Seneca Business Park and Storage Project

Initial Study/Mitigated Negative Declaration

Location and Development Plan (LDP) 24-03
Conditional Use Permit (CUP) 24-05
Tentative Parcel Map (TPM) 20841

Lead Agency

City of Adelanto
Development Services – Planning Division
11600 Air Expressway
Adelanto, CA 92301

Project Proponent

Adelanto Seneca Land, LLC
% Jake Sowder
10621 Civic Center Drive
Rancho Cucamonga, CA 91730

Prepared By

EPC Environmental Inc.
11801 Pierce Street, Ste. 200
Riverside CA 92505

August 26, 2024

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Section 1.0 Background Information

1. **Project Title: Seneca Business Park and Storage.** Location and Development Plan (LDP) 24-03; Conditional Use Permit (CUP) 24-05; and Tentative Parcel Map (TPM) 20841.

2. **Lead Agency Name, Address, and Telephone Number:** City of Adelanto, Development Services-Planning Division, 11600 Air Expressway, Adelanto, CA 92301

3. **Description of Project:** The Project Proponent plans to construct a business park comprised of self-storage facilities, recreational vehicle storage, and office and retail space on a 9.67-acre vacant parcel. (See 3.0, *Project Description*, for additional details.

4. **Project Location:** The Project site is located on the southeast corner of Seneca Road and Pearmain Street and is also referred to as San Bernardino County Tax Assessor's Parcel Number (APN) 3103-511-08.

5. **General Plan and Zoning Designation:** The parcel has a current zoning classification of General Commercial (C). The General Commercial district provides for commercial areas that include, but are not limited to, service commercial businesses; professional business offices; and restaurants. The district also provides for a wide range of smaller-scale business activities which serve the needs of residents who live nearby.

6. **Other Public Agencies whose Approval is Required:** Issuance of building permits, and completion of structures to current building code are required by the City prior to the establishment of the use. Additionally, approvals from the following agencies are required:

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

7. **Have California Native American Tribes requested Consultation per Assembly Bill 52 (PRC §21080.1)?** Yes. See Section 4.18, *Tribal Cultural Resources*, of this document.

Significant or Potentially Significant Environmental Factors

The following environmental factors have been evaluated in this Initial Study to determine if development of the Project will result in a Significant or Potentially Significant impact(s) to the environment that cannot be mitigated to a level of insignificance. The environmental factors checked below require mitigation measures to reduce impacts to a level of insignificance.

- ☐ Aesthetics
- ☐ Agriculture and Forestry Resources
- ☐ Air Quality
- ☒ **Biological Resources**
- ☒ **Cultural Resources**
- ☐ Energy
- ☐ Geology/Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards and 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

Because the environmental factors above have been mitigated to less than significant, the adoption of a Mitigated Negative Declaration is recommended. View Table 2.2-1 below for further information.

Determination

Based on this initial evaluation:

I find that the proposed use COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be recommended for adoption. ☐

I find that although the proposal could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project Applicant. A **MITIGATED NEGATIVE DECLARATION** will be recommended for adoption. ☒

I find that the proposal MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐

I find that the proposal MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed Project could have a significant effect on the environment, because all potgentially significnat effect (a) have been analyzed adequately in an earlier **EIR or NEGATIVE DECLARATION**, pursuant to all applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures are are imposed upon the proposed Project, nothing further is required. ☐

	City of Adelanto
Signature	**Lead Agency**
Louis Morales, Contract Planner	8/26/2024
Printed Name/Title	**Date**

Section 2.0 Introduction

2.1 Purpose of the Initial Study/Mitigated Negative Declaration

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

- **Negative Declaration**: If the initial study concludes that the project will not cause a significant effect on the environment, the city can prepare a Negative Declaration. (California Public Resources Code §21080(c); CEQA Guidelines §15070 et seq. (negative declaration process). A Negative Declaration is a written statement that an EIR is not required because a project will not have a significant adverse impact on the environment. (California Public Resources Code §§21064, 21080(c).)
- **Mitigated Negative Declaration**: The City may attach conditions to a Negative Declaration to mitigate potential environmental effects. This is referred to as a "Mitigated Negative Declaration" (CEQA Guidelines §15070(b); Public Resources Code §21064.5).
- **Environmental Impact Report**: If the Initial Study determines that there are potentially significant physical effects on the environment that cannot be mitigated to a less than significant level, the city will prepare an Environmental Impact Report. Environmental Impact Reports are reports to inform the public and City decision-makers of the significant environmental effects of proposed projects, identify possible ways to minimize those effects, and describe reasonable alternatives to those projects. Based on the Initial Study prepared for the Project, a **Mitigated Negative Declaration** is recommended.

2.2 Environmental Impacts Requiring Mitigation

Table 2.2-1, *Summary of Mitigation Measures (MM) and Best Management Practices (BMPs,)* lists all the Mitigation Measures in this document.

Table 2.2-1. Summary of Mitigation Measures and Best Management Practices

Environmental Impact	Mitigation Measures (MM) or Best Management Practices (BMPs)
4.3 (b) Air Quality Although the Project will not exceed air quality emission thresholds established by the MDAQMD, BMPs are recommended to reduce impacts to the maximum extent feasible.	**BMP AQ-1. RULE 403.** The following measure shall be incorporated into Project plans and specifications as implementation of Rule 403: ▪ Use periodic watering for short-term stabilization of Disturbed Surface Area to minimize visible fugitive dust emissions. For purposes of this Rule, use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered sufficient to maintain compliance. Take actions sufficient to prevent project-related trackout onto paved surfaces. **BMP AQ-2. RULE 1113**. The following measures shall be incorporated into Project plans and specifications as implementation of MDAQMD Rule 1113: ▪ Only "Low-Volatile Organic Compounds (VOC)" paints consistent with MDAQMD Rule 1113 shall be used.
4.4 (a) Biological Resources Construction will impact species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	**MM BIO-1. Preconstruction Rare Plant Survey:** It is recommended that a protocol-level preconstruction survey be conducted for the eleven special-status plant species that have a low potential to occur on the Project site, including White pygmy-poppy, Mojave spineflower, Mojave monkeyflower, Sagebrush loeflingia, Torrey's box-thorn, Solitary blazing star, Crowned muilla, short-joint beavertail, Beaver Dam breadroot, Latimer's woodland-gilia, and Mojave fish-hook cactus. The protocol-level survey should occur during the typical blooming period for these species (April-May) the season or the year prior to the start of ground-breaking Project activities. The survey should be performed by a qualified botanist or biologist experienced with surveying for and identifying desert flora. The surveys should be conducted in consideration of the USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants (USFWS 1996), General Rare Plant Survey Guidelines (Cypher 2002), CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018), and the CNPS's Botanical Survey Guidelines (CNPS 2001). If special-status plant species are observed on the Project site during the survey, then a non-disturbance buffer shall be established around the location(s) of the individuals or population. The size of the nondisturbance buffer shall be determined by the qualified botanist or biologist based on location of specialstatus species and expected construction activities. If one or more special-status plants are found on the Project site and avoidance of the location(s) is not feasible during Project construction, then additional mitigation measures will need to be implemented. Mitigation measures could include, but are not limited to, biological monitoring, seasonal work avoidance, seed collection, or transplanting. Coordination with CDFW may need to occur before or during mitigation implementation. **MM BIO-2. Preconstruction Surveys for Burrowing Owl:** Pre-construction surveys for burrowing owl shall be conducted prior to the start of construction. The surveys shall follow the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012). Two surveys shall be conducted, with the first survey being conducted between 30 and 14 days before initial ground disturbance (e.g., grading, grubbing, construction), and the second survey being conducted no more than 24 hours prior to initial ground disturbance. If

Environmental Impact	Mitigation Measures (MM) or Best Management Practices (BMPs)
	burrowing owls or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project site during the survey and impacts to those features are unavoidable, consultation with the CDFW shall be conducted and the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) for avoidance and/or passive relocation shall be followed. **MM BIO-3. Preconstruction Nesting Bird Survey:** If construction or other Project activities are scheduled to occur during the nesting bird season (February 1 through August 31), a pre-construction nesting bird survey shall be conducted by a qualified avian biologist to ensure that active bird nests, including nests belonging to special-status avian species, will not be disturbed, or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project site and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly, due to construction activity, noise, human activity, or ground disturbance. If an active nest is identified, a qualified avian biologist shall establish an appropriately sized non-disturbance buffer around the nest using flagging or staking. Construction activities shall not occur within any nondisturbance buffer zones until the nest is deemed inactive by the qualified avian biologist. If initial ground-disturbing activities are scheduled to occur during the nesting bird season, then a biological monitor shall be present during all vegetation removal activities to ensure no impacts to nesting birds occur. **MM BIO-4.Biological Monitoring:** A qualified biologist will be present to monitor all initial ground disturbance and vegetation clearing for the Project. Prior to the onset of work, the biological monitor will perform a survey "sweep" in areas where clearing/disturbance is scheduled. The monitor will be responsible for ensuring impacts to special-status species, nesting birds, and active nests will be avoided to the greatest extent possible. If any special-status resources are observed while monitoring, then measures recommended by the biological monitor shall be implemented (e.g., establishing a buffer around the resource using flagging or staking, redirecting work to other locations) to prevent potential impacts. Construction activities will be restricted within any buffer zone until the biologist has determined a nest is no longer active or the resource has been safely moved/relocated. If special-status wildlife species are detected during biological monitoring, then consultation with the USFWS and/or CDFW will be conducted, and recommendations provided by the resource agencies to offset impacts shall be incorporated into the Project. Measures may consist of, but are not limited to, additional surveys, "no work" buffers, work restrictions, clearance surveys, passive relocation, or additional biological monitoring. **MM BIO-5. Preconstruction Survey for Desert Tortoise:** The Project site provides low quality habitat for desert tortoise; therefore, a preconstruction survey for desert tortoise shall be conducted by a qualified biologist to identify any desert tortoise on the Project site prior to construction and to ensure there is no desert tortoise mortality. Survey methods should follow those outlined in the USFWS' Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise (USFWS 2019). If desert tortoise is identified on the Project site during the preconstruction survey, then coordination with USFWS and CDFW will need to

