert A. Webb Associates. 2026. Preliminary Drainage Study, Adelanto Industrial Park. May 2025, revised June 2026. (SEIR Appendix F-1.)

California Department of Water Resources (DWR). 2025. Bulletin 118 Groundwater Basin Dashboard. Accessed August 22, 2025.

California Department of Water Resources (DWR). 2025. Dam Breach Inundation Maps. Accessed August 22, 2025.

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129), Section 4.8, Hydrology and Water Quality.

City of Adelanto. 2024. Adelanto North 2035 Comprehensive Sustainable Plan. 2014.

Federal Emergency Management Agency (FEMA). 2025. National Flood Hazard Layer Viewer. Accessed August 22, 2025.

Lahontan Regional Water Quality Control Board. Water Quality Control Plan for the Lahontan Region (Basin Plan), as amended.

Mojave Water Agency (MWA). 2014. Final Mojave Region Integrated Regional Water Management Plan. June 2014.

State Water Resources Control Board. 2025. Groundwater Management Program (SGMA). Accessed August 22, 2025.

4.8 Land Use and Planning

4.8.1 Introduction

This section evaluates the Project's land use and planning impacts using current regulations and the following plan.

Technical Reports

- Adelanto North 2035 Comprehensive Sustainable Plan, City of Adelanto, 2014

NOP Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No comments addressed land use or planning.

4.8.2 Environmental Setting

The 451-acre site is approximately 1 mile east of State Route 395, 4 miles northwest of Interstate 15, 1 mile south of the Southern California Logistics Airport, and 3 miles north of State Route 18. Air Expressway borders the site on the north and Adelanto Road on the west (Figures 2-1, *City Location*, and 2-5, *Surrounding Land Uses*). Tentative Parcel Map No. 20837 would divide the site into seven parcels.

Air Expressway and the Southern California Logistics Airport are north of the site. Office, warehouse, and vacant uses are to the south; Victorville and the Federal Correctional Institution are to the east; and cold storage, warehouses, retail, and vacant land are west across Adelanto Road. Figure 4.6-1, *Southern California Logistics Airport Compatibility Review Areas* shows the site within the airport compatibility review areas.

The Project proposes seven industrial warehouse and distribution buildings, a use allowed by the site's Manufacturing/Industrial land use designation.

> The Manufacturing/Industrial designation supports employment-intensive uses where site design can limit effects on surrounding land. Permitted or conditionally permitted uses include correctional facilities, controlled-hazard uses, renewable energy facilities, manufacturing, and distribution. This analysis evaluates the Project against the City's General Plan and Municipal Code and SCAG's Connect SoCal plan.

4.8.3 Regulatory Framework

Plans and regulations adopted to avoid or mitigate an environmental effect are evaluated in the section that analyzes that effect. Table 4.8-1, Plans, Policies, and Regulations Analyzed in Other Sections, lists them. The plans evaluated in this section are the General Plan, the Municipal

Code Zoning Ordinance, the Southern California Logistics Airport Specific Plan and Comprehensive Land Use Plan, and SCAG's Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy.

Table 4.8-1. Plans, Policies, and Regulations Analyzed in Other Sections

Environmental Topic	Plan, Policy, or Regulation	SEIR Section
Air Quality	MDAQMD Air Quality Management Plan; Federal 70 ppb Ozone Attainment Plan; MDAQMD Rules 401, 402, 403, 219, and 1113	4.1 Air Quality
Biological Resources	Federal Endangered Species Act; California Endangered Species Act; Western Joshua Tree Conservation Act; Migratory Bird Treaty Act; California Desert Native Plants Act	4.2 Biological Resources
Cultural Resources	Public Resources Code Sections 5020.1, 5024.1, and 21083.2; Health and Safety Code Section 7050.5	4.3 Cultural Resources
Energy	California Energy Code (Title 24, Part 6); CALGreen (Title 24, Part 11); Title 20 Appliance Efficiency Regulations	4.4 Energy
Greenhouse Gas Emissions	2022 Scoping Plan for Achieving Carbon Neutrality; Assembly Bill 32; Senate Bill 32; Assembly Bill 1279; San Bernardino County Regional Greenhouse Gas Reduction Plan; City of Adelanto GHG Screening Tables (Resolution No. 25-03)	4.5 Greenhouse Gas Emissions
Hazards and Hazardous Materials	14 CFR Part 77; Southern California Logistics Airport Comprehensive Land Use Plan; Government Code Section 65962.5 (Cortese list); California Fire Code	4.6 Hazards and Hazardous Materials
Hydrology and Water Quality	Lahontan Basin Plan; NPDES Construction General Permit and MS4 permit; Porter-Cologne Water Quality Control Act; Federal Emergency Management Agency flood mapping	4.7 Hydrology and Water Quality

Environmental Topic	Plan, Policy, or Regulation	SEIR Section
Noise	Adelanto Municipal Code Sections 17.90.020 and 17.90.030; General Plan Noise Element standards; Caltrans vibration guidance	4.9 Noise
Transportation	Senate Bill 743 and CEQA Guidelines Section 15064.3(b); Adelanto General Plan Mobility Element; Adelanto Municipal Code Section 10.22.030 (truck routes); San Bernardino County Congestion Management Program	4.10 Transportation
Tribal Cultural Resources	Assembly Bill 52 (Public Resources Code Sections 21080.3.1 and 21074)	4.11 Tribal Cultural Resources
Utilities and Service Systems	Urban Water Management Planning Act; Senate Bill 1383; San Bernardino County Integrated Waste Management Plan; Water Code Section 10910	4.12 Utilities and Service Systems

Regional

The Southern California Association of Governments is the metropolitan planning organization, regional transportation planning agency, and council of governments for six counties and 191 cities. SCAG prepares regional transportation plans, sustainable communities strategies, growth forecasts, transportation improvement programs, and regional housing allocations.

Local

Adelanto North 2035 Comprehensive Sustainable Plan. The plan establishes land use, transportation, infrastructure, economic-development, and resource-protection policies for the area. Its sustainability policies address vehicle and fuel use, clustered development, and protection of desert resources.

Adelanto Municipal Code Title 17, Zoning Ordinance. Title 17 establishes the MI Manufacturing/Industrial zone standards that apply to the site, including permitted uses, setbacks, height, landscaping, parking, and design review.

Southern California Logistics Airport Specific Plan and Comprehensive Land Use Plan. The Specific Plan governs development at the airport north of the site. The Comprehensive Land Use Plan establishes compatibility review areas, height limits under 14 CFR Part 77, and overflight and density criteria for land near the airport.

Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. SCAG's plan sets regional goals for growth, mobility, and greenhouse gas reduction. Its goals apply to regional planning and funding decisions rather than to individual development projects.

Regulatory Compliance Requirements

RR LU-1 through RR LU-5 are existing legal requirements. They are not mitigation.

> ***RR LU-1 — Adelanto North 2035 Comprehensive Sustainable Plan (2014).*** *The Project shall be consistent with the Adelanto North 2035 Comprehensive Sustainable Plan land use designation and applicable policies as documented throughout this SEIR. Consistency with each topical Element is addressed in the corresponding topical section.*
>
> ***RR LU-2 — Adelanto Municipal Code Title 17 — Zoning Ordinance.*** *Project shall comply with applicable provisions of Adelanto Municipal Code Title 17 governing the MI Manufacturing/Industrial zone, including use permissions, development standards, parking, landscaping, signage, and design review (§17.15.020).*
>
> ***RR LU-3 — A****irport Land Use Compatibility. The Project site is within the Southern California Logistics Airport Airport Influence Area. The City of Adelanto makes airport land use compatibility determinations under the alternative procedure in Public Utilities Code §21670.1(c) (Resolution No. 95-26), using the 2008 SCLA Comprehensive Land Use Plan as guidance. Building heights are governed by 14 CFR Part 77 through the Federal Aviation Administration's aeronautical study process and by Adelanto Municipal Code §17.30.040(c), as set out in RR HAZ-5 and Mitigation Measure HAZ-1 in Section 4.6.*
>
> ***RR LU-4 — Connect SoCal 2024–2050 Regional Transportation Plan / Sustainable Communities Strategy.*** *Project shall be reviewed for consistency with applicable goals and policies of the SCAG Connect SoCal 2024–2050 RTP/SCS, including land use, transportation, and GHG-reducing policies.*
>
> ***RR LU-5 — Tribal Consultation under AB 52.*** *Project consultation with California Native American tribes traditionally and culturally affiliated with the geographic area was conducted under Public Resources Code §21080.3.1, as documented in Section 4.11 Tribal Cultural Resources.*

Applicable General Plan Policies

The Adelanto North 2035 Comprehensive Sustainable Plan serves as the General Plan for the area north of Holly Road, including the Project site. Table 4.8-2, *Project Consistency with Adelanto North 2035 Comprehensive Sustainable Plan Policies* evaluates the Project against applicable policies.

4.8.4 Thresholds of Significance

Section XI of Appendix G to the CEQA Guidelines uses the following questions to evaluate land use and planning impacts. Would the Project:

a) Physically divide an established community;

b) Cause significant environmental impacts due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

4.8.5 Impacts Analysis

Threshold 4.8 (a): Would the Project physically divide an established community?

Environmental Setting

No residential neighborhood or other established community has been built on or adjacent to the site.

Impact Analysis

The Project would develop seven warehouses within one site and take access from bordering public streets. It would not place a roadway, rail line, channel, wall, or other linear feature through a developed area or remove an existing community connection.

No established community occupies or adjoins the site. The surrounding uses are the airport, correctional complex, utility corridor, industrial and commercial development, and vacant land. Scattered residences northwest of the site are not connected across the Project site and would not be separated by development.

Mitigation Measures

No mitigation measures are required.

Significance Determination

No Impact. The Project would not physically divide an established community because none occupies or adjoins the site. No mitigation is required.

Threshold 4.8 (b): Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Environmental Setting

The General Plan designates the site Manufacturing/Industrial, and the Municipal Code zones it MI Manufacturing/Industrial. The site is also within airport Compatibility Review Areas 2 and 3 (Figure 4.6-1).

The Adelanto North 2035 Comprehensive Sustainable Plan retains the site's industrial designation. The applicable plans are the General Plan, the Municipal Code, and SCAG's Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy.

Impact Analysis

General Plan Land Use and Zoning

The General Plan designates the site Manufacturing/Industrial, and the Municipal Code zones it MI Manufacturing/Industrial. Warehouse and distribution uses are permitted in that zone. The Project meets the MI development standards: the smallest parcel is 367,327 square feet against a 20,000-square-foot minimum; street-side building setbacks are 25 feet; the parapet height is 55 feet against the 60-foot limit north of Holly Road; the floor area ratio is approximately 42 percent, and the MI zone sets no maximum; landscaping covers approximately 13 percent of the site against a 5 percent minimum; and 4,294 parking spaces are provided against 2,684 required (Table 3-1, Manufacturing Industrial (MI) District Development Standards).

Southern California Logistics Airport

The site is within Compatibility Review Areas 2 and 3 of the Southern California Logistics Airport Comprehensive Land Use Plan (Figure 4.6-1). Industrial and warehouse uses are compatible in both areas, and the Project would not place residences or other concentrated populations under the runway approaches. Two corners of Building 3 would exceed the Runway 35 approach surface, and MM HAZ-1 requires a current Federal Aviation Administration determination of no hazard for each structure before a building permit is issued. Section 4.6, Hazards and Hazardous Materials, evaluates airport safety.

General Plan Policies

Table 4.8-2 evaluates the Project against applicable General Plan goals and policies. The Project would be consistent with these provisions, and the impact would be less than significant.

Table 4.8-2. Project Consistency with Adelanto North 2035 Comprehensive Sustainable Plan Policies

General Plan Policy	Consistency Analysis
Land Use Element	
Policy LC 1.3: Encourage Master Plans to be prepared prior to the approval of development applications.	**Consistent.** The Project is processed as a single master-planned industrial park (LDP 25-02 and Tentative Parcel Map No. 20837) covering all seven buildings and the backbone water, sewer, drainage, and street improvements.
Policy LC 1.4: Require sustainable practices and the use of sustainable methods in all site, lotting, and circulation planning.	**Consistent**. Site, lotting, and circulation plans incorporate CALGreen requirements, on-site stormwater infiltration, and a single internal circulation system serving all buildings.
Policy LC 3.1: Establish business and employment land use designations to support employment and economic development.	**Consistent**. The Project develops land designated Manufacturing/Industrial with employment-generating warehouse and distribution uses.
Policy LC 5.1: Require new development to pay its fair share of the cost of public facilities, services, and infrastructure, including but not limited to transportation, incremental water supply, sewer and wastewater treatment, solid waste, flood control and drainage, schools, fire and police protection, and parks and recreation.	**Consistent.** The Project pays the City's Development Impact Fees and constructs the water, sewer, drainage, and street improvements required by its conditions of approval.
Policy LC 6.1 Minimize direct or indirect impacts to sensitive biological resources while optimizing the potential for mitigation.	**Consistent**. Focused biological surveys were conducted and Mitigation Measures BIO-1 and BIO-3 through BIO-12 apply.
Policy LC 14.1: Emphasize the main building entrance and landscaping at the front of a project site.	**Consistent**. Building entrances and landscaping are oriented to the street frontages and are subject to City design review.
Policy LC 14.2: Design loading areas, outdoor storage equipment, service areas, and work areas to be screened with walls and landscaping.	**Consistent**. Loading docks and truck courts are internal to the site and screened by buildings, walls, and landscaping, subject to City design review.
Policy LC 14.3: Provide appropriate buffering techniques, such as setbacks, screening, and landscaping to mitigate any negative effect of the industrial operation or energy generation facility.	**Consistent**. Setbacks, screening, and landscaping along Adelanto Road, Air Expressway, and the southern boundary buffer the industrial operations from adjacent uses.
Policy LC 14.4: Design loading areas with adequate spacing for truck maneuvering	**Consistent**. Truck courts and drive aisles are sized for on-site maneuvering; no truck

General Plan Policy	Consistency Analysis
without encroaching onto the adjoining street.	maneuvering would occur on public streets.
Policy LC 14.5: Provide the highest level of articulation and architectural features along the front façade.	**Consistent**. Front façades are subject to City design review for articulation and architectural features.
Economic Development	
Policy ED 1.2: Build upon the future employment expansion of the Southern California Logistics Airport (SCLA) and improvements to US 395 and the High Desert Corridor (HDC) as crucial drivers of local economic growth.	**Consistent**. The Project adds industrial employment adjacent to SCLA and within one mile of US 395.
Policy ED 6.1: Promote diversified job opportunities, particularly in new technologies, to increase the opportunity for a more balanced number of City residents to work within City limits.	**Consistent.** The Project creates warehouse, distribution, and cold storage employment within the City.
Policy ED 9.2: Work with major developers to facilitate the development of the industrial/business center adjacent to the SCLA and extending westerly to US 395.	**Consistent**. The Project develops part of the industrial/business center between SCLA and US 395.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal)

SCAG prepares Connect SoCal, the Regional Transportation Plan/Sustainable Communities Strategy for the six-county region. The plan coordinates long-range transportation investment, land use strategies, and eligibility for federal and state transportation funding.

Senate Bill 375 requires the plan to include a sustainable communities strategy that coordinates land use and transportation to reduce greenhouse gas emissions from cars and light-duty trucks.

Table 4.8-3. SCAG Connect SoCal Goal Consistency Analysis

RTP/SCS Goal	Goal Statement	Project Consistency Discussion
1	Encourage regional economic prosperity and global competitiveness.	**Consistent.** The seven industrial buildings would support employment and business investment on land planned for industrial use.
2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project would support regional goods movement and would not create a substantial transportation safety hazard, as evaluated in Section 4.10.

RTP/SCS Goal	Goal Statement	Project Consistency Discussion
3	Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent.** The Project is within adopted growth assumptions and would pay applicable fees for transportation improvements and roadway maintenance.
4	Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The industrial site is near the state highway system and would provide bicycle parking under CALGreen.
5	Reduce greenhouse gas emissions and improve air quality.	**Partially consistent.** The Project would comply with CALGreen, and MM GHG-1 requires at least 100 points under the City's Screening Tables. Mitigated operational emissions of VOC, NOx, CO, and PM10 would exceed MDAQMD thresholds, and the greenhouse gas impact would be significant and unavoidable (Sections 4.1 and 4.5).
6	Support healthy and equitable communities.	**Consistent.** The site is zoned for industrial use and is not within a disadvantaged community or pollution-burdened area (OEHHA 2025).
7	Adapt to a changing climate and support an integrated regional development.	**Consistent.** The Project would accommodate varied industrial users on land planned for industrial development near regional highways and the local workforce.
8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Consistent.** The buildings would meet current industry standards and could accommodate automation and other emerging goods-movement technologies.
9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent.** Industrial development at the site would not interfere with housing development in areas planned for residential use.
10	Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The site is not designated for agricultural or conservation use, and development would not prevent conservation or habitat restoration elsewhere.

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The Project would be consistent with the General Plan and other applicable land use provisions adopted to avoid or reduce environmental effects. No mitigation is required.

4.8.6 Cumulative Impact Analysis

The cumulative study area is the Adelanto planning area and adjoining industrial and airport land in Victorville, where cumulative projects C-1 through C-4 are located. Each project must comply with the applicable general plan, zoning, and airport compatibility requirements of its jurisdiction.

The Project and nearby cumulative projects are industrial, logistics, or institutional uses on land planned for those uses near the airport. None would introduce a linear feature through a developed residential area or remove an existing community connection. The projects therefore would not cumulatively divide an established community.

The Project is consistent with its Manufacturing/Industrial designation and applicable City and SCAG policies, as shown in Tables 4.8-1, *Project Consistency with Adelanto North 2035 Comprehensive Sustainable Plan Policies*, and 4.8-2, *SCAG Connect SoCal Goal Consistency Analysis*. Its contribution to cumulative land use and planning effects would not be cumulatively considerable. The cumulative impact would be less than significant.

4.8.7 Summary of Impacts and Mitigation Measures

The Project would not divide an established community. It would be consistent with the site's Manufacturing/Industrial designation, MI zoning, applicable General Plan policies, and SCAG regional goals. Project and cumulative impacts would be less than significant, and no mitigation is required.

4.8.8 References

California Office of Environmental Health Hazard Assessment (OEHHA). 2025. CalEnviroScreen 4.0. Accessed January 31, 2025.

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129), Section 4.9, Land Use and Planning.

City of Adelanto. 2024. Adelanto North 2035 Comprehensive Sustainable Plan. 2014.

City of Adelanto. Adelanto Municipal Code, Title 17, Zoning.

Coffman Associates. 2008. Southern California Logistics Airport Comprehensive Land Use Plan, Final Report. September 2008.

Southern California Association of Governments (SCAG). 2020. Connect SoCal: The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Adopted September 3, 2020.

Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Adopted April 4, 2024.

4.9 Noise

4.9.1 Introduction

This section evaluates the Project's construction and operational noise and vibration impacts using the following technical study:

- Noise and Vibration Analysis, Urban Crossroads, August 12, 2026, included as Appendix G

Noise Definitions

Noise is unwanted sound that interferes with activity, causes physical harm, or affects health. Sound pressure is measured in decibels on a logarithmic scale. A-weighted decibels, or dBA, approximate human hearing by reducing the influence of very low and very high frequencies.

Range of Noise

The decibel scale expresses the broad range of audible sound. Each 10-decibel increase represents ten times more sound energy and is generally perceived as approximately twice as loud. Common sounds range from approximately 40 dBA in a quiet setting to 100 dBA for very loud sound. Normal conversation at 3 feet is approximately 60 dBA; a loud jet at 1,000 feet can reach approximately 110 dBA.

Noise Descriptors

Environmental noise is commonly described by the equivalent continuous noise level, or Leq. Leq is the steady sound level containing the same energy as fluctuating sound over a specified period.

Community Noise Equivalent Level, or CNEL, describes 24-hour exposure and accounts for greater sensitivity during quiet hours. It adds 5 dB to evening levels from 7:00 to 10:00 p.m. and 10 dB to nighttime levels from 10:00 p.m. to 7:00 a.m. CNEL represents cumulative exposure rather than the sound level at a specific moment. The City uses CNEL to evaluate transportation-noise compatibility.

Sound Propagation

Sound level and frequency change with distance. The rate of reduction depends on geometric spreading, ground absorption, atmospheric conditions, and shielding.

Geometric Spreading

A stationary point source spreads sound in a spherical pattern, reducing the level by approximately 6 dB with each doubling of distance. A roadway behaves as a line source and generally reduces sound by approximately 3 dB with each doubling of distance.

Ground Absorption

Ground absorption can reduce sound beyond geometric spreading. For distances under approximately 200 feet, hard reflective surfaces are assumed to provide no additional attenuation, while soft surfaces such as soil, grass, or scattered vegetation typically provide approximately 1.5 dB of additional attenuation per doubling of distance.

Atmospheric Effects

Downwind receivers can experience higher noise levels than upwind receivers. Temperature inversions can increase sound at distances greater than approximately 500 feet. Temperature, humidity, and turbulence also affect sound propagation.

Shielding

A solid object or barrier can reduce noise by blocking the path between a source and receiver. Ordinary landscaping provides little physical attenuation. Vegetation must be approximately 15 feet high, 100 feet wide, and dense enough to block the line of sight to provide up to 5 dBA of reduction. FHWA does not treat vegetation planting as a noise-abatement measure.

Community Response to Noise

Community response varies with both the ambient level and the increase caused by a new source. Research cited in the Noise Effects Handbook indicates that high annoyance is near zero at 45 dB or less, approximately 10 percent near 60 dB, and approximately 70 percent near 85 dB or greater. A 3-dBA change is barely perceptible; a 5-dBA change is readily perceptible.

Vibration

Groundborne vibration is the periodic movement of a medium or object. Sources include natural events, machinery, traffic, trains, explosions, and construction equipment. Vibration may be continuous or intermittent and is described by amplitude and frequency.

Residential background vibration is generally approximately 50 VdB. Vibration becomes perceptible near 65 VdB and distinctly perceptible near 75 VdB. Construction equipment, rail traffic, and vehicles on rough roads can produce perceptible vibration. Minor damage to fragile buildings can begin near 100 VdB.

NOP/Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. No comments addressed noise.

4.9.2 Environmental Setting

Existing Study Area Ambient Noise Considerations

Ambient noise in the Project area reflects transportation and stationary sources typical of urban and suburban areas. Vehicles, trucks, motorcycles, trains, and aircraft are the principal mobile sources. Traffic dominates locations next to roadways.

Existing Ambient Noise

The study measured 24-hour noise levels at four locations selected to represent nearby sensitive receivers and document ambient conditions (Table 4.9-1).

Table 4.9-1 reports hourly Leq values for daytime, from 7:00 a.m. to 10:00 p.m., and nighttime, from 10:00 p.m. to 7:00 a.m.

