SAN BERNARDINO COUNTY
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

PROJECT LABEL:

APNs:	0585-273-04	***USGS Quad:***	Yucca Valley South Quadrangle
Applicant:	Ethan Ramberg RAMBERG WEST 53 Sansovino Ladera Ranch, CA 92694	***T, R, Section:***	East 1/3 Fractional Section 5, Township 1 South, Range 5 East, San Bernardino Base and Meridian.
Location	Address: 7886 Shafter Avenue Morongo Valley, CA 92284	***Thomas Bros***	
Project No:	PROJ-2022-00176	***Community Plan:***	N.A.
Rep	3rd Supervisorial District; Dawn Rowe	***LUZD:***	IC – Community Industrial
Proposal:	A Minor Use Permit to establish a personal self-storage facility (mini storage) to include (155) 8'x20' and (8) 8'x10' standard height shipping containers totaling 25,440 square feet of structures in the unincorporated community of Morongo Valley	***Overlays:***	Flood Plain Safety Zone (FP: F129-B) Fire Safety Zone (FS: F129-B)

PROJECT CONTACT INFORMATION:

Lead agency: San Bernardino County
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

Contact person: Alexander Lee, Planner
Phone No: (909) 361-7258 ***Fax No:*** (909) 387-3223
E-mail: *Alexander.Lee@lus.sbcounty.gov*

Project Sponsor

Inside the Box, Inc.
PO Box 3398
Landers, CA 92285

PROJECT DESCRIPTION:

Summary

The proposed project involves a Minor Use Permit entitlement to establish a personal self-storage facility (mini storage) utilizing shipping containers. The facility would include one hundred fifty-five

(155) 8'x20' and eight (8) 8'x10' standard 10-foot height metal shipping containers totaling 25,440 square feet, to be located on a vacant 9.46-acre parcel in the unincorporated community of Morongo Valley, immediately adjacent to the Town of Yucca Valley northwesterly corporate boundary.

The facility is proposed to operate 7 days a week, from 9 a.m. to 4 p.m. Access will be governed by a self-serve kiosk at a 20-foot-wide entrance gate, with each storage unit assigned an Entry Code for access. The Entry Code will only work during the hours of operation. Security personnel will stop by the site and drive through units twice a day during business hours to ensure compliance with business terms of service. Storage units will be limited to standard residential purposes, such as storage of furniture, clothing, holiday decorations, files /paperwork, and similar items and will be prohibited from storing firearms, food and other hazardous materials.

One 17'-4" x 12' trash enclosure providing two bins will be located near the entrance to the facility per County Standards, and the entire storage facility will be enclosed within a chain link fence structure. The proposed site plan configuration incorporates setbacks as follows: Front – 25 feet; Street side - 25 feet; Interior side - 10 feet; and Rear - 10 feet as required by County Land Development Standards in the MV/IC – Community Industrial Zone.

Vehicular access to the facility will be provided by a 26-foot-wide asphalt paved driveway connecting to Shafter Avenue. All interior drives will also be asphalt paved 24 feet wide, depending on location. Parking will be provided for 83 vehicles (82 regular spaces and one disabled parking space), all located within the fenced area and parallel adjacent to storage units. A portion of Shafter Avenue (from the site entrance to Highway 62), which is currently a gravel/dirt road in a degraded condition, will also be repaved with asphalt to accommodate proposed site usage.

Approximately 20.5% of the development site area will be devoted to landscaped area utilizing drought tolerant native desert plant species such as shrubs, groundcovers, cacti, succulents, and trees as well as decorative rock in compliance with County standards. No protected Joshua trees are located within the development site area. Yucca and Joshua trees located on the hilly remainder of the property will not be disturbed by the proposed project. (Please refer to Section IV: Biological Resources for additional information.)

Surrounding Land Uses and Setting

Existing Land Use and Land Use Zoning Districts		
Location	**Existing Land Use**	**Land Use Zoning District**
Project Site	Vacant	San Bernardino County: IC (Community Industrial)
North	Industrial – Auto Collision Repair Business	Town of Yucca Valley: I-Industrial Zone
South	Vacant	San Bernardino County: IC (Community Industrial)
East	Vacant	San Bernardino County: IC (Community Industrial)
West	Vacant	San Bernardino County: IC (Community Industrial

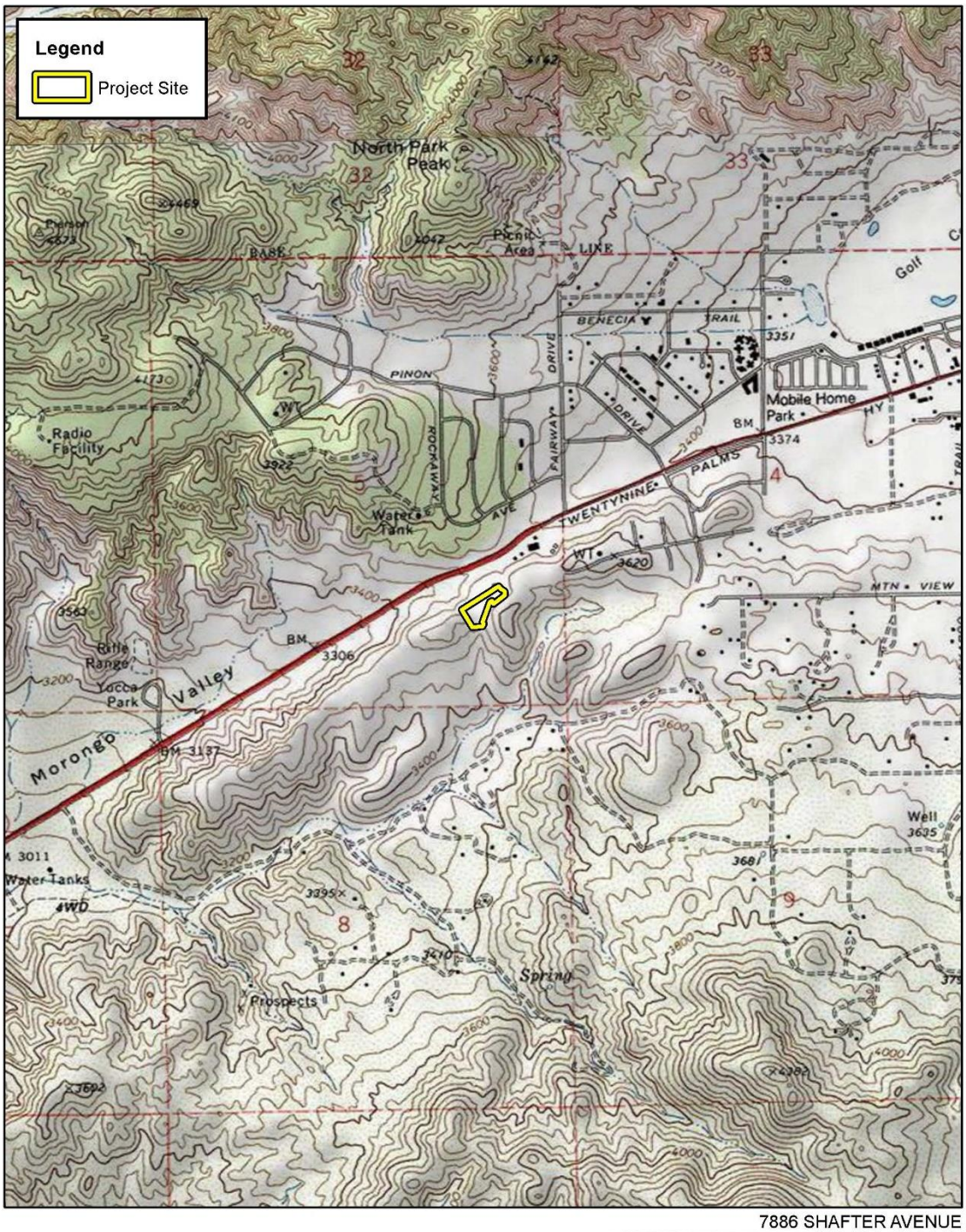
Project Site Location, Existing Site Land Uses and Conditions

The project site encompasses 9.46 acres of vacant land located at 7886 Shafter Avenue, Morongo Valley, immediately adjacent to the northwesterly boundary of the Town of Yucca Valley, in the unincorporated area of San Bernardino County. Existing land uses on-site and on surrounding parcels are indicated in the table above.

A 2.3-acre portion of the 9.46-acre project site is proposed to be developed. This portion of the site has been graded level at some time in the past. Minimal, mostly weedy, vegetation exists within this portion of the site. The remainder of the site is hilly topography in its natural condition and contains typical desert vegetation. (Additional description of this portion of the site is contained in Section IV - Biological Resources).

Exhibits 1 through 3 illustrate the project location regionally and locally. Exhibits 4-a through 4-d provide photographs of existing on-site conditions. Exhibit 5 shows the proposed Site Plan. Exhibit 6 illustrates the proposed Container Layout and Parking Plan.

7886 SHAFTER AVENUE
INITIAL STUDY
Regional Vicinity
Exhibit 1



7886 SHAFTER AVENUE
INITIAL STUDY
Site Vicinity
Exhibit 2

ELMT CONSULTING

0 1,000 2,000 4,000 Feet

Source: USA Topographic Map, San Bernardino County

7886 SHAFTER AVENUE
INITIAL STUDY
Project Site
Exhibit 3

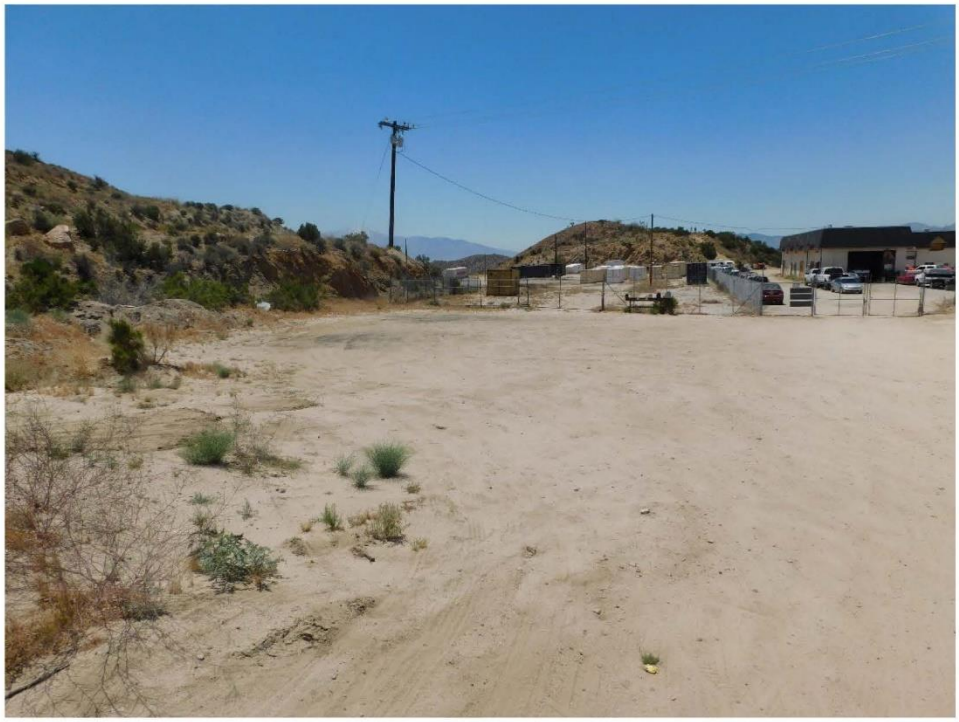
EXHIBIT 4-A: SITE PHOTOGRAPHS

Photograph 1: From the northeast corner of the project site looking southeast.