Environmental Impact	Mitigation Measures (MM) or Best Management Practices (BMPs)
	occur. If impacts to desert tortoise could occur because of Project development, then the appropriate permits will need to be obtained prior to the start of Project activities. **MM BIO-6. Preconstruction Survey for Mohave Ground Squirrel:** The project site provides low quality habitat for Mohave ground squirrel; therefore, a preconstruction visual survey for this species shall be conducted between March 15 and July 15 by a qualified Mohave ground squirrel biologist, prior to construction. The survey shall be conducted by walking the entire site, periodically stopping to look for Mohave ground squirrel with binoculars and listening for the distinctive Mohave ground squirrel call. The survey should be conducted during daylight hours and should include all suitable habitats within the Project site. If the survey confirms presence and if any potential for direct impacts exists, CDFW should be contacted to obtain information on applying for the a "take" permit for MGS. **BMP BIO-1. Best Management Practices.** Further, the following best management practices are not mitigation measures pursuant to CEQA but are recommended to further reduce impacts to species that have potential to occur on the property: — Confine all work activities to a pre-determined work area. — To prevent inadvertent entrapment of wildlife during the construction phase of a Project, all excavated, steep-walled holes or trenches more than two feet deep should be covered at the close of each working day by plywood or similar materials. If the trenches cannot be closed, one or more escape ramps constructed of earthen fill, or wooden planks shall be installed. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals. — Wildlife is often attracted to burrow- or den-like structures such as pipes and may enter stored pipes and become trapped or injured. To prevent wildlife use of these structures, all construction pipes, culverts, or similar structures with a diameter of four inches or greater should be capped while stored onsite. — All food-related trash items such as wrappers, cans, bottles, and food scraps should be disposed of in securely closed containers and removed at least once a week from the construction or Project site. — Use of rodenticides and herbicides on the Project site should be restricted. This is necessary to prevent primary or secondary poisoning of wildlife, and the depletion of prey populations on which they depend. All uses of such compounds should observe label and other restrictions mandated by the USEPA, California Department of Food and Agriculture, and other state and federal legislation. If rodent control must be conducted, zinc phosphide should be used because of a proven lower risk to predatory wildlife.
4.5 (b) Cultural Resources Although no surface cultural resources (including historic-period or prehistoric archaeological resources, or historic-period architectural resources) or cultural resource sensitivity were identified on or near the Project site, future	**Mitigation Measure CUL-1: Contractor Awareness Training.** The lead agency shall ensure that a Contractor Awareness Training Program is delivered to train equipment operators about cultural resources. The program shall be designed to inform construction personnel about: federal and state regulations pertaining to cultural resources and TCRs; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the lead agency of any occurrences; Project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for noncompliance with the program.

Environmental Impact	Mitigation Measures (MM) or Best Management Practices (BMPs)
ground-disturbing activities have the potential to reveal buried deposits not observed on the surface.	The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined appropriate by the archaeologist. The training shall be provided to all construction supervisors, forepersons, and operators of ground-disturbing equipment. All personnel shall be required to sign a training roster. The Construction Manager is responsible for ensuring that all required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the lead agency as proof of compliance. **Mitigation Measure CUL-2: Archaeological Monitoring**. Prior to the start of construction, the Project proponent shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were previously monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling). The Monitoring Archaeologist shall meet or work under the direct supervision of someone meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 100 feet of any discovery of potential historical or archaeological resources to address unanticipated discoveries. **Mitigation Measure CUL-3: Post-Review Discoveries**. The potential always remains for ground-disturbing activities to expose previously unrecorded cultural resources. Both CEQA and Section 106 of the NHPA require the lead agency to address any unanticipated cultural resource discoveries during construction of the Project. Therefore, ECORP recommends the following mitigation measures be adopted and implemented by the lead agency to reduce potential adverse impacts to less than significant: If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for pre- contact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The YSMN and the MBMI shall be contacted, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find to provide Tribal input with regards to significance and treatment. The following notifications shall apply, depending on the nature of the find: ▪ If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. ▪ If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment

Environmental Impact	Mitigation Measures (MM) or Best Management Practices (BMPs)
	measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a Historic Property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction. ▪ If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the San Bernardino County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no- work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.
4.18 (b) Tribal Cultural Resources Sub-surface tribal cultural resources may be encountered during ground disturbance.	**MM TCR-1. Discovery of Pre-contact and/or Historic-era Cultural Resources.** The YSMN and the MBMI shall be contacted, as detailed in MM CUL-2, (See Section 4.4, *Cultural Resources*), of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist in coordination with the YSMN and MBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI and any other tribe noticed in accordance with AB 52 requirements for the remainder of the project, should YSMN and elect to place monitors on-site. **MM TCR-2. Copies of Archaeological/Cultural Documents**. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI and any other tribe noticed in accordance with AB 52 requirements. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI and any other tribe noticed in accordance with AB 52 requirements throughout the life of the project.

Environmental Impact	Mitigation Measures (MM) or Best Management Practices (BMPs)
	MM TCR-3 Inadvertent Discoveries of Human Remains/Funerary Objects. In the event that any human remains are discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately who shall notify YSMN, MBMI, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98. Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD, in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties. It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).
4.19 (a) Utilities and Service Systems Construction/installation of utilities and service systems will impact Biological Resources, Cultural Resources, and Paleontological Resources.	MM BIO-1 through MM BIO-6 ,MM CUL-1 through MM CUL-3, an MM TCR-1 through MM TCR-3 described above are required.

Section 3.0 Project Description/Environmental Setting

3.1 Project Location

The Project site is located on the southeast corner of Seneca Road and Pearmain Street, further identified as Assessor Parcel Number (APN) 3103-511-08. (See Figure 3.1 .)

Figure 3.1 Location Map

3.2 Project Description

The property is approximately 9.67 acres, located on the southeast corner of Seneca Road and Pearmain Street, and is zoned C (Commercial). The proposed Project is a business park incorporating office, retail, and self-storage spaces. The project consists of seven single-story buildings and two covered RV parking areas. The project is planned to be phased as follows: Phase One: Buildings A, B, C, D and Covered Parking A. Phase Two: Buildings E and F Phase Three: Building G and Covered Parking B Buildings A and G focus primarily on office and retail uses on the north side of the building, fronting Seneca Road. The south side will feature enclosed drive-up storage units. Thirteen of the office spaces and nine retail spaces will have direct access through a connecting door on the interior of the building to the assigned storage unit. These buildings will also include restrooms, a leasing office, a mail center, a print area, a lounge, and conference space.

Additionally, Buildings B, C, and F will offer various climate-controlled storage options. The outside of these buildings will feature drive-up storage units, while the interior conditioned space will feature walk-up storage units. Buildings D and E feature enclosed drive-up storage units and stretch along the west, south, and part of the east boundaries. Lastly, Covered Parking A and B feature storage for recreational vehicles like automobiles, boats, and trailers. The entrance and exits will come off Seneca Road only. The project provides a total of 58 parking spaces. The retail/office uses will be publicly accessible, while the storage portion of the project will be secured. There are two points of ingress/egress to the storage component of the project abutting Building A on each side. The south and west sides of the site will be secured by Buildings D and E while the east side will be a combination of Building F and a tube steel fence.

3.3 Proposed Improvements

Development of the Project will impact approximately 9.67 acres of undeveloped land, with relatively flat topography, moderately dense native desert vegetation (brush and short dry grasses), with dirt roads trending northwest to southeast. Project activities include site preparation (ground clearing and removal of all vegetation); grading of the entire project site and installation of building footings, utility lines, and underground infrastructure, construction of new structures, paving, landscaping.

Street Improvements and Access

Seneca Road

The Project will construct pavement for curbs, gutters, sidewalks, driveway approach and a landscaped parkway.

The site can be accessed through three full-access driveways off Seneca Road. Both driveways are 30'.

Water and Sewer Improvements

Water Service

The Project site will connect to the 12-inch public water main on Seneca Road. The project will install a new water meter along the sidewalk on Seneca Road.

Sewer Service

The Project will connect to the 8-inch public sanitary sewer line on Seneca Road. The project proposes to install a new sewer lateral across Seneca Road.