Table 4.9-1. Ambient Noise Level Measurement

Location[1]	Description	Energy Average Noise Level (dBA Leq)[2]	
		Daytime	Nighttime
L1	Located northwest of the site near the school at 17927 Jonathan St.	58.7	49.0
L2	Located northwest of the site near the residence at 17767 Adelanto Rd.	62.8	54.6
L3	Located east of the site near the correctional facility at 13777 Air Expressway.	52.8	43.5
L4	Located west of the site near the residence at 12191 Hibiscus Rd.	54.5	46.6

Source: Table 5-1, Noise and Vibration Analysis (Appendix G)

1 See Figure 4.9-1, Ambient Noise Measurement Locations for the noise level measurement locations.

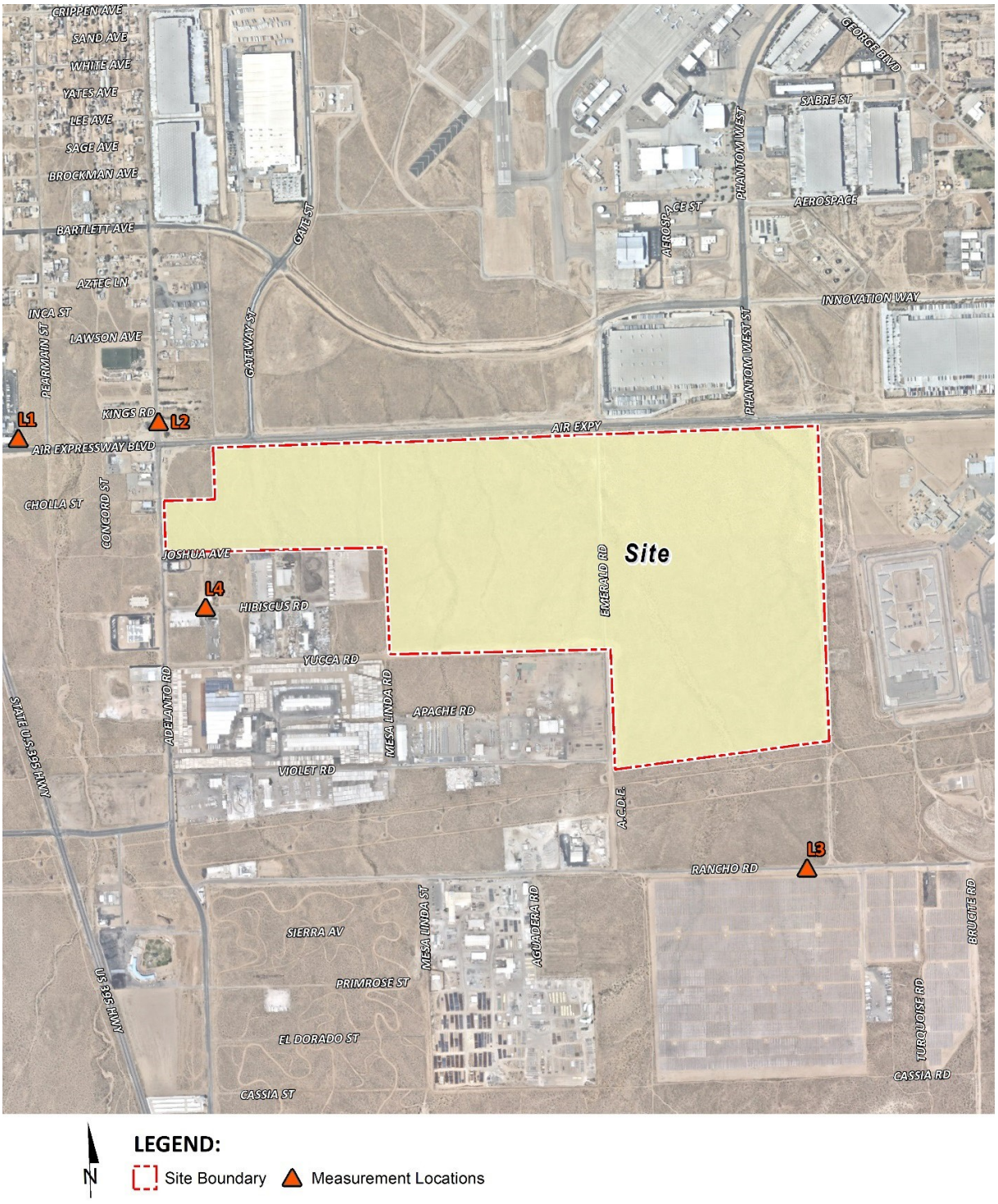
2 Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 of Appendix G to this SEIR.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Existing Groundborne Vibrations

The vacant site has no existing sources of groundborne vibration.

Figure 4.9-1. Ambient Noise Measurement Locations



Source: Noise and Vibration Impact Analysis, Urban Crossroads, Inc. (Technical Appendix G).

Existing Airport Noise

Southern California Logistics Airport is approximately 0.5 mile north of the site. The site is within the 75-dBA CNEL contour and Compatibility Review Area 2 (Figure 4.9-4, *SCLA Future Airport Noise Contours*). The SCLA Comprehensive Land Use Plan identifies warehouse use in Review Area 2 as normally acceptable.

Construction Noise Analysis

Appendix G evaluates construction noise using equipment reference levels and usage factors from the FHWA Roadway Construction Noise Model.

The CadnaA model treated construction equipment as moving point sources within the site and assumed the loudest equipment would operate simultaneously. Table 4.9-2 presents the highest modeled level at each receiver. Construction noise would range from 34.1 to 44.3 dBA Leq (Appendix G).

Table 4.9-2. Construction Equipment Noise Level Summary

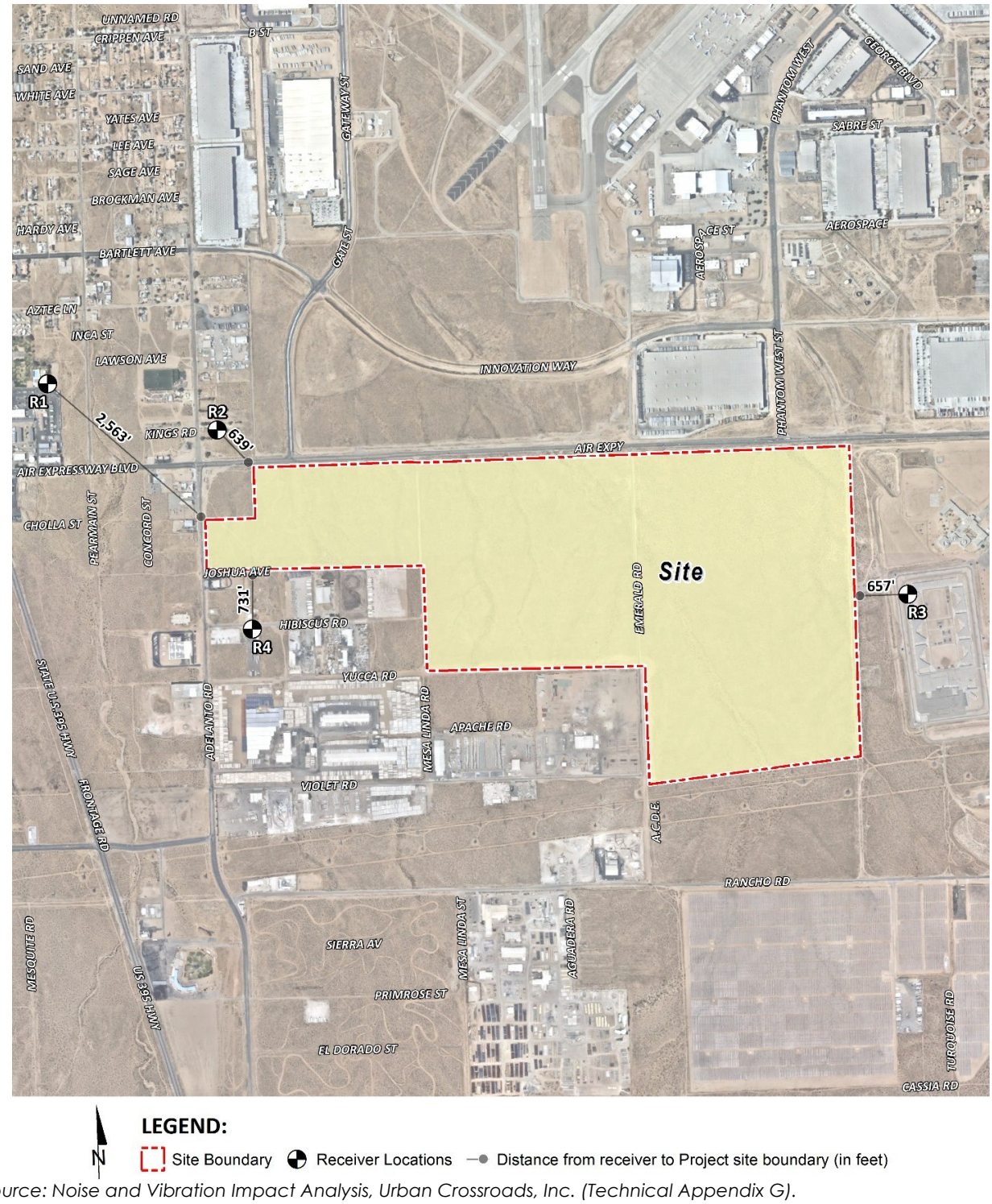
Reciever Construction Noise Levels (dBA Leq)						
Location[1]	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	32.8	34.1	32.0	27.7	26.0	34.1
R2	40.5	41.8	39.7	35.4	33.7	41.8
R3	43.0	44.3	42.2	37.9	36.2	44.3
R4	41.4	42.7	40.6	36.3	34.6	42.7

Source: Table 10-2, Noise and Vibration Analysis (Appendix G)

1 *Construction noise source and receiver locations are shown in Figure 4.9-2.*

2 *Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 9.1 of the Noise and Vibration Analysis (Appendix G)*

Figure 4.9-2. Construction Noise Source and Receiver Locations



Source: Noise and Vibration Impact Analysis, Urban Crossroads, Inc. (Technical Appendix G).

Operational Noise Analysis

Appendix G estimates operational noise using measurements from comparable activities. The analysis assumes the sources shown in Figure 4.9-3, *Operational Noise Source Locations* operate simultaneously, although actual activity would vary during the day.

Reference measurements used a calibrated Larson Davis LxT Type 1 sound meter set to slow, A-weighted response at approximately 5 feet above ground. The equipment met ANSI S1.4-2014 and IEC 61672-1:2013 specifications (Appendix G, p. 43).

Table 4.9-3. Reference Noise Level Measurements

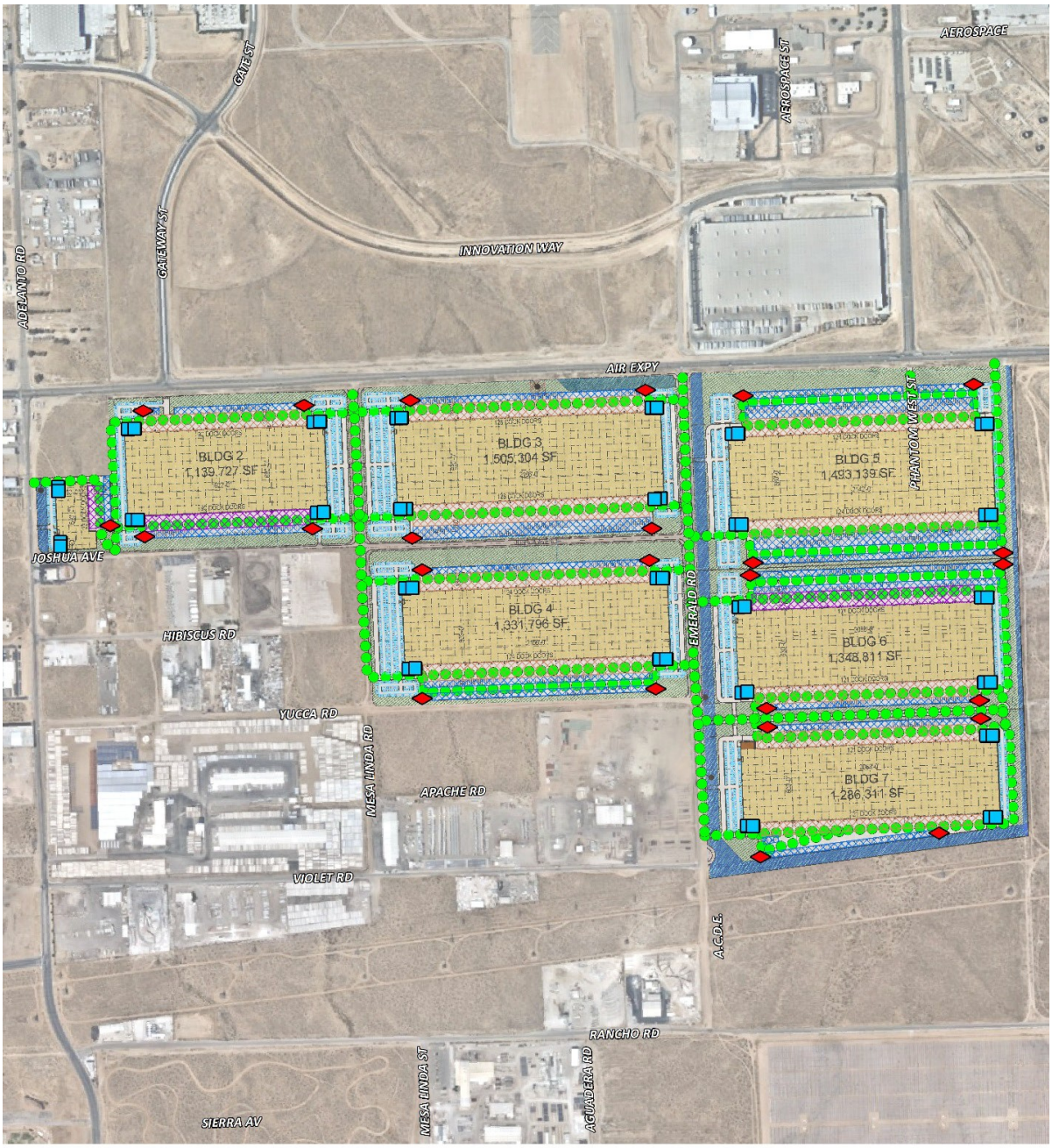
Reference Noise Source	Noise Source Height (Feet)	Min./Hour[1]		Reference Noise Level (dBA Leq) @ 50 Feet	Sound Power Level (dBA)[2]
		Day	Night		
Parking Lot Vehicle Movements	5'	60	60	52.6	84.2
Cold Storage Loading Dock Activity	8'	60	60	79.9	111.5
Warehouse Loading Dock Activity	8'	60	60	71.8	103.4
Truck/Trailer Parking Activity	8'	60	60	62.8	94.4
Truck Movements	8'	60	60	61.6	93.2
Trash Enclosure Activity	8'	10	10	57.4	89.0
Roof-Top Air Conditioning Units	5'	39	28	57.3	88.9

Source: Table 9-1, Noise and Vibration Analysis (Appendix G)

1 *Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.*

2 *Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.*

Figure 4.9-3. Operational Noise Source Locations



Source: Noise and Vibration Impact Analysis, Urban Crossroads, Inc. (Technical Appendix G).

Traffic Noise Analysis

Appendix G estimates traffic noise with a program that implements the FHWA Traffic Noise Prediction Model using California vehicle-emission levels. Inputs include roadway type and width, traffic volume and speed, vehicle mix, grade, angle of view, ground conditions, and hourly traffic distribution. The analysis applies soft-site conditions consistent with Caltrans research.

Traffic Noise Contours

Noise contours identify the distance from roadway centerlines to the 70-, 65-, and 60-dBA CNEL levels at adjacent land uses. The contours exclude attenuation from existing barriers or topography and represent roadway traffic only.

Tables 4.9-4 through 4.9-7 present exterior traffic-noise levels without barrier attenuation for existing and 2046 conditions, with and without the Project. Appendix G provides the contour calculations.

Table 4.9-4. Existing Without Project Traffic Noise Level Increases

CNEL at Receiving					Distance to Contour from Centerline (Feet)		
ID	Road	Segment	Receiving Land Use1	Land Use (dBA)2	70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Air Expressway	w/o Adelanto Rd	Non-Sensitive	67.6	45	96	207
2	Air Expressway	e/o Adelanto Rd	Non-Sensitive	68.4	50	108	233
3	Air Expressway	e/o Gateway Dr	Non-Sensitive	68.6	52	112	241
4	Air Expressway	e/o Emerald Rd	Non-Sensitive	68.5	51	110	237
5	Air Expressway	e/o Phantom West	Non-Sensitive	67.0	41	87	188
6	Adelanto Rd	n/o Air Expressway	Sensitive	55.5	RW	RW	32
7	Adelanto Rd	s/o Air Expressway	Non-Sensitive	59.2	RW	RW	57

Source: Table 7-1, Noise and Vibration Analysis (Appendix G)

1 Based on a review of existing aerial imagery.

2 The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use. "RW" = Location of the respective noise contour falls within the right-of-way of the road.

Table 4.9-5. Future Year (2046) Without Project Traffic Noise Level Increases

CNEL at Receiving					Distance to Contour from Centerline (Feet)		
ID	Road	Segment	Receiving Land Use1	Land Use (dBA)2	70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Air Expressway	w/o Adelanto Rd	Non-Sensitive	69.7	61	131	283
2	Air Expressway	e/o Adelanto Rd	Non-Sensitive	70.6	71	152	327
3	Air Expressway	e/o Gateway Dr	Non-Sensitive	70.6	71	152	328
4	Air Expressway	e/o Emerald Rd	Non-Sensitive	70.6	70	150	324
5	Air Expressway	e/o Phantom West	Non-Sensitive	67.7	45	97	210
6	Adelanto Rd	n/o Air Expressway	Sensitive	58.3	RW	RW	49
7	Adelanto Rd	s/o Air Expressway	Non-Sensitive	61.1	RW	35	76

Source: Table 7-3, Noise and Vibration Analysis (Appendix G)

1 *Based on a review of existing aerial imagery.*

2 *The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use. "RW" = Location of the respective noise contour falls within the right-of-way of the road.*

Table 4.9-6. Existing With Project Traffic Noise Level Increases

CNEL at Receiving					Distance to Contour from Centerline (Feet)		
ID	Road	Segment	Receiving Land Use1	Land Use (dBA)2	70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Air Expressway	w/o Adelanto Rd	Non-Sensitive	73.8	115	247	533
2	Air Expressway	e/o Adelanto Rd	Non-Sensitive	72.1	88	190	410
3	Air Expressway	e/o Gateway Dr	Non-Sensitive	71.5	81	174	374
4	Air Expressway	e/o Emerald Rd	Non-Sensitive	72.3	91	196	422
5	Air Expressway	e/o Phantom West	Non-Sensitive	72.8	98	212	456
6	Adelanto Rd	n/o Air Expressway	Sensitive	55.5	RW	RW	32
7	Adelanto Rd	s/o Air Expressway	Non-Sensitive	67.4	43	93	200

Source: Table 7-5, Noise and Vibration Analysis (Appendix G)

1 Based on a review of existing aerial imagery.
2 The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use. "RW" = Location of the respective noise contour falls within the right-of-way of the road.

Table 4.9-7. Future Year 2046 With Project Traffic Noise Level Increases

			CNEL at Receiving		Distance to Contour from Centerline (Feet)		
ID	Road	Segment	Receiving Land Use1	Land Use (dBA)2	70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Air Expressway	w/o Adelanto Rd	Non-Sensitive	74.4	126	270	583
2	Air Expressway	e/o Adelanto Rd	Non-Sensitive	73.2	104	225	484
3	Air Expressway	e/o Gateway Dr	Non-Sensitive	72.7	96	207	447
4	Air Expressway	e/o Emerald Rd	Non-Sensitive	73.3	106	227	490
5	Air Expressway	e/o Phantom West	Non-Sensitive	73.0	101	218	470
6	Adelanto Rd	n/o Air Expressway	Sensitive	58.3	RW	RW	49
7	Adelanto Rd	s/o Air Expressway	Non-Sensitive	67.8	46	98	211

Source: Table 7-6, Noise and Vibration Analysis (Appendix G)
1 Based on a review of existing aerial imagery.
2 The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use. "RW" = Location of the respective noise contour falls within the right-of-way of the road.

Vibration Analysis Methodology

Construction equipment produces localized, intermittent ground vibration that varies with equipment, distance, frequency, and site geology. The analysis estimates vibration using FTA reference levels for the equipment listed in Table 4.9-8.

Table 4.9-8. Vibration Source Levels for Construction Equipment

Equipment	PPV (inches per second) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual (2018); Noise and Vibration Impact Analysis, Urban Crossroads, August 12, 2026 (Appendix G).

4.9.3 Regulatory Framework

Federal, state, and local requirements regulate environmental noise. The principal requirements are summarized below.

Federal and state agencies generally regulate mobile sources such as aircraft and motor vehicles. Local agencies regulate stationary sources and land use compatibility. Traffic is the principal environmental noise source in most developed areas, while aircraft, rail, commercial, and industrial sources can also be important.

Federal

Federal Transit Administration. The City has no numeric construction-noise threshold for CEQA analysis at sensitive receivers. This analysis therefore applies FTA thresholds of 80 dBA Leq during the day and 70 dBA Leq at night for noise-sensitive residential uses.

State and Local

State of California noise requirements. California regulates freeway and occupational noise, building sound transmission, and land use compatibility. State law requires city and county general plans to include noise elements, and CEQA requires analysis of environmental noise effects.

The Adelanto General Plan Health and Safety Element includes the following noise policies:

> **Policy HS 8.1** Continue to enforce City and State noise regulations to protect residents from excessive noise levels.
>
> **Policy HS 8.2** Require noise-sensitive land use development to incorporate measures to reduce interior and exterior noise levels.
>
> **Policy HS 8.3** Require mixed-use structures to be designed to account for noise from adjacent uses, and minimize transfer of noise and vibration from commercial/retail to residential use.
>
> **Policy HS 8.4** Use site planning and project design strategies to achieve acceptable noise level standards as outlined in the noise/land use compatibility guidelines. The use of noise barriers shall be considered after all practical design-related noise measures have been integrated into project design.
>
> **Policy HS 8.5** Require a detailed analysis of proposed noise reduction measures to determine whether the proposed use is compatible when a project is to be located in an area that exceeds normally acceptable noise thresholds.
>
> **Policy HS 8.6** Minimize noise impacts to noise-sensitive land uses ("sensitive receptors"), such as residential uses, schools, hospitals, child care facilities, wildlife habitat areas, and other noise sensitive areas.

Policy HS 8.7 Restrict noise levels from stationary sources through enforcement of the Noise Ordinance.

Policy HS 8.8 Continue to consider noise impacts as part of the development review process.

Regulatory Compliance Requirements

RR NOI-1 through RR NOI-6 are existing legal requirements. They are not mitigation.