Photograph 2: From the northeast corner of the project site looking south.

Photos by ELMT Consulting

EXHIBIT 4-B: SITE PHOTOGRAPHS



Photograph 3: From the eastern limits of the project site at Shafter Avenue looking west.

Photograph 4: From the northwest corner of the project site looking west along the northern boundary.

Photos by ELMT Consulting

EXHIBIT 4-C: SITE PHOTOGRAPHS

Photograph 5: From the southwest corner of the project site looking north along the western boundary.

Photograph 6: From the southwest corner of the project site looking east along the southern boundary.

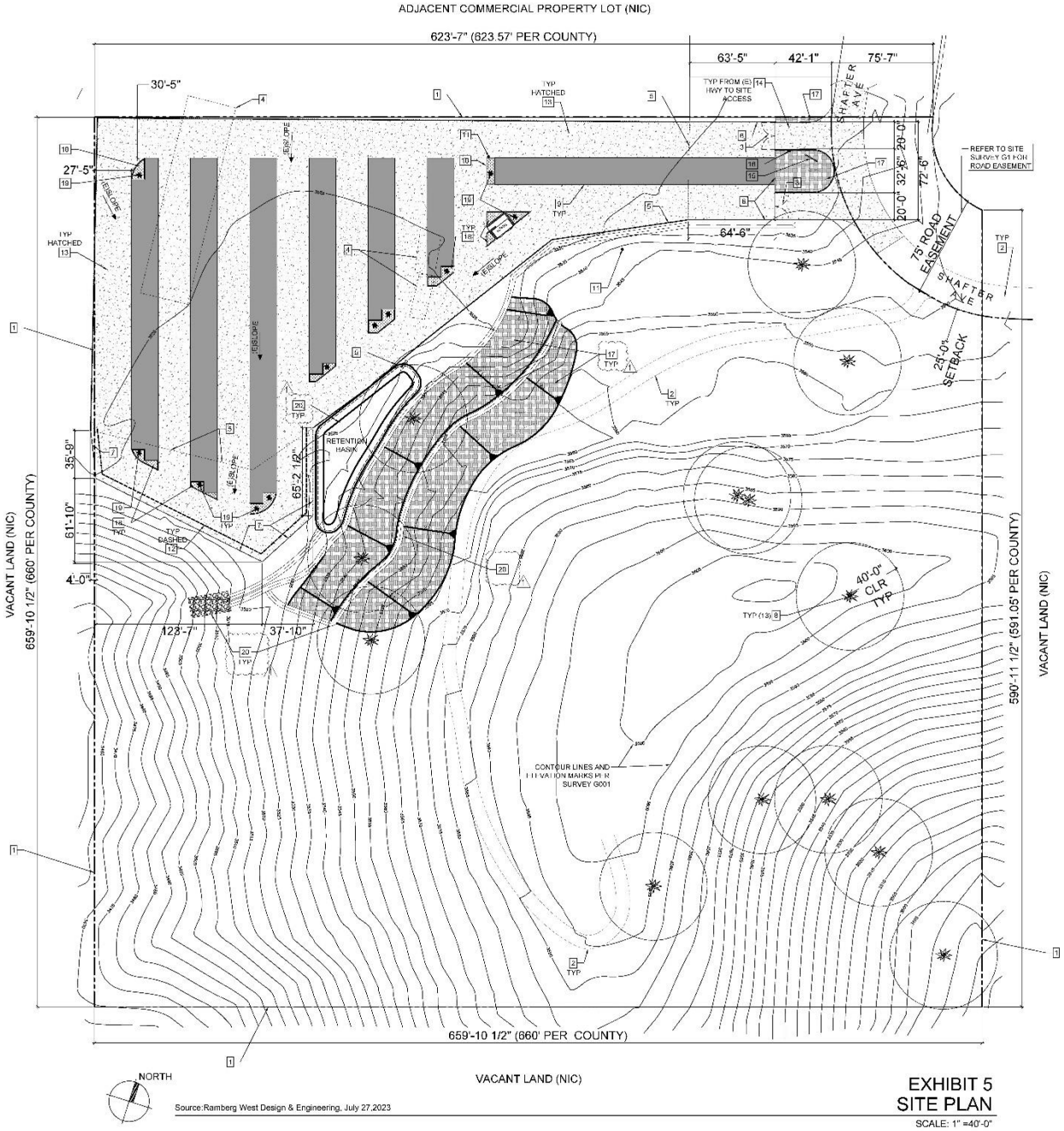
Photos by ELMT Consulting

EXHIBIT 4-D: SITE PHOTOGRAPHS

Photograph 7: From the middle of the southern boundary of the project site looking southwest.

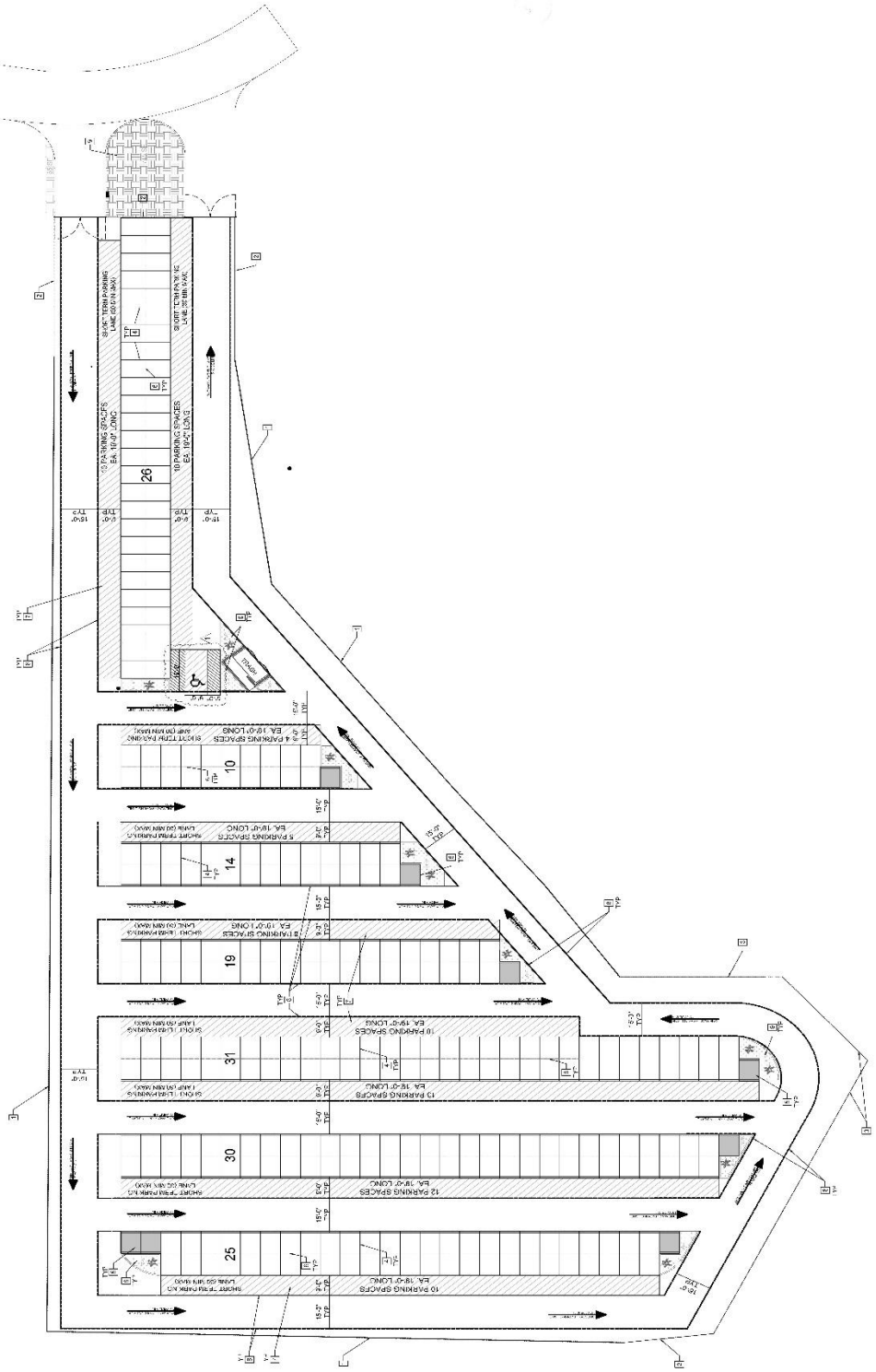
Photograph 8: From the middle of the southern boundary of the project site looking northeast.

Photos by ELMT Consulting



Source:Ramberg West Design & Engineering, July 27,2023

EXHIBIT 5
SITE PLAN
SCALE: 1" =40'-0"



Source:RAMBERG West Design & Engineering, 7/27/23

EXHIBIT 6

Container Layout & Parking Plan

ADDITIONAL APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES

Federal: None.
State of California: None.
County of San Bernardino: Land Use Services Department-Building and Safety, Public Health-Environmental Health Services, Special Districts, and Public Works.
Regional: None.
Local: None other than County approvals.

CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

On July 20, 2003, the County of San Bernardino mailed notifications pursuant to AB 52 to four tribes. Table 2 – AB 52 Consultation Results, shows a summary of comments and responses provided for the Project.