Storm Drainage Improvements

The existing site is undeveloped, relatively flat with existing drainage patterns generally conveying runoff northeasterly to Seneca Road, however a small portion of the site is tributary to the intersection of Pearmain Street and Seneca Road. There is runon from southerly off-site areas onto the property.

Site runoff will be by sheet flow and concentrated v-gutter, collected in drop inlets and ultimately to a proposed detention basin. Mitigated discharge from the site will be out onto Seneca Road toward the easterly property line.

Off-site runon drainage will be collected in a perimeter v-gutter located along the south and east sides of the property. This gutter will drain to the proposed detention basin.

A requirement of development is to limit proposed runoff to a condition below the existing peak flow. The aforementioned detention basin is proposed for this purpose. Calculations herein demonstrate that runoff will not exceed the existing condition. (Refer to 3.2 Site Plan)

Construction and Operational Characteristics

Construction Schedule

Construction is expected to commence in April 2025 and will last through December 2026. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[1] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines.

Operational Characteristics

The proposed Project would operate as a mixed-use with retail, office and self-storage facilities. Tenants for both retail/office buildings are currently unknown. However, the self-storage facility will be operational 24 hours per day, 365 days per year, with exterior areas lit at night. Lighting would be subject to compliance with the City of Adelanto Municipal Code or CALGreen Code, which both require that lighting fixtures be focused, directed, and arranged to prevent glare or direct illumination on streets or adjoining property.

Buildings are designed such that most business operations would be conducted within the enclosed buildings and exterior uses are minimal and include self-storage and recreational vehicle storage, with the exception of traffic movement, parking, and the loading and unloading of tractor trailers at designated loading bays and trailer parking stalls.

3.4 Environmental Setting

CEQA Guidelines §15125 establishes requirements for defining the environmental setting to which the environmental effects of a proposed project must be compared. The environmental setting is defined as "…the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or if no Notice of Preparation is published, at the time the environmental analysis is commenced…" (CEQA Guidelines §15125[a]). Because a Notice of Preparation was not required, the environmental setting for the Project is June 20234 which is the date that the Project's environmental analysis commenced.

The proposed Project site is located in an area that supports a variety of land uses in the City of Adelanto. The land surrounding the site comprises undeveloped commercial zoned vacant land to the north, south and west and developed single family residential zoned property to the west. Elevations range from 3,104 to 3,121 feet above mean sea level within the Project Area. The Project Area is located in the Mojave Desert, a large expanse of relatively flat land north of the San Gabriel Mountains. It is bounded to the west by residential communities, to the east by vacant land and Highway 395, and to the north and south by vacant land. The Project Area is also located 7 miles west of the Mojave Narrows.

The site is bounded immediately to the north by Seneca Road with commercial vacant land beyond, to the west by Pearmain Street with residential development beyond, the south by commercial undeveloped vacant land, and to the east by commercial undeveloped land. The site is entirely undeveloped vacant land and consists of creosote bush scrub vegetation that is heavily disturbed by off-highway vehicle trails/dirt roads, excessive trash, transient encampments, and pedestrians.

Onsite and adjacent land uses, General Plan land use designations, and zoning classifications are shown in Table 3.4-1.

Table 3.4-1 Land Uses, General Plan Land Use Designations, and Zoning Classifications

Location	Current Land Use	General Plan Land Use/Zoning Designations
Site	Vacant land	General Commercial (C)
North	Undeveloped land	General Commercial (C)
South	Undeveloped land	General Commercial (C)
East	Undeveloped land	General Commercial (C)
West	Residential Community	Single Family Residential (R1)

Source: Field inspection, City of Adelanto – City of Adelanto Zoning Map WEB.

Figure 3.2 Tentative Parcel Map. No. 20481

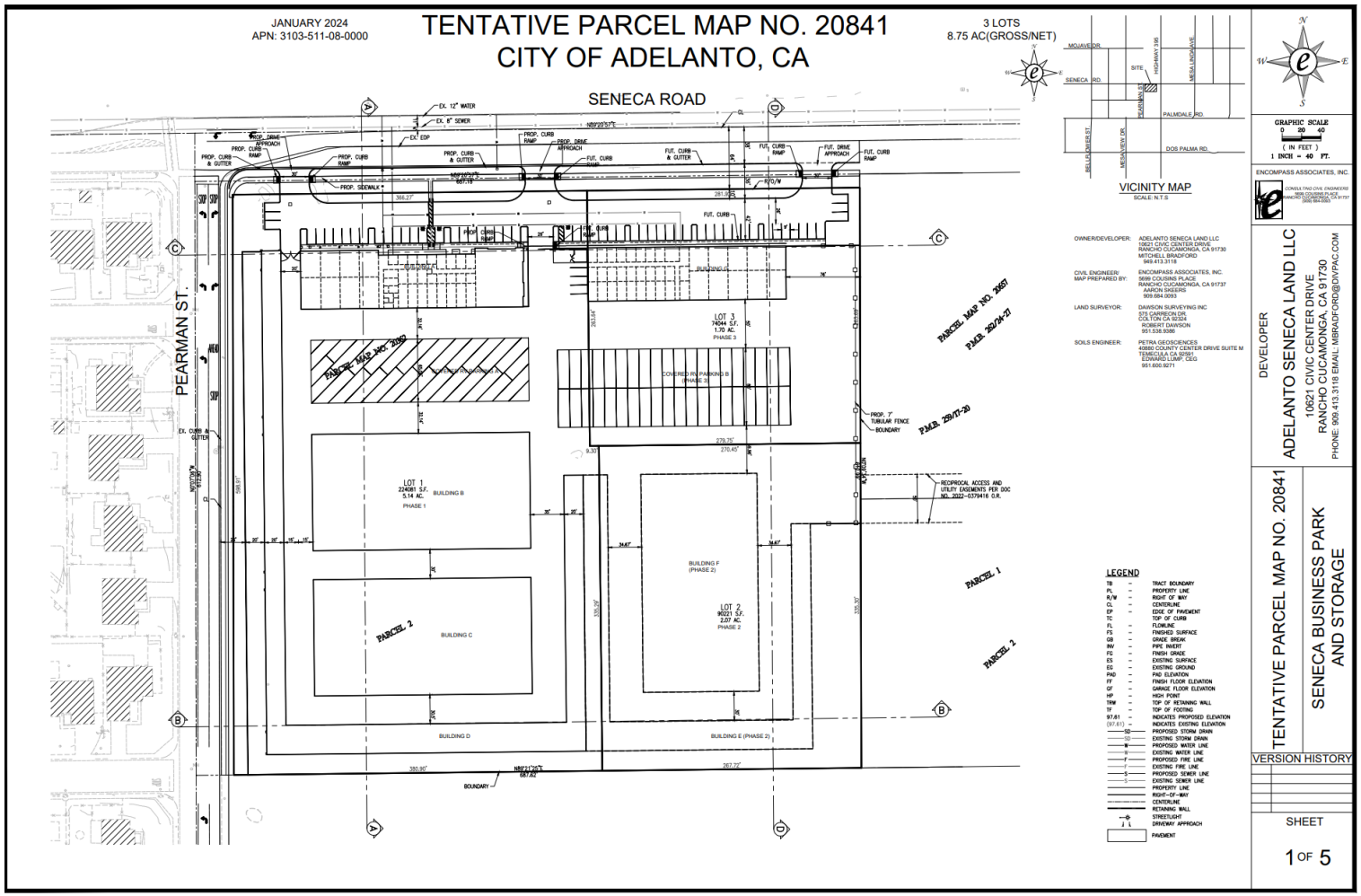
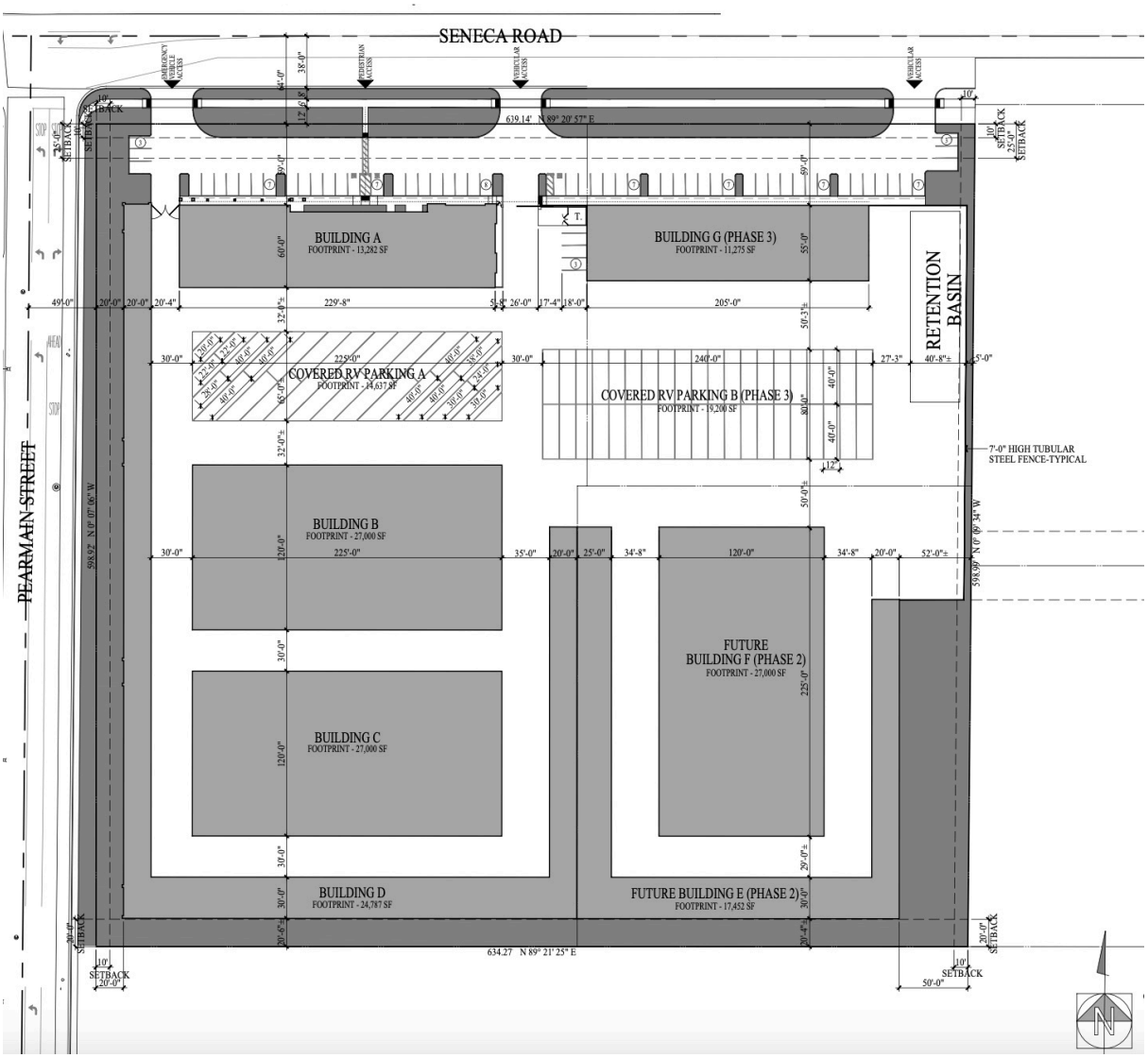