RR NOI-1 — Adelanto Municipal Code §17.90.020(b) — Noise Standards. *Applies the General Plan Noise Element land use compatibility standards citywide and limits how long noise from a source may exceed those standards at another property, from 3 dBA above the standard for no more than 30 minutes in an hour to 20 dBA above it at any time.*

RR NOI-2 — Adelanto Municipal Code §17.90.020(d) — Construction Noise Control. *Per Municipal Code §17.90.020(d), 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, with no construction on weekends or State holidays without prior consent of the Building Official; (2) Stationary construction equipment generating noise in excess of 65 dBA at the project boundaries must be acoustically shielded and located at least 100 feet from occupied residences; (3) Construction routes are limited to City-designated truck routes; (4) Dust control through water trucks/sprinklers; (5) Designated dust control monitor; and (6) Construction equipment in good working order per factory specifications.*

RR NOI-3 — Adelanto Municipal Code §17.90.060 — Mechanical and Electrical Equipment. *Per Municipal Code §17.90.060, all mechanical and electrical equipment (air conditioners, antennas, pumps, transformers, heating and ventilating equipment) shall be located and operated in a manner that does not disturb adjacent uses and activities.*

RR NOI-4 — Adelanto Municipal Code §17.90.030 — Vibration. *Per Municipal Code §17.90.030, no ground vibration shall be allowed which can be felt without the aid of instruments at or beyond the subject property line, nor will any vibration be permitted which produces a particle velocity greater than or equal to two-tenths of an inch (0.2 in/sec) per second measured at or beyond the lot line.*

RR NOI-5 — Cal/OSHA Construction Noise Exposure Limits. *8 CCR §5096 et seq. establishes occupational noise exposure limits for construction workers. Project construction contractors shall comply with Cal/OSHA hearing conservation requirements.*

RR NOI-6 — FAA Part 150 / SCLA CALUP Noise Compatibility. *Project shall comply with applicable provisions of the SCLA Comprehensive Land Use Plan governing noise-sensitive land uses within the airport noise contours. The site is within the future 75-dBA CNEL contour,*

where the SCLA Comprehensive Land Use Plan identifies warehouse use as normally acceptable.

General Plan Policy Matrix

Table 4.9-10. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy / Program	Policy Language (summary)	Project Consistency
HS 8.4	Use site planning and project design strategies to achieve acceptable noise level standards as outlined in the noise/land use compatibility guidelines. The use of noise barriers shall be considered after all practical design-related noise measures have been integrated into project design.	**Consistent.** Operational noise levels meet City standards at all receiver locations.
HS 8.6	Minimize noise impacts to noise-sensitive land uses ("sensitive receptors"), such as residential uses, schools, hospitals, child care facilities, wildlife habitat areas, and other noise-sensitive areas.	**Consistent.** Noise at the nearest sensitive receivers is below City thresholds during construction and operation.
HS 8.8	Continue to consider noise impacts as part of the development review process.	**Consistent.** A Noise and Vibration Impact Analysis was prepared (Appendix G) and is reviewed by the City as part of the Project approval.

4.9.4 Thresholds of Significance

Section XIII of Appendix G to the CEQA Guidelines uses the following questions to evaluate noise and vibration impacts. Would the Project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b) Generation of excessive groundborne vibration or groundborne noise levels?
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

4.9.5 Impacts Analysis

Threshold 4.9 (a): Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis

Table 4.9-11 summarizes the FICON and City criteria used to evaluate Project-related increases in ambient noise.

Table 4.9-11. Significance Criteria Summary

Receiving		Condition(s)	Significance Criteria	
Analysis	Land Use		Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive[1]	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
Operational	Noise-Sensitive	Residential Exterior Noise Level[2]	65 dBA Leq	65 dBA Leq
		If ambient is < 60 dBA Leq[1]	≥ 5 dBA Leq Project increase	
		If ambient is 60 - 65 dBA Leq[1]	≥ 3 dBA Leq Project increase	
		If ambient is > 65 dBA Leq[1]	≥ 1.5 dBA Leq Project increase	
Construction	Noise-Sensitive	Noise Level Threshold[3]	65 dBA Leq	n/a
		Exterior Noise Level Increase[4]	20 dBA Leq	
		Vibration Level Threshold[5]	0.2 PPV (in/sec)	

1 FICON, 1992.
2 City of Adelanto Municipal Code Section 17.90.020[b][1] (Appendix 3.1)
3 City of Adelanto Municipal Code Section 17.90.020[d][2] (Appendix 3.1)
4 Temporary construction noise increases that can be tolerated without significant adverse effects.
5 City of Adelanto Municipal Code Section 17.90.030 (Appendix 3.1) "Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Construction Noise Impacts Analysis

The CadnaA analysis assumes the loudest construction equipment operates simultaneously. Modeled levels at nearby receivers would range from 34.1 to 44.3 dBA Leq, below the 80-dBA Leq threshold (Tables 4.9-2, *Construction Equipment Noise Level Summary*, and 4.9-12, *Construction Noise Level Compliance*). Appendix G provides the model inputs.

The highest modeled construction level at each receiver would remain below 80 dBA Leq. The levels are also below the 65-dBA Leq limit in Municipal Code §17.90.020(d)(2). Construction noise impacts would be less than significant.

Table 4.9-12. Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Level Compliance (dBA Leq)		
	Exterior Noise Levels[2]	Threshold	Threshold Exceeded?[3]
R1	34.1	80	No
R2	41.8	80	No
R3	44.3	80	No
R4	42.7	80	No

1 Construction noise source and receiver locations are shown in Figure 4.9-2
2 Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations, as shown in Table 4.9-2.
3 Do the estimated Project construction noise levels exceed the construction noise level threshold?

On-site Operational Impact Analysis

Appendix G modeled tractor-trailer parking, loading, vehicle movements, trash service, and rooftop equipment. Daytime Project noise at off-site receivers would range from 36.8 to 46.5 dBA Leq (Table 4.9-13).

Table 4.9-13. Project Daytime Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)			
	R1	R2	R3	R4
Parking Lot Vehicle Movements	24.8	33.2	33.6	34.7
Loading Dock Activity	34.5	42.1	41.3	41.2
Truck Parking Activity	21.4	29.0	29.2	29.0
Truck Movements	31.3	38.9	44.2	42.3
Trash Enclosure Activity	9.1	14.0	11.9	15.5
Roof-Top Air Conditioning Units	23.4	29.8	30.9	31.9
Total (All Noise Sources)	**36.8**	**44.4**	**46.5**	**45.5**

1 See Figure 4.9-3 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 of the Noise and Vibration Impact Analysis (Appendix G).

Nighttime Project noise at off-site receivers would range from 36.1 to 44.8 dBA Leq (Table 4.9-14). The difference from daytime levels reflects the assumed duration of each activity.

Table 4.9-14. Project Nighttime Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)			
	R1	R2	R3	R4
Parking Lot Vehicle Movements	24.8	33.2	33.6	34.7
Loading Dock Activity	34.5	42.1	41.3	41.2
Truck Parking Activity	21.4	29.0	29.2	29.0
Truck Movements	28.1	35.8	41.0	39.1
Trash Enclosure Activity	8.1	13.0	10.9	14.5
Roof-Top Air Conditioning Units	21.0	27.4	28.5	29.5
Total (All Noise Sources)	**36.1**	**43.7**	**44.8**	**44.1**

1 See Figure 4.9-3 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 of the Noise and Vibration Impact Analysis (Appendix G).

On-site Operational Noise Level Compliance

Table 4.9-15 compares Project-only operational noise with City exterior standards at nearby sensitive receivers. Modeled daytime and nighttime levels would remain below the applicable standards. The impact would be less than significant.

Table 4.9-15. Project Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	36.8	36.1	65	45	No	No
R2	44.4	43.7	65	45	No	No
R3	46.5	44.8	65	45	No	No
R4	45.5	44.1	65	45	No	No

Source: Table 9-4, Noise and Vibration Analysis (Appendix G)

1 See Figure 4.9-2 for the receiver locations.

2 Proposed Project unmitigated operational noise levels as shown in Tables 4.9-14 and 4.9-15

3 Exterior noise level standards, as shown in Table 4-1 of the Noise and Vibration Impact Analysis.

4 Do the estimated Project operational noise source activities exceed the noise level standards? "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Tables 4.9-16 and 4.9-17 combine Project noise with measured ambient conditions. Daytime increases would range from 0.0 to 0.9 dBA Leq, and nighttime increases would range from 0.2 to 3.7 dBA Leq. These increases would remain below the applicable significance criteria.

Table 4.9-16. Daytime Project Operational Noise Level Increase Analysis

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	36.8	L1	58.7	58.7	0.0	5.0	No
R2	44.4	L2	62.8	62.9	0.1	5.0	No
R3	46.5	L3	52.8	53.7	0.9	5.0	No
R4	45.5	L4	54.5	55.0	0.5	5.0	No

1 See Figure 4.9-2 for the receiver locations.
2 Total Project unmitigated daytime operational noise levels as shown in Table 9-2 of the Noise and Vibration Impact Analysis.
3 Reference noise level measurement locations as shown in Figure 4.9-1.
4 Observed daytime ambient noise levels as shown in Table 5-1 of the Noise and Vibration Impact Analysis.
5 Represents the combined ambient conditions plus the Project activities.
6 The noise level increase expected with the addition of the proposed Project activities.
7 Significance increase criteria as shown in Table 4-1of the Noise and Vibration Impact Analysis.

Table 4.9-17. Nighttime Project Operational Noise Level Increase Analysis

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	36.1	L1	49.0	49.2	0.2	5.0	No
R2	43.7	L2	54.6	54.9	0.3	5.0	No
R3	44.8	L3	43.5	47.2	3.7	5.0	No
R4	44.1	L4	46.6	48.6	2.0	5.0	No

1 See Figure 4.9-2 for the receiver locations.
2 Total Project unmitigated daytime operational noise levels as shown in Table 9-2 of the Noise and Vibration Impact Analysis.
3 Reference noise level measurement locations as shown in Figure 4.9-1.
4 Observed daytime ambient noise levels as shown in Table 5-1 of the Noise and Vibration Impact Analysis.
5 Represents the combined ambient conditions plus the Project activities.
6 The noise level increase expected with the addition of the proposed Project activities.
7 Significance increase criteria as shown in Table 4-1of the Noise and Vibration Impact Analysis.

Off-site Operational Traffic Noise Impact Analysis

Existing traffic noise would range from 55.5 to 68.6 dBA CNEL, and existing-with-Project levels would range from 55.5 to 73.8 dBA CNEL (Tables 4.9-4, *Existing Without Project Traffic Noise Level Increases*, and 4.9-6, *Existing With Project Traffic Noise Level Increases*). Project-related increases would range from 0.0 to 8.2 dBA CNEL (Table 4.9-18). The only noise-sensitive land use in the study area, along Adelanto Road north of Air Expressway, would experience no increase. Off-site traffic noise impacts would be less than significant. Haul trucks importing fill during grading would make approximately 819 trips per day on the City's designated truck routes (Section 3.12). That is fewer than the 3,285 daily truck trips the Project would generate during operation, which would not exceed the traffic noise increase criteria at any noise-sensitive use. Haul truck noise would be temporary and less than significant.

Table 4.9-18. Existing with Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded ?
1	Air Expressway	w/o Adelanto Rd	Non-Sensitive	67.6	73.8	6.2	n/a	No
2	Air Expressway	e/o Adelanto Rd	Non-Sensitive	68.4	72.1	3.7	n/a	No
3	Air Expressway	e/o Gateway Dr	Non-Sensitive	68.6	71.5	2.9	n/a	No
4	Air Expressway	e/o Emerald Rd	Non-Sensitive	68.5	72.3	3.8	n/a	No
5	Air Expressway	e/o Phantom West	Non-Sensitive	67.0	72.8	5.8	n/a	No
6	Adelanto Rd	n/o Air Expressway	Sensitive	55.5	55.5	0.0	5.0	No
7	Adelanto Rd	s/o Air Expressway	Non-Sensitive	59.2	67.4	8.2	n/a	No

Source: Table 7-5, Noise and Vibration Analysis (Appendix G)

1 Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.9-11)? "n/a" Per the City of Victorville General Plan Noise Element Table N-3, unmitigated normally acceptable exterior noise levels of less than 70 dBA CNEL are considered less than significant and a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

Mitigation Measures

Mitigation Measures from 2009 EIR

NOI-1. Construction Noise. Prior to Grading Permit issuance, the project shall demonstrate, to the satisfaction of the City of Adelanto Community Development Department that the project complies with the following:

- Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices.
- Property owners and occupants located immediately surrounding the project construction site shall be sent a notice, at least 15 days prior to commencement of construction, regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the project construction site. All notices and signs shall be reviewed and approved by the City of Adelanto Community Development Department, prior to mailing or posting and shall indicate the dates and duration of construction activities, as well as provide a contact name and a telephone number where residents can inquire about the construction process and register complaints.
- Prior to the issuance of a Grading or Building Permit, the Applicant shall designate, to the satisfaction of the City of Adelanto Community Development Department, a qualified "Noise Disturbance Coordinator." The Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Disturbance Coordinator shall notify the City within 24-hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall implement reasonable measures to resolve the compliant, as deemed acceptable by the City Community Development Department.
- During construction, construction activities shall be limited to the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday, and on legal holidays from 7:00 a.m. and 8:00 p.m., excluding Sunday. The Construction Contractor shall ensure construction activities only occur during the specified time limit. Where the Municipal Code hours are more restrictive, the Municipal Code hours apply (RR NOI-2).

New Mitigation Measures

MM NOI-1, adopted with the 2009 EIR, still applies. No new mitigation measures are required.

Significance Determination

Less Than Significant. Construction, operational, and traffic noise would remain below the applicable standards and incremental-increase criteria. The Project would not cause a substantial temporary or permanent increase in ambient noise.

Threshold 4.9 (b): Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis

Construction Vibration Analysis

FTA methods and the equipment levels in Table 4.9-8, *Vibration Source Levels for Construction Equipment* were used to estimate construction vibration at nearby receivers. At distances of 427 to 2,120 feet, vibration would be 0.01 inch per second PPV or less, below the 0.20-inch-per-second building-damage threshold (Table 4.9-19). Construction vibration impacts would be less than significant.

Table 4.9-19. Project Construction Vibration Levels

Location[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]						Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jack-hammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	2,120'	0.00	0.00	0.00	0.00	0.00	0.00	0.20	No
R2	427'	0.00	0.00	0.00	0.01	0.01	0.01	0.20	No
R3	657'	0.00	0.00	0.00	0.00	0.01	0.01	0.20	No
R4	551'	0.00	0.00	0.00	0.00	0.01	0.01	0.20	No

Source: Table 10-6, Noise and Vibration Analysis (Appendix G)

1 Construction noise source and receiver locations are shown in Figure 4.9-2.
2 Distance from receiver building façade to Project construction boundary (Project site boundary).
3 Based on the Vibration Source Levels of Construction Equipment (Appendix G, Table 10-5).
4 City of Adelanto Municipal Code Section 17.90.030 (Appendix 3.1).
5 Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity

Operational Vibration Analysis

Operational vibration would primarily result from truck traffic. FTA data indicate that heavy trucks at normal roadway speeds produce approximately 0.004 inch per second PPV at 25 feet. On-site trucks would travel at low speeds, and off-site vibration would remain below the 0.2-inch-per-second PPV threshold.

Heavy-truck vibration generally exceeds automobile vibration on the same roadway. Because vibration diminishes rapidly with distance and vehicle events are brief, traffic vibration is rarely perceptible beyond the right-of-way and rarely causes annoyance or building damage.

Mitigation Measures

No mitigation measures are required.

Significance Determination

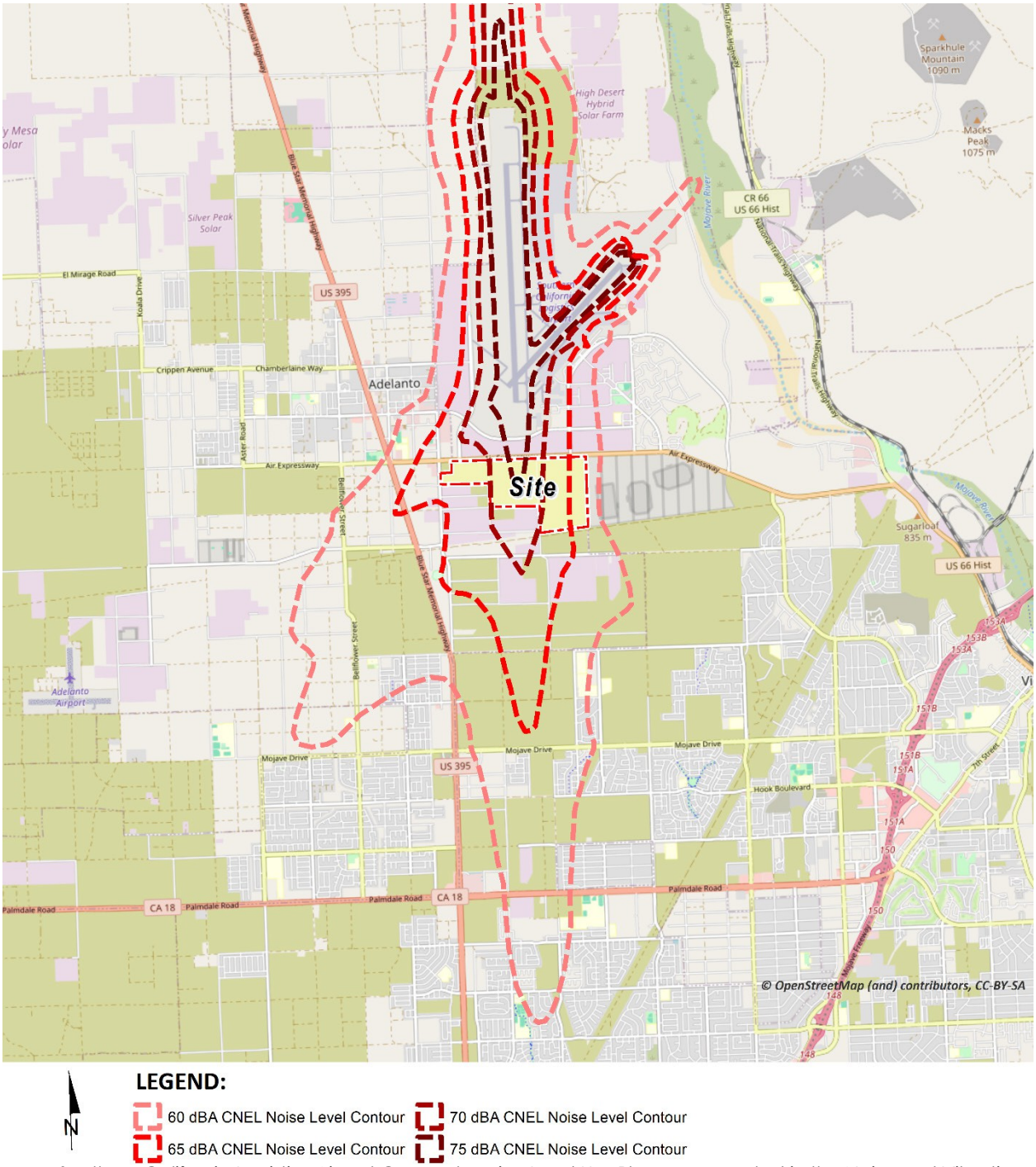
Less Than Significant. Construction and operational vibration would remain below the applicable thresholds. No mitigation is required.

Threshold 4.9 (c): For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact Analysis

Southern California Logistics Airport is approximately 0.5 mile north of the site. Figure 4.9-4 places the site within the future 75-dBA CNEL contour. The SCLA Comprehensive Land Use Plan identifies warehouse use within this contour as normally acceptable; no further analysis is required (Appendix G, pp. 21-22).

Figure 4.9-4. SCLA Future Airport Noise Contours



Source: Southern California Logistics Airport Comprehensive Land Use Plan, as presented in the Noise and Vibration Impact Analysis (Technical Appendix G).

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant. The Project is approximately 0.5 mile from SCLA and within the 75-dBA CNEL contour, where the airport land use plan identifies warehouse use as normally acceptable at an average intensity of no more than 100 people per gross acre. No mitigation is required.

4.9.6 Cumulative Impacts Analysis

The cumulative analysis considers the Project with nearby development and buildout under the general plans of adjoining cities.

Construction Noise

Concurrent construction could expose the same receiver to noise from more than one project. Several nearby projects may overlap with Project construction. Each project must comply with City noise requirements and, where applicable, implement project-specific mitigation. Construction noise is intermittent, localized, and diminishes with distance. The Project's contribution to cumulative construction noise would not be considerable.

Operational Noise

Each cumulative project must comply with City operational-noise limits. Project operations would remain below those limits and would not make a cumulatively considerable contribution to operational noise.

Stationary-source noise diminishes with distance and would be limited to each project site and vicinity. Combined stationary-source noise would not be cumulatively significant.

Traffic-noise results for existing and 2046 conditions show that land uses along study roadways would remain below the applicable incremental-increase criteria. The Project's contribution to cumulative traffic noise would not be considerable.

Groundborne Vibration and Noise

Construction vibration would be greatest during grading but would diminish rapidly with distance. No known active or pending construction project abuts the site and overlaps the Project schedule. During operation, the Project would have no equipment that produces perceptible off-site vibration, and truck vibration on paved roads would not be perceptible beyond the right-of-way. The Project's contribution to cumulative vibration would not be considerable.

Airport Noise

The Project would not construct or operate an airport or add a source of airport noise. Its warehouse use is compatible with the applicable SCLA noise contour. The Project would not contribute to cumulative airport-noise exposure.

4.9.7 Summary of Impacts and Mitigation Measures

Construction, operational, traffic, vibration, airport, and cumulative noise impacts would be less than significant. The 2009 EIR's Mitigation Measure NOI-1 would continue to reduce construction noise; no new mitigation measures are required.

4.9.8 References

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129), Section 4.10, Noise.

City of Adelanto. 2024. Adelanto North 2035 Comprehensive Sustainable Plan. 2014.

City of Adelanto. Adelanto Municipal Code, Chapter 17.90, Noise and Vibration.

Coffman Associates. 2008. Southern California Logistics Airport Comprehensive Land Use Plan, Final Report. September 2008.

David Evans and Associates, Inc. 2026. Traffic Impact Study, Adelanto Gateway Logistics Center. Revised August 24, 2026. (SEIR Appendix H-1.)

Federal Highway Administration (FHWA). 2006. Roadway Construction Noise Model User's Guide. FHWA-HEP-05-054.

Federal Highway Administration (FHWA). 1978. FHWA Highway Traffic Noise Prediction Model. FHWA-RD-77-108.

Federal Interagency Committee on Noise (FICON). 1992. Federal Agency Review of Selected Airport Noise Analysis Issues.

Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123.

Urban Crossroads, Inc. 2026. Adelanto Industrial Park Noise and Vibration Impact Analysis. August 12, 2026. (SEIR Appendix G.)