Table 1
AB 52 Tribal Consultation

Tribe	Comment Received	Summary of Response	Conclusion
Twenty-Nine Palms Band of Mission Indians	None	None	Concluded
Colorado River Indian Tribes	None	None	Concluded
Morongo Band of Mission Indians	None	None	Concluded
San Manuel Band of Mission Indians	None	None	Concluded

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

EVALUATION FORMAT

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact**: No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact**: No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated**: Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact**: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials

☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

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

Alex Lee
_____ 11/17/2023
Signature: (prepared by Alexander Lee, Planner) Date

_____ 11/20/2023
Signature:(Steven Valdez, Supervising Planner) Date

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
I.	***AESTHETICS*** – Except as provided in Public Resources Code Section 21099, would the project:				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d)	Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?	☐	☐	☐	☒

SUBSTANTIATION: *(Check ☐ if project is located within the view-shed of any Scenic Route listed in the General Plan):*

Sources: San Bernardino Countywide Plan and EIR, Site Exhibits and Photographs, Submitted Project Materials.

a) **Have a substantial adverse effect on a scenic vista?**

The project site is not located in proximity to any designated scenic vista, and is visually obscured from surrounding areas by either topography or intervening development. (See Site Photographs.) Consequently, the proposed project would have no impact on a scenic vista.

No Impact.

b) **Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?**

There are no scenic resources such as trees or rock outcroppings or permanent structures of any kind located on the project site. Yucca and Joshua Trees located on the hilly remainder portion of the project site will not be affected by proposed

construction. (See Section IV- Biological Resources). According to CalTrans, State Route 62, which provides the major circulation access to the region, and to the project site from Shafter Avenue, is eligible for Scenic Highway designation but is not presently an officially designated State Scenic Route. It is, however, a designated County Scenic Route in the San Bernadino County General Plan. The project site, in any case, is not located immediately adjacent to Route 62, but is obscured by an intervening existing auto collision repair business. (See Exhibit 3 – Project Site, for an aerial view of the area.) Consequently, the proposed project will not impact any scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway corridor.

No Impact.

c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

The project site is located in a non-urbanized area but is situated in such a way that it is not visible from State Route 62, which is located north of the project site. Adjacent parcels are designated for industrial use and are vacant, with the exception of the auto collision business previously noted on the north side of the project site. (Please refer to Site Photographs and Exhibit 3 which provides an aerial view of the Project Site and adjacent surrounding area.) Consequently, the proposed project will have no impact on the existing visual character or quality of public views of the site and its surroundings.

No Impact.

d) **Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?**

As has been previously described, there are no views either from or to the project site. The storage facility will, however, have limited security lighting at night, which must comply with County lighting and design requirements. The Proposed Project's lighting plan is required to be designed in accordance with the Night Sky Protection Ordinance (Ordinance No. 4419, Chapter 83.07 of Division 3 of Title 8 - San Bernardino County Development Code, Section 83.07.060) The Proposed Project would be subject to design review in the final stages of development to ensure the use of proper lighting at the Project Site which would reduce impacts from any additional light and glare in the area. No significant adverse impacts from light and glare are identified or anticipated, and no mitigation measures are required.

No Impact.

In consideration of the preceding information and analysis, no adverse aesthetic impacts are identified or anticipated, and no mitigation measures are required.

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

SUBSTANTIATION: *(Check ☐ if project is located in the Important Farmlands Overlay):*

Sources: San Bernardino Countywide Plan and EIR; *California Department of Conservation Farmland Mapping and Monitoring Program; Submitted Project Materials*

a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

The project site is not, and never has been, utilized for agricultural purposes and is not contained on any official California Farmland Maps. No impacts to prime or unique farmlands will occur. No mitigation measures are necessary.

No Impact.

b) **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

As has been noted, the project site is zoned for industrial use, as are all immediately surrounding parcels. No conflicts with existing zoning for agricultural use, or a Williamson Act contract, will occur. No mitigation measures are necessary.

No Impact.

c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

A 2.3-acre portion of the 9.46-acre site has been graded and the remainder of the site is natural desert habitat. As has been noted, the project site and all adjacent parcels are zoned for industrial purposes. No forest or timberland exists on-site or in surrounding areas. Consequently, no conflicts with zoning for forest or timberland will occur. No mitigation measures are necessary.

No Impact.

d) **Result in the loss of forest land or conversion of forest land to non-forest use?**

See Response II-c above. No loss of forest land or conversion of forest land to non-forest use will occur. No mitigation measures are necessary.

No Impact.

e) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

See preceding Responses II-a through d. No farmland or forest land will be affected by the proposed project in any way. No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no adverse impacts to either farmland or forest land are identified or anticipated, and no mitigation measures are required.

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

SUBSTANTIATION: *(Discuss conformity with the Mojave Desert Air Quality Management Plan, if applicable):*

Sources: San Bernardino Countywide Plan and EIR; *Submitted Project Materials*

a) **Conflict with or obstruct implementation of the applicable air quality plan?**

The Project Site is in the Mojave Desert Air Basin (MDAB). The Mojave Desert Air Quality Management District (MDAQMD) has jurisdiction over air quality monitoring and regulations within the east desert area which includes the Project site. A project is deemed by the MDAQMD to not exceed "significant emissions thresholds" established by the district if it is consistent with the existing land use plan and does not increase vehicle trips and vehicle miles traveled beyond plan assumptions.

The proposed Project is a request for a Minor Use Permit (MUP) for a self-storage facility. The Project site occurs within the General Plan Land Use category "Industrial" and is zoned Community Industrial (IC). These adopted land use designations are assumed in the preparation of the *Mojave Desert Air Quality Management Plan* (AQMP). The proposed Project is conditionally permitted within the IC Zone and will be required to comply with all pertinent regulations of the MDAQMD as listed below during construction. It is also worth noting that land uses much more intense in terms of potential air quality impacts than the Proposed Project, such as light manufacturing and warehouse operations, are allowed within the existing Industrial General Plan land use designation.

MDAQMD Requirements

The Project would be required to comply with Rule 402 - Nuisance Dust and Rule 403 - Fugitive Dust, which require the implementation of Best Available Control Measures (BACMs) for each fugitive dust source, and the MDAQMP, which identifies Best Available Control Technologies (BACTs) for area sources and point sources. The BACMs and BACTs would include, but may not be limited to the following:

1. The Project Applicant shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.

(a) The Project Applicant shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly (2 x daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.

(b) The Project Applicant shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.

(c) The Project Applicant shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.

(d) The Project Applicant shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

2. To reduce emissions, all equipment used in grading and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.

3. The Project Applicant shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.

4. The Project Applicant shall ensure that construction personnel are informed of ride sharing and transit opportunities.

5. All buildings on the Project Site shall conform to energy use guidelines in Title 24 of the California Administrative Code.

6. The Project Applicant shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.

7. The Project Applicant shall comply with all existing and future CARB and MDAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment."

The San Bernardino County Traffic Study Guidelines require the preparation of a traffic study if a proposal generates 100 or more peak hour trips without consideration of pass-by trips during any peak hour. The Public Works Traffic Division of the Land Development Department has reviewed the project and has determined that the Proposed Project would generate no more than 50 peak hour trips, thus it does not meet the threshold specified by San Bernardino County Traffic Study Guidelines to require a traffic study. In

consideration of these facts, the Proposed Project will not obstruct or conflict with the implementation of the MDAQMP. No mitigation measures are necessary.

Less than Significant Impact.

b) **Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?**

See Response III-(a) above.
The Proposed Project is limited in scope. Project-related construction air quality impacts are anticipated to be minimal because the site has already been graded and will require a limited amount of additional grading. The use of metal shipping containers for storage units will also minimize construction-related air quality impacts as no new structures other than trash enclosures are anticipated. The Proposed Project will be required to comply with all pertinent regulations of the MDAQMD listed in Item III-a) above during construction.

A project is deemed by the MDAQMD to not exceed "significant emissions thresholds" established by the District if it is consistent with the existing land use plan and does not increase vehicle trips and vehicle miles traveled beyond plan assumptions. As has been noted, the proposed Project is consistent with both the General Plan Industrial Land Use designation as well as zoning Community Industrial, (IC) which form the basis of regional air quality planning programs. It is also worth noting that land uses are much more intense in terms of potential air quality impacts than the Proposed Project such as light manufacturing and warehouse operations, are allowed within existing +designations.

The San Bernardino County Traffic Study Guidelines require the preparation of an assessment of Vehicle Miles Travelled (VMT) if a proposal generates 100 or more peak hour trips without consideration of pass-by trips during any peak hour. The Public Works Traffic Division of the Land Development Department has reviewed the project and has noted that it is "located in a low VMT generating area according to the San Bernardino County Traffic Analysis (SBCTA) VMT Screening Tool. Projects in this area are primarily local serving, not expected to increase VMT". The Traffic Division also estimated that the Proposed Project would generate no more than 50 peak hour trips, thus it does not meet the threshold specified by SBCTA Study Guidelines to require a VMT assessment. In consideration of these factors, the Proposed Project is not anticipated to generate cumulatively considerable net increase of any criteria pollutant. Consequently, no significant air quality impacts either on a project specific or cumulative level have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact.

c) **Expose sensitive receptors to substantial pollutant concentrations?**

As has been described, the project site is immediately surrounded on three sides by vacant land. The auto collision repair facility adjacent to the north of the project site is not considered a sensitive receptor. Sensitives receptors are defined as residences, schools, daycare centers, playgrounds and medical facilities. Industrial uses proposed within 1000 feet of such sensitive receptors are subject to more rigorous analysis by MDAQMD. The

closest sensitive receptor is a residence located approximately 1450_feet to the east, accessible to the Project Site only by a partially unpaved road, according to Google Earth. Exhibit 2 shows area topography and the approximate location of this residence. No project related traffic will utilize this road either during construction or long-term operations. As has been noted, the project must comply with all applicable pollution control measures of the MDAQMD, any construction related air quality impacts will be temporary and minimized by compliance with all applicable MDAQMD rules and regulations. No substantial pollutant concentrations of any type are anticipated. Consequently, no significant air quality impacts to sensitive receptors are anticipated and no mitigation measures are necessary.

Less than significant impact.

d) **Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?**

The proposed storage facility will not involve any industrial processes or activities that are anticipated to generate objectionable odors**.** As has been noted, the project site is bounded by vacant land on three sides and there is not a large concentration of people at the auto collision repair service adjacent on the north**.** No impacts from odors will occur**.** No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no significant adverse air quality impacts are identified or anticipated, and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
IV.	**BIOLOGICAL RESOURCES -** Would the project:				
a)	Have substantial adverse effects, 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, and regulations or by the California Department of Fish and Wildlife or US 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

SUBSTANTIATION: *(Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database ☐):*

Sources: San Bernardino Countywide Plan and EIR; *Submitted Project Materials; Biological Resources Assessment, prepared by ELMT Consulting, June 2023 and "Joshua Tree Location Inspection" prepared by ARBORPRO, August 2023, as contained in Appendix A to this Initial Study.*

a) **Have substantial adverse effects, 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?**

The CNDDB Rarefind 5 and the CNPS Electronic Inventory of Rare and Endangered Vascular Plants of California were queried for reported locations of special-status plant and wildlife species as well as special status natural plant communities in the Yucca Valley South USGS 7.5-minute quadrangle. The habitat assessment evaluated the conditions of the habitat(s) within the boundaries of the project site to determine if the existing plant communities, at the time of the survey, have the potential to provide suitable habitat(s) for special-status plant and wildlife species.