Figure 3.3 Site Plan



Buildings	Total Square Footage (SF)
Building A	12,732
Building B	27,000
Building C	27,000
Building D	24,787
Building E (Phase 2)	17,452
Building F (Phase 2)	27,000
Building G (Phase 3)	11,275
Sub-Total Buildings	**147,246**
Covered RV Spaces A	14, 637 (28 spaces)
Covered RV Spaces B (Phase 3)	19,200 (40 spaces)
Sub-Total RV Spaces	**33,837 (68 spaces)**
TOTAL ALL STRUCTURES	**181,083**

Figure 3.4 Phasing Plan

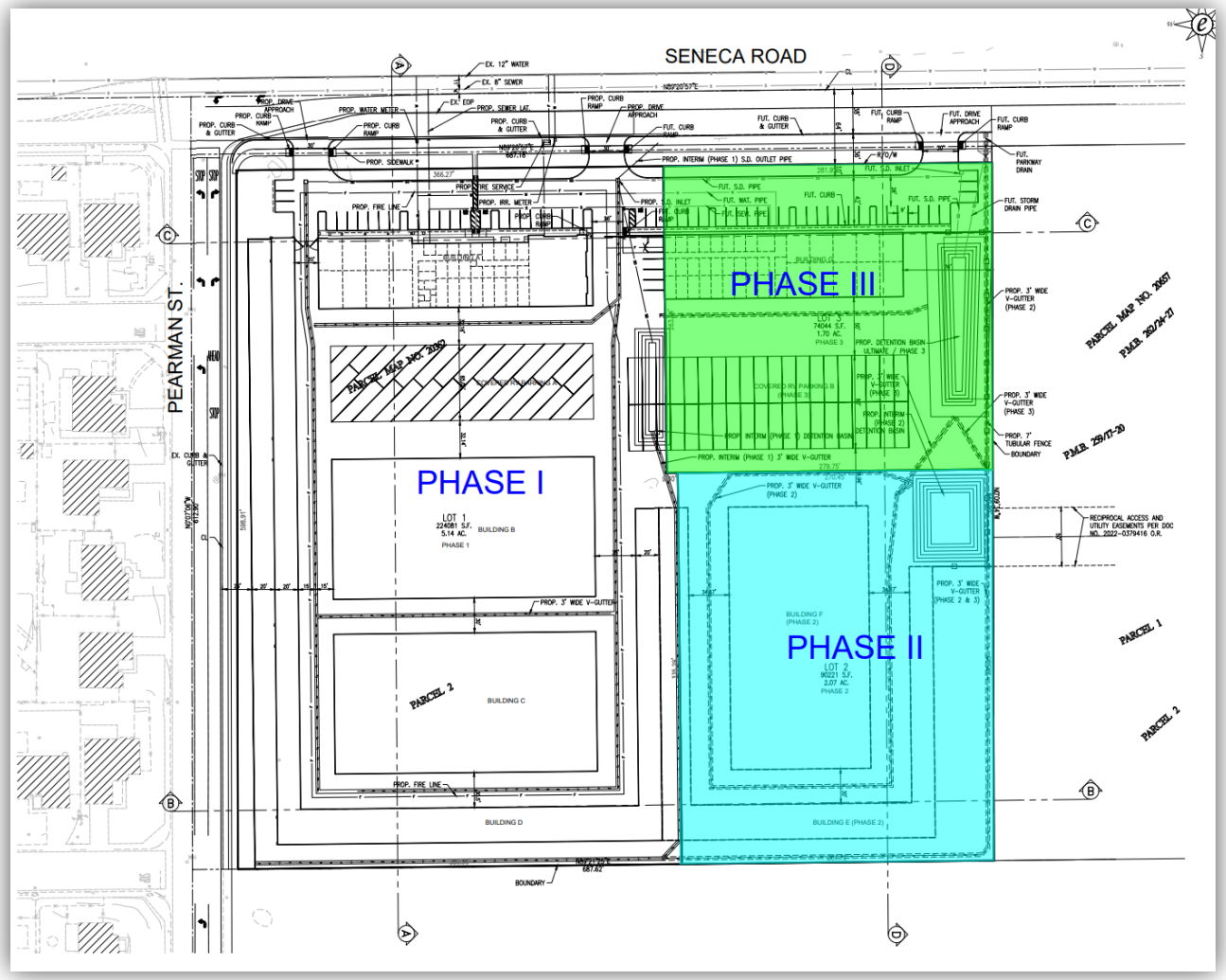


Figure 3.5 Aerial View of Adjacent Land Uses

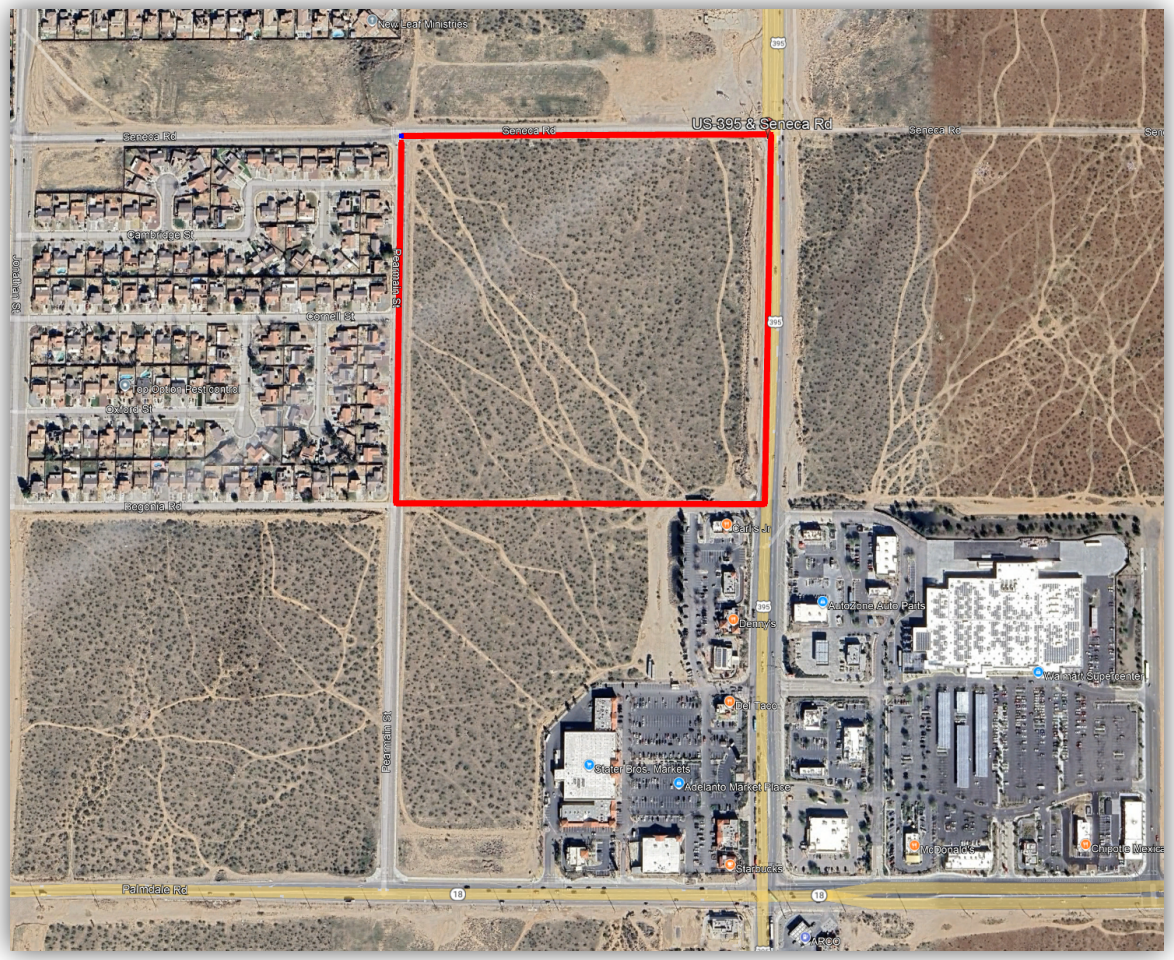


Figure 3.6 Street View-Existing Conditions (2024)