4.10 Transportation

4.10.1 Introduction

This section evaluates the potential for impacts to transportation resulting from implementation of the proposed Project. This section is based on current regulations and the following technical reports prepared to evaluate the potential for Project-related construction and operational activities to result in adverse effects on transportation:

Technical Reports

- Traffic Impact Study, prepared by David Evans and Associates, Inc., revised August 24, 2026 (Appendix H-1)
- Vehicle Miles Traveled Analysis Memorandum, prepared by GTS (General Technologies and Solutions) for David Evans and Associates, Inc., October 31, 2024 (Appendix H-2)

NOP Scoping Comments

The Notice of Preparation was circulated from May 29 to June 30, 2025, and a scoping meeting was held June 11, 2025. No comments addressed transportation.

4.10.2 Environmental Setting

The City of Adelanto (the City) circulation system comprises highways and their interchanges, major, collector, activity, and loop streets, public transportation, and non-motorized transportation. In addition to these facilities and services, the implementation and management of the circulation system includes parking policies and goods and freight movement.

Roadways

The following roadways provide local and regional access to the Project (Figure 4.10-1, Project Truck Routes):

- **Air Expressway** is a major east-west primarily four-lane road (two lanes in each direction with a striped center lane, and with turn pockets at key intersections) within the project vicinity. Air Expressway is identified as a major street on the City of Adelanto Circulation Plan. The posted speed limit is 60 mph.
- **Adelanto Road** is a major north-south primarily four-lane road (two lanes in each direction, a striped center lane, and turn pockets at key intersections) in the project area. Adelanto Road is identified as a major boulevard on the City of Adelanto Circulation Plan south of El Mirage Road. The posted speed limit within the project area is 40 mph.

- **Gateway Drive** is a north-south primarily four-lane road (two lanes in each direction, a raised median, and turn pockets at key intersections) in the project area. The posted speed limit within the project area is 45 mph.
- **Emerald Road** is an unpaved north-south road along the Project's eastern frontage. The City of Adelanto Circulation Plan identifies it as a major street. The Project would improve its frontage.
- **Phantom West** is primarily a four-lane road (two lanes in each direction, a striped center lane, and turn pockets at key intersections) in the project area. Phantom West is identified as a major street on the City of Adelanto Circulation Plan. The posted speed limit within the project area is 50 mph.

Transit

Adelanto is currently served by Victor Valley Transit Authority (VVTA). At present the closest service is via Route 32 and 33, with Route 32 being directly north of the project site along Air Expressway.

Non-Motorized (Bicycle and Pedestrian)

Air Expressway and Adelanto Road are designated major streets in the City's General Plan Circulation Element, a classification that governs intersection spacing and allowable traffic controls and includes Class II bike lanes and sidewalks. The proposed Project would use driveway access from the surrounding City streets and their connections to the broader circulation system. Internal circulation would connect to Emerald Road and Mesa Linda Road, the two primary north-south streets accessed from Air Expressway, and to Joshua Avenue, an east-west street accessed from Adelanto Road. The Project would also improve existing streets to provide non-motorized access.

4.10.3 Regulatory Framework

Transportation in the State of California is governed by a framework of enabling legislation and the operative regulations that implement it. The principal enabling statute is Senate Bill 743 (2013), which directed the State to replace automobile delay and level of service with vehicle miles traveled as the measure of transportation impacts under CEQA. That mandate is implemented through CEQA Guidelines section 15064.3 and, at the local level, through the City of Adelanto's adopted VMT guidelines and thresholds. The Project is evaluated against these operative regulations, which are summarized in the following table, together with the standard environmental regulations and applicable General Plan policies identified below

State of California

Senate Bill 743. SB 743 (2013) changed how CEQA evaluates transportation impacts. Under CEQA Guidelines Section 15064.3, which took effect statewide on July 1, 2020, local agencies

such as the City of Adelanto use vehicle miles traveled (VMT), the amount and distance of driving, in place of road congestion and delay (level of service) to assess transportation impacts.

Local

City of Adelanto Transportation Regulations. The City regulates transportation through the following:

General Plan Mobility Element.

City Council Resolution 20-41: Adopting "Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (LOS) Guidelines."

City Council Resolution No. 20-41a- Amended: "Adopting Carbon Dioxide Equivalent Thresholds of Significance for Purposes of Analyzing Transportation Impacts."

Regulatory Compliance Requirements

The following Regulatory Compliance Requirements (RR TRA-1 through RR TRA-6) are existing federal, state, regional, and local regulatory requirements with which the Project is required to comply. Compliance with these requirements is assumed in the impact analysis. Their application is identified at the head of each threshold question. These requirements are not mitigation under CEQA Guidelines §15370 because they do not avoid, minimize, rectify, reduce, or compensate for a Project impact beyond what existing law already requires.

> ***RR TRA-1 — SB 743 / CEQA Guidelines §15064.3 — Vehicle Miles Traveled (VMT) Methodology.*** *Public Resources Code §21099 (as added by SB 743, 2013) and CEQA Guidelines §15064.3 (effective July 1, 2020) establish VMT as the primary metric for analyzing transportation impacts under CEQA, replacing automobile delay (level of service) for most projects. Project transportation impact is analyzed using the City of Adelanto-adopted VMT methodology per the Vehicle Miles Traveled Analysis (Appendix H-2).*
>
> ***RR TRA-2 — Adelanto Municipal Code Chapter 10 — Traffic and Roadways.*** *Project shall comply with applicable provisions of Adelanto Municipal Code Title 10 governing truck routes, traffic control, and on-street parking, including the designated truck routes in Section 10.22.030, which Project trucks would use.*
>
> ***RR TRA-3 — Caltrans Highway Design Manual / Encroachment Permits.*** *Any Project improvements within Caltrans right-of-way (including U.S. 395 and Interstate 15 ramp-area improvements, as applicable) shall comply with the Caltrans Highway Design Manual and shall be authorized under a Caltrans Encroachment Permit issued by District 8.*
>
> ***RR TRA-4 — CALGreen Tier 2 — EV Charging Infrastructure.*** *Per CCR Title 24, Part 11 and City-adopted Tier 2 voluntary measures, Project parking facilities shall be equipped with electric vehicle (EV) charging infrastructure and EV-capable spaces per the current CALGreen schedule for non-residential industrial use.*

RR TRA-5 — Adelanto Pedestrian Circulation Standards. *Per Adelanto Municipal Code §13.20.050, Project frontage and on-site pedestrian circulation shall comply with the City's pedestrian circulation standards, including ADA compliance, sidewalk widths, and ADA-compliant pedestrian connections from the public right-of-way to building entrances.*

RR TRA-6 — AB 1358 — Complete Streets Act. *Government Code §65302(b)(2) requires general plans to include provisions for a complete streets network. Project frontage improvements shall be consistent with the Complete Streets policies of the Adelanto North 2035 Comprehensive Sustainable Plan Mobility Element.*

General Plan Policy Matrix

Table 4.10-1 lists the General Plan policies that apply to transportation and the Project's consistency with each.

Table 4.10-1. Project Consistency with Applicable Policies of the Adelanto North 2035 Comprehensive Sustainable Plan (2014)

Policy	Policy Text	Project Consistency
LC 3.2	Accommodate industrial, logistics, and warehousing uses to complement the SCLA in the Airport Development District, Business Park District, and Light Manufacturing District East. Ensure the sustainable concepts and practices described in Policy OS 3.2, OS 3.5, OS 4.5, OS 6.1, OS 6.2, OS 6.3, OS 8.2, OS 9.1 are implemented	**Consistent.** The Project is a freight-oriented logistics use in the MI zone next to the Southern California Logistics Airport.
LC 5.1	Require new development to pay its fair share of the cost of public facilities, services, and infrastructure, including but not limited to transportation, incremental water supply, sewer and wastewater treatment, solid waste, flood control and drainage, schools, fire and police protection, and parks and recreation.	**Consistent**. The Project would pay the City's Transportation Development Impact Fee and build the street improvements required by the City's conditions of approval.
LC 14.4	Design loading areas with adequate spacing for truck maneuvering without encroaching onto the adjoining street.	**Consistent**. Truck courts and loading docks are inside each site, and trucks would maneuver on site without encroaching onto public streets (Figure 3-1).
M 1.1	Apply Complete Streets strategies whenever practicable and feasible. Encourage development designs that integrate multiple modes of access and integrate Complete Streets in all capital improvement projects and new development projects.	**Consistent**. Frontage improvements include curb, gutter, sidewalk, and parkway landscaping, and would accommodate the planned Class II bike lanes on Air Expressway and Adelanto Road.
M 1.7	Require new nonresidential development to	**Consistent.** Each building would

Policy	Policy Text	Project Consistency
	provide secure bicycle parking on-site. Major employers should provide shower and changing rooms for employees, as appropriate. Work with existing employers to provide secure bicycle parking on-site and, where appropriate, work with them to provide shower and changing rooms for employees.	provide short- and long-term bicycle parking as required by CALGreen.
M 1.9	Require developers to construct or pay their fair share toward improvements for all modes consistent with this Mobility Chapter, and specific impacts associated with their development.	**Consistent.** The Project would build its frontage and intersection improvements and pay its fair share toward other improvements identified in the Traffic Impact Study (Appendix H-1).
M 2.6	Design designated truck routes such that the pavement, roadway width, and curb return radii support anticipated heavy vehicle use, particularly on routes to and from SCLA and the Logistics Centre.	**Consistent.** Project trucks would use Air Expressway, Adelanto Road south of Air Expressway, and U.S. 395, which are designated truck routes (Adelanto Municipal Code Section 10.22.030).
M 4.8	Maintain truck routes throughout the City for efficient freight transportation service to businesses and industry while limiting impacts to residents and visitors.	**Consistent.** Project trucks would use the designated truck routes and would not use Adelanto Road north of Air Expressway or other residential streets.

4.10.4 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the project would have a significant impact on transportation if it would:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)
d) Result in inadequate emergency access?

4.10.5 Impacts Analysis

Threshold 4.10 (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Environmental Setting

The Project site is currently vacant and undeveloped. The surrounding circulation system includes Air Expressway and Adelanto Road, which are designated major streets in the City's General Plan circulation element. There are no existing pedestrian, bicycle, or transit facilities along the Project's currently undeveloped frontages. VVTA Route 32 (Victorville–North Adelanto) operates in the vicinity along Air Expressway. The City's General Plan circulation element identifies planned Class II bicycle lanes along Air Expressway and Adelanto Road.

Project Traffic. At buildout the Project would generate approximately 12,749 daily vehicle trips, including 3,285 truck trips, 711 trips in the morning peak hour, and 859 in the evening peak hour (Table 4.10-2, Project Trip Generation). Most truck trips would use Air Expressway, Adelanto Road south of Air Expressway, and U.S. 395, which are designated truck routes (Adelanto Municipal Code Section 10.22.030).

Table 4.10-2. Project Trip Generation

Vehicle Type	Daily Trips	AM Peak Hour	PM Peak Hour
Passenger cars	9,461	528	637
2-axle trucks	580	32	39
3-axle trucks	533	30	36
4-or-more-axle trucks	2,172	121	146
Trucks, all types	3,285	183	221
Total	12,749	711	859

Source: Traffic Impact Study, David Evans and Associates, Inc., revised August 24, 2026 (Appendix H-1), Table 5-1. Trips are actual vehicles, not passenger car equivalents.

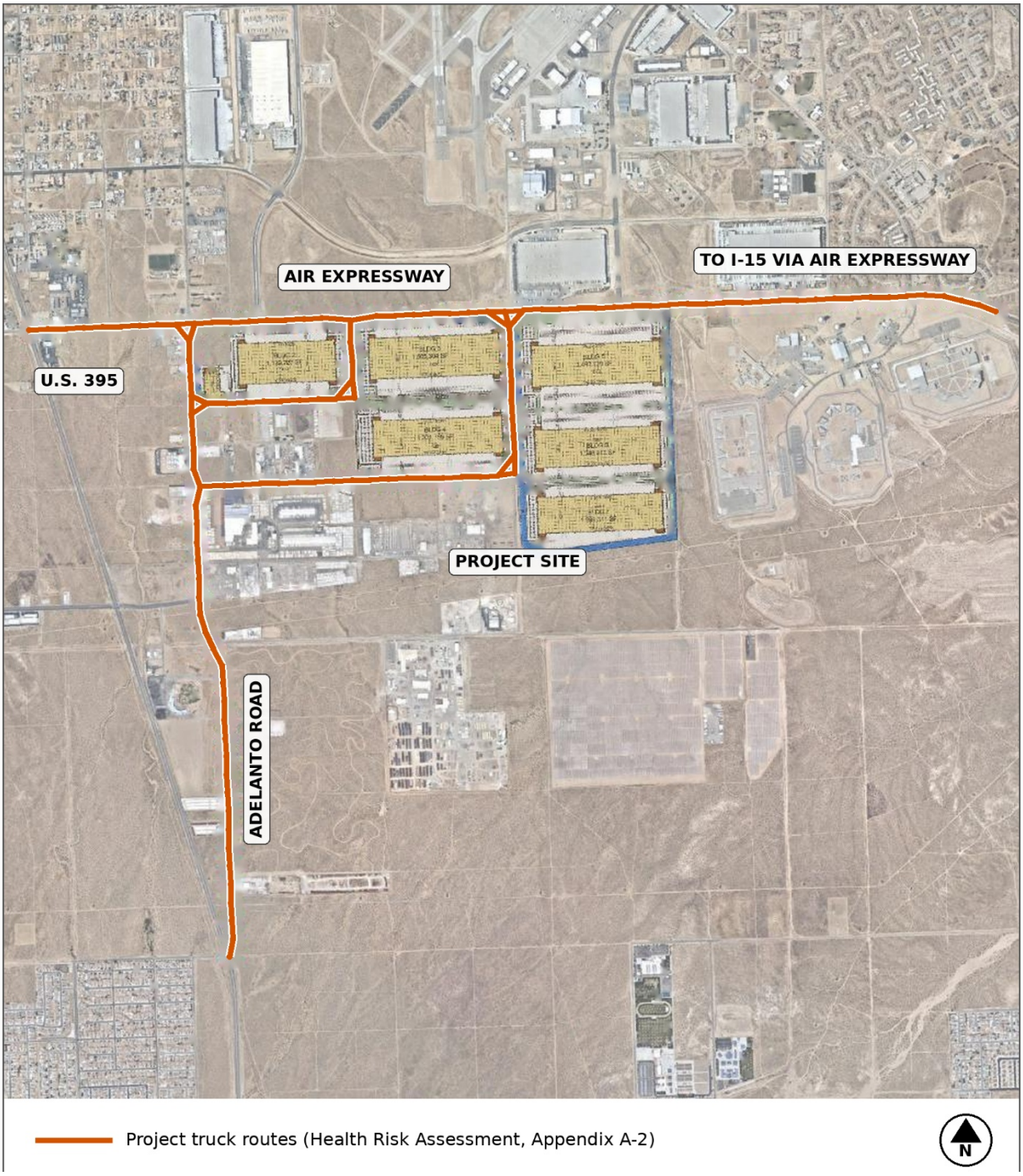
Truck Traffic. Project trucks would use designated truck routes: west on Air Expressway to U.S. 395, east on Air Expressway toward Interstate 15, and south on Adelanto Road to U.S. 395 (Figure 4.10-1, Project Truck Routes). Adelanto Road north of Air Expressway, which has homes along it, is not a truck route (Adelanto Municipal Code Section 10.22.030). The Project would widen Air Expressway to add left- and right-turn lanes at each Project entrance, install traffic signals at Mesa Linda Road and Emerald Road, and modify the signals at Gateway Drive and Phantom West (Appendix H-1). At Adelanto Road and Joshua Avenue, the northbound lane would be striped 24 feet wide so trucks can swing wide turning onto Joshua Avenue, and the traffic study's truck turning templates show trucks making those turns without crossing into opposing lanes. The

turn lanes let trucks slow and turn outside the through lanes, so cars, buses, bicycles in the planned bike lanes, and emergency vehicles can continue past.

Added traffic, especially trucks, can make walking and bicycling less comfortable along the streets that carry it. The streets serving the site are major streets and a major boulevard built for heavy traffic, and the Mobility Element plans sidewalks and Class II bike lanes on them. The Project would build those facilities along its frontages. Even with the added traffic, the streets are designed to carry both motorized and non-motorized travel.

Figure 4.10-1. Project Truck Routes

Source: Health Risk Assessment, Urban Crossroads, Inc., August 2026 (Technical Appendix A-2), Exhibit 2-C, redrawn by EPC Environmental, Inc.



Impact Analysis

A significant impact would occur if the Project would conflict with an adopted program, plan, ordinance, or policy that establishes or protects transit, bicycle, pedestrian, or roadway facilities. **Roadway and Pedestrian Facilities**. The Project would improve its street frontages with paving, curb, gutter, sidewalk, and parkway landscaping constructed to City standards, providing continuous pedestrian facilities along the Project frontages where none currently exist. The 14-foot screen wall is set back behind the landscaped parkway, so that the sidewalk and parkway remain at the street edge and are not obstructed by the wall. These improvements carry out Mobility Element Policy M 1.1, which calls for Complete Streets in new development.

Bicycle Facilities. The City has no existing designated bicycle facilities. The City's Mobility Element identify planned Class II bike lanes along Air Expressway and Adelanto Road, both of which abut the Project. The Project's frontage improvements would accommodate, and would not preclude, the planned Class II bike lanes. Each building would also provide bicycle parking (Policy M 1.7).

Public Transit. Public transit in the area is provided by the Victor Valley Transit Authority (VVTA). VVTA Route 32 (Victorville–North Adelanto) operates along the Project's Air Expressway frontage, with the nearest stops located at the Adelanto Road and Emerald Road intersections; no stop is located along the site frontage itself. The Project's frontage improvements would not remove or obstruct any existing stop and would not preclude a future stop along the frontage. The Project would not conflict with any existing or planned VVTA route or stop.

Mitigation Measures

No mitigation measures are required.

Significance Determination

No Impact: 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. Therefore, there would be no impact as a result of the Project.

Threshold 4.10 (b): Would the Project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Environmental Setting

The Project site is currently vacant and generates no vehicle trips or vehicle miles traveled.

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 on

July 1, 2020. Impacts related to LOS will be evaluated through the City's development review process apart from CEQA.

The VMT analysis was prepared in accordance with the City of Adelanto's VMT thresholds adopted by Resolution No. 20-41 on June 24, 2020. The Project does not meet the guidelines' screening criteria (transit priority area, low-VMT area, or fewer than 110 daily trips), so a full VMT analysis was performed using the San Bernardino County Transportation Analysis Model (SBTAM Plus, version 3.2).

SBTAM is a socioeconomic data-based model, so the warehouse land use was converted to model employment using the SCAG Employment Density Study Summary Report (October 31, 2001) factor of 1,195 square feet per employee. The VMT model evaluated 8,599,962 square feet of warehouse floor area, yielding 7,197 employees (Table 4.10-3). That floor area is larger than the 8,256,274 square feet analyzed elsewhere in this SEIR, so the VMT analysis overstates Project VMT and is conservative.

Table 4.10-3. Employment Estimates

Land Use Type	Square Feet	Square feet per Employee	Total Employees
Warehouse (Buildings 1 through 7)	8,599,962	1,195	7,197
Total	**8,599,962**	---	**7,197**

Source: SCAG Employment Density Study Summary Report, October 31, 2001

Model runs were conducted for baseline (2019) and horizon year (2050) conditions, and existing (2024) values were developed by linear interpolation between them. Because SBTAM does not permit the creation of new traffic analysis zones (TAZs), one TAZ was borrowed to isolate the Project's travel. Minor network modifications for both scenarios incorporated known roadway improvements in the Project vicinity, and full model runs with feedback loops were conducted. For the cumulative (2050) scenario the Project land use was added to the model as new growth without redistributing growth from other TAZs, which makes the cumulative result conservative.

Origin-destination (OD) VMT was derived by combining the peak and off-peak vehicle trip matrices with trip lengths from the model skimming step. Because the OD matrices report vehicle trips directly, no auto-occupancy conversion was applied. Under the City's guidelines, a significant impact occurs if the Project's OD VMT per service population exceeds the San Bernardino County regional average OD VMT per service population, obtained from the SBCTA VMT map. Table 4.10-4, *Project VMT Analysis, shows*, the Project VMT metrics for 2019, 2024, and 2050 with the regional thresholds.

Table 4.10-4. Project VMT Analysis

	Adelanto Gateway Logistics Center (Project) (miles)	San Bernardino County (Threshold)*
Year 2019		
Population	0	n/a
Employment	7,197	n/a
Service population	7,197	n/a
Auto OD VMT	166,930	n/a
Truck OD VMT	192,779	n/a
Total OD VMT	359,709	n/a
Auto OD VMT per service population	**23.19**	**34.98**
Truck OD VMT per service population	26.79	3.02
Total OD VMT per service population	49.98	37.99
Year 2024 (interpolated)		
Population		n/a
Employment	7,197	n/a
Service population	7,197	n/a
Auto OD VMT	171,059	n/a
Truck OD VMT	197,986	n/a
Total OD VMT	369,044	n/a
Auto OD VMT per service population	**23.77**	**35.63**
Truck OD VMT per service population	27.51	3.17
Total OD VMT per service population	51.28	38.79

	Adelanto Gateway Logistics Center (Project) (miles)	San Bernardino County (Threshold)*
Year 2050		
Population	0	n/a
Employment	7,197	n/a
Service population	7,197	n/a
Auto OD VMT	192,528	n/a
Truck OD VMT	225,059	n/a
Total OD VMT	417,587	n/a
Auto OD VMT per service population	**26.75**	**39.03**
Truck OD VMT per service population	31.27	3.92
Total OD VMT per service population	58.02	42.95

Source: Table 2, Vehicle Miles Traveled Analysis, GTS for David Evans and Associates, Inc., October 31, 2024 (Appendix H-2)
**Threshold values obtained from https://sbcta.maps.arcgis.com/apps/instant/sidebar/index.html?appid=774fb0dfc0584db8b2aa1603c7a8f5b4*

Table 4.10-4 summarizes the Project's OD VMT against the regional thresholds. The City's VMT thresholds, adopted by Resolution No. 20-41 on June 24, 2020, use the San Bernardino County Transportation Analysis Model and set the threshold at the countywide average VMT per service population under existing conditions (Resolution No. 20-41, Exhibit A, Table 1, and Decision Checklist, Steps 4 and 5). The resolution defines VMT as the amount and distance of automobile travel attributable to a project, as does CEQA Guidelines Section 15064.3(a). The comparison therefore uses automobile VMT; heavy-truck VMT is reported for disclosure. The Project's automobile OD VMT per service population is below the San Bernardino County average in every analysis year: 23.19 versus 34.98 in 2019, 23.77 versus 35.63 in 2024, and 26.75 versus 39.03 in 2050.

Table 4.10-5 evaluates the Project's effect on VMT by comparing roadway VMT within San Bernardino County with and without the Project. Countywide VMT per service population with the Project is equal to or slightly lower than without the Project in every analysis year (22.2 versus 22.4 in 2019; 22.8 versus 22.9 in 2024; 25.1 versus 25.1 in 2050).