- Special Status Plant Species

The literature search identified ten (10) special-status plant species and thirty-four (34) special-status wildlife species as having potential to occur within the Yucca Valley South USGS 7.5-minute quadrangle. Special-status plant and wildlife species were evaluated for their potential to occur within the project site based on habitat requirements, availability and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity of the project site are listed in

the Biological Resources Assessment contained in Appendix A to this Initial Study. No special-status plant species were, however, observed on-site during the field investigation.

While the portion of the site identified for development is disturbed land, the majority of the site supports an uninterrupted, undeveloped open space that supports a natural creosote bush scrub plant community. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, and proximity of the site to known occurrences, it was determined that the undeveloped portions of project site have a low potential to support Joshua Tree poppy (Eschscholzia androuxii) and Latimer's woodland-gilia (Saltugilia latimeri).

While no western Joshua tree (Yucca brevifolia) were observed within the proposed storage facility footprint itself, a total of thirteen specimens do, however, occur in the adjacent hilly area, a portion of which is to be graded for drainage improvements as shown on Exhibit 5 - Site Plan. Joshua trees within 40 feet of planned construction activity have been evaluated by a qualified arborist, as described in Appendix A. The arborist determined that no adverse impacts to four Joshua Trees located within 40 feet of planned construction activities will occur with the utilization of temporary fencing seven (7) feet in diameter around each tree. With implementation of the construction fencing contained in **Mitigation Measure BIO-1,** impacts to western Joshua Trees will be less than significant and no additional mitigation measures are considered necessary.

It was further determined that the project site does not have the potential to support the remainder of special-status plant species known to occur in the vicinity of the site and all are presumed to be absent. These special-status plant species are not state or federally listed as threatened or endangered.

- Special-Status Wildlife

According to the CNDDB, thirty-four (34) special-status wildlife species have been reported in the Yucca Valley South quadrangle (refer to Attachment C). The only special-status wildlife species observed during the field investigation was Cooper's hawk. Based on habitat requirements for specific species and the availability and quality of on-site habitats, and proximity to known occurrences, it was determined that the proposed project site has a high potential to support Cooper's hawk (Accipiter cooperii), sharp-shinned hawk (Accipiter striatus), Costa's hummingbird (Calypte costae), and loggerhead shrike (Lanius ludovicianus); and a low potential to support red-diamond rattlesnake (Crotalus ruber), western mastiff bat (Eumops perotis californicus), prairie falcon (Falco mexicanus), coast horned lizard (Phrynosoma blainvillii), and black-tailed gnatcatcher (Polioptila melanura). It was further determined that the project site does not have the potential to support the remainder of special-status wildlife species known to occur in the vicinity of the site and all are presumed to be absent.

None of the aforementioned special-status wildlife species are federally or state listed as endangered or threatened. Of the aforementioned avian species, only Costa's hummingbird and loggerhead shrike might be expected to nest on-site. None of the other avian species are expected to nest on-site due to the lack of suitable nesting habitat or geographic limitations regarding species' nesting range.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). In order to ensure impacts to special-status avian species do not occur from implementation of the proposed project, a pre-construction nesting bird clearance survey is required prior to ground disturbance. With implementation of the pre-construction survey contained in **Mitigation Measure BIO-2,** impacts to special-status avian species will be less than significant and no additional action is considered necessary.

Due to regional significance and/or listing status, the potential occurrence of burrowing owl and desert tortoise are discussed in further detail below.

- *Burrowing Owl*

The burrowing owl is currently listed as a California Species of Special Concern. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground. Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting. The presence or absence of suitable mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drain

pipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

No burrowing owls or recent sign (i.e., pellets, feathers, castings, or whitewash) was observed during the field investigation. Portions of the project site are unvegetated and/or vegetated with a variety of low-growing plant species that allow for line-of-sight observation favored by burrowing owls. However, no suitable burrows (>4 inches) for roosting and nesting were observed within or near site boundaries. In addition, the site is bounded by structures and electrical poles that provide perching opportunities for large raptors (i.e., red-tailed hawk) that prey on burrowing owls. Therefore, the project site was determined not to have potential to support burrowing owl. No further surveys are recommended.

- *Desert Tortoise*

The Mojave population of the desert tortoise inhabits areas north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and southwestern Utah, and in the Sonoran Desert in California. Throughout the majority of the Mojave Desert, desert tortoises occur most commonly on gentle sloping soils characterized by an even mix of sand and gravel and sparsely vegetated low-growing vegetation where there is abundant inter-shrub space. Typical habitat for the Mojave desert tortoise has been characterized as Mojavean desert scrub below 5,500 feet in elevation with a high diversity of perennial and ephemeral plants. The dominant shrub commonly associated with desert tortoise habitat is creosote bush; however, other shrubs including burrobush (Ambrosia dumosa), Mojave yucca, cheesebush (Ambrosia salsola), and Mojave prickly pear (Opuntia mojavensis) also provide suitable habitat. The desert tortoise spends 95 percent of its life underground and will opportunistically utilize burrows of various

lengths, deep caves, rock and caliche crevices, or overhangs for cover. Therefore, a moderately friable soil is required to allow for burrow construction and ensure that burrows do not collapse.

No live desert tortoises, suitable burrows, or other sign were observed during the field investigation. The Mojavean desert scrub plant community supported by the project site and adjacent open space provide suitable foraging habitat for desert tortoise; however, routine disturbance associated with on-site and adjacent development likely preclude this species from occurring. As such, the project site was determined not to have potential to support desert tortoise. No further surveys are recommended.

With **Mitigation Measure BIO-2**, no significant impacts to 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 will occur.

Mitigation Measure BIO-1:

To ensure no impacts to Western Joshua trees, any tree within 40 feet of active construction shall be encircled by temporary construction fencing. This will be of a height and color to be visible from a distance. With this mitigation incorporated, no western Joshua trees will be affected. Should impacts to this species become unavoidable in the future, an incidental take permit (ITP) will be required from the CDFW. The ITP will detail all impacts to the species and any necessary additional mitigation measures.

Mitigation Measure BIO-2:

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds shall be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer.

The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas.

A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and

left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Less than Significant Impact with Mitigation Incorporated.

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

A 2.3-acre portion of the project site has been graded and the remainder of the site is hilly natural desert habitat. There is no riparian habitat or sensitive natural community located on the project site or in the vicinity**.** No impacts to riparian habitat will occur. No mitigation measures are necessary.

No Impact.

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?**

A 2.3-acre portion of the project site has been graded and the remainder of the site is hilly natural desert habitat. No wetlands or vernal pools of any kind are located on-site or in any adjacent areas. No adverse effect on state or federally protected wetlands will occur. No mitigation measures are necessary.

No Impact.

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?**

The project site is not located within the federally designated Critical Habitat. Further, the nearest Critical Habitat designations are located approximately 8.9 miles to the south for Coachella Valley milk-vetch (Astragalus lentiginosus var. coachellae). The proposed project will have no effect on designated Critical Habitat, or regional wildlife corridors/linkage because none exist within the area. No mitigation measures are necessary.

No Impact.

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

Section 88.01.060 of the County of San Bernardino Development Code provides regulations for the removal or harvesting of specified desert native plants in order to preserve and protect the plants and to provide for the conservation and wise use of desert resources. The provisions are intended to coincide with the Desert Native Plants Act (Food and Agricultural Code Section 8001 et seq.) and the State Department of Food and Agriculture to implement and enforce the Act. Pursuant to Section 88.01.060 of the

Development Code, the following desert native plants or any part of them, except the fruit, shall not be removed except under a Tree or Plant Removal Permit:

1) The following desert native plants with stems two inches or greater in diameter or six feet or greater in height:

(a) Dalea spinosa (smoke tree);

(b) All species of the genus Prosopis (mesquites);

2) All species of the family Agavaceae (century plants, nolinas, yuccas);

3) Creosote Rings, 10 feet or greater in diameter;

4) All Joshua trees (Yucca brevifolia);

5) Any part of any of the following species, whether living or dead: (A) Olneya tesota (desert ironwood); (B) All species of the genus Prosopis (mesquites); (C) All species of the genus Cercidium (palos verdes).

Based on the results of the field investigation, Mohave yucca is present on-site. If any of these Mojave Yucca are expected to be impacted by project implementation, respective Tree or Plant Removal Permits will be required for each individual prior to ground disturbance in association with Section 88.01.060 of the San Bernardino County Development Code. Consequently, no conflicts with local policies or ordinances protecting biological resources will occur. No mitigation measures are necessary.

Less than Significant Impact.

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?**

The project site is not located within any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan, and none are located in proximity to the project site. Consequently, no conflicts with such plans will occur. No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, with Mitigation Measure BIO-1. no significant adverse impacts to biological resources will occur.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
V.	**CULTURAL RESOURCES** - Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c)	Disturb any human remains, including those outside of formal cemeteries?	☐	☒	☐	☐

SUBSTANTIATION: (Check if the project is located in the Cultural ☐ or Paleontologic ☐ Resources overlays or cite results of cultural resource review):

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials; Cultural Resources Assessment, conducted by BCR Consulting, LLC, May 24, 2023. This report is attached in Appendix B to this Initial Study.

a) **Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**

There are no structures located on the project site, and no known historical resources located in proximity to the project site. Parcels adjacent to the project site are vacant on three sides and developed as an auto collision repair business on the north side. Consequently, no impacts to historical resources are anticipated. No mitigation measures are necessary.

No Impact.

b) **Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

In May 2023, BCR Consulting LLC. completed a Phase I Cultural Resources Investigation for the Project Site. The purpose of a Phase I Cultural Resources Assessment is to identify and document any cultural resources that may potentially occur within a Project Site and to evaluate resources pursuant to National Historic Preservation Act (NHPA) Section 106, CEQA, and the County's General Plan. The Cultural Resources Investigation searched for historic or archaeological properties by means of a record search, field survey, and the initiation of Native American consultation. Findings of the Cultural Resource Investigation are summarized herein.

A standard archaeological records search was completed though the California State University, Fullerton, California-South Central Coastal Information Center (CSUF-SCCIC). The records search revealed that 14 cultural resource studies have taken place within one half-mile of the project site, none of which assessed any portion of the project site. No cultural resources have been identified within a one half-mile radius of the project site, and no cultural resources have been previously identified within its boundaries.