Figure 3.7 Street View-Existing Conditions (2024)

Looking southwest from the intersection of Seneca Road and US

Section 4.0 Environmental Analysis

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

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

Section 4.1. Aesthetics

Threshold 4.1 – Aesthetics Except as provided in Public Resources Code §21099, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			✓	

Impact Analysis

A scenic vista is defined as a publicly accessible vantage point that provides expansive views of a highly valued landscape. The City of Adelanto General Plan identifies Shadow Hills and the Mojave River as scenic vistas. Shadow Hills is located approximately 9 miles to the northwest of the Project site, and the Mojave River is located approximately 7 miles east of the Project site. Impacts on scenic vistas are analyzed from points or corridors that are accessible to the public and that provide a view of a scenic vista. Structures within a viewer's line of sight of a scenic vista may interfere with a public view of a scenic vista, either by physically blocking or screening the scenic vista from view, or by impeding or blocking access to a formerly available viewing position. Those viewers may see the scenic areas prior to development but would have those views blocked post-development. Potential public views and vantage points from the Project site to the Shadow Hills or the Mojave River would be from the public right-of-way of Seneca Pearmain Street, and US 395.

Because of the distance to the Shadow Hills, only distant views of the hills in the horizon are available. Post development, the distant views will remain available. The scenic value of the Mojave River is derived from the riverbed and the related vegetation, which is observed from vantage points adjacent to the river. Because of this the Mojave River is not visible from either the Project site or surrounding roads.

In addition, as required by Adelanto Zoning *Commercial District Development Standards*, the Commercial (C) zoning's maximum building height is limited to 45 feet, and there are required building setbacks for the front, rear, and side lot lines that will create space between structures. As such, the proposed structures would not block or completely obstruct views from the public vantage points described above on the Shadow Hills. The Mojave River is not visible from the Project site because of the flat topography. Impacts are less than significant, and no mitigation measures are required.

Threshold 4.1 – Aesthetics Except as provided in Public Resources Code §21099, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓

Impact Analysis

According to the California Department of Transportation, the Project site is not located within a state scenic highway.[1] As such, there is no impact.

Threshold 4.1 – Aesthetics Except as provided in Public Resources Code §21099, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	

Impact Analysis

According to US Census Bureau, Adelanto is located within the Victorville-Hesperia, CA Urbanized Area.[2] As such, the Project was required to submit a Location and Development Plan per Municipal Code Chapter 17.150.

"17.150.010 Purpose

(a) The City recognizes that in order to provide safe and efficient circulation, compatibility with surrounding uses, attractive and efficient designs, and required landscaping, open space, and other areas, all new development, establishment of new uses require the formal review and approval of a detailed Location and Development Plan. The Location and Development Plan approval process is provided for this purpose".

As required by Adelanto Municipal Code Chapter 17.15 *Design Review*, all residential, commercial and industrial development proposals are subject to the City's Design Review process to ensure that development projects comply with all applicable local design guidelines, standards and ordinances; to minimize adverse effects on surrounding properties and the environment; and to ensure consistency with the General Plan, which promotes high aesthetics

[1] California Department of Transportation, State Scenic Highway Program, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed August 18, 2024.

[2] United States Census Bureau, 2010 Census Urban Area Reference Maps, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua90541_victorville--hesperia_ca/DC10UA90541_001.pdf; Accessed August 18, 2024.

and functional standards to complement and add to the physical, economic and social character of Adelanto.

The Project Proponent submitted Location and Development Plan (LDP) No. 24-03 for the City to review for compliance with the above-referenced regulations governing scenic quality.

Before releasing this ISMND document, the City staff reviewed LDP 24-03 and recommended approval to the Planning Commission.

A brief overview of the key design elements is shown in Figure 4.1-1. *Architectural Rendering*, Figure 4.1-2. Typical Building Elevations, and Figure 4.1-3, Concept Landscape Plan.

Figure 4.1-1 Architectural Rendering

View from Seneca Road

Figure 4.1-2 Exterior Building Elevations

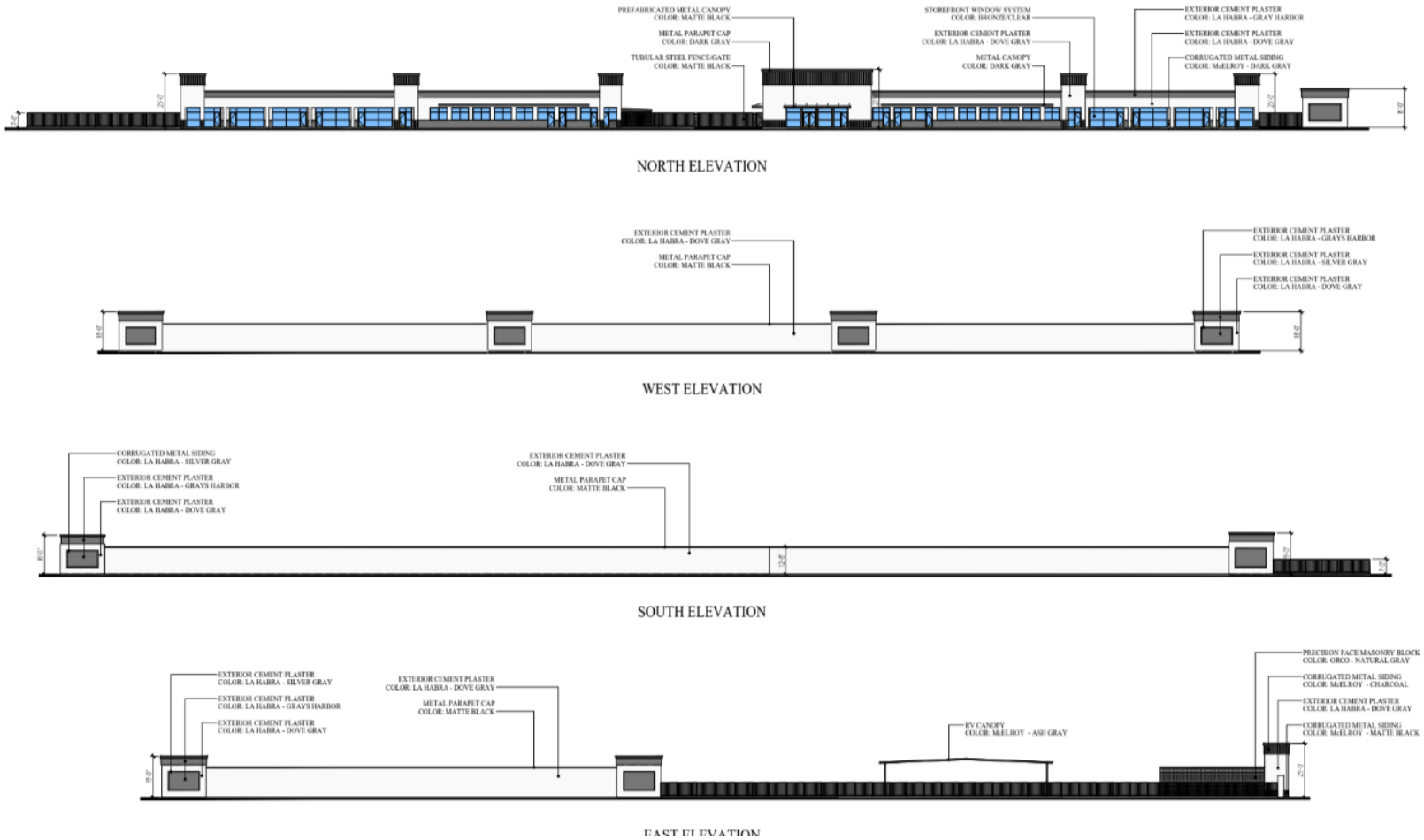
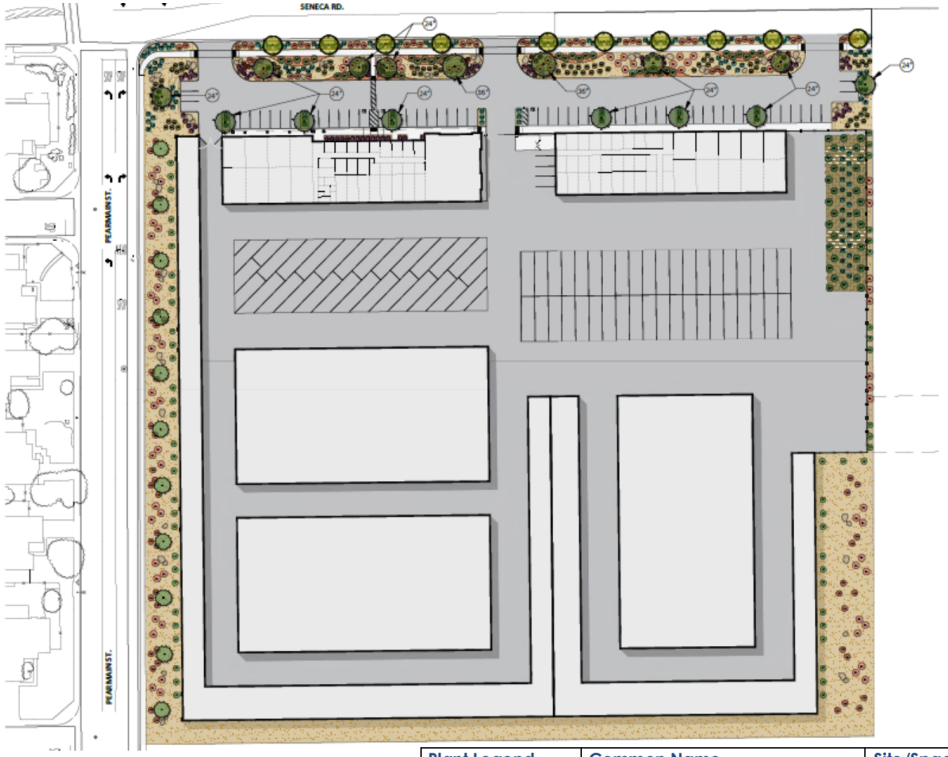