Table 4.10-5. Roadway VMT within San Bernardino County

	With Project	Without Project
Year 2019		
Roadway VMT	68,648,987	68,975,804
Service population	3,089,217	3,082,020
VMT per service population	22.2	22.4
Year 2024 (interpolated)		
Roadway VMT	72,840,937	73,098,722
Service population	3,198,761	3,191,564
VMT per service population	22.8	22.9
Year 2050		
Roadway VMT	94,639,078	94,537,893
Service population	3,768,388	3,761,191
VMT per service population	25.1	25.1

Source: Table 3, Vehicle Miles Traveled Analysis, GTS for David Evans and Associates, Inc., October 31, 2024 (Appendix H-2).

Although the Project's VMT impact is less than significant and no mitigation is required, the Project incorporates features and complies with adopted regulations that support the State's and City's VMT-reduction objectives. The Project locates freight-oriented logistics uses within the designated Manufacturing/Industrial area adjacent to the Southern California Logistics Airport and the U.S. Route 395/Interstate 15 goods-movement network, consistent with General Plan Policy LC 3.2, which reduces out-of-direction travel for the truck trips that characterize the use. Consistent with RR TRA-4, the Project provides electric-vehicle charging infrastructure under CALGreen Tier 2 standards. Consistent with RR TRA-5 and RR TRA-6, the Project completes pedestrian and bicycle facilities along its frontages and accommodates the planned Class II bike lanes on Air Expressway and Adelanto Road, supporting the multimodal connectivity called for in the General Plan Mobility Element. The Project also pays the City's Transportation Development Impact Fee, consistent with General Plan Policy LC 5.1.

Mitigation Measure

No mitigation measures are required.

Significance Determination

Less Than Significant: Based on the VMT analysis as shown in Table 4.10-4 and Table 4.10-5 above, the Project's automobile VMT per employee is below the San Bernardino County regional average in every analysis year, and the Project does not increase countywide VMT per service population. The Project does not constitute a significant impact for either "project generated VMT" or "project's effect on VMT."

Threshold 4.10 (c): Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Environmental Setting

The Project site is vacant and undeveloped. Access is available from Air Expressway on the north, Adelanto Road on the west, and Emerald Road on the east. Air Expressway and Adelanto Road are straight, level streets built to City standards with no sharp curves, restricted sight distance, or other unusual geometric features. Emerald Road is unpaved and would be improved to City standards along the Project frontage. The existing traffic on these streets is a mix of passenger cars and trucks serving the surrounding industrial, airport, and correctional uses.

Impact Analysis

The Project site is generally rectangular in shape and will have public roads along site boundary line as well as internal north-south and east-west streets. The type of traffic generated by the Project (i.e., passenger cars and trucks) would be compatible with the type of existing traffic on Project area roadways, as the surrounding areas are either developed or planned to be developed with industrial land uses. In addition, all proposed improvements within the public right-of-way would be installed in conformance with City design standards. The traffic study's truck turning templates show that trucks can turn into and out of the Project entrances, and from Adelanto Road onto Joshua Avenue, without crossing into opposing lanes (Appendix H-1).

Mitigation Measures

No mitigation measures are required.

Significance Determination

Less Than Significant Impact: The proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible use.

Threshold 4.10 (d): Would the Project result in inadequate emergency access?

Environmental Setting

The Project site is currently vacant and undeveloped, with no internal circulation or emergency access improvements. Emergency services are provided by the San Bernardino County Fire Department and the San Bernardino County Sheriff's Department. The surrounding street network, including Air Expressway and Adelanto Road, provides existing access to the site frontages.

Impact Analysis

Emergency access would be provided via multiple Project driveways on the surrounding street network, including the new full-access driveway at Air Expressway/Gateway Drive and

additional driveways on Adelanto Road and the interior streets, all connecting to the citywide circulation system. Turn lanes at each Project entrance would keep turning trucks out of the through lanes, which would remain open for emergency vehicles.

Mitigation Measures

No mitigation measures are required.

Significance Determination

No Impact: Based on the proposed Project design and with required adherence to City requirements for emergency vehicle access, no impact would occur.

4.10.6 Cumulative Impact Analysis

This cumulative analysis considers the Project together with other development projects and planned development in Adelanto and in Victorville, including the Southern California Logistics Airport area north and east of the site (Table 4.0-1).

As identified in the analysis presented under Threshold 4.10 (a), the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The City of Adelanto and the City of Victorville would review future development projects in their jurisdictions for consistency with adopted programs, plans, ordinances, or policies. Therefore, the Project would not contribute to a cumulative impact and thus would not be cumulatively considerable in this regard.

As identified in the analysis presented under Threshold 4.10 (b), the Project does not exceed the City's VMT thresholds of significance for "project generated VMT" and the Project's effect on VMT is less than significant. Therefore, the Project would not contribute to a cumulative impact and thus would not be cumulatively considerable in this regard.

As identified in the analysis presented under Threshold 4.10 (c), the type of traffic generated by the Project (i.e., passenger cars and trucks) would be compatible with the type of existing traffic on Project area roadways, as the surrounding areas are either developed or planned to be developed with industrial or commercial land uses. In addition, all proposed improvements within the public right of way would be installed in conformance with City design standards, as would all the projects in the planning area. Therefore, the Project would not contribute to a cumulative impact and thus would not be cumulatively considerable in this regard.

As identified in the analysis presented under Threshold 4.10 (d), the City of Adelanto reviewed the Project's design and confirmed that the Project would provide adequate access to-and-from the Project site for emergency vehicles and also that development of the Project would not interfere with the circulation of emergency vehicles along public streets that abut the site. This is also required of other projects in the planning area. Therefore, the Project would not contribute to a cumulative impact and thus would not be cumulatively considerable in this regard.

4.10.7 Summary of Impacts and Mitigation Measures

The Project's impact on the City's roadway circulation does not interfere with the ability to provide transit, bicycle, or pedestrian modes of travel; does not create a hazard because of roadway design, impair emergency vehicle access to the site or surrounding area; nor does it generate vehicle miles traveled that are above the acceptable thresholds adopted by the City in order to comply with state law. Therefore, impacts are less than significant.

4.10.8 References

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129), Section 4.11, Transportation and Circulation.

City of Adelanto. 2020. Vehicle Miles Traveled Thresholds of Significance. Adopted by Resolution No. 20-41, June 24, 2020.

City of Adelanto. 2014. Adelanto North 2035 Comprehensive Sustainable Plan, Mobility Element.

GTS (General Technologies and Solutions). 2024. Vehicle Miles Traveled (VMT) Analysis – Adelanto Industrial Park, Adelanto, CA. Memorandum to David Evans and Associates, Inc. October 31, 2024. (SEIR Appendix H-2.)

David Evans and Associates, Inc. 2026. Traffic Impact Study, Adelanto Gateway Logistics Center. Revised August 24, 2026. (SEIR Appendix H-1.)

San Bernardino County Transportation Authority (SBCTA). 2025. San Bernardino County VMT Screening Tool. Accessed 2025.

Southern California Association of Governments (SCAG). 2001. Employment Density Study Summary Report. October 31, 2001.

Victor Valley Transit Authority (VVTA). 2025. Route 32 and Route 33 schedules.

4.11 Tribal Cultural Resources

4.11.1 Introduction

This section evaluates the Project's impacts on tribal cultural resources. Under Public Resources Code Section 21074, these are places and objects with cultural value to a California Native American tribe that are listed or eligible for listing in a historical register, or that the lead agency determines to be tribal cultural resources.

NOP Scoping Comments

The City circulated the Notice of Preparation from May 30 through June 30, 2025, and held a scoping meeting on June 11, 2025. One comment letter addressed tribal cultural resources: the Native American Heritage Commission's letter of June 6, 2025 (Appendix K).

4.11.2 Environmental Setting

The Project site is vacant desert land with creosote bush scrub, patches of white bursage scrub, scattered Joshua trees, and dirt and paved roads. During AB 52 consultation the Yuhaaviatam of San Manuel Nation (YSMN) identified the Project area as within the ancestral territory of the Serrano people. The cultural resources records search and field survey for the site are summarized in Section 4.3 (Cultural Resources).

4.11.3 Applicable Regulations

The statutes and adopted plans below govern tribal cultural resources in the Project area.

State of California

Assembly Bill 52 (AB 52, 2014). AB 52 added tribal cultural resources to CEQA. It requires lead agencies to consult with California Native American tribes that have asked to be notified of projects in their traditional territory, and to consider tribal cultural resources early in environmental review (Public Resources Code Sections 21074, 21080.3.1, and 21080.3.2).

Local

City of Adelanto General Plan. The Open Space and Conservation Element of the General Plan lists the following goal:

OS 10.2 Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.

Regulatory Compliance Requirements

The following existing legal requirement applies to the Project. It is not mitigation.

RR TCR-1 (Health and Safety Code §7050.5; Public Resources Code §5097.98; Discovery of Human Remains). — If human remains are encountered during ground disturbance, work within the vicinity of the find shall stop and the San Bernardino County Coroner shall be notified. If the Coroner determines the remains are Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours, and the Commission shall identify the Most Likely Descendant, who may make recommendations for the treatment and disposition of the remains and any associated grave goods. No further disturbance shall occur until the requirements of Public Resources Code §5097.98 have been met.

General Plan Policy Consistency

Open Space and Conservation Element Policy OS 10.2 directs the City to review proposed development for potential cultural resources and compliance with the cultural resources program. The AB 52 consultation described here and the cultural resources review in Section 4.3 evaluated the Project. The Project incorporates MM CUL-1 and MM TCR-1 through MM TCR-4 and is consistent with Policy OS 10.2.

4.11.4 Thresholds of Significance

Section XVIII of Appendix G to the CEQA Guidelines provides the following thresholds for evaluating impacts to Tribal Cultural Resources.

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

4.11.5 Impacts Analysis

Threshold 4.11 (a): Would the Project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Impact Analysis

Section 4.3, Cultural Resources, describes the 19 historic-era sites recorded on the Project site. They have no association with events or notable individuals significant to local, State, or national history. They lack distinctive characteristics of a type, period, region, or construction method, high artistic values, or work by an important creative individual. They have therefore not been identified as eligible for listing in the California Register of Historical Resources. Intact subsurface archaeological deposits that are historic under CEQA may be present. The site should therefore be treated as potentially sensitive for historic tribal cultural resources. MM CUL-1 and MM TCR-1 through MM TCR-4, developed through consultation with YSMN, provide monitoring, discovery, and treatment procedures. With these measures, impacts to listed or eligible tribal cultural resources would be less than significant.

Mitigation Measures (MM)

MM CUL-1 and MM TCR-1 through MM TCR-4 (Threshold 4.11(b), below) apply.

Significance Determination

Less Than Significant with Mitigation. No listed or eligible tribal cultural resource has been identified on the site. MM CUL-1 and MM TCR-1 through MM TCR-4 address any resource discovered during ground disturbance.

Threshold 4.11(b): Would the Project cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1, considering the significance of the resource to a California Native American tribe?

Impact Analysis

AB 52 Consultation

On June 24, 2025, the City of Adelanto, as lead agency, sent Project notices and invitations to consult consistent with Public Resources Code §21080.3.1. Notices went to the four California Native American tribes traditionally and culturally affiliated with the area that had requested notice:

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

Two tribes responded:

- **Agua Caliente Band of Cahuilla Indians, June 24, 2025.** The Tribal Historic Preservation Office checked its cultural registry and determined that the Project is outside the Tribe's Traditional Use Area. The Tribe deferred to other local tribes.
- **Yuhaaviatam of San Manuel Nation, July 18, 2025.** YSMN confirmed receiving the notice on June 24, 2025. It identified the area as Serrano ancestral territory of interest to the Tribe. YSMN requested the cultural resources report (including DPR forms), geotechnical report, and project plans showing proposed disturbance depths. It elected to consult under AB 52. The City concluded consultation with YSMN by letter dated September 21, 2026, which transmitted MM TCR-1 through MM TCR-4 (Public Resources Code Section 21080.3.2(b)).

Consultation with YSMN produced the four measures below. YSMN requested these measures, and the City agreed to include them in the Cultural Resources Management Program required by MM CUL-1.

Mitigation Measures (MM)

MM CUL-1 applies (see Section 4.3, Cultural Resources). In addition, the following measures were developed through government-to-government consultation with YSMN. Before issuance of a grading permit, the Cultural Resources Management Program required by MM CUL-1 shall incorporate them, and each shall be placed as a note on the grading plan.

MM TCR-1 (Archaeological and Tribal Monitoring). — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan:

> *"A qualified Archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards, and a San Manuel Tribal Monitor shall be on site during all grading and other significant ground-disturbing activities in native sediments (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a qualified Archaeologist and a representative from the Yuhaaviatam of San Manuel Nation's Cultural Resources Management Department (YSMN, also known as the San Manuel Band of Mission Indians) stating that the Property Owner/Developer has retained these individuals."*

MM TCR-2 (Pre-Grading Conference). — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan:

> **"***The qualified Archaeologist and Tribal Representative, including a representative from YSMN, shall attend the pre-grade conference and shall inform construction personnel of the potential for encountering unique cultural resources and how to identify these resources if encountered. This shall include providing written materials to familiarize*

personnel with the range of resources that might be expected, the types of activities that may result in impacts, and the legal framework for cultural resource protection. All construction personnel shall be instructed to stop work in the vicinity of a potential discovery until the Archaeologist and Tribal Representative assess the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of cultural resources is prohibited."

MM TCR-3 (Inadvertent Discovery of Artifacts During Ground Disturbance). — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan:

"In the event that artifacts of Native American origin are discovered, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The Property Owner/Developer and Archaeologist shall notify the City of Adelanto and the appropriate local Native American tribe, including YSMN. The Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the City shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the tribe. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the Archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the Project, should YSMN elect to place a monitor on site. All items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling. Native American artifacts that cannot be avoided or relocated at the Project site shall be prepared in a manner for curation, and the Archaeologist shall deliver the materials to an accredited curation facility approved by the City of Adelanto. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts shall be subjected to curation or returned to the Property Owner/Developer, as deemed appropriate. Once ground-altering activities have ceased or the Archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Adelanto. A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Adelanto, shall signify completion of the

program to mitigate impacts to archaeological and/or cultural resources. A copy of the report shall also be filed with the South Central Coastal Information Center."

MM TCR-4 (Treatment of Cultural Resources During Project Implementation). — Prior to the issuance of a grading permit, the following note shall be placed on the grading plan:

"It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within or near the original find location during Project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloging and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to the Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial agreement that shall be developed between the landowner and YSMN outlining the determined reburial process and location, and shall include measures and provisions to protect the reburial area from any future impacts."

Note: The Morongo Band of Mission Indians and the Soboba Band of Luiseño Indians, which are on the City's AB 52 notification list, did not request consultation. If either Tribe later asks to participate in monitoring or discovery procedures, it may do so consistent with the intent of these measures. YSMN has no objection.

Significance Determination

Less Than Significant with Mitigation. No tribal cultural resource significant under Public Resources Code §5024.1(c) has been identified on the Project site through consultation with the tribes that requested notice under AB 52. MM CUL-1 and MM TCR-1 through MM TCR-4 provide tribal and archaeological monitoring, stop-work and evaluation procedures, and treatment and reburial requirements for any resource discovered during ground disturbance. With these measures, impacts would be less than significant.

4.11.6 Cumulative Impacts Analysis

The cumulative analysis covers the Serrano people's ancestral territory in the High Desert. This area includes the Project and the cumulative projects listed in Table 4.0-1.

Impacts to tribal cultural resources are site-specific and result from ground disturbance. Each cumulative project is subject to AB 52 consultation and to CEQA Guidelines §15064.5, and each would have its own monitoring and discovery measures. With MM CUL-1 and MM TCR-1 through MM TCR-4, the Project would not damage or destroy a tribal cultural resource, and its contribution to any cumulative loss of tribal cultural resources would not be cumulatively considerable.

Significance Determination

Less Than Significant with Mitigation. The Project's contribution to cumulative impacts to tribal cultural resources would not be cumulatively considerable.

4.11.7 References

Agua Caliente Band of Cahuilla Indians, Tribal Historic Preservation Office. 2025. Letter to the City of Adelanto regarding AB 52 consultation, Adelanto Gateway Logistics Center. June 24, 2025.

California Native American Heritage Commission. 2025. Comment letter on the Notice of Preparation, Adelanto Gateway Logistics Center. June 6, 2025. (SEIR Appendix K.)

City of Adelanto. 2009. Final Environmental Impact Report, Adelanto Gateway Logistics Center (SCH No. 2008071129).

City of Adelanto. 2014. Adelanto North 2035 Comprehensive Sustainable Plan, Open Space and Conservation Element.

State of California. Assembly Bill 52 (Chapter 532, Statutes of 2014); Public Resources Code §§21074, 21080.3.1, 21080.3.2, 21082.3, 21084.2, and 21084.3.

State of California. Health and Safety Code §7050.5; Public Resources Code §5097.98.

Yuhaaviatam of San Manuel Nation, Cultural Resources Management Department. 2025. Letter to the City of Adelanto regarding AB 52 consultation, Adelanto Gateway Logistics Center. July 18, 2025.

4.12 Utilities and Service Systems

4.12.1 Introduction

This section evaluates physical environmental impacts from relocating and constructing the Project's utilities and service systems. It also evaluates providers' capacity to serve the Project.

Technical Reports

The analysis relies on the following reports and plans:

- Sewer and Water Feasibility Study (Albert A. Webb Associates, December 2025), included as SEIR Appendix I.
- Water Supply Assessment (Albert A. Webb Associates, September 16, 2025), included as SEIR Appendix J.
- Adelanto Water Master Plan (Albert A. Webb Associates), accepted and published by the Adelanto Public Utility Authority Board on March 25, 2026, and referenced as the adopted Water Master Plan in the Engineering Conditions of Approval.
- Adelanto Sanitary Sewer Master Plan (Stantec Consulting Services Inc., February 2026), a draft citywide planning document that has not been adopted by the City. Cited for background only.
- Industrial Sewer & Water Development Impact Fees Assessment (City of Adelanto, January 5, 2026), as applicable to the Project.
- Adelanto 2020 Urban Water Management Plan (adopted June 2021).
- 2025 Mojave Regional Urban Water Management Plan, Chapter 7 – The City of Adelanto (Mojave Water Agency and participating retailers), adopted by the Adelanto Public Utility Authority June 10, 2026. Submitted to the Department of Water Resources June 25, 2026.
- Adelanto 6th Cycle Housing Element Update (2014).
- Adelanto Wastewater Treatment Plant Asset Management and Operations & Maintenance Report, December 2025 (PERC Water Corporation), and Wastewater and Water Department Monthly Operating Reports, May 2026 (Woodard & Curran), received and filed by the Adelanto Public Utility Authority on August 12, 2026.

Notice of Preparation/Scoping Comments

The Notice of Preparation was circulated from May 29 to June 30, 2025, and a scoping meeting was held June 11, 2025. No comments addressed water supply, wastewater, stormwater drainage, or solid waste.

4.12.2 Environmental Setting

Water Resources

The Adelanto Water Department, through the Adelanto Public Utility Authority (APUA), provides water service in Adelanto under the federal Safe Drinking Water Act and State Water Resources Control Board standards.

Adelanto's water system includes 6 storage tanks with 21.750 million gallons of combined storage, 3 Pressure Reducing Valves (PRVs), and 180 miles of mains. Its 8,900 meters serve approximately 38,000 residents and commercial/industrial entities. The City also connects to the Mojave Water Agency's Regional Recharge and Recovery (R3) Project. That project constructs canals, dams, storage facilities, and pipelines to deliver Northern California water to the local aquifer, increasing Mojave Basin supply. An emergency connection with Victorville provides backup water.

Wastewater Treatment

The Adelanto Water Department, through the Adelanto Public Utility Authority (APUA), also collects and treats sewage through gravity and force main pipelines. Wastewater flows to APUA's treatment plant at Auburn Avenue and Jonathan Street, which has a permitted capacity of 4.0 MGD. Woodard and Curran operates and maintains the plant under contract. It also cleans the collection system, responds to and cleans up spills, and administers industrial sewage pretreatment.

Storm Drains and Flood Control

Adelanto lies north of the San Gabriel Mountains in the low-lying Victor Valley. Tributary rainfall originates in the Baldy Mesa foothills, approximately 15 to 20 miles south of the City limits. The Baldy Mesa Watershed carries runoff from the 4,600-foot elevation north through natural drainage courses. The City's flood control program must account for this approximately 57-square-mile watershed outside its limits. North of Palmdale Road, it becomes the Adelanto Watershed. Stormwater crosses undeveloped land or follows engineered and natural channels to Fremont Wash in northern Adelanto. Together, the watersheds cover 98 square miles of desert terrain draining across the City to Fremont Wash. (Adelanto North 2035 Sustainable by Design Technical Report, 2012)

Electricity

Southern California Edison (SCE) provides electricity through three distribution circuits from two nearby substations. The Portland 33 kV circuit originates at the Victor 115/33 kV substation, south of the site near Palmdale Road (SR-18) and Mesa Linda Avenue. It follows the US Highway 395 (US-395) transmission corridor into Adelanto. The nearby Roadway 115/12 kV Substation (Freightliner and Mack 12 kV circuits) in the industrial district feeds lines along Air Expressway, Adelanto Road, Rancho Road, and US-395. These lines are 430 to 2,100 feet from Project buildings. No SCE facilities occupy the site.

SCE would serve the Project through its service application process. After receiving the electrical design, SCE determines needed improvements and their timing. It designs, permits, and constructs them under CPUC jurisdiction, including environmental review under General Order 131-D. On-site distribution and connections to existing circuits would occupy the grading footprint and adjacent rights-of-way. Their construction is included in this SEIR's Project construction analysis.

Natural Gas

Southwest Gas Corporation provides natural gas service in Adelanto. Its southern division is a wholesale customer of Southern California Gas Company. Southwest Gas maintains distribution mains in the rights-of-way in the Project vicinity; there are no gas facilities on the site.

Southwest Gas would extend service from its 8-inch high-pressure main in Air Expressway along the northern frontage. Its line extension rule is approved by the California Public Utilities Commission. Initial service review indicates no pressure-regulating station is expected. Gas lines would follow the electrical street corridors.

If SCE cannot serve a building when it is ready for occupancy, the Applicant may install natural gas engines there until SCE service begins, within the limits of RR UTIL-6 (Section 3.11).

Telecommunications

Verizon and Charter Communications (Spectrum) provide local telecommunications service, as identified on the Tentative Parcel Map. Both have conduit and cable in adjacent rights-of-way. Southern California Edison's fiber-optic facilities, 0.7 to 1.7 miles away, serve its own system rather than customers. No telecommunications facilities occupy the site.

The Project would connect to Verizon and Spectrum lines in adjacent rights-of-way. Underground conduit would occupy the grading footprint and road sections as part of the dry utility package. It would share an electrical trench where providers allow. Connections would meet provider standards and require City encroachment permits. These private providers extend service on request and maintain their facilities. Each provider would identify needed network upgrades through its service application process and construct them. This SEIR includes on-site conduit and service connections in its Project construction analysis. No telecommunications construction or relocation beyond connections to existing lines would be required. Impacts would be less than significant.