The geologic units underlying the project area are mapped primarily as alluvial fan deposits of "fanglomerate", in arkosic matrix, from the early Quarternary, possibly Tertiary, along with Precambrian gneiss (Dibblee and Minch 2008). These units, while partially alluvial, are considered to be of low paleontological value, and the Western Science Center does not have localities within the project area or within a 1-mile radius. Should excavation activity associated with the development of the project area extend beyond the identified development footprint into surrounding alluvial units, paleontological resources would be possible. However, under current project parameters, and with the geologic units described, it would be unlikely for fossil material to be preserved.

During the field survey, BCR Consulting archaeologists did not identify any surface cultural resources within the project site boundaries. Based on these factors, no significant impacts related to archaeological, historical resources are anticipated and no further investigations or monitoring are recommended for any proposed project activities.

Although no on-site cultural resources were identified during the records search and field survey, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

- historic-period artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
- historic-period structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
- prehistoric flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and or cryptocrystalline silicates;
- groundstone artifacts, including mortars, pestles, and grinding slabs;
- dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, groundstone, and fire affected rocks;
- human remains.

The following mitigation measure is recommended to insure adequate and compliant management of any resources that may be identified within the project area during

project development. With Mitigation Measure CR-1, no substantial adverse change in the significance of an archaeological resource will occur.

Mitigation Measure CR-1:

Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register of Historic Places (National Register), plans for the treatment, evaluation, and mitigation of impacts shall be developed.

Less than significant impact with Mitigation Incorporated.

c) **Disturb any human remains, including those outside of formal cemeteries?**

Findings are pending for the Sacred Lands File search with the NAHC. The Legislature added requirements regarding tribal cultural resources for CEQA in Assembly Bill 52 (AB 52) that took effect in 2015. AB 52 requires consultation with California Native American tribes and consideration of tribal cultural resources in the CEQA process. The Lead Agency is responsible to carry out the required AB52 Native American Consultation.

Construction activities, particularly grading, could potentially disturb human remains interred outside of a formal cemetery. Field surveys conducted as part of the Cultural Resource Assessment did not encounter any evidence of human remains. The Project Site is not located on or near a known cemetery, and no human remains are anticipated to be disturbed during the construction stage. However, to insure adequate and compliant management of any buried remains that may be identified during project development, the following mitigation measure is required as a condition of project approval to reduce any impact to a level below significant.

Mitigation Measure CR-2:

If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project Mitigation Measure CR-2.

Less than significant with Mitigation Incorporated.

In consideration of the preceding information and analysis, no significant impacts to cultural resources are anticipated with mitigation measures identified.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VI.	**ENERGY** – Would the project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: San Bernardino County General Plan and EIR; Submitted Project Materials.

a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

The proposed project involves limited grading on a 2.3-acre portion of the site which has been previously graded, paving of access and drive aisles and the construction of concrete footings to support the proposed re-use of shipping containers. Construction is estimated to require approximately 4 months. Construction activities would be relatively limited in scope and will comply with all pertinent County of San Bernardino ordinances and regulations. Energy use during long term operations will be limited to nighttime security lighting. No wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation are anticipated. In consideration of these factors, no Mitigation Measures are necessary.

Less than Significant Impact.

b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

See **Response VI-a** above**.** The proposed project will not conflict with or obstruct any state or local energy related plans or policies.

No Impact.

In consideration of the preceding information and analysis, no impacts pertaining to energy use are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VII.	**GEOLOGY AND SOILS** - Would the project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map Issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv. Landslides?	☐	☐	☐	☒
b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

SUBSTANTIATION: *(Check ☐ if project is located in the Geologic Hazards Overlay District):*

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials - Boundary and Topographic Survey; "Geotechnical Engineering Investigation for 7886 Shafter Avenue", prepared by NorCal Engineering, June 8, 2023. This report is contained in Appendix C to the Initial Study; Cultural Resources Assessment, conducted by BCR Consulting, LLC, May 24, 2023. This report is attached in Appendix B to the Initial Study.

a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Based on the State of California Special Studies Zone Regulatory Map - Yucca Valley South Quadrangle dated July 1, 1993, the Pinto Mountain Fault is situated parallel to the south side of Highway 62. The subject site is situated approximately 450 feet south of the fault and is just within the state designated Alquist-Priolo Special Studies Zone. According to the California Division of Mines and Geology, the Pinto Mountain Fault is an active fault capable of generating a maximum magnitude earthquake of 7.0 - 7.5 on the Richter Scale. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults.

New development within an Alquist- Priolo Fault Zone must comply with General Plan Policy HZ-1.2 - "New Development in Earthquake Hazard Zones, which states that "any lot or parcel that does not have sufficient buildable area outside of such hazard areas requires adequate mitigation, including designs that allow occupants to shelter in place and to have sufficient time to evacuate during times of extreme weather and natural disasters."

The proposed project does not involve habitable space and has been designed in compliance with the San Bernardino County Building Code. Concrete footings upon which storage units will be placed are to be reinforced with steel rebar. The storage containers themselves would be generally considered more earthquake resistant than conventional structures. As has been described, the storage containers are one story (10 feet) in height, which would minimize hazards from potential structural failure. In addition, users of the proposed storage facility are not anticipated to be present on the site for extended periods of time. Evacuation from the site after a major earthquake event would be available on Shafter Avenue to Highway 62, a distance of approximately 450 feet.

With compliance to County seismic building standards and the recommendation of the project geotechnical investigation, all feasible measures to minimize potential impacts from fault rupture have been incorporated in the project and remaining impacts are considered less than significant. No additional measures are necessary.

Less than Significant Impact.

ii. Strong seismic ground shaking?

Like much of Southern California, the project site is subject to potentially strong ground shaking. The Pinto Mountain fault is estimated by The California Division of Mines and Geology to be capable of generating a maximum magnitude earthquake of 7.0-7.5 on the Richter Scale. As has been described in the preceding Response i) above, the proposed project incorporates features in compliance with seismic standards contained in the San Bernardino County Building Code. No other measures are feasible without excluding development of the site altogether, which the County General Plan does not stipulate.

With compliance to County seismic building standards and the recommendations of the project geotechnical investigation, all feasible measures to minimize potential impacts from strong ground shaking have been incorporated in the project and remaining impacts are considered less than significant. No additional mitigation measures are necessary.

Less than Significant Impact.

iii. Seismic-related ground failure, including liquefaction?

See preceding **Responses VII, a-i) and a-ii).** The project site is not located in an area subject to liquefaction. Groundwater was not encountered during site borings conducted as part of the project geotechnical investigation. Groundwater in the project vicinity has been recorded at a depth 102 feet below the ground surface.

With compliance to County seismic building standards and the recommendations of the project geotechnical investigation, all feasible measures to minimize potential impacts from seismic related ground failure have been incorporated in the project and remaining impacts are considered less than significant. No additional mitigation measures are necessary.

Less than Significant Impact.

iv. Landslides?

As has been described, the portion of the site proposed to be developed is essentially level and has been previously graded. The remainder of the property, which will remain vacant, is hilly topography. No known landslide areas are located within this remainder area. No landslide related mitigation measures are necessary.

No Impact.

b) **Result in substantial soil erosion or the loss of topsoil?**

The Project Site has been previously graded and cleared of most vegetation. Limited grading and site preparation is anticipated. The total disturbed area is estimated at one hundred twenty-four thousand (124,000) square feet of area. Four thousand six hundred (4,600) cubic yards of cut and two thousand nine hundred (2,900) cubic yards of fill are anticipated. Proposed cut/fill is nearly balanced when considering compaction. Any extra soil will remain on site.

The Project is subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. Construction activities covered under the State's General Construction Permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction Permit requires development of a Stormwater Pollution Prevention Plan (SWPPP) prior to issuance of building permits. The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. Consequently, no significant impacts from soil erosion or loss of topsoil. are identified or anticipated. No mitigation measures are necessary.

Less than Significant Impact.

c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?**

See preceding **Responses VII, a-iii) and a-iv).**
Exploratory drilling conducted during the project geotechnical investigation revealed that a portion of the site is underlain by a layer of fill soils containing deleterious material such as gravel, plastic, wood, glass and pieces of concrete. This material will be removed from the site and not will not be mixed or blended with fill soils placed in areas of planned development.

There are no landslides on-site or in proximity and it is not subject to liquefaction. The geotechnical investigation conducted for the proposed project determined that the potential for lateral spreading, subsidence and soil collapse were minimal.

With compliance to County seismic building standards and the recommendations of the project geotechnical investigation, all feasible measures to minimize potential impacts from lateral spreading, subsidence, liquefaction and soil collapse have been incorporated in the project and remaining impacts are considered less than significant. No additional mitigation measures are necessary.

Less than Significant Impact.

d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

The project geotechnical investigation determined that the upper on-site soils are low in expansion potential (El 21-50). Expansive Soil Guidelines are outlined in the project geotechnical study and have been considered during the design of the project. With compliance to County seismic building standards and the recommendations of the project geotechnical investigation, all feasible measures to minimize potential impacts from expansive soils have been incorporated in the project and remaining impacts are considered less than significant. No additional mitigation measures are necessary.

Less than Significant Impact.

e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

The proposed project does not involve use of septic tanks or sewer connections. No mitigation measures are necessary.

No Impact.

f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

The geologic units underlying the project area are mapped primarily as alluvial fan deposits of “fanglomerate”, in arkosic matrix, from the early Quarternary, possibly Tertiary, along with Precambrian gneiss (Dibblee and Minch 2008). These units, while partially alluvial, are considered to be of low paleontological value, and no resource localities within the project area or within a 1-mile radius have been identified. Should excavation activity associated with the development of the project area extend beyond the current project site into surrounding alluvial units, paleontological resources would be possible. However, under current project parameters, and with the geologic units described, it would be unlikely for fossil material to be preserved.

There are no unique geologic features located on the Project Site. As has been noted, the site has been previously graded. Limited additional grading is anticipated. As such, minimal impacts to underlying soils conditions would occur and no mitigation measures are necessary.

Less than Significant Impact.

In consideration of the preceding information and analysis, no significant adverse impacts pertaining to geology and soils are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VIII.	**GREENHOUSE GAS EMISSIONS – Would the project:**				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials, "Greenhouse Gas Consistency Evaluation", prepared by MD Acoustics, August 21, 2023. This report is attached in Appendix D to the Initial Study.

a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Table 2 outlines the estimated construction and operational GHG emissions for the project. The project's emissions are below (127.79 MTCO2e) the County of San Bernardino's screening threshold of 3,000 MTCO2e for all land uses and; therefore, the impact is less than significant. No mitigation measures related to GHG emissions are necessary.

Less than Significant Impact.