Figure 4.1-3 Concept Landscape Plan



Plant Legend	Common Name	Site/Spacing	Qty
Trees	WESTERN REDBUD	24" BOX	11
	THORNLESS HONEY LOCUST	24" BOX	10
	FRUITLESS OLIVE (MULIT-TRUNK)	PLAN SIZE	15
Basin Planting			
BP	PIGEON POINT COYOTE BUSH	1 GAL	40
CP	CANYON PRINCE WILD RYE	1 GAL	34
Hardscape			
	3" MIN. LAYER DECOMPOSED GRANITE		
	3"-6" CRUSHED ROCK		
	3'-5' BOULDERS		
	3" MIN. LAYER WOOD MULCH		

Plant Legend	Common Name	Site/Spacing	Qty
Shrubs & Ground Cover			
BL	BOUGAINVILLEA 'LA JOLLA'	1 GAL	80
BT	BOUGAINVILLEA 'TORCH GLOW'	1 GAL	12
BP	PIGEON POINT COYOTE BUSH	1 GAL	69
CP	CANYON PRINCE WILD RYE	1 GAL	177
LM	DALLAS RED LANTANA	1 GAL	93
LF	GREEN CLOUD TEXAS RANGER	1 GAL	57
MC	PINK MUHLY	1 GAL	79
PS	FOUNTAIN GRASS	1 GAL	74

Threshold 4.1 – Aesthetics Except as provided in Public Resources Code §21099, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

Impact Analysis

Outdoor Lighting and Glare

The Project would increase the amount of light in the area above what is being generated by the vacant site by directly adding new sources of illumination including security and decorative lighting for the proposed structures. All outdoor lighting is required to be designed and installed to comply with §17.90.040 - Lighting, of the Zoning Ordinance,[3] which stipulates:

> "Except for residential light fixtures using less than a 75-watt bulb, the following shall apply to all outdoor lighting fixtures:
>
> (a) All on-site lighting shall be energy efficient, stationary, and directed away from adjoining properties and public rights-of-way.
> (b) Light fixtures shall be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture.
> (c) Light fixtures shall be shielded so no light above 0.5 footcandle spills over onto adjacent properties and rights-of-way. There shall be no spillover (0.0 footcandle) onto adjacent residential used or zoned properties."

Building Material Glare

The building will be constructed with materials that do not induce glare. Outdoor lighting systems will be designed to meet the backlight, uplight, and established glare ratings. As such, the Project will not adversely affect daytime or nighttime views in the area as a result of glare.

[3] Zoning Ordinance.

Section 4.2 Agriculture and Forestry Resources

Threshold 4.2 – Agriculture and Forestry Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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?				✓

Impact Analysis

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

Threshold 4.2 – Agriculture and Forestry Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			✓	

Impact Analysis

Agricultural Zoning

The current zoning classification for the site is General Commercial (C). The General Commercial (C) district provides for retail centers that serve community-wide needs and neighborhood needs. The General Commercial district provides for commercial areas that include, but are not limited to, large retail uses such as "big box" stores, furniture stores, appliance and home electronics retailers; movie theaters; service commercial businesses; professional business offices; and restaurants. The district also provides for a wide range of smaller-scale business activities which serve the needs of residents who live nearby. The Commercial zone is not intended for agricultural use.

[4] https://databasin.org/maps/new/#datasets=b83ea1952fea44ac9fc62c60dd57fe48, accessed on August 18, 2024.

Williamson Act

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

Threshold 4.2 – Agriculture and Forestry Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	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))?				✓

Impact Analysis

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

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

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

Threshold 4.2 – Agriculture and Forestry Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓

Impact Analysis

As noted in the response to Threshold 4.2(c) above, the Project site and surrounding properties do not contain forest lands, are not zoned for forest lands, nor are they identified as containing

[5] https://sbcountyarc.org/wp-content/uploads/arcforms/NPP874-WilliamsonActParcels.pdf, accessed August 18, 2024.

forest resources by the General Plan. Because forest land is not present within the Project site or in the immediate vicinity of the site, the Project has no potential to result in the loss of forest land or the conversion of forest land to a non-forest use.

Threshold 4.2 – Agriculture and Forestry Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	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?				✓

Impact Analysis

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

Section 4.3 Air Quality

The following analysis is based in part on the following:

- Air Quality Impact Analysis, Urban Crossroads, March 20, 2024, included as Appendix A.
- MDAQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines, February 2020, available at: https://www.mdaqmd.ca.gov/rules/overview.

Air Quality Setting

Topography and Climate

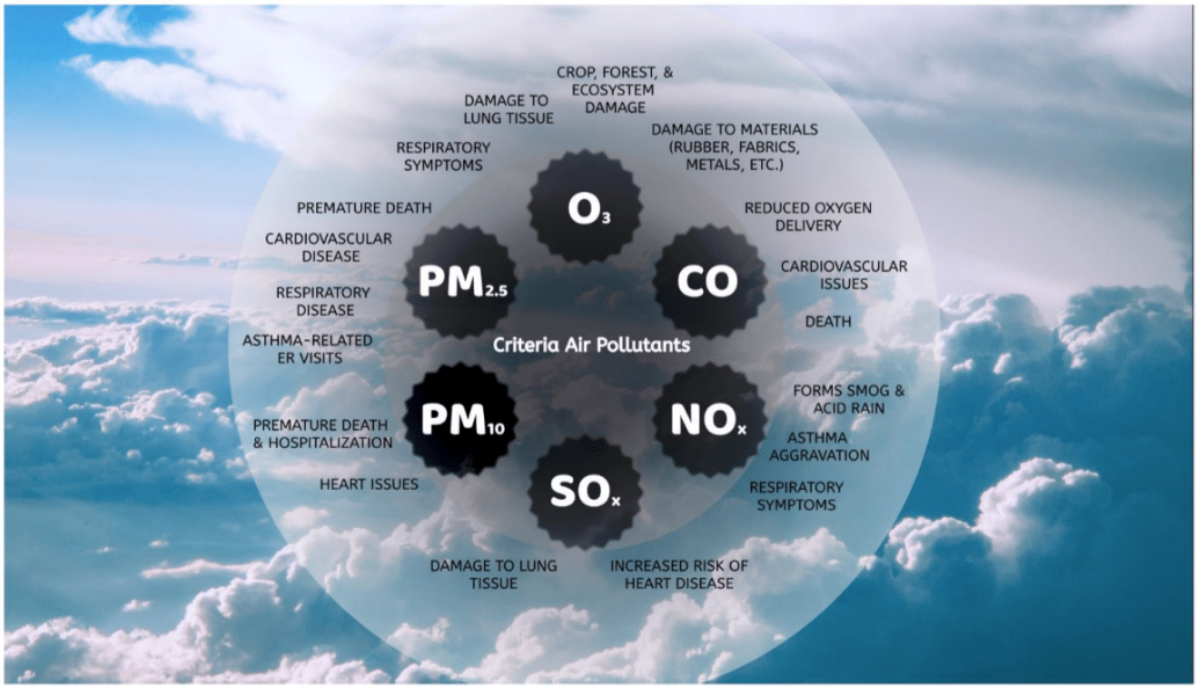
The Project site is located in the portion of the County of San Bernardino, California, that is part of the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the MDAQMD. The MDAB is separated from the Southern California coastal and central California valley regions by mountains (highest elevation is approximately 10,000 ft), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, separated from the San Gabriels by the Cajon Pass (4,200 ft). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley), whose primary channel is the San Gorgonio Pass (2,300 ft) between the San Bernardino and San Jacinto Mountains.

The MDAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these frontal systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist, and unstable air masses from the south. The MDAB averages between three and seven inches of precipitation per year (from 16 to 30 days with at least 0.01 inch of precipitation). The MDAB is classified as a dry-hot desert climate, with portions classified as dry-very hot desert, to indicate that at least three months have maximum average temperatures over 100.4° F.

Air Pollutants and Health Effects

Air pollutants are the foreign and/or natural substances occurring in the atmosphere that may result in adverse effects to humans, animals, vegetation, and/or materials. The air pollutants regulated by the MDAQMD that are applicable to the Project are shown in Figure 4.3 below.

Figure 4.3 -1 Air Pollutants and Health Effects



Source: California Air Resources Board.

Non-Attainment Designations and Classification Status

The United States Environmental Protection Agency (EPA)and the California Air Resources Board (CARB) have designated portions of the district nonattainment for a variety of pollutants. An "attainment" designation for an area signifies that criteria pollutant concentrations did not exceed the established standard. In contrast to attainment, a "nonattainment" designation indicates that a criteria pollutant concentration has exceeded the established standard. Table 4.3-1 shows the attainment status of criteria pollutants in the MDAB.

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

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	No 1-Hour Standard
Ozone – 8-hour standard	Nonattainment	Nonattainment
Respirable Particulate Matter (PM10)	Nonattainment	Nonattainment
Fine Particulate Matter (PM2.5)	Attainment	Unclassified
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen Dioxide (NOx)	Attainment	Unclassified/Attainment
Sulfur Dioxide (SO2)	Attainment	Unclassified/Attainment
Lead (Pb)	Attainment	Unclassified/Attainment

Source: California Air Resources Board, 2015.

As shown in Table 4.3-1 above, the MDAB is classified as Nonattainment for Ozone – 1-hour standard, Ozone – 8-hour standard, and Respirable Particulate Matter (PM_{10}).

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

Impact Analysis

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

Conformity with Air Quality Management Plans

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

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

- A project is non-conforming if it conflicts with or delays the implementation of any applicable attainment or maintenance plan. A project may also be non-conforming if it increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).
- A project is conforming if it complies with all applicable Mojave Desert Air Quality Management District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

Consistency with Emission Thresholds

As shown in Table 4.3-3, *Construction Emissions (Without Mitigation)*, and Table 4.3-4, Summary of Peak Operational Emissions, below, the Project's air quality emissions are less than significant. Additionally, the Project would not exceed the Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction or during long-term operation.

Consistency with Control Measures

The construction contractors are required to comply with rules, regulations, and control measures to control fugitive dust from grading (Rule 403) and only "low-volatile organic compounds (VOC)" paints consistent with MDAQMD (Rule 1113).

Consistency with Growth Forecasts

The current zoning classification for the site is General Commercial (C). The General Commercial (C) district provides for retail centers that serve community-wide needs and neighborhood needs. The General Commercial district provides for commercial areas that include, but are not limited to, large retail uses such as "big box" stores, furniture stores, appliance and home electronics retailers; movie theaters; service commercial businesses; professional business offices; and restaurants. The district also provides for a wide range of smaller-scale business activities which serve the needs of residents who live nearby. The minimum project size is 10,000 SF; at this density full urban levels of service and public improvements are required. The General Commercial land use designation was used by the MDAQMD to generate the growth forecasts for the air quality plans referenced above.

Threshold 4.3 – Air Quality Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No 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?			✓	

Impact Analysis

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

Table 4.3-2. MDAQMD Air Quality Significance Thresholds

Pollutant	Daily Threshold (lbs/day)
Carbon Monoxide (CO)	548
Oxides of Nitrogen (NOx)	137
Volatile Organic Compounds (VOC)	137
Oxides of Sulphur (SOx)	137
Particulate Matter (PM_{10})	82
Particulate Matter ($PM_{2.5}$)	65

Source: Air Quality Impact Analysis, Urban Crossroads, Table 3-1, March 20, 2024. (Appendix A of this Initial Study)).

Both construction and operational emissions for the Project were modeled using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.21, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the MDAQMD.

Construction Emissions

Construction of the Project is assumed to begin in the year 2025. Construction phases are assumed to consist of site preparation, grading, building construction, paving, and architectural coating. The Project is expected to be operational in the year 2026. Construction phases are not expected to overlap. Construction activities produce combustion emissions from various sources (e.g., utility engines, tenant improvements, and motor vehicles transporting the construction crew). Exhaust emissions from construction activities envisioned on site would vary daily as construction activity levels change. The Project will be required to comply with several standard fugitive dust control measures, per MDAQMD Rule 403.

Daily construction emissions based on the above-described parameters are shown in Table 4.3-3 below.

Table 4.3-3. Construction Emissions (Without Mitigation)

Year	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2025 Winter	1.51	12.36	17.87	0.03	1.46	0.68
2025 Summer	4.15	37.58	33.90	0.05	7.83	4.52
2026 Winter	23.20	20.06	30.36	0.05	2.11	1.03
2026 Summer	1.47	11.60	19.08	0.03	1.40	0.62
Maximum Daily Emissions	**23.20**	**37.58**	**33.90**	**0.05**	**7.83**	**4.52**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Air Quality Impact Analysis, Urban Crossroads, March 20, 2024. (Appendix A of this Initial Study).

Operational Emissions

The Project would be operated as a retail, office , and self-storage facility. Typical operational characteristics include customers and employees traveling to and from the site, delivery of goods and services to the businesses, and maintenance activities. Table 4.3-4 shows the MDAQMD thresholds for operational emissions compared to the Project's maximum daily emissions.

Table 4.3-4. Summary of Peak Operational Emissions

Operational Activities – Summer	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Source	4.46	0.05	6.45	0.00	0.01	0.01
Energy Source	0.06	1.07	0.90	0.01	0.08	0.08
Mobile	3.51	2.90	26.57	0.06	5.06	1.32
Total Maximum Daily Emissions	**8.02**	**4.02**	**33.920**	**0.07**	**5.15**	**1.41**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Area Source	3.40	0.00	0.00	0.00	0.00	0.00
Energy Source	0.06	1.07	0.90	0.01	0.08	0.08
Mobile	3.07	3.12	20.84	0.05	5.06	1.32

Operational Activities – Summer	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Total Maximum Daily Emissions	**6.53**	**4.19**	**21.74**	**0.06**	**5.14**	**1.40**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Air Quality Impact Analysis, Urban Crossroads, March 20, 2024(Appendix A of this Initial Study).

As shown in Table 4.3-4 above, neither construction nor operational-related emissions would exceed MDAQMD thresholds. The Project must comply with all applicable MDAQMD rules and adhere to the City of Adelanto General Plan Policies and Implementing Programs. Additionally, per the California Attorney General's Bureau of Environmental Justice: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, to ensure emissions impacts from the operational phases will be reduced to the extent feasible, the following Best Management Practices (BMPs) are recommended:

BMP- AQ-1. Rule 403. The following measures shall be incorporated into Project plans and specifications as implementation of Rule 403.

Use periodic watering for short-term stabilization of Disturbed Surface Area to minimize visible fugitive dust emissions. For purposes of this Rule, use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered sufficient to maintain compliance. Take actions sufficient to prevent project-related trackout onto paved surfaces.

RULE 1113 The following measures shall be incorporated into Project plans and specifications as the implementation of MDAQMD Rule 1113 (3). Only "Low-Volatile Organic Compounds (VOC)" paints consistent with MDAQMD Rule 1113 shall be used.

The BMPs are not mitigation measures but will be added to the Conditions of Approval for LDP 24-03.

Threshold 4.3 – Air Quality Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?				✓

Impact Analysis

As per the MDAQMD Guidelines, the following project types located within a specified distance to an existing or planned sensitive receptor land use must be evaluated to determine exposure of substantial pollutant concentrations to sensitive receptors (21):

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

- A gasoline dispensing facility within 300 feet.

The proposed Project consists of a 4,700-sf strip retail plaza, a 4,700-sf office, a 139,000-sf self-storage building, and 68 RV parking spaces on approximately 8.75 acres As such, no analysis for sensitive receptors is required. Additionally. results of the regional analysis indicate that the Project will not exceed the MDAQMD significance thresholds during construction or operations. Therefore, sensitive receptors would not be subject to a significant air quality impact during Project construction and operational activities.

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

Impact Analysis

The potential for the Project to generate objectionable odors has been considered. Land uses generally associated with odor complaints include:

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

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short- term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The proposed Project would also be required to comply with MDAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors, and emissions that may lead to odors, associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

Section 4.4 Biological Resources

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

- Biological Technical Report, ECORP Consulting, Inc., February 2024, included as Appendix B to this initial study.
- Phase I Environmental Site Assessment, Petra Geosciences, February 20, 2024, included as Appendix F to this Initial Study.