4.12.3 Applicable Regulations

The following laws, regulations, and plans apply to utilities and service systems.

State of California – Water and Wastewater

The Urban Water Management Planning Act, codified in California Water Code (CWC) §10610 et seq., requires water providers serving over 3,000 connections to prepare and submit a UWMP every five years. The plan must forecast water reliability over 20 years across normal, single dry, and multiple dry year cycles.

California Senate Bill 610, codified at CWC §10910–§10915, requires a Water Supply Assessment (WSA) for projects over 40 acres or 650,000 sq ft. The WSA must verify if water suppliers' assets can support the project and existing uses over 20 years.

Regional – Wastewater

The **Lahontan Regional Water Quality Control Board** administers the Porter-Cologne Water Quality Control Act and regulates municipal and industrial discharges through Waste Discharge Requirements (WDRs). Board Order No. R6V-2013-0058 authorizes a 4.0 MGD operating threshold for the Adelanto WWTF.

State of California – Solid Waste

California's Integrated Waste Management Act (AB 939 / SB 1383), codified at California Public Resources Code § 40000 et seq., requires cities to develop waste management plans to achieve at least 50% waste diversion. SB 1383 aims for a 75% statewide reduction in organic waste land disposal below 2014 levels.

Regional – Solid Waste

County of San Bernardino, Countywide Integrated Waste Management Plan: The Countywide Integrated Waste Management Plan (CIWMP) implements programs among the County's jurisdictions to ensure the statewide diversion mandates are met.

Local

City of Adelanto General Plan. Land Use and Community Design Element Policy LC 5.1: Require new development to pay its fair share of the cost of public facilities, services, and infrastructure, including but not limited to transportation, incremental water supply, sewer and wastewater treatment, solid waste, flood control and drainage, schools, fire and police protection, and parks and recreation.

City of Adelanto Municipal Code. Chapter 8.05 (Recycling and Diversion of Construction and Demolition Waste), Chapter 8.20 (Water Conservation Plan), Chapter 8.70 (Mandatory Organic Waste Disposal Reduction), Chapter 17.60 (Landscaping/Water Conservation), and Title 17 (Zoning)

Regulatory Compliance Requirements

The Project must comply with the following existing requirements. They are not mitigation.

Construction-phase requirements also apply alongside the "RR-UTIL" requirements below. Sections 4.1 (Air Quality), 4.7 (Hydrology and Water Quality), 4.9 (Noise), and 4.10 (Transportation) describe these "RR" measures.

RR UTIL-1 (Engineering Conditions of Approval Nos. 34, 35, 37, and 38; APUA Will-Serve Verification). — Sewer and water service for the Project shall be consistent with the approved Webb Sewer and Water Feasibility Study. Before issuance of building permits for each phase, the applicant shall obtain APUA Will-Serve verification for the buildings covered by the permit and shall pay all water and sewer connection fees and Development Impact Fees in effect at the time of issuance. The fees are not deferred. Conditions 34 and 37 provide that sewer and water Development Impact Fees are calculated on Maximum Day Demand and, in the language of the conditions, are "supported by the adopted Industrial Sub-Area Sanitary Sewer Collection System Master Plan (2026)" and "the adopted City of Adelanto Water Master Plan." The applicant shall comply with all APUA rules, standards, and ordinances governing service and connections.

RR UTIL-2 (Engineering Conditions of Approval Nos. 1, 2, 3, 11, 36, 39, and 40; Infrastructure Design, Extension, and Sequencing). — Approval of the Project does not obligate the City to extend water, sewer, or other infrastructure (Condition 1). The applicant shall obtain all off-site rights-of-way and easements, and where a property interest cannot be acquired Government Code §66462.5 applies and the City may require the applicant to pay the cost of acquisition (Condition 2). All public infrastructure shall be designed to the City General Plan, the current Green Book standard specifications, the adopted Sewer Master Plan and Water Master Plan, and APUA and AWWA standards (Conditions 3, 35, and 40). The applicant shall connect to the City sewer system and extend APUA water mains as necessary to serve the Project (Conditions 36 and 39). All improvements shown on the approved plans shall be constructed before occupancy of any building within the applicable phase of development (Condition 11).

RR UTIL-3 (APUA Industrial Pretreatment Program; Lahontan Order No. R6V-2013-0058). — Discharges to the City sewer system are subject to the APUA Industrial Pretreatment Program, administered under the federal General Pretreatment Regulations (40 CFR Part 403), and to the discharge limitations of the plant's Waste Discharge Requirements.

RR UTIL-4 (Water Efficiency; California Plumbing Code, CALGreen, Adelanto Municipal Code Chapters 8.20 and 17.60). — The Project shall comply with the California Plumbing Code water-efficient fixture requirements, the CALGreen (CCR Title 24, Part 11) nonresidential indoor water-use provisions, the City's Water Conservation Plan (Chapter 8.20), and the City's Landscaping/Water Conservation ordinance (Chapter 17.60), which implements the State Model Water Efficient Landscape Ordinance.

RR UTIL-5 (Solid Waste Diversion; CALGreen §5.408, Adelanto Municipal Code Chapters 8.05 and 8.70, AB 341, AB 1826, SB 1383). — The Project shall prepare and implement a Construction and Demolition Debris Management Plan diverting at least 65 percent of non-hazardous construction debris (CALGreen §5.408; Chapter 8.05), and tenants shall participate in the commercial recycling and organic waste collection programs required by AB 341, AB 1826, and SB 1383 (Chapter 8.70) through the City's franchise hauler.

RR UTIL-6 (Natural Gas Generation Option; Conditional Use Permit and MDAQMD Authority to Construct). If the Applicant elects to install natural gas engines under the natural gas generation option described in Section 3.11, the engines shall be limited to a combined installed capacity of 22.5 megawatts across the Project and to a combined natural gas consumption of no more than 747,228 million British thermal units per year, the amounts analyzed in the Natural Gas Emissions Update (Appendix A-4). Engines may be installed at no more than three buildings and only at a building that SCE cannot serve by the time it is ready to occupy. Before a building permit is issued for any engine, the Applicant shall obtain a Conditional Use Permit from the City and an Authority to Construct from the Mojave Desert Air Quality Management District, and the Authority to Construct application shall show that the engines meet the District's health risk thresholds at every sensitive receptor, without assuming a fixed number of years of engine operation. Engines at a building shall cease operation as the building's power supply when SCE service to that building begins. A proposal to exceed the capacity or fuel limits in this requirement is a change in the Project subject to CEQA Guidelines §15162.

General Plan Policy Consistency

Table 4.12-1 identifies the General Plan policies that pertain to utilities and service systems and the Project's consistency with each.

Table 4.12-1. Project Consistency with Applicable Policies of the General Plan

General Plan Policy	Project Consistency
Policy LC-5.1: Require new development to pay its fair share of the cost of public facilities, services, and infrastructure.	**Consistent.** The Project developer is required to fund all on-site utility installations and pay applicable sewer and water connection fees, including the Sewer Development Impact Fee established by the DIF Assessment for the Project. Under the Engineering Conditions of Approval (May 1, 2026), connection fees and Development Impact Fees are paid in full before building permit issuance and are not deferred (RR UTIL-1).

General Plan Policy	Project Consistency
Policy PF-3.1: Coordinate the demands of new development with the capacity of the wastewater system.	**Consistent.** Project wastewater discharge is coordinated with plant capacity through APUA's Will-Serve verification process (RR UTIL-1). The Webb Feasibility Study, approved by the City as the implementing sewer document (Engineering Conditions of Approval, Condition 34), identifies the collection-system improvements needed to serve the Project and other tributary development.
Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service.	**Consistent.** The Project pays all applicable sewer connection fees and the Sewer Development Impact Fee in effect at the time of building permit issuance, under the framework outlined in the DIF Assessment. Engineering Condition of Approval No. 11 (RR UTIL-2) requires all improvements shown on the approved plans to be constructed before occupancy of any building within the applicable phase.
Policy PF 1.4: Require developers to minimize water use through the use of efficient irrigation methods, drought tolerant plants, and water re-use systems.	**Consistent.** Water-efficient irrigation and drought-tolerant plants are required (RR UTIL-4).
Policy PF 2.3: Require developers to construct recycled water systems and connect to the existing infrastructure.	**Not applicable at this time.** No recycled water system serves the Project area; the Project would connect if the City extends recycled water service to the area.

4.12.4 Thresholds of Significance

Under Appendix G of the CEQA Guidelines, the Project would result in a significant utility-related impact if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.12.5 Impacts Analysis

Threshold 4.12(a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Existing Site Conditions

The vacant desert site contains no water, sewer, storm drain, electric, gas, or telecommunications lines. A 12-inch APUA water main between Violet Road and Rancho Road in Emerald Road and a 10-inch gravity sewer fronting Building 7 have been constructed. The Project would need new water mains, a sewer lift station, force main, gravity sewers, on-site storm drains, and electric and telecommunications connections in adjacent rights-of-way. These facilities are sized for buildout. Building construction order alone would not require additional facilities.

Applicable Regulatory Compliance Requirements

RR UTIL-1 and **RR UTIL-2** apply to this threshold, together with the construction-phase requirements identified in Section 4.1 (Air Quality), Section 4.7 (Hydrology and Water Quality), Section 4.9 (Noise), and Section 4.10 (Transportation).

Impact Analysis

Water Service Improvements

The Project requires new public water mains connecting to the APUA Zone 2 system. It would build four off-site improvements: new or replacement 12-inch mains in Mesa Linda Road, Joshua Avenue, Emerald Road, and Adelanto Road (Water Master Plan improvements W-5 through W-7; Figure 3-5, Proposed Water Infrastructure Improvements).

The Feasibility Study identifies facilities others must build before the Project can receive adequate supply and fire flow. The 12-inch Emerald Road main between Violet Road and Rancho Road (part of W-7) is installed. The remaining facility is a pressure reducing station near Adelanto Road/Holly Road with approximately 2,000 feet of 12-inch main in Adelanto Road. The main runs between Pansy Road and Holly Road, connecting Pressure Zones 2 and 3 (W-10 and V-3). This facility is outside the Project and may be built concurrently with its on-site public mains.

The applicant must replace the Adelanto Road main (W-5) along the frontage, with reimbursement available for work beyond the property limits. With the Project improvements

and implementing facility, the hydraulic analysis shows compliance with minimum City pressure and fire-flow requirements (Feasibility Study, Sections 2.3 and 2.5). Construction would occur in existing rights-of-way and the grading footprint. Section 4.1 (Air Quality), Section 4.9 (Noise), and Section 4.10 (Transportation) address construction effects.

Sewer Service Improvements

New off-site sewers would carry Project wastewater to the City's 15-inch Pearmain Street trunk sewer. The Webb Feasibility Study evaluated two alignments. The City selected Plan A because Plan B crosses Victorville right-of-way and would require an encroachment permit, easement, and interagency agreements (Feasibility Study, Sections 3.2.2 and 3.5; K. Emami, City Engineer, personal communication). Plan A includes a lift station at the Air Expressway regional low point just west of Emerald Road. A force main in Air Expressway would discharge to the existing Pearmain Street trunk sewer, with a parallel gravity sewer along Air Expressway. These improvements are within Adelanto and shown in Figure 3-6, *Proposed Sewer Infrastructure Improvements*.

The Project would build all sewers shown on Figure 3-6 with initial site infrastructure, except laterals for Buildings 1, 5, 6, and 7. Those laterals would accompany their buildings. Mains, the lift station, and the force main are sized for sub-area buildout, including other tributary parcels. As upstream projects develop, the 10-inch segment between the Building 7 lateral and 15-inch main may need expansion to 12 inches (Feasibility Study, Section 3.4).

Storm Drains

New impervious surfaces require on-site storm drains meeting San Bernardino County Flood Control District standards. Facilities described in the Webb Drainage Report (June 2026) would also convey regional flows across the site. Section 4.7 (Hydrology and Water Quality) analyzes these facilities, their phasing, and water quality performance. All storm drains lie within the grading limits and adjacent rights-of-way.

Electric and Telecommunications

The Project connects to existing Southern California Edison facilities in adjacent rights-of-way. The scope and timing of any SCE system improvements are determined by SCE through its service application process. Southwest Gas would extend natural gas service to the buildings from its main in Air Expressway. If the natural gas generation option is used, the engines would be permitted by the City and the Mojave Desert Air Quality Management District under RR UTIL-6. Telecommunications connect to existing conduit. On-site distribution is within the grading footprint and roads.

Construction Impacts

Building and relocating the utilities described above would disturb the ground. This SEIR evaluates those effects as part of Project construction. Applicable mitigation or regulatory requirements in the relevant resource sections would reduce significant utility-construction effects to less-than-significant levels.

The construction mitigation measures in Sections 4.1 (MM AQ-1 through MM AQ-5 and MM AQ-23), 4.2 (MM BIO-1 and MM BIO-3 through MM BIO-12), 4.3 (MM CUL-1 through MM CUL-3), 4.9 (MM NOI-1), and 4.11 (MM TCR-1 through MM TCR-4) apply to construction of the utility improvements.

Significance Determination

Less Than Significant with Mitigation Incorporated.

With implementation of the applicable mitigation measures identified above, construction of the required utility and service-system improvements would not result in a significant physical environmental effect.

Threshold 4.12(b): Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Existing Conditions

The Adelanto Public Utility Authority (APUA) provides drinking water across approximately 6,230 acres to approximately 8,425 active connections. In CY 2024, it produced 5,249 acre-feet per year (AFY) from three sources: groundwater (2,750 AFY), imported State Water Project water through the R-Cubed Project (1,870 AFY), and the Victorville Water District emergency intertie (629 AFY).

APUA's groundwater pumping is governed by the adjudicated Mojave Basin Judgment. APUA holds a Free Production Allowance (FPA) of 2,612 AFY (50.4 percent of its 5,182 AFY Base Annual Production) in the Alto Subarea. APUA can pump beyond its FPA by paying standard replacement-water fees to the Mojave Basin Watermaster, which purchases imported water to recharge the basin.

System Delivery Capacity

Table 4.12-2. *Water System Delivery* Capacity shows APUA's delivery capacity of 7,665 gallons per minute (gpm) (12,364 AFY). This exceeds the current Maximum Day Demand (MDD) of 4,759 gpm.

Table 4.12-2. Water System Delivery Capacity

Supply Source	Capacity (gpm)	Capacity (AFY)	Operational Notes
City Wells	1,315	2,121	Firm capacity with largest well out of service.
R-Cubed Project	5,960	9,614	Pipeline design capacity; wholesale contract caps deliveries at 3,000 AFY.
VWD Emergency Intertie	390	629	Volume conveyed in CY 2024 assumed as emergency capacity.
Total System Capacity	7,665	12,364	Exceeds CY 2024 Peak Daily Demand of 4,759 gpm.

Source: Albert A. Webb Associates, Sewer and Water Feasibility Study (December 2025); Woodard & Curran, APUA Water Department Monthly Operating Report (May 2026).

Project Demand vs. Supply (Water Supply Assessment Baseline)

APUA approved Webb's Water Supply Assessment (Appendix J) on September 16, 2025. It compared Project demand with the 2020 Urban Water Management Plan (UWMP) under Water Code §10910(c)(2). Table 4.12-3, *Project Water Demand and Supply*, summarizes the finding: supplies can meet the Project's 634 AFY demand and existing and planned growth. This finding covers normal, single-dry, and multiple-dry years over 20 years.

Table 4.12-3. Project Water Demand vs. Supply

Evaluation Parameter	Normal Year (AFY)	Single-Dry Year (AFY)	Multiple-Dry Years (AFY)
Alto Subarea Basin Yield Surplus	>58,000	>58,000	>58,000
Project Water Demand	634	634	634
WSA Supply Availability Finding	Sufficient	Sufficient	Sufficient

Source: Albert A. Webb Associates, Water Supply Assessment for the Adelanto Gateway Logistics Center (September 16, 2025).

Project Demand vs. Supply (2025 RUWMP Baseline)

On June 10, 2026, APUA adopted the 2025 Mojave Regional Urban Water Management Plan (2025 RUWMP). The 2025 RUWMP projects that total service area demand will reach 6,135 AFY by 2050, with managed groundwater supply fully matching demand under all normal, single-dry, and 5-year drought scenarios.

As shown in Table 4.12-4, *Project Demand vs. Supply (2025 RUWMP Baseline)*, the WSA's finding of water supply sufficiency remains valid under the 2025 RUWMP because:

- The Project's 634 AFY demand is within the growth in demand the 2025 RUWMP forecasts through 2045.
- The Mojave Basin Judgment's adjudicated yield and APUA's Base Annual Production remain unchanged.
  APUA will continue to serve growth exceeding its FPA through established replacement-water fee payments.

Table 4.12-4. Project Demand vs. Supply (2025 RUWMP Baseline)

Planning Year	Projected Population	APUA Service Area Demand (AFY)	Projected Managed Supply (AFY)	Net Difference / Deficit (AFY)
2030	45,913	5,555	5,555	0
2040	48,565	5,845	5,845	0
2050	51,216	6,135	6,135	0

Source: Mojave Water Agency and APUA, 2025 Mojave Regional Urban Water Management Plan, Chapter 7 (June 2026).

Applicable Regulatory Compliance Requirements

RR UTIL-1 and **RR UTIL-4** apply to this threshold.

Mitigation Measures (MM)

No mitigation measures are required. RR UTIL-1 (Will-Serve verification and fees) and RR UTIL-4 (water efficiency) apply.

Significance Determination

Less Than Significant.

The WSA approved September 16, 2025 finds sufficient supply for the Project's 634 AFY, and the finding holds under the 2025 RUWMP adopted June 10, 2026. The Project's demand is within the growth the adopted plan forecasts, and the plan projects supply equal to demand through 2050. No mitigation is required.

Threshold 4.12(c): Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Existing Conditions

Approximately 100 miles of City-owned sewers convey wastewater to the Adelanto Wastewater Treatment Plant (WWTP) at Jonathan Street and Auburn Avenue. Woodard & Curran operates the plant under Lahontan Regional Water Quality Control Board Order No. R6V-2013-0058. The order permits average dry-weather treatment of 4.0 million gallons per day (MGD). On March 12, 2025, the Authority awarded process improvements (PERC Water Corporation, $2,432,556.65) increasing treatment capacity from approximately 3.0 to approximately 3.8 MGD. The City is pursuing upgrades to reach permitted capacity (Feasibility Study, Section 3.4.3; APUA Staff Report, March 12, 2025). Treated effluent enters on-site percolation ponds.

System Treatment and Conveyance Capacity Without Project

Table 4.12-5 shows that treatment and conveyance infrastructure operates below maximum design thresholds, with capacity for peak flows and local growth.

Table 4.12-5. System Treatment and Conveyance Capacity Without Project

Infrastructure / Metric	Permitted / Design Capacity	Baseline Operations (2025–2026)	Operational & Regulatory Status
Adelanto WWTP Capacity	4.0 MGD (Average Dry-Weather)	3.25 – 3.34 MGD	Operates at 81%–84% of permitted capacity under Order R6V-2013-0058.
Adelanto WWTP Treatment Capacity	About 3.8 MGD (after 2025 Process Improvement Plan)	3.25 – 3.34 MGD	Operates at approximately 86%–88% of treatment capacity.
Percolation Ponds	Design Capacity	2 empty; 7–24 ft freeboard	Compliant with discharge limits; ample percolation reserve.
Sewer Collection Network	100+ miles of mains	Normal Dry-Weather Flow	No system overflows reported through May 2026; trunk lines operate within d/D limits.

Source: PERC Water Corporation, AWTP Asset Management Report (December 2025); Woodard & Curran, APUA Monthly Operating Report (May 2026); Lahontan Order No. R6V-2013-0058.

Project Demand vs. Wastewater Capacity

The 2007 City of Adelanto Sewer Master Plan sets an industrial wastewater factor of 400

gallons per day (gpd) per acre. Applying it to 450.7 net acres, the Webb Sewer and Water Feasibility Study estimates 180,280 gpd (0.18 MGD) of average daily Project flow. This represents 4.5 percent of total plant capacity. For Sewer Development Impact Fee (DIF) purposes, the City's DIF Assessment applies 400 gpd per acre to 451 acres and a 2.0 peaking factor. Maximum day wastewater demand is 360,800 gpd.

Table 4.12-6, *System Treatment and Conveyance Capacity With Project*, adds 0.18 MGD of Project flow to baseline inflows. Total treatment volume becomes 3.43–3.52 MGD, or 86 to 88 percent of permitted capacity, leaving 0.48 to 0.57 MGD. Hydraulic analysis finds adequate depth-to-diameter (d/D) capacity in off-site mains, including the 15-inch Pearmain Street trunk, at full sub-area buildout.

Table 4.12-6. System Treatment and Conveyance Capacity With Project

Evaluation Parameter	Baseline Operations	Project Addition	Total Post-Project Operations	Remaining Plant Capacity
Average Daily Inflow (MGD)	3.25 – 3.34	0.18 (180,280 gpd)	3.43 – 3.52	0.48 – 0.57 MGD
WWTP Permitted Capacity Utilized (%)	81% – 84%	4.5%	86% – 88%	12% – 14%
WWTP Treatment Capacity Utilized (%)	86% – 88%	4.7%	90% – 93%	7% – 10%

Source: Albert A. Webb Associates, Sewer and Water Feasibility Study (December 2025); City of Adelanto, DIF Assessment (January 2026).

Sewer Planning and Capital Improvement Framework

The Webb Feasibility Study, approved under Engineering Condition 34, and the 2007 Sewer Master Plan govern Project wastewater service. The study's Appendix B includes the Stantec Technical Memorandum for the Industrial Sub-Area Sanitary Sewer Collection System Master Plan (July 12, 2024).

Infrastructure upgrades and capacity allocations are managed through the following mechanisms:

- **On-Going Capital Improvements:** The Authority awarded the WWTP Process Improvement Plan on March 12, 2025 (PERC Water Corporation, $2,432,556.65). New equipment raises treatment capacity from approximately 3.0 to approximately 3.8 MGD. The City is pursuing additional upgrades for future flows.
- **Building-by-Building Verification:** APUA verifies sewer capacity and issues will-serve commitments on a first-come, first-served basis during building permit plan check (RR UTIL-1).

- **Development Impact Fees**: System capacity contributions are paid via the Sewer Development Impact Fee calculated on peaked daily demand.

Wastewater collection and treatment impacts are less than significant. The Adelanto WWTP's 4.0 MGD permitted capacity and available infrastructure capacity can accommodate the Project's 0.18 MGD flow and existing commitments.

Applicable Regulatory Compliance Requirements

The Project must comply with **RR UTIL-1** (will-serve verification and DIF payment), RR UTIL-2 / Condition 11 (installation of required conveyance improvements prior to occupancy), and RR UTIL-3 (industrial wastewater pretreatment standards).

Mitigation Measures:

No mitigation measures are required.

Significance Determination

Less than significant.