Table 2: Opening Year Project-Related Greenhouse Gas Emissions

Category	Greenhouse Gas Emissions (Metric Tons/Year)[1]						
	Bio-CO_2	NonBio-CO_2	CO_2	CH_4	N_2O	R	CO_2e
Area Sources[2]	0.00	0.37	0.37	0.00	0.00	0.00	0.37
Energy Usage[3]	0.00	67.84	67.84	0.00	0.00	0.00	68.07
Mobile Sources[4]	0.00	32.56	32.56	0.00	0.00	0.06	33.14
Solid Waste[6]	2.13	0.00	2.13	0.21	0.00	0.00	7.47
Water[7]	1.87	8.65	10.51	0.19	0.00	0.00	16.68
Construction[8]	0.00	2.05	2.05	0.00	0.00	0.00	2.06
Total Emissions	4.00	111.46	115.46	0.41	0.01	0.06	**127.7**
County of San Bernardino Screening Threshold							**3,00**
Exceeds Threshold?							**No**

Notes:
[1] Source: CalEEMod Version 2022.1.1.17
[2] Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
[3] Energy usage consist of GHG emissions from electricity and natural gas usage.
[4] Mobile sources consist of GHG emissions from vehicles.
[5] Solid waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills.
[6] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
[7] Construction GHG emissions based on a 30-year amortization rate.

Source: MD Acoustics, August 2023

b) **Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?**

According to the *County of San Bernardino Greenhouse Gas Emissions Reduction Plan*, "all development projects, including those otherwise determined to be exempt from CEQA will be subject to applicable Development Code provisions, including the GHG performance standards, and state requirements, such as the California Building Code requirements for energy efficiency. With the application of the GHG performance standards, projects that are exempt from CEQA and small projects that do not exceed 3,000 MTCO2e per year are considered to be consistent with the Plan and determined to have a less than significant individual and cumulative impact for GHG emissions."

As presented in Table 1, the Project's operational GHG emissions do not exceed the County's screening threshold of 3,000 MTCO2e per year. The Project is required to comply with applicable provisions of the County Development Code and California Building Code for energy efficiency. Therefore, the proposed Project is consistent with the GHG Plan pursuant to Section 15183.5 of the State CEQA Guidelines. The Project will not conflict with the County of San Bernardino Climate Action Plan (CAP). No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no significant adverse impacts pertaining to greenhouse gas emissions are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
IX.	**HAZARDS AND HAZARDOUS MATERIALS –** Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
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 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 or excessive noise 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials

a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

The proposed project will not involve the routine transport, use, or disposal of hazardous materials. Storage units are anticipated to contain only typical household goods. No mitigation measures are necessary.

No Impact.

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?**

The proposed project will not involve the transport, use, or disposal of hazardous materials. Storage units are anticipated to contain only typical household goods. Consequently, no reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment are anticipated. No mitigation measures are necessary.

No Impact.

c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

There are no existing or proposed schools located within one-quarter mile of the Project Site. The proposed project will not involve the transport, use, or disposal of hazardous materials. Storage units are anticipated to contain only typical household goods. Consequently, no hazardous emissions or risk to schools from use of hazardous or acutely hazardous materials, substances, or waste are anticipated. No mitigation measures are necessary.

No Impact.

d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would not create a hazard to the public or the environment. No mitigation measures are necessary.

No Impact.

e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

The project site is not located within an airport land use plan or within two miles of a public airport or public use airport. Only very minimal noise would occasionally be generated by operation of the proposed storage facility and no employees would be permanently located on-site. The height of the storage units (10 feet) would be less than the height of structures of the adjacent auto collision repair business. The proposed development area is also at a lower elevation than the remainder of the project site, as shown on the Project Site Plan. Thus , the project would not result in any airport related safety hazard. No mitigation measures are necessary.

No Impact.

f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The project site is located immediately adjacent to Shafter Avenue which would provide circulation access to Highway 62**.** Shafter Avenue is not a designated emergency evacuation route, and only very minimal other development exists in the vicinity**.** The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No mitigation measures are necessary.

No Impact.

g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

The proposed project is not located in a designated Wildland Fire Hazard area. In addition, quick access is available to Highway 62 and the nature of the proposed storage facility (using steel shipping containers) would make it resistant to fire hazards. No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no significant adverse impacts pertaining to the use or transport of hazardous materials are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
X.	**HYDROLOGY AND WATER QUALITY -** Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
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 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 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials; "Preliminary Drainage Study" prepared by SITETECH, Inc, Highland, CA. July 2023. This study is incorporated in Appendix E to this Initial Study. See additional sources in the Bibliography at the end of this Initial Study.

a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

The proposed Project is located outside of the MS 4 (Municipal Storm Water Program) Map boundaries that define regulated storm water and discharge of storm water. Any incremental increase in storm water discharge due to impervious surfaces must be retained on-site.

The proposed project is not located in proximity to any stream or river and incorporates a system of surface drainage ditches and a retention basin at the base of the hilly portion of the site in order to collect and direct any stormwater flow from exterior sources away from the storage facility. Within the storage facility, a catch basin inlet will collect runoff into adjacent gutters and to the retention basin. (Refer to Exhibit 5 – Site Plan).

The amount of driveway paving and parking area, combined with the amount of land disturbed by pads for storage facilities, is more than one acre. Thus the Project is subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. Construction activities covered under the State's General Construction Permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction Permit requires recipients to reduce or eliminate non-storm water discharges into storm water systems, and to develop a Stormwater Pollution Prevention Plan (SWPPP) prior to issuance of building permits. This is a standard requirement and would address potential impacts to surface and groundwater quality.

The Proposed Project's design incorporates measures to diminish impacts to water quality to an acceptable level as required by state and federal regulations and is not expected to violate any water quality standards or waste discharge requirements. Consequently, no significant adverse impacts to surface or groundwater quality are identified or anticipated, and no mitigation measures are necessary.

Less than Significant Impact.

b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

The proposed project will be served by the Hi-Desert Water District (HDWD), 55439 29 Palms Highway, Yucca Valley, CA. The HDWD 2020 Urban Water Quality Management Plan (UWMP), which was developed in partnership with Mojave Water Agency (MWA), is a long-term plan to ensure an adequate water supply is available to meet the future needs of the District. Water supply for the District service area is sourced almost entirely from pumped groundwater from the Warren Valley and Ames Groundwater Basins. Groundwater is recharged by natural storm water flows, irrigation and wastewater return flow, and State Water Project imports to recharge the Warren Valley Basin via water deliveries from the Morongo Basin Pipeline to percolation ponds in Yucca Valley.

According to the 2020 UWMP, "The HDWD, in collaboration with Mojave Water Agency and other local agencies, has established opportunities to optimally manage water supplies in the Warren Valley Basin and Ames Valley Basin through innovative actions.

These actions have created a robust water supply for the District that demonstrates there is sufficient water supply to meet the District's growing demands through 2045."

Water demand in the proposed project will be limited to irrigation of landscape area and to meet fire protection needs. Although this demand has not been quantitatively estimated, it would clearly be negligible, and would not decrease groundwater supplies or interfere with groundwater recharge. Consequently, no significant adverse impacts to groundwater recharge or supplies are identified or anticipated, and no mitigation measures are necessary.

Less than Significant Impact.

c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

i. result in substantial erosion or siltation on- or off-site;

See **Response X-a)** above. The proposed project incorporates a system of surface drainage ditches and a retention basin at the base of the hilly portion of the site in order to collect and direct any storm runoff from exterior sources away from the storage facility. Within the storage facility, a catch basin inlet will collect runoff into adjacent gutters and to the retention basin. (Refer to Exhibit 5 – Site Plan). The Project is subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. Consequently, no significant adverse impacts from erosion or siltation are identified or anticipated, and no mitigation measures are necessary.

Less than Significant Impact.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;

See **Responses X- a)** and **c)-ii** above. Runoff from the storage facility will be conveyed to a series of concrete gutters which will convey the runoff in a westerly direction, then southerly to a retention basin. (See Exhibit 5- Site Plan.) The proposed basin will mitigate the difference in runoff before it outlets in the same location as the existing condition. Calculations of pre- and post- construction surface run-off conditions for a 100-year storm prepared by SITETECH, Inc. estimate a negligible increase in runoff that will be controlled by drainage improvements incorporated in the project. (Please refer to Appendix E for further detail.) Consequently, no significant adverse impacts from the amount or rate of surface runoff are identified or anticipated, and no mitigation measures are necessary.

Less Than Significant Impact.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff;

See **Responses X- c) i** and **ii** above. The estimated increase in stormwater generated under a 100-year storm scenario is negligible. Consequently, no

significant change in surface runoff has been identified. The capacity of existing and planned storm water drainage systems off-site will not be significantly impacted. No mitigation measures are necessary.

Less than Significant Impact.

iv. impede or redirect flood flows?

See **Responses X- c)**i and **ii** above. The proposed Project is limited in scale and no significant run-off during a 100-year storm condition has been identified. No impediments or changes in flood flows have been identified or are anticipated. No mitigation measures are necessary.

No impact.

d) **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

The project site is not located in proximity to any stream, river or water body. No mitigation measures are necessary.

No Impact.

e) **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

See **Responses X-a)** and **b)** above. The proposed project will not obstruct implementation of a water quality control plan or sustainable groundwater management plan. No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no significant adverse impacts pertaining to hydrology and water quality are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XI.	**LAND USE AND PLANNING** - Would the project:				
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials

a) **Physically divide an established community?**

The project site is located on the fringe of the Town of Yucca Valley and is zoned for Industrial Use, as are all immediately surrounding parcels.(See Project Description). Only very sparse residential uses exist in the vicinity. Implementation of the project would not impact or physically divide an established community. No mitigation measures are necessary.

No Impact.

b) **Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

The proposed project is consistent with both the Countywide Plan and existing zoning. There are no other land use plans, policies, or regulations pertinent to the proposed project. No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no adverse land use related impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XII.	**MINERAL RESOURCES** - Would the project:				
a)	Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☐	☒
b)	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

SUBSTANTIATION: *(Check ☐ if project is located within the Mineral Resource Zone Overlay):*

Sources: San Bernardino Countywide Plan and EIR ; Submitted Project Materials

a) **Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?**

The project site is not located within a designated mineral resource conservation area. No loss of availability of a known mineral resource of value to the region and the residents of the state would occur. No mitigation measures are necessary.

No Impact.

b) **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

The project site is not located within a designated mineral resource area on the County General Plan or other land use plan. Consequently, no loss of availability of a designated locally important mineral resource recovery site would occur. No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no adverse impacts related to mineral resources are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIII.	**NOISE** - 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?	☐	☐	☐	☒

SUBSTANTIATION: *(Check if the project is located in the Noise Hazard Overlay District ☐ or is subject to severe noise levels according to the General Plan Noise Element ☐):*

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials

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?**

There are no sensitive receptors located in proximity to the project site, and adjacent parcels are planned for similar industrial land uses. Construction activities would be limited in duration and would occur within the daytime hours permitted by Chapter 83.01 of the Development Code. Permitted construction hours in the County are identified in Subsection 83.01.080 of the Development Code and are between the hours of 7:00 a.m. and 7:00 p.m. (except for Sunday and Federal Holidays).