Threshold 4.12(d): Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Existing Conditions

Burrtec Waste Industries collects solid waste under an exclusive City franchise. Non-hazardous waste goes to the County's approximately 341-acre Class III Victorville Sanitary Landfill on Stoddard Wells Road. It is permitted for 3,000 tons per day, with approximately 79.4 million cubic yards remaining and projected closure on October 1, 2047 (CalRecycle Solid Waste Information System, SWIS No. 36-AA-0045). The Mid-Valley and San Timoteo Sanitary Landfills provide additional capacity. The County's Integrated Waste Management Plan documents remaining system capacity through the SEIR planning horizon.

Applicable Regulatory Compliance Requirements

RR UTIL-5 applies to this threshold.

Impact Analysis

Construction

Construction across the 451-acre site would generate scrap wood, pallets, concrete, and packaging. The site requires imported fill, so no soil would be exported, and no demolition is required. Under a Construction and Demolition Debris Management Plan (RR UTIL-5), at least 65 percent of non-hazardous construction debris would be diverted, and the remainder would go to the Victorville Sanitary Landfill within its permitted daily throughput.

Operation

The 8,256,274-square-foot logistics complex would generate approximately 7,761 tons of solid waste annually at buildout, or approximately 21.2 tons daily. Estimates use the CalEEMod default disposal rates in Project air quality and greenhouse gas modeling (Technical Appendix A-3, Section 3.5.5 and Appendix 3.2). This is approximately 0.71 percent of the landfill's 3,000-ton-per-day permit. Tenant recycling and organics programs (RR UTIL-5) reduce disposal. The Project would not consume a meaningful portion of remaining capacity.

Mitigation Measures (MM)

No mitigation measures are required. **RR UTIL-5** applies.

Significance Determination

Less Than Significant.

Threshold 4.12(e): Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Existing Conditions

The solid waste framework includes the federal Resource Conservation and Recovery Act; California's Integrated Waste Management Act (AB 939, 50% diversion); AB 341 (mandatory commercial recycling); AB 1826 (mandatory organics recycling); SB 1383 (75% organic waste reduction); CALGreen Sections 4.408 and 5.408; Adelanto Municipal Code; the City's franchise with Burrtec Waste; and the County's waste plan. CalRecycle and the County oversee compliance.

Applicable Regulatory Compliance Requirements

RR UTIL-5 applies to this threshold.

Impact Analysis

The Project would generate construction and operational waste. CALGreen § 5.408 and Adelanto Municipal Code Chapter 8.05 require a Debris Management Plan diverting at least 65 percent of non-hazardous construction and demolition waste. Adelanto Municipal Code Chapter 8.70 and state legislation (AB 341, AB 1826, and SB 1383) require tenant participation in commercial recycling and organic waste diversion. Burrtec Waste Industries, the City's exclusive franchise hauler, provides these programs. Compliance through RR UTIL-5 would meet all federal, State, and local solid waste management and reduction requirements.

Mitigation Measures (MM)

No mitigation measures are required. RR UTIL-5 applies.

Significance Determination

Less Than Significant. The Project would comply with applicable federal, State, and local solid waste statutes and regulations through RR UTIL-5. The impact is less than significant.

4.12.6 Cumulative Impacts Analysis

Cumulative utility effects are evaluated using the service providers' adopted plans and projections (CEQA Guidelines Section 15130(b)(1)(B)).

Water Supply

The cumulative water supply analysis covers APUA's service area. It uses the Projection Approach under CEQA Guidelines § 15130(b)(1)(B), based on APUA's adopted 2025 Regional Urban Water Management Plan (RUWMP). That plan accounts for citywide land use designations, including Manufacturing/Industrial (MI). It projects potable demand of 5,990 acre-feet per year (AFY) in 2045 and 6,135 AFY in 2050. Managed groundwater production under the Mojave Basin Area Adjudication and Watermaster replacement purchases will meet these demands (2025 RUWMP, Chapter 7).

The Water Supply Assessment (WSA), prepared under Water Code § 10910, finds sufficient supplies for the Project's 634 AFY demand and existing and planned uses. This finding covers normal, single-dry, and multiple-dry years over 20 years. Required CALGreen water-efficiency standards and City landscape irrigation regulations support efficient use. The 2025 RUWMP's growth projections include Project demand, so no water entitlements beyond those planned regionally would be needed. The Project's incremental contribution is not cumulatively considerable.

Conclusion: **Less than significant cumulative impact**. The Project's incremental contribution is not cumulatively considerable.

Wastewater Collection and Treatment

The analysis covers the Adelanto Wastewater Treatment Plant (AWTP) service area. Average daily inflow is 3.25 to 3.34 million gallons per day (MGD), below the permitted 4.0 MGD treatment capacity. Project buildout flow represents approximately 4.5% of plant capacity. Connecting developments require capacity verification, connection fees, and compliance with Lahontan Regional Water Quality Control Board Waste Discharge Requirements (WDRs). The City's capital improvement program and updated WDR permits would manage expansion for future growth, each subject to separate environmental review. The Project's contribution is minor and will not exceed plant capacity thresholds.

Conclusion: **Less than significant cumulative impact.** The Project's incremental contribution is not cumulatively considerable.

Stormwater Drainage

The geographic scope is the Fremont Wash sub-basin within the Mojave River watershed. Cumulative developments are subject to National Pollutant Discharge Elimination System (NPDES) Construction General Permit regulations, City drainage master plans, and San Bernardino County Flood Control District design criteria. Mandatory compliance with regional drainage standards ensures cumulative runoff will not cause downstream flooding or erosion.

Conclusion: **Less than significant cumulative impact**. The Project's incremental contribution is not cumulatively considerable.

Solid Waste

The geographic scope covers the San Bernardino County landfill system managed by Burrtec Waste Industries. Primary disposal occurs at the Victorville Sanitary Landfill (79.4 million cubic yards remaining capacity; closure in October 2047), supported by the Mid-Valley and San Timoteo Landfills. Per the County's 2020 Waste Management Plan, ample disposal capacity exists past a 20-year planning horizon. Cumulative developments must comply with state waste diversion mandates (AB 939, AB 341, AB 1826, SB 1383, and CALGreen) under CalRecycle and County oversight.

Conclusion: **Less than significant cumulative impact**. The Project's incremental contribution is not cumulatively considerable.

Electric Power, Natural Gas, and Telecommunications

Southern California Edison (SCE) plans grid upgrades to maintain service reliability across its service territory, subject to California Public Utilities Commission (CPUC) approval and project-specific environmental review. Southwest Gas would serve the Project from its existing main in Air Expressway. Telecommunications providers maintain fiber-optic infrastructure within existing rights-of-way and review connection requests as development occurs. Individual cumulative projects undergo separate environmental review to identify any necessary utility extensions or upgrades.

Conclusion: **Less than significant cumulative impact.** The Project's incremental contribution is not cumulatively considerable.

Significance Determination

Less Than Significant.

4.12.7 References

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Stantec Consulting Services Inc. 2026. City of Adelanto Sanitary Sewer Master Plan (draft). February 2026.

Stantec Consulting Services Inc. 2024. Technical Memorandum, Industrial Sub-Area Sanitary Sewer Collection System Master Plan. July 12, 2024. Included as Appendix B to Albert A. Webb Associates, Sewer and Water Feasibility Study (SEIR Appendix I).

Urban Crossroads, Inc. 2026. Adelanto Industrial Park Air Quality Impact Analysis, August 14, 2026 (SEIR Appendix A-1); Adelanto Industrial Park Greenhouse Gas Analysis, August 14, 2026 (SEIR Appendix A-3).

Woodard & Curran. 2026. Adelanto Public Utility Authority Wastewater Department and Water Department Monthly Operating Reports, May 2026. Received and filed by the Adelanto Public Utility Authority Board, August 12, 2026.

5.0 Effects Not Found to be Significant

The City relies on the certified 2009 EIR for the topics below. For each topic, the revised Project, changed circumstances, and new information would not cause a new significant effect or make a previously identified effect substantially more severe, so none of the conditions in CEQA Guidelines Section 15162(a) applies.

Each topic lists the Appendix G thresholds, the 2009 EIR finding (City Council Resolution No. 09-35), and the City's determination. "No New Impact" means the 2009 EIR adequately analyzed the topic and no further analysis is required. Where a Project feature or a later City policy change affects a topic, the text explains why the finding remains valid.

5.1 Aesthetics

The 2009 EIR found each Appendix G aesthetics threshold less than significant, with no mitigation required (2009 EIR Section 8.1; City Council Resolution No. 09-35, Section 3.A). The revised Project occupies the same site, proposes the same general industrial building type, and follows the regulatory framework analyzed in 2009. Building height would increase from 38 feet in 2009 to 55 feet, within the 60-foot limit of the Manufacturing/Industrial zone (Table 3-1, *Manufacturing Industrial (MI) District Development Standards*). The site is not near a designated scenic vista or state scenic highway, so the taller buildings would not change these findings.

Table 5-1 Aesthetics 2009 EIR Finding and §15162 Determination

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
a) Have a substantial adverse effect on a scenic vista?	Reso. 09-35 §3.A.1: site is not within the vicinity of a designated scenic vista; located adjacent to the federal prison, existing industrial development, and the SCLA facility, the Project would not interfere with any scenic vista; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
b) Substantially damage scenic resources, including trees, rock outcroppings, or historic buildings within a state scenic highway?	Reso. 09-35 §3.A.2: site is not within a designated scenic-resource area and is not in the vicinity of a state scenic highway; not significant. No state scenic-highway designation has been adopted in the vicinity since 2009. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
c) Substantially degrade the existing visual character or quality of public views (non-urbanized areas); or conflict with applicable zoning and other regulations governing scenic quality (urbanized areas)?	Reso. 09-35 §3.A.3: site is designated Manufacturing/Industrial, surrounded by industrial uses, the SCLA facility, and FCI-Victorville; visual character compatible and consistent with the General Plan and Zoning Code; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views?	Reso. 09-35 §3.A.4: based on compliance with the City lighting ordinance, the SCLA CALUP, and compatibility with surrounding uses, light-and-glare impacts not significant. Zoning Ordinance §17.90.040 and the CALUP remain in effect and apply to the revised Project. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

The 2009 EIR's less-than-significant aesthetics findings remain valid. None of the conditions in CEQA Guidelines §15162(a) applies.

5.2 Geology and Soils

The 2009 EIR found the Appendix G geology and soils thresholds less than significant (City Council Resolution No. 09-35, Section 3.E; 2009 EIR Section 4.4). The revised Project occupies the same site under the same geologic setting and remains subject to the California Building Code and the City's grading and geotechnical review requirements.

Table 5-2 Geology and Soils 2009 EIR Finding and §15162 Determination

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
a) Expose people or structures to potential substantial adverse effects, including rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides?	Reso. 09-35 §3.E.1 (fault rupture): no known active faults traverse the site; potential for surface rupture is low; not significant. §3.E.2 (landslides): flat topography, no steep slopes; landslide not likely; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
b) Result in substantial soil erosion or the loss of topsoil?	2009 EIR Section 4.4: addressed through required grading and erosion/silt-control plans (Mitigation Measures GEO-1 and GEO-2); less than significant. These standard requirements apply to the revised Project. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
c) Be located on a geologic unit or soil that is unstable or would become unstable (landslide, lateral spreading, subsidence, liquefaction, or collapse)?	2009 EIR Section 4.4: site not subject to liquefaction or lateral spreading; collapse/settlement addressed through grading-plan requirements (GEO-1, GEO-2); less than significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
d) Be located on expansive soil, creating substantial direct or indirect risks?	2009 EIR Section 4.4: on-site soils have low shrink-swell potential; addressed through Mitigation Measure GEO-3 (grading/building plans incorporating expansive-soil measures); less than significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
e) Have soils incapable of supporting septic tanks or alternative wastewater disposal where sewers are unavailable?	**Not applicable** — the Project connects to the public sewer system; no septic disposal is proposed. No §15162(a) trigger.
f) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	Addressed in the 2009 EIR's geologic/cultural analysis; the site contains no mapped unique geologic feature. No new information since 2009 alters this. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

The 2009 EIR's geology and soils findings remain valid. None of the conditions in CEQA Guidelines §15162(a) applies.

2009 Mitigation That Still Applies. Mitigation Measures GEO-1 through GEO-3 supported the 2009 EIR's less-than-significant geology and soils findings. They apply to the revised Project, with the building code reference in GEO-1 updated to the current California Building Code. They will be included in the Mitigation Monitoring and Reporting Program adopted with the Project (Table 1-5). Their full text follows.

MM GEO-1 (Building Plans and Specifications). Prior to issuance of grading permits, the project applicant shall submit building plans and specifications to the Building and Engineering Department for review and approval. Plans and specifications shall demonstrate that the

proposed buildings comply with the California Building Code and the City's seismic design standards.

MM GEO-2 (Grading). All grading within the project area shall be accomplished in accordance with the applicable requirements set forth in the City of Adelanto Grading Ordinance and Standard Conditions as approved by the City Engineer, including dust-control measures.

MM GEO-3 (Expansive Soils). Prior to issuance of grading and/or building permits, the project applicant shall submit grading and building plans and specifications to the Engineering/Building Department for review and approval, incorporating measures to address the expansive nature of site soils.

5.3 Mineral Resources

The 2009 EIR found the Appendix G mineral resources thresholds not significant (City Council Resolution No. 09-35, Section 3.I). The revised Project does not change site conditions, and no change in circumstances or new information of substantial importance alters the prior analysis.

Table 5-3 Mineral Resources 2009 EIR Finding and §15162 Determination

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
a) Result in the loss of availability of a known mineral resource of value to the region and the residents of the state?	Reso. 09-35 §3.I.1: site is not within a mineral resource zone in the City's General Plan; per the General Plan EIR, the loss of this land would not be significant to the region or state; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local plan?	Reso. 09-35 §3.I.2: the Adelanto General Plan does not identify the site as a locally important mineral resource recovery area; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

The 2009 EIR's mineral resources findings remain valid. None of the conditions in CEQA Guidelines §15162(a) applies.

5.4 Public Services

The 2009 EIR found the Appendix G public services thresholds less than significant (City Council Resolution No. 09-35, Section 3.L). The revised Project proposes no residential use and is subject to applicable Development Impact Fees for each service. The analysis below addresses an intervening change in adopted City fire-protection policy.

Fire Protection — Change in Adopted City Policy. The 2009 less-than-significant fire-protection finding (Reso. 09-35 §3.L.4) relied partly on a required on-site fire station. County Fire's response time of approximately 8 minutes 39 seconds exceeded the District's target. In 2014, the City amended its General Plan through the Adelanto North 2035 Comprehensive Sustainable Plan (City Council Resolution Nos. 14-44 and 14-45; Ordinance No. 528, 2014). The amendment replaced all Safety Element fire-protection goals and policies and removed the on-site fire station requirement. Current policies require contemporary on-site and department-controlled fire protection for high-hazard industrial facilities (Policy HS 5.3). They also require pro-rata public-safety contributions from new development (Policy HS 6.2) and ongoing consultation with the San Bernardino County Fire Department (Policy HS 6.4). This consultation addresses community fire-protection needs.

The Adelanto North 2035 Plan EIR's adopted Findings of Fact identified only Noise and Transportation/Traffic as significant and unavoidable. Public services, including fire protection, were less than significant under the 2014 General Plan framework, with no mitigation required. Removing the on-site fire station reflects that adopted policy change, already analyzed and found less than significant in a certified EIR. It is not a new effect of the revised Project. The San Bernardino County Fire Protection District will serve the Project. Construction will meet current fire and building codes, including automatic fire-sprinkler protection. County Fire will review fire flow and access through plan check. Applicable Development Impact Fees will also apply.

Table 5-4 Public Services 2009 EIR Finding and §15162 Determination

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
a) Result in substantial adverse physical impacts associated with new or physically altered fire-protection facilities to maintain acceptable service?	Reso. 09-35 §3.L.4 found fire protection less than significant. The 2009 on-site-station requirement was removed by the 2014 General Plan amendment (Reso. 14-44/14-45; Ord. 528) and found less than significant in the 2014 GP EIR. Service is provided by County Fire with current-code construction, plan-check, and DIF. **No New Impact** — no §15162(a) trigger.
b) police protection?	Reso. 09-35 §3.L.5: commercial/industrial use; service-call increase incremental; no new police facilities required; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
c) schools?	Reso. 09-35 §3.L.3: no residential use; no increase in student population; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
d) parks?	Reso. 09-35 §3.L.1: no residential use; no increased park demand; not significant. **No New Impact —** 2009 finding remains valid; no §15162(a) trigger.
e) other public facilities (e.g., libraries)?	Reso. 09-35 §3.L.2: no residential use; no increased library demand; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

The 2009 EIR's public-services findings remain valid as modified by the 2014 General Plan amendment and its certified EIR, including removal of the on-site fire station. None of the conditions in CEQA Guidelines §15162(a) applies. The City also relies on the 2014 General Plan EIR.

5.5 Recreation

The 2009 EIR found no impact to parks and recreational facilities because the Project proposes no residential use and would not increase population demand for parks (City Council Resolution No. 09-35, Section 3.L.1). The revised Project likewise proposes no residential use. Any indirect, employment-related demand is offset through applicable Development Impact Fees.

Table 5-5 Recreation 2009 EIR Finding and §15162 Determination

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
a) Would the project increase the use of existing parks or recreational facilities such that substantial physical deterioration would occur or be accelerated?	Reso. 09-35 §3.L.1: no housing proposed; population would not increase; no additional park demand; no impact. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
b) Does the project include or require the construction or expansion of recreational facilities that might have an adverse physical effect?	No recreational facilities are proposed or required. No §15162(a) trigger. **No New Impact**.

The 2009 EIR's recreation findings remain valid. None of the conditions in CEQA Guidelines §15162(a) applies.

5.6 Wildfire

The 2009 EIR found wildland-fire impacts not significant (City Council Resolution No. 09-35, Section 3.F.7). The site is flat and surrounded by industrial, commercial, and airport uses. The Adelanto General Plan does not identify the area as prone to wildland-fire hazard. The 2009 finding referenced the required fire station. As discussed under Public Services, the 2014 General Plan amendment removed that requirement. The 2014 GP EIR found the resulting service framework less than significant. The wildfire determination below relies on physical site conditions and current regulations, independent of the deleted station.

Table 5-6 Wildfire 2009 EIR Finding and §15162 Determination

CEQA Guidelines Appendix G Threshold — Would the Project:	2009 EIR Finding and §15162 Determination
a) Substantially impair an adopted emergency response or evacuation plan?	2009 EIR / Reso. 09-35 §3.F.6–.7: Project consistent with the County Multi-Jurisdictional Hazard Mitigation Plan; designated evacuation routes unaffected; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
b) Due to slope, winds, and other factors, exacerbate wildfire risk and expose occupants to pollutant concentrations or uncontrolled spread?	Reso. 09-35 §3.F.7: flat terrain in an industrializing area; development converts open space to urbanized form, reducing wildland-fire potential; not significant. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.
c) Require installation or maintenance of infrastructure (roads, fuel breaks, water sources, power lines) that may exacerbate fire risk or cause environmental impact?	Project infrastructure is standard urban industrial servicing reviewed by County Fire; no wildland fuel-break or special infrastructure required. **No New Impact.**
d) Expose people or structures to post-fire risks such as downslope flooding or landslides from runoff or slope instability?	Flat terrain; no downslope/landslide exposure; drainage addressed in Section 4.7. **No New Impact** — 2009 finding remains valid; no §15162(a) trigger.

The 2009 EIR's wildfire-related findings remain valid. None of the conditions in CEQA Guidelines §15162(a) applies. The City also relies on the 2014 General Plan EIR.

6.0 Other CEQA Considerations

6.1 Significant Effects That Cannot Be Avoided if the Proposed Project is Implemented

Section 4.0 discloses the Project's environmental effects. With the identified mitigation measures, all impacts would be less than significant except five: three air quality and two greenhouse gas emissions impacts. These significant and unavoidable impacts are described below.

Consistency with the Applicable Air Quality Plan (Threshold 4.1 (a)). Mitigated operational-source emissions would exceed the MDAQMD regional thresholds for VOC, NOX, CO, and PM10, as shown in Table 4.1-7, *Operational Emissions at Buildout Compared to MDAQMD Regional Thresholds*. The Project therefore does not satisfy MDAQMD consistency criterion No. 3 and would be inconsistent with the applicable air quality plan. No feasible mitigation would reduce this impact below the thresholds. Vehicle emissions are the dominant source. The California Air Resources Board regulates them statewide, and the City lacks authority to impose further restrictions.

Operational Criteria Pollutant Emissions (Threshold 4.1 (b)). The Project's operational-source emissions of VOC, NOX, CO, and PM10 would exceed the MDAQMD regional thresholds after implementation of all feasible mitigation. Mitigation Measures MM AQ-4 and MM AQ-6 through MM AQ-22 reduce operational emissions to the extent feasible. No additional feasible mitigation is available for the reasons stated above. PM2.5 would also exceed its threshold while the natural gas generation option is in use (Appendix A-4).

Cumulative Air Quality Impacts. Because mitigated operational emissions would exceed the levels assumed in the attainment plans, the Project's contribution to regional air quality impacts would be cumulatively considerable. No additional feasible mitigation is available because on-road vehicles are the dominant source and are regulated by the California Air Resources Board.

Greenhouse Gas Emissions (Threshold 4.5 (a) and Cumulative). With MM GHG-1 the Project would meet the City's adopted GHG thresholds, which would normally support a less-than-significant finding. The City does not make that finding for this Project because of the Project's emissions of approximately 89,661 $MTCO_2e$ per year before mitigation, the limits of the Screening Tables for a project of this size, the limits on quantifying reductions, and the natural gas generation option. The City finds the Project's contribution to climate change cumulatively considerable (CEQA Guidelines Section 15064(b)(2)). MM GHG-1 would reduce the impact, but not below significance.

Consistency with GHG Reduction Plans (Threshold 4.5 (b)). With SCE electricity the Project would be consistent with State and City plans. While the natural gas generation option is in use, on-site generation from fossil gas would conflict with the 2022 Scoping Plan and the State's goal of

carbon neutrality by 2045 (AB 1279). No qualified GHG reduction plan is available to reduce the impact below significance.

To approve the Project, the City must adopt findings for each significant impact under CEQA Guidelines §15091. Because the impacts above cannot be avoided or substantially lessened, approval also requires a Statement of Overriding Considerations under CEQA Guidelines §15093. That statement must identify specific economic, legal, social, technological, or other Project benefits the City determines outweigh the significant and unavoidable effects. It will form part of the Findings of Fact for Planning Commission consideration.

6.2 Significant Irreversible Environmental Changes

CEQA requires an EIR to identify significant irreversible environmental changes (CEQA Guidelines Section 15126.2(d)). The Project would cause the following.

Grading and development would permanently convert approximately 451 acres of vacant desert land to industrial use. This includes removal of 19 western Joshua trees, a candidate threatened species under CESA, and 0.04 acre of State jurisdictional drainage. MM BIO-4, MM BIO-11, and MM BIO-12 address the Joshua trees and the drainage (Section 4.2, Biological Resources).