Operating hours for the Proposed Project will be from 9:00 a.m. to 4:00 p.m. with no nighttime operations. The noise generated by long-term operations, including traffic generation, would be minimal due to the nature and limited scale of the proposed project and would not exceed the daytime acceptable noise levels of 65 DBA LDN. With compliance to established standards and regulations, noise impacts are anticipated to be less than significant. No mitigation measures are necessary.

Less than Significant Impact.

b) **Generation of excessive groundborne vibration or groundborne noise levels?**

Ground borne vibration and ground borne noise could originate from grading and site preparation activities during construction. The project would not, however, involve any pile driving or other heavy construction techniques which typically generate ground borne vibration impacts. Any ground-borne vibration resulting from construction activities would be very low level and temporary in nature.

As has been noted, the project site is surrounded on three sides by vacant land. The auto collision repair business adjacent to the north is housed primarily in metal structures that would not be susceptible to damage or other adverse impacts from the limited ground borne vibration that might occur. In consideration of these factors, the ground borne vibration impacts that could be generated by project construction are anticipated to result in less than significant and would not expose people to or generate excessive ground borne vibration or ground borne noise levels. No mitigation measures are required.

Less than significant impact.

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?**

The Project Site is not located within the vicinity of a private or public airstrip. The nearest airport is Yucca Valley Airport, a private aviation facility located approximately 4 miles from the Project Site. Consequently, no impacts are anticipated and no mitigation measures are required.

No Impact.

In consideration of the preceding information and analysis, no adverse noise impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIV.	**POPULATION AND HOUSING** - Would the project:				
a)	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)?	☐	☐	☐	☒
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials.

a) **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)?**

Minimal employment (one or possibly two employees) is expected to be generated by the Proposed Project and would be easily filled within the local area. No population growth not already anticipated by the County's General Plan is anticipated. The Project Site is served by an existing public street and available utility infrastructure. Implementation of the proposed Self-Storage Facility would not result in significant direct or indirect growth in the area. Furthermore, the Proposed Project would not result in the construction of new homes nor would any residents be displaced. Consequently, no adverse population and housing impacts are anticipated, and no mitigation measures are required.

No Impact.

b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere**

See response XIV (a) above. The project is vacant. No homes exist on-site or in proximity. No mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no adverse population and housing impacts are anticipated and no mitigation measures are required.

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

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials

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

Fire Protection?

The San Bernardino County Fire Department (SBCFD) provides services to the unincorporated Morongo Valley/Yucca Valley area. The Project site is served by Station No. 4, located approximately 4 miles away at 57201 29 Palms Highway, near the intersection with Highway 274.

Any development, along with associated human activity, in previously undeveloped areas increases the potential of the occurrence of fires. The Project Site is located within a Fire Safety Overlay Zone, which requires additional site design, building, and access standards to provide enhanced resistance to fire hazards. The nature of the Proposed Project, utilizing metal storage containers would, however, minimize structural fire risk. Safety measures that comply with federal, state, and local worker safety and fire protection codes and regulations would be implemented to minimize the potential for fires to occur during construction and long-term operations. The Proposed Project would be required to comply with County fire suppression standards, to provide adequate fire access and pay required development fees. In consideration of these requirements, proximity of Station 41, and easy access from Highway 62, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact.

Police Protection?

Personnel organization, distance, grade and road conditions as well as other physical factors influence response times by law enforcement. The unincorporated portions of San Bernardino County near the Project site are served by the Twentynine Palms Patrol Station, located at 63665 Twentynine Palms Highway (State Highway 62), in Joshua Tree. The Sheriff's Department reviews staffing needs on a yearly basis and adjusts service levels as needed to maintain an adequate level of public protection. Due to the limited activity level typical of similar storage facilities and ease of accessing the property from Highway 62, no significant impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact.

Schools?

The nature of the proposed project is not one that is anticipated to generate any additional demand on schools. The proposed storage facility would serve existing residents and businesses, rather than attract new residents and businesses. Only one full-time long-term employee (Security Personnel) is anticipated associated with the proposed project. Therefore, the proposed Project is not expected to draw any new residents to the region that would require expansion of existing schools or additional schools. Development impact fees payable to the School District may be required but have not been determined at this time. Impacts related to school facilities are expected to be less than significant and no mitigation measures are required.

No Impact.

Parks?

As previously noted, the proposed storage facility is intended to serve the existing population. Operation of the Proposed Project would place no demands on parks because it would not involve the construction of housing and would not involve the introduction of a temporary or permanent human population into the area. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact.

Other Public Facilities?

The Proposed Project would not result in an increased residential population or a significant increase in the work force. Therefore, no impact to other public facilities is identified or anticipated, and no mitigation measures are required.

No Impact.

In consideration of the preceding information and analysis, no significant adverse public service-related impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVI.	**RECREATION**				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☐	☒
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials

a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?**

No population growth is anticipated in association with the Proposed Project; thus the Proposed Project would not increase the use of existing neighborhood or regional parks, or other recreational facilities. No new recreational facilities would be constructed as part of the Proposed Project. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact.

b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

See Response XVI-a) above.

No Impact.

In consideration of the preceding information and analysis no adverse recreation related impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVII.	**TRANSPORTATION** – Would the project:				
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b)	Would the project 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?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials

a) **Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

The proposed Project will obtain access from Shafter Avenue and 29 Palms Highway (Highway). Shafter Avenue, which is presently unimproved but treated with an oil substance, will be improved to a paved thirty-six (36) foot wide street with project implementation. By its nature, the Project is not anticipated to generate a substantial amount of traffic. Typical usage of storage facilities is sporadic in nature and unlikely to involve more than a small number of units at any one time. No bicycle, pedestrian or transit facilities exist in proximity to the Project site. A public transit route does exist along Highway 62, but there are no stops in the project vicinity and the Proposed Project would not be expected to generate any demand for transit services, nor would it conflict with any transit plan or program.

The San Bernardino County Traffic Study Guidelines require the preparation of a traffic study if a proposal generates 100 or more peak hour trips without consideration of pass-by trips during any peak hour. The proposed project consists of only 155 storage units, thus generation of 100 or more peak hour trips will not occur. The Public Works Traffic Division evaluated the proposed Project would generate no more than 50 peak hour trips and found such an analysis would not be required based upon Project characteristics and a limited number of anticipated daily vehicle trips. Therefore, the proposed Project does not conflict with an applicable plan, ordinance, or policy establishing measure of effectiveness for the performance of the circulation system. No impacts are identified or are anticipated, and no mitigation measures are necessary.

No Impact.

b) **Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?**

See Response XVII- a) above. CEQA Guidelines Section 15064.3 deals with determining the significance of transportation impacts. Sub-section (b) addresses criteria for analyzing transportation impacts. The County of San Bernardino has adopted traffic study guidelines that establish a threshold for the requirement of a full traffic study. As noted in Response XVII-a) the proposed project does not meet the minimum trip generation to trigger a full traffic study. Therefore, no conflict or inconsistency with CEQA Guidelines Section 15064.3 subdivision (b) are identified or anticipated, and no mitigation measures are required.

No Impact.

c) **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Access from Shafter Avenue will be improved with project implementation**.** This will benefit the adjacent auto collision repair business as well as any future development which may occur in the vicinity as well as scattered residences that exist nearby. Project-related traffic generation is anticipated to be minimal, and no unusual equipment or vehicles are expected. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact.

d) **Result in inadequate emergency access?**

Highway 62 is a designated emergency evacuation route. The Proposed Project is located within approximately 450 feet of Highway 62 and Shafter Avenue will be improved with project implementation. As has been previously noted, typical usage of storage facilities is sporadic in nature and unlikely to involve more than a small number of units at any one time, thus demand on emergency access would be minimal. The Project would be subject to any conditions required by the San Bernardino County Fire Department to maintain adequate emergency access. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact.

In consideration of the preceding information and analysis no significant adverse transportation-related impacts are identified or anticipated and no mitigation measures are required.

Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVIII. 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 Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan; Cultural Historical Resources Information System (CHRIS), South Coast Information Center, California State University, Fullerton; Submitted Project Materials

a) **Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

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

There are no permanent structures located on the Project site. Therefore, no impacts pertaining to resources 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) are identified or anticipated, and no mitigation measures are required.

No Impact.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

In accordance with Public Resources Code Section 5024.1, on July 20, 2003, the County of San Bernardino mailed notifications to four area tribes, including the Twenty-Nine Palms Band of Mission Indians, the Colorado River Indian Tribes, the Morongo Band of Mission Indians, and the San Manuel Band of Mission Indians. As described in the Project Description, page 13 of this Initial Study, no responses were received. No cultural resources (including architectural historical resources, prehistoric archaeological resources, or historic-period archaeological resources) were identified during research or fieldwork conducted by BCR Consulting for the Proposed Project. (See Appendix B- Cultural Resources Assessment) Due to a lack of historical resources located within or near the project site combined with a high level of disturbance, BCR Consulting recommends that no additional cultural resources work for monitoring is necessary for any proposes project activities. The current study attempted to determine whether significant archaeological deposits were present on the proposed project site. Although none were yielded during the records search and field survey, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits.

Mitigation Measures CR-1 and **CR-2** outlined in Section V - Cultural Resources, page 32, will require evaluation by a qualified archaeologist of any cultural resources discovered during site preparation to assess the significance of any finds; and notification of the County Coroner if human remains or funerary objects are discovered during the course of project development. These measures will ensure adequate and compliant management of any resources that may be identified within the project area during project development. With **Mitigation Measure CR-1 and 2**, no substantial adverse change in the significance of an archaeological or tribal resource will occur.

Less than significant Impact with Mitigation.

In consideration of the preceding information and analysis no significant adverse impacts to tribal resources are identified or anticipated and no mitigation measures are required at this time.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIX.	**UTILITIES AND SERVICE SYSTEMS -** Would the project:				
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
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 adequate 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?	☐	☐	☒	☐
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan and EIR; Submitted Project Materials

a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

The proposed Project will result in a very negligible change in demand for water. The only component of the Project that will utilize water is landscape irrigation, and the landscaping proposed will feature drought tolerant plant materials. No wastewater will be generated on-site as the Project does involve an on-site manager residence or office.

The project is designed to collect all storm water runoff into a drain system and then to a retention basin. The estimated increase in storm water run-off in the post development condition is minimal. (See Section X - Hydrology and Water Quality and Exhibit 5 – Site Plan, for additional detail.)

The Project Site is serviced by Southern California Edison (SCE), which provides electrical service to the project vicinity. The Proposed Project will receive electrical power by connecting to SCE's existing power lines. The increased demand for electric power is expected to be very minimal and will be sufficiently served by existing SCE electrical facilities. Total electricity demand in SCE's service area is estimated to increase by approximately 12,000 Gigawatt hours between the years 2015 and 2026. The increase in electricity demand from the project would represent an insignificant portion of overall demand in SCE's service area.

The Proposed Project would not require the expansion or construction of any new infrastructure to provide water, wastewater treatment, storm water drainage, electric power, natural gas or telecommunications other than on-site improvements and/or typical service connections to the site. Therefore, no significant adverse impacts to any of the foregoing services and utilities are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact.

b) **Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

The proposed project will be served by the Hi-Desert Water District (HDWD), 55439 29 Palms Highway, Yucca Valley, CA. The HDWD 2020 Urban Water Quality Management Plan (UWMP), which was developed in partnership with Mojave Water Agency (MWA), is a long-term plan to ensure an adequate water supply is available to meet the future needs of the District. Water supply for the District service area is sourced almost entirely from pumped groundwater from the Warren Valley and Ames Groundwater Basins

According to the 2020 UWMP, "The HDWD, in collaboration with Mojave Water Agency and other local agencies, has established opportunities to optimally manage water supplies in the Warren Valley Basin and Ames Valley Basin through innovative actions. These actions have created a robust water supply for the District that demonstrates there is sufficient water supply to meet the District's growing demands through 2045." It should be noted that the proposed use is consistent with the General Plan Industrial Land Use designation, thus future development of the project site would be assumed in long-term projections of water demand.

Water demand in the proposed project will be limited to irrigation of landscape area and to meet fire protection needs. Although this demand has not been quantitatively estimated, it would clearly be negligible, and would not impact the ability of the Hi-Desert Water District or the Mojave Water Agency to meet projected demands. Consequently, no significant adverse impacts to water supply to serve the Project are identified or anticipated, and no mitigation measures are necessary.

Less than Significant Impact.

c) **Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?**

The proposed project will not be connected to the public sewer system. Consequently, no adverse impacts to the capacity of the wastewater treatment infrastructure to serve the Project are identified or anticipated, and no mitigation measures are necessary.

No Impact.

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?**

The Project site is currently within the refuse collection area of Burrtec Waste Industries. Solid waste generated at the Project Site would be disposed of at either the San Bernardino County Landers Sanitary Landfill (36-AA-0057), or other active landfills as necessary. According to the CalRecycle web site, the Landers Sanitary Landfill has a maximum throughput of 1,200 tons per day, an expected operational life through 2072, and a remaining capacity of 11,148,100 cubic yards, as of 7/5/16. Due to the nature of the proposed Project, solid waste generation is anticipated to be very limited. An on-site waste collection receptacle is provided in design plans. (See Exhibit 6 – Container Layout and Parking Plan) The Project would be served by a landfill with sufficient permitted capacity to accommodate its solid waste disposal needs. No hazardous wastes are anticipated to be generated by the project, which is intended to accommodate only storage of typical household items. No significant adverse impacts pertaining to solid waste from long-term operations are identified or are anticipated, and no mitigation measures are required.

Preparation and approval of a Construction and Demolition Solid Waste Management Plan is required by the County of San Bernardino. The California Green Building Standards Code (CALGreen) requires all newly constructed buildings, including low-rise residential and most nonresidential commercial projects, develop a waste management plan and divert a minimum of 65 percent of construction waste. Projects are required to estimate the amount of solid waste tonnage to be disposed and diverted during construction. The mandatory requirement to prepare a Construction and Demolition Solid Waste Management Plan would ensure that impacts related to construction waste would be less than significant and no mitigation measures are required.

Less than Significant Impact.

e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Please refer to Response XIX- (d) above**.** The proposed Project would comply with all federal, state, and local statutes and regulations related to solid waste. Solid waste produced during the construction phase and operational phase of the proposed Project would be disposed of in accordance with all applicable statutes and regulations.

Therefore, no significant adverse impacts pertaining to solid waste disposal are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact.

In consideration of the preceding information and analysis, no significant adverse impacts related to utilities and service systems are identified or anticipated and no mitigation measures are required.

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

SUBSTANTIATION:

Sources: San Bernardino Countywide Plan; Submitted Project Materials

a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

The Project site is located within approximately 450 feet of 29 Palms Highway (Highway 62) which is a designated Countywide Plan evacuation route. Operations and construction of the proposed Project would not interfere with the use of this route during an evacuation. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County Fire Department. Furthermore, the Project site does not contain any emergency facilities. Long-term operations at the proposed Project would not interfere with an adopted emergency response or evacuation plan. Proposed project driveways would be maintained for ingress/egress. As has been previously noted, site occupancy at any one time can be expected to be very low due to the nature of the facility. The auto collision repair facility is the only other substantial use taking access from Shafter Avenue, and it has separate driveway access. The area to the east of the project site which also takes access from Shafter Avenue is very sparsely populated. No significant

impacts pertaining to emergency response or evacuation are identified or anticipated, and no mitigation measures are necessary.

Less than Significant Impact.

b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?**

The portion of the project site to be developed is essentially flat, but the remainder of the site on the south edge of the property is characterized by a steep slope bank that will remain in its natural state. As has been previously noted, the proposed use of metal shipping containers for storage would minimize the level of fire risk. No habitable structures are involved in the proposed Project. No significant impacts pertaining to emergency response or evacuation are identified or anticipated, and no mitigation measures are necessary.

Less than Significant Impact.

c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

The Project site would provide moderate improvements to the property, including improved access to the site from Shafter Avenue. The utilization of recycled metal storage containers would be more fire resistant than typical storage facilities. The proposed Project does not include the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impacts are identified, and no mitigation measures are required.

No Impact.

d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

None of the cited conditions exist on the Project site. Please refer to Section VII - Geology and Soils, and Section X- Hydrology and Water Quality, for additional information. No impacts have been identified or are anticipated and no mitigation measures are necessary.

No Impact.

In consideration of the preceding information and analysis, no significant adverse impacts related to wildfire risks are identified or anticipated and no mitigation measures are required

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

a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

The Biological Resource Assessment (RA) prepared for the proposed Project concluded that all direct, indirect, and cumulative impacts would be reduced to a less than significant impact with implementation of Mitigation Measures BIO-1 and BIO-2. Therefore, the proposed Project is not anticipated to have the potential to significantly degrade the overall quality of the region's environment, or substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population or drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal.

Potential impacts to cultural resources were identified in the Phase I Cultural Resources Assessment (CRA) prepared for the Proposed Project. As discussed in this Initial Study, all direct, indirect, and cumulative can be reduced to a less than significant level with implementation of Mitigation Measures CR-1 and CR-2. Adherence to mitigation measures as presented in this Initial Study would ensure that any important examples of the major periods of California history or prehistory that may be discovered during construction are not eliminated as a result of the proposed Project.

Less than Significant Impact with Mitigation Incorporated.

b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

The project has 3 potential impact categories that are individually limited but may potentially be cumulatively considerable. These are: Biological Resources, Cultural Resources, and Tribal Cultural Resources. The project is not considered growth-inducing, as defined by *State CEQA Guidelines*. These referenced issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no potential significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and therefore, less than significant.

Less than Significant Impact with Mitigation Incorporated.

c) **Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?**

All potential impacts have been fully evaluated and have been deemed to be neither individually significant nor cumulatively considerable in terms of adverse effects upon the region, the local community, or its inhabitants, with mitigation as incorporated in this Initial Study. It is anticipated that conditions of approval will incorporate all mitigation measures set forth in this analysis in addition to other requirements that will further ensure that no potential for substantial adverse impacts will be introduced by construction activities or long-term operations authorized by the project approval.

Less than Significant Impact with Mitigation Incorporated.

MITIGATION MEASURES / CONDITIONS OF APPROVAL

Any mitigation measures, which are not "self-monitoring", shall have a Mitigation Monitoring and Reporting Program prepared and adopted at time of project approval. Condition compliance will be verified by existing procedures. (CCRF)

Mitigation Measure BIO-1:

To ensure no impacts to Western Joshua trees, any tree within 40 feet of active construction shall be encircled by temporary construction fencing. This will be of a height and color to be visible from a distance. With this mitigation incorporated, no western Joshua trees will be affected. Should impacts to this species become unavoidable in the future, an incidental take permit (ITP) will be required from the CDFW. The ITP will detail all impacts to the species and any necessary additional mitigation measures.

Mitigation Measure BIO-2:

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds shall be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer.

The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas.

A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

***Mitigation Measure CR-1*:**

Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance

of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register of Historic Places (National Register), plans for the treatment, evaluation, and mitigation of impacts shall be developed.

Mitigation Measure CR-2:

If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project Mitigation Measure CR-2.

BIBLIOGRAPHY

GENERAL REFERENCES

- Basin Transit website. https://basin-transit.com/
- California Department of Conservation, Farmland Mapping and Monitoring Program
- California Department of Resources Recycling and Recovery (CalRecycle), Solid Waste Facilities.
- California Department of Transportation, Scenic Highways Program.
- California Energy Commission, California Energy Consumption Database.
- San Bernardino County. Development Code.
- San Bernardino County, Countywide Plan and EIR. 2020. All pertinent Elements of the General Plan and EIR chapters in addition to the following supporting documents:
    - San Bernardino County. Greenhouse Gas Emissions Reduction Plan. September 2011.
    - San Bernardino County, Multi-Jurisdictional Hazard Mitigation Plan, July 2017
    - Cultural Resources Technical Report
    - Land Use Background Report
    - Morongo Valley Community Action Guide.
    - Paleontological Resources Technical Report
    - San Bernardino County Community and Municipal Greenhouse Gas Inventory, October 2017
    - Safety Background Report
    - Water, Wastewater, and Hydrology Existing Conditions
- San Bernardino County, Transportation Impact Study Guidelines. July 2019
- High Desert Water District Urban Water Quality Management Plan (UWMP), 2020.
- Mojave Air District CEQA Guidelines, 2020

PROJECT SPECIFIC REFERENCES

- “Biological Resources Assessment for the Proposed Project”, 7888 Shafter Avenue, Yucca Valley, San Bernardino County, California, Prepared by ELMT Consulting, June 6, 2023.

- “Cultural Resources Assessment”, 7886 Shafter Avenue Self Storage Project, Yucca Valley, San Bernardino County, California. Prepared by BCR Consulting, May 24, 2023.
- “Geotechnical Engineering Investigation”, Proposed ISO Shipping Container Self-Storage Facility 7886 Shafter Avenue, Yucca Valley, California. Prepared by Nor Cal Engineering, June 8, 2023
- “Preliminary Drainage Study”, 7886 Shafter Avenue, Yucca Valley, Prepared by SITETECH, Inc. July 27, 2023.