Project construction would use materials and energy, including non-renewable fossil fuel. Operations would use electricity, partly from renewable resources. Required compliance with the California Building Standards Code would minimize demand for non-renewable resources (Section 4.4, Energy).

6.3 Growth-Inducing Impacts

CEQA requires an EIR to discuss how a project could foster economic or population growth or the construction of additional housing, directly or indirectly (CEQA Guidelines Section 15126.2(e)). Growth is not assumed to be beneficial or harmful.

The Project would build seven industrial warehouses with offices on vacant land along a designated truck route in an existing manufacturing/industrial zone. It includes no housing and would generate approximately 7,197 employees. (Appendix H-2) The City's General Plan accounted for potential growth from this employment because the Project follows the site's land use designation. The Project would not directly promote growth on or around the site beyond that anticipated in the General Plan. Construction workers are expected to come from Adelanto and surrounding communities, including Victorville and Hesperia. Construction and operations may also attract workers from other desert areas who would move to Adelanto. These employees and residents represent direct growth and may increase local housing demand. Secondary effects include larger local markets, additional economic activity, greater public service and infrastructure demand, and environmental impacts addressed elsewhere in this SEIR.

The Project's water and sewer improvements are mostly in adjacent or nearby streets and connect the site to existing City systems. They would not open new areas to development. The facilities are sized for the industrial sub-area planned in the City's master plans, so they would serve industrial development the City has already planned.

Project-induced economic or employment growth causing measurable physical environmental impacts is unlikely, speculative, and not reasonably foreseeable.

6.4 Impacts Considered Not Significant

The analysis found no significant impact on agriculture and forestry resources or population and housing, so these topics are not discussed in detail (CEQA Guidelines Section 15128). The reasons are below. Mineral resources, public services, recreation, and wildfire are addressed in Section 5.0.

Agriculture and Forestry Resources

The site is outside agricultural preserves, is not in agricultural use, and contains no forest lands or Williamson Act contracts. The proposed use is consistent with its Manufacturing/Industrial zoning. No impact would occur under the agriculture and forestry resources thresholds, and no mitigation is required.

Population and Housing

The Project proposes industrial warehouse and distribution uses with no housing. As discussed in Subsection 6.3, workers are expected to come from the existing regional labor force. The Project would not induce substantial unplanned population growth. The vacant site contains no people or housing to displace, so no replacement housing would be required. Population and housing impacts would be less than significant and are not discussed in detail in this SEIR.

7.0 Alternatives

7.1 Introduction

CEQA requires an EIR to describe a reasonable range of alternatives that would meet most of the basic Project objectives while avoiding or substantially lessening its significant effects. The EIR must include a no project alternative, explain why other alternatives were rejected, and identify the environmentally superior alternative (CEQA Guidelines Section 15126.6).

The Project modifies the project approved in 2009 under the certified Adelanto Gateway Logistics Center EIR (State Clearinghouse No. 2008071129). That approval has expired. This section compares alternatives with the current proposal and the site's existing Manufacturing/Industrial (MI) designation, which would apply without Project approval.

7.2 Project Objectives

Section 3.2 states the Project's purpose and eight objectives.

- **Objective 1.** Develop Class A industrial warehouse and distribution facilities meeting current industry standards for clear height, structural bay spacing, dock ratio, and truck court depth, so that logistics, e-commerce, and manufacturing tenants can occupy the buildings without later retrofit.
- **Objective 2.** Achieve a development intensity sufficient to fund and support the off-site water, sewer, drainage, and roadway improvements the Project constructs, and make efficient use of a large contiguous industrial site under single ownership.
- **Objective 3.** Expand economic development, attract new businesses, and provide employment in the City of Adelanto, improving the jobs-to-housing balance and reducing out-commuting.
- **Objective 4.** Make full and efficient use of land previously surveyed and analyzed under the certified 2009 EIR, consistent with the site's Manufacturing/Industrial designation.
- **Objective 5.** Build the infrastructure improvements identified in the City's Mobility Element, Water Master Plan, and Sewer Master Plan.
- **Objective 6.** Provide temperature-controlled warehouse capacity for regional food and pharmaceutical distribution.
- **Objective 7.** Incorporate energy-efficient and low-emission design consistent with the California Green Building Standards Code, City General Plan policies, and California Air Resources Board guidance.

- **Objective 8.** Develop a logistics facility near the Southern California Logistics Airport and US 395 to support the region's goods movement network.

7.3 Significant and Unavoidable Impacts

The Project has five significant and unavoidable impacts, all in air quality and greenhouse gas emissions. The alternatives were chosen to test whether those impacts can be avoided or lessened.

Air Quality

- **Threshold 4.1(a).** Consistency with the air quality plan. The Project meets the Mojave Desert Air Quality Management District's (MDAQMD) first two consistency tests, consistency with the local land use plan and compliance with District rules, but not the third, because its mitigated operational emissions would exceed the District's regional thresholds.
- **Threshold 4.1(b).** After all feasible mitigation, peak daily operational emissions of VOC, NOx, CO, and PM10 would remain above the MDAQMD thresholds. PM2.5 would also exceed its threshold while the natural gas generation option is in use.
- Cumulative. The Project's contribution to regional emissions is cumulatively considerable.

Greenhouse Gas Emissions

- **Threshold 4.5(a).** The City's threshold is compliance with its Screening Tables. A project that emits more than 3,000 metric tons of carbon dioxide equivalent (MTCO2e) a year must earn at least 100 points on the tables. With Mitigation Measure MM GHG-1 the Project would earn the 100 points. Its mitigated emissions would be approximately 88,240 MTCO2e a year, close to half the City's 2016 inventory, and the natural gas generation option would raise the total to approximately 127,998 MTCO2e. Because of that amount, the limits of the Screening Tables for a project of that size, and the natural gas generation option, the City finds the Project's contribution cumulatively considerable.
- **Threshold 4.5(b).** With SCE electricity the Project would be consistent with State and City plans. While the natural gas generation option is in use, on-site generation from fossil gas would conflict with the 2022 Scoping Plan and the State's goal of carbon neutrality by 2045 (AB 1279). No greenhouse gas reduction plan adopted through a CEQA document is available to reduce the impact below significance.

Vehicle travel produces most of these emissions. Trucks and cars account for about two-thirds of Project greenhouse gases and most operational NOx, PM10, VOC, and CO. Transport refrigeration units and cold storage refrigerant leaks account for another 13 percent of greenhouse gases. Substantially reducing these impacts requires fewer truck trips, fewer truck

miles, or less cold storage. This informed the alternatives selected below. The comparison also covers other Project impacts, which are less than significant or less than significant with mitigation.

7.4 Alternatives Considered and Rejected

The City considered the following alternatives and did not analyze them in detail.

Alternative Site. A different location must avoid or substantially reduce a significant effect to warrant consideration (§15126.6(f)(2)). A facility of this size generates the same truck trips regardless of location. A site farther from US 395 and the SCLA truck route network would increase local truck miles and mobile-source emissions. The Applicant controls no other industrially designated City site of this size, and the 2009 EIR studied this site. The City rejected relocation because it would shift impacts without reducing them.

Emissions-Compliant Reduced Project. Operational emissions were scaled by floor area to estimate the reduction needed to meet MDAQMD thresholds. NOx controls the required reduction: mitigated emissions are approximately 514 pounds daily against a 137-pound threshold. Meeting it requires approximately 27 percent of proposed floor area, roughly 2.2 million square feet. VOC requires a 68 percent reduction, PM10 approximately 62 percent, and CO approximately 35 percent. At 27 percent of its size, the Project would emit approximately 23,500 MTCO2e annually. It would exceed the 3,000 MTCO2e level requiring greenhouse gas analysis and remain subject to the 100-point standard. Falling below 3,000 MTCO2e requires approximately 3 percent of proposed size, roughly 280,000 square feet. This would not meet Objectives 1, 2, 4, or 8 or fund off-site water, sewer, drainage, and roadway improvements. Most of the site would remain undeveloped. The City rejected this alternative because it fails to meet most basic objectives. These figures disclose the reductions needed to avoid the impacts.

No Cold Storage Alternative. Removing cold storage would eliminate transport refrigeration units, refrigerant emissions, and cold storage's higher truck trip rate. Dry warehouse space and trips would remain, producing most NOx, PM10, and greenhouse gases. Alternative 3 provides the same benefit by excluding cold storage, so a separate alternative was not analyzed.

Data Center Alternative. Data centers are not part of the Project. Section 3.13 states that any data center use would require its own approval and environmental review. No tenant, letter of intent, or design for such a use exists, and the Notice of Preparation scoped this SEIR to warehouse uses. The City rejected this alternative as remote and speculative (§15126.6(f)(3)).

7.5 Alternatives Analyzed

Four alternatives are analyzed. Table 7-1, *Comparison of Project and Alternative Impacts* compares their impacts with the Project by topic, and Table 7-2, *Attainment of Project Objectives* compares how well each meets the objectives.

The Project is designed for SCE electricity. If SCE cannot serve a building when it is ready for occupancy, the Applicant may install natural gas engines there until SCE service begins, within the limits of RR UTIL-6 (Section 3.11).

Natural gas generation depends on SCE's service schedule. Any site development, including Alternatives 2, 3, and 4, would face the same service gap and could use this option on the same terms. The comparison holds the option constant. Project emissions and energy figures use SCE service, from Appendices A-1 and A-3. Sections 4.1, 4.4, 4.5, and 4.12 disclose emissions at full optional fuel use. They do not distinguish the alternatives from the Project.

7.5.1 Alternative 1: No Project/No Development

Description. No development would occur. The 451-acre site would remain vacant desert with its Joshua trees, creosote–white bursage scrub, ephemeral drainage, and dirt roads. None of the off-site water, sewer, drainage, or street improvements would be built.

Impacts. No construction or operational emissions would occur, avoiding all five significant and unavoidable impacts. Biological, cultural, and tribal cultural resources would remain undisturbed, with no mitigation needed. Drainage would remain unchanged, with untreated stormwater sheet-flowing toward Fremont Wash. Master Plan of Drainage Channel 1 and the Channel 1A easement would not be built or dedicated. The sub-area would lack sewer service, and the site would remain open to trespass and dumping. Regional logistics demand would remain, so similar emissions would likely occur elsewhere in the region.

Objectives. Alternative 1 meets none of the Project objectives.

7.5.2 Alternative 2: No Project/Existing Zoning

Description. CEQA Guidelines §15126.6(e)(3)(A) requires consideration of likely development under current plans without Project approval. Manufacturing/Industrial zoning allows warehouse, distribution, manufacturing, and related uses by right with a Location and Development Plan. It has no maximum floor area ratio and a 60-foot height limit. This alternative assumes similar intensity to the Project, with market-driven layout and tenants. Development could occur parcel by parcel under separate owners, without the proposed Tentative Parcel Map or single master plan.

Impacts. The same permitted uses and intensity would produce substantially the same construction and operational impacts, including all five significant and unavoidable impacts. Separate owners would not build a coordinated infrastructure system. The sewer lift station and force main, Water Master Plan loops, Channel 1, and four signalized Air Expressway access points would be built piecemeal or not at all. Each owner would obtain its own will-serve letters. Biological, cultural, hydrology, and hazards impacts would be similar, with parcel-by-parcel mitigation under the same regulations. Cumulative impacts would also be similar. The Guidelines require this alternative, which would not avoid or reduce any significant impact.

Objectives. Alternative 2 would meet Objectives 3, 4, and 7 as well as the Project. It would meet Objectives 1, 5, 6, and 8 only to the extent individual owners chose to, and would not meet Objective 2.

7.5.3 Alternative 3: Reduced Intensity/Previously Approved 2009 Project

Description. Alternative 3 is the project the City approved in 2009 (Resolution No. 09-35), without the cold storage use the 2009 EIR allowed. The 2009 project had 6,935,398 square feet of building area in nine buildings (6,783,354 square feet of warehouse and 152,044 square feet of office) on approximately 334 acres of building sites, 5,351 parking spaces, a 38-foot building height limit, a 1.5-acre fire station parcel, and approximately 27.2 acres reserved for detention basins and drainage easements. The 2009 site plan also reserved 36.7 acres along the northern part of the site for the High Desert Corridor.

The High Desert Corridor freeway was replaced by an unfunded rail concept with no schedule. Alternative 3 retains the approved design's undeveloped 36.7-acre reservation but does not depend on corridor construction. Building area would be 1,320,876 square feet, or 16 percent, less than the Project. The same off-site water, sewer, and drainage improvements would be built, sized for lower demand. The same Regulatory Compliance Requirements and mitigation measures would apply.

Air Quality. The same construction equipment would work a smaller footprint for less time. Peak daily emissions would be similar and remain less than significant with mitigation. At 84 percent of Project floor area, mitigated daily emissions would be approximately 356 pounds of VOC, 431 of NOx, 704 of CO, and 180 of PM10. Eliminating cold storage would further reduce emissions through lower truck trip rates per square foot and removal of transport refrigeration units. That reduction is not quantified. Each value exceeds its MDAQMD threshold, and air quality plan inconsistency would remain. Air quality impacts would be less than the Project's but significant and unavoidable.

Greenhouse Gas Emissions. Removing cold storage eliminates transport refrigeration emissions of approximately 4,384 MTCO2e annually and most refrigerant emissions of approximately 7,286 MTCO2e annually. Scaling remaining sources to 84 percent yields approximately 64,000 MTCO2e annually, approximately 27 percent below the Project. Emissions would exceed 3,000 MTCO2e and remain subject to the 100-point standard. The City's finding rests on emissions volume and the natural gas generation option, which this alternative would retain. Impacts under Thresholds 4.5(a) and (b) and the cumulative impact would remain significant and unavoidable.

Biological Resources. The 36.7-acre corridor reservation and 27.2 acres of detention and drainage easements would leave more land ungraded than the Project. Impacts would decrease where these areas overlap creosote–white bursage scrub, mapped Joshua trees, or ephemeral drainage. Elsewhere, impacts and required mitigation would be unchanged (MM BIO-1 and MM BIO-3 through MM BIO-12).

Cultural and Tribal Cultural Resources. Less ground would be disturbed, so the chance of encountering unknown resources would be lower. The same measures would apply. Impacts would be similar to the Project's and less than significant with mitigation.

Energy. Building energy and vehicle fuel use would be approximately 16 percent lower, with no cold storage refrigeration load. Impacts would be less than the Project's and less than significant.

Hazards and Hazardous Materials. The 2009 design's 38-foot height limit is below the Runway 35 approach surface that Building 3 would penetrate at 55 feet, so the FAA determination that MM HAZ-1 addresses would not be needed. Other hazards impacts would be the same. Impacts would be less than the Project's and less than significant.

Hydrology and Water Quality. The 2009 design used detention basins and a trapezoidal channel discharging to Air Expressway culverts, rather than on-site retention and infiltration of the 100-year storm. Current MS4 and Water Quality Management Plan requirements would require redesign to the Project's retention and infiltration standard. Water quality impacts would therefore be similar, and less paving would reduce runoff. Impacts would be similar to or less than the Project's and less than significant.

Land Use and Planning. The alternative is consistent with the MI designation and the Adelanto North 2035 Comprehensive Sustainable Plan. Impacts would be the same as the Project's, no impact under Threshold 4.8(a) and less than significant under 4.8(b).

Noise. Construction noise would be similar on peak days and shorter overall. Operational stationary and truck noise sources would be approximately 16 percent fewer, with no refrigeration equipment. Impacts would be less than the Project's and less than significant.

Transportation. Trips would be approximately 16 percent fewer, and fewer still with cold storage removed. Automobile vehicle miles traveled per employee, the SB 743 metric, is a rate and would not change much. The Project already meets the regional threshold. Impacts would be less than significant, as for the Project.

Utilities and Service Systems. Water demand, wastewater flow, and solid waste would be approximately 16 percent lower. The same off-site improvements would be needed. Impacts would be less than the Project's and less than significant.

Objectives. Alternative 3 would meet Objectives 3, 5, 7, and 8 and partially meet Objectives 1, 2, and 4. The 2009 design would need revision to meet current Class A clear-height and truck-court standards. Its smaller size would generate less revenue for off-site improvements, and 36.7 acres would remain unused. It would not meet Objective 6 because it excludes temperature-controlled space.

7.5.4 Alternative 4: Light Manufacturing/Business Park

Description. Alternative 4 would develop the 451-acre site with approximately 8.26 million square feet of light manufacturing, assembly, and business park uses permitted in the MI zone. This equals Project floor area but replaces high-cube warehouse and cold storage uses. Smaller buildings would have lower clear heights and fewer docks; tenants would make or assemble goods rather than move them. The same off-site water, sewer, drainage, and street improvements would be needed. This alternative tests a different trip mix. Manufacturing and business parks employ more people per square foot and generate more car trips but far fewer heavy truck trips than logistics uses.

Air Quality. Construction impacts would be similar to the Project's and less than significant with mitigation. The Project's 3,285 daily truck trips, including 2,172 by trucks with four or more axles, produce most operational NOx and PM10. General light industrial uses generate approximately three times as many daily trips per thousand square feet, but trucks form a small share. Trucks account for 26 percent of Project trips. Heavy truck NOx and PM10 would be substantially lower, car VOC and CO higher, and transport refrigeration units absent. No CalEEMod run is available, so this qualitative comparison cannot determine whether NOx would fall below 137 pounds daily. Air quality plan inconsistency would remain if any pollutant exceeded its threshold. Impacts would be lower for NOx and PM10 and would likely remain significant and unavoidable.

Greenhouse Gas Emissions. Heavy truck travel, the largest mobile-source contributor, would decrease substantially. More workers would increase car emissions, and manufacturing buildings use more energy per square foot than warehouses. Net emissions would be lower but exceed 3,000 MTCO2e and remain subject to the 100-point standard. Impacts under Thresholds 4.5(a) and (b) and the cumulative impact would remain significant and unavoidable.

Biological, Cultural, Tribal Cultural, Hydrology, Hazards, Land Use, Utilities. The same footprint would be graded and the same improvements built, so these impacts would be the same as the Project's and would need the same mitigation. Buildings would be lower, so the FAA Part 77 exceedance for Building 3 would not occur.

Energy. Manufacturing uses more electricity per square foot than warehousing, and vehicle fuel would shift from diesel to gasoline. Total energy use would likely be similar to or greater than the Project's and less than significant.

Noise. Truck noise would be lower and car noise higher. Manufacturing may add process noise inside buildings. Impacts would be similar to the Project's and less than significant.

Transportation. Employment would increase substantially, at approximately 500 to 700 square feet per employee rather than 1,195, increasing car travel. Automobile vehicle miles traveled per employee would be similar to or higher than the Project's and could approach the regional threshold the Project meets. Emergency access and design hazards would be unchanged.

Objectives. Alternative 4 would meet Objectives 3, 4, 5, and 7. Its larger workforce would meet Objective 3 more fully than the Project. It would not meet logistics- and cold-storage-specific

Objectives 1, 6, or 8. Meeting Objective 2 would depend on market support for this scale of High Desert manufacturing, which is not known.

7.6 Environmentally Superior Alternative

Alternative 1, No Project/No Development, is environmentally superior because it avoids all Project impacts, including the five significant and unavoidable impacts. It meets no Project objectives. Unmet regional demand would likely be served elsewhere with similar emissions. Because no project is environmentally superior, §15126.6(e)(2) also requires identification of the environmentally superior development alternative.

Alternative 2 reduces no significant impact. Alternative 4 reduces NOx, PM10, and greenhouse gases by removing most heavy truck travel. It increases car emissions, building energy use, and vehicle miles, so its net reduction is not known. Alternative 3 reduces all five significant and unavoidable impacts by known amounts and removes cold storage sources. Leaving 36.7 acres ungraded reduces biological and hydrology impacts. It also avoids the Part 77 issue and lowers energy use, noise, and utility demand. Alternative 3 is environmentally superior among development alternatives. It would not avoid any significant and unavoidable impact, meet Objective 6, or fully meet Objectives 1, 2, and 4.

7.7 Comparison Tables

Table 7-1. Comparison of Project and Alternative Impacts

Topic	Project	Alt 1: No Development	Alt 2: Existing Zoning	Alt 3: Reduced/2009 Project	Alt 4: Light Manufacturing
Air Quality — plan consistency	SU	Avoided	SU (similar)	SU (less)	SU (less)
Air Quality — operational emissions	SU	Avoided	SU (similar)	SU (less)	SU (less NOx/PM10; more VOC/CO)
Air Quality — construction	LTS/M	Avoided	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Air Quality — cumulative	SU	Avoided	SU (similar)	SU (less)	SU (less)
Biological Resources	LTS/M	Avoided	LTS/M (similar)	LTS/M (less)	LTS/M (similar)

Topic	Project	Alt 1: No Development	Alt 2: Existing Zoning	Alt 3: Reduced/2009 Project	Alt 4: Light Manufacturing
Cultural Resources	LTS/M	Avoided	LTS/M (similar)	LTS/M (less)	LTS/M (similar)
Energy	LTS	Avoided	LTS (similar)	LTS (less)	LTS (similar or more)
Greenhouse Gas — 4.5(a) and cumulative	SU	Avoided	SU (similar)	SU (less)	SU (less)
Greenhouse Gas — 4.5(b)	SU	Avoided	SU (similar)	SU (less)	SU (less)
Hazards and Hazardous Materials	LTS/M	Avoided	LTS/M (similar)	LTS (less)	LTS (less)
Hydrology and Water Quality	LTS	Greater	LTS (similar)	LTS (less)	LTS (similar)
Land Use and Planning	NI / LTS	Avoided	Similar	Similar	Similar
Noise	LTS	Avoided	LTS (similar)	LTS (less)	LTS (similar)
Transportation	LTS / NI	Avoided	LTS (similar)	LTS (less)	LTS (similar or more VMT)
Tribal Cultural Resources	LTS/M	Avoided	LTS/M (similar)	LTS/M (less)	LTS/M (similar)
Utilities and Service Systems	LTS	Avoided	LTS (similar)	LTS (less)	LTS (similar)

NI = No Impact; LTS = Less Than Significant; LTS/M = Less Than Significant with Mitigation; SU = Significant and Unavoidable. "Less," "similar," and "greater" describe the alternative's impact relative to the Project. The natural gas generation option is held constant and is not a basis for comparison.

Table 7-2. Attainment of Project Objectives

Objective	Alt 1	Alt 2	Alt 3	Alt 4
1. Class A warehouse/distribution facilities	Not met	Partially met	Partially met	Not met
2. Intensity to fund off-site improvements; efficient use of site	Not met	Not met	Partially met	Partially met
3. Economic development and employment	Not met	Met	Met	Met
4. Full and efficient use of previously analyzed land	Not met	Met	Partially met	Met
5. Mobility, Water, and Sewer Master Plan improvements	Not met	Partially met	Met	Met
6. Temperature-controlled warehouse capacity	Not met	Partially met	Not met	Not met
7. Energy-efficient, low-emission design	Not met	Met	Met	Met
8. Logistics facility near SCLA and US 395	Not met	Partially met	Met	Not met

7.8 References

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