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

Impact Analysis

Special-Status Species

The Project site is generally classified as disturbed creosote bush scrub. Disturbances observed on the site were mainly associated with off-highway vehicle trails/dirt roads, excessive trash dumping, transient encampments, and pedestrians. No special-status plant or wildlife species were observed during the biological survey. Eighteen special-status plant species were identified in the literature review and database searches. None of the species were determined to have a high or moderate potential to occur. However, eleven species (White pygmy-poppy, Mojave spineflower, Mojave monkeyflower, Sagebrush loeflingia, Torrey's box-thorn, Solitary blazing star, Crowned muilla, short-joint beavertail, Beaver Dam breadroot, Latimer's woodland-gilia, and Mojave fish-hook cactus) were determined to have low potential to occur based on the available habitat and records in the vicinity of the Project site. Impacts to status plant species could occur in the form of direct take (mortality) during ground disturbance and vegetation removal when the Project is constructed. However, impacts to special-status plants would be less than significant with the implementation of **Mitigation Measures BIO-1** and **BIO-4.**

The literature review and database searches identified 26 special-status wildlife species that occur in the vicinity of the Project site but based on the condition of the site and the available habitat, only two species (burrowing owl and loggerhead shrike) were determined to have a moderate potential to occur on the Project site and two species (desert tortoise and Mohave ground squirrel) have a low potential to occur on the Project site; however, the presence of these species is likely precluded due to the abundance of anthropogenic disturbances and lack of quality habitat.

Burrowing owl and loggerhead shrike were found to have a moderate potential to occur on the Project site. Although no burrowing owl, burrowing owl sign (whitewash, pellets, and/or feathers), or loggerhead shrike were observed during the survey, the Project site does contain suitable habitat for this species and the literature review and database search identified multiple records in the vicinity of the Project site.

Burrowing owls and loggerhead shrikes are CDFW SSC species that are also protected by the MBTA and California Fish and Game Code. Impacts resulting from direct take of burrowing owl, loggerhead shrike, and/or their burrows/nests shall be mitigated. These species are mobile and if the conditions were to change on the Project site, they could take up residence on the Project site. If burrowing owl or loggerhead shrike are present on the Project site prior to construction, direct impacts could occur in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts could occur in the form of increased human activity, noise, dust, nighttime lighting, and ground vibrations. However, impacts to burrowing owl and loggerhead shrike would be less than significant with the implementation of **Mitigation Measures MM BIO-2, BIO-3, and MM BIO-4.**

No desert tortoise or desert tortoise sign (e.g., scat, tracks, burrows) were identified during the biological reconnaissance survey. However, desert tortoises were assigned a low potential to occur on the Project site based on the presence of marginally suitable habitat and records in the vicinity of the Project site.

Marginally suitable, low-quality habitat was present within the disturbed creosote bush scrub habitat on the Project site. However, the site is fairly isolated, very disturbed, and bordered by urban development. If desert tortoise is present on the Project site prior to construction, direct impacts could occur in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts could occur in the form of increased human activity, noise, dust, nighttime lighting, and ground vibrations. However, impacts to desert tortoise would be less than significant with the implementation of **Mitigation Measures MM BIO-4 and MM BIO-5.**

Mohave ground squirrel was also assigned a low potential to occur on the Project site based on the presence of marginally suitable habitat and records in the vicinity of the Project site. Marginally suitable, low-quality habitat was present within the disturbed creosote bush scrub habitat on the Project site, but no winter fat or spiny hopsage was identified on site. Additionally, the site is isolated, very disturbed, and bordered by urban development. If Mohave ground squirrel is present on the Project site prior to construction, direct impacts could occur in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts could occur in the form of increased human activity, noise, dust, nighttime lighting, and ground vibrations. However, impacts to Mohave ground squirrel would be less than significant with the implementation of **Mitigation Measures MM BIO-4 and MM BIO-6.**

The Project site also contained suitable nesting habitat for bird species protected under the MBTA. Development of the Project site will be required to comply with the MBTA and avoid impacts to nesting birds. If construction of the Project occurs during the nesting bird season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests through the removal of habitat and indirectly

through increased noise. Impacts to Bendire's thrasher and other nesting birds would be less than significant with the implementation of **Mitigation Measures MM BIO-3 and MM BIO-4.**

Mitigation Measures

MM BIO-1. Preconstruction Rare Plant Survey: It is recommended that a protocol-level preconstruction survey be conducted for the eleven special-status plant species that have a low potential to occur on the Project site, including White pygmy-poppy, Mojave spineflower, Mojave monkeyflower, Sagebrush loeflingia, Torrey's box-thorn, Solitary blazing star, Crowned muilla, short-joint beavertail, Beaver Dam breadroot, Latimer's woodland-gilia, and Mojave fish-hook cactus. The protocol-level survey should occur during the typical blooming period for these species (April-May) the season or the year prior to the start of ground-breaking Project activities. The survey should be performed by a qualified botanist or biologist experienced with surveying for and identifying desert flora. The surveys should be conducted in consideration of the USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants (USFWS 1996), General Rare Plant Survey Guidelines (Cypher 2002), CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018), and the CNPS's Botanical Survey Guidelines (CNPS 2001). If special-status plant species are observed on the Project site during the survey, then a non-disturbance buffer shall be established around the location(s) of the individuals or population. The size of the nondisturbance buffer shall be determined by the qualified botanist or biologist based on location of specialstatus species and expected construction activities. If one or more special-status plants are found on the Project site and avoidance of the location(s) is not feasible during Project construction, then additional mitigation measures will need to be implemented. Mitigation measures could include, but are not limited to, biological monitoring, seasonal work avoidance, seed collection, or transplanting. Coordination with CDFW may need to occur before or during mitigation implementation.

MM BIO-2. Preconstruction Surveys for Burrowing Owl: Pre-construction surveys for burrowing owl shall be conducted prior to the start of construction. The surveys shall follow the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012). Two surveys shall be conducted, with the first survey being conducted between 30 and 14 days before initial ground disturbance (e.g., grading, grubbing, construction), and the second survey being conducted no more than 24 hours prior to initial ground disturbance. If burrowing owls or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project site during the survey and impacts to those features are unavoidable, consultation with the CDFW shall be conducted and the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) for avoidance and/or passive relocation shall be followed.

MM BIO-3. Preconstruction Nesting Bird Survey: If construction or other Project activities are scheduled to occur during the nesting bird season (February 1 through August 31), a pre-construction nesting bird survey shall be conducted by a qualified avian biologist to ensure that active bird nests, including nests belonging to special-status avian species, will not be disturbed, or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project site and adjacent areas where

Project activities have the potential to affect active nests, either directly or indirectly, due to construction activity, noise, human activity, or ground disturbance. If an active nest is identified, a qualified avian biologist shall establish an appropriately sized non-disturbance buffer around the nest using flagging or staking. Construction activities shall not occur within any no disturbance buffer zones until the nest is deemed inactive by the qualified avian biologist. If initial ground-disturbing activities are scheduled to occur during the nesting bird season, then a biological monitor shall be present during all vegetation removal activities to ensure no impacts to nesting birds occur.

MM BIO-4.Biological Monitoring: A qualified biologist will be present to monitor all initial ground disturbance and vegetation clearing for the Project. Prior to the onset of work, the biological monitor will perform a survey "sweep" in areas where clearing/disturbance is scheduled. The monitor will be responsible for ensuring impacts to special-status species, nesting birds, and active nests will be avoided to the greatest extent possible. If any special-status resources are observed while monitoring, then measures recommended by the biological monitor shall be implemented (e.g., establishing a buffer around the resource using flagging or staking, redirecting work to other locations) to prevent potential impacts. Construction activities will be restricted within any buffer zone until the biologist has determined a nest is no longer active or the resource has been safely moved/relocated. If special-status wildlife species are detected during biological monitoring, then consultation with the USFWS and/or CDFW will be conducted, and recommendations provided by the resource agencies to offset impacts shall be incorporated into the Project. Measures may consist of, but are not limited to, additional surveys, "no work" buffers, work restrictions, clearance surveys, passive relocation, or additional biological monitoring.

MM BIO-5. Preconstruction Survey for Desert Tortoise: The Project site provides low quality habitat for desert tortoise; therefore, a preconstruction survey for desert tortoise shall be conducted by a qualified biologist to identify any desert tortoise on the Project site prior to construction and to ensure there is no desert tortoise mortality. Survey methods should follow those outlined in the USFWS' Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise (USFWS 2019). If desert tortoise is identified on the Project site during the preconstruction survey, then coordination with USFWS and CDFW will need to occur. If impacts to desert tortoise could occur because of Project development, then the appropriate permits will need to be obtained prior to the start of Project activities.

MM BIO-6. Preconstruction Survey for Mohave Ground Squirrel: The project site provides low quality habitat for Mohave ground squirrel; therefore, a preconstruction visual survey for this species shall be conducted between March 15 and July 15 by a qualified Mohave ground squirrel biologist, prior to construction. The survey shall be conducted by walking the entire site, periodically stopping to look for Mohave ground squirrel with binoculars and listening for the distinctive Mohave ground squirrel call. The survey should be conducted during daylight hours and should include all suitable habitats within the Project site. If the survey confirms presence and if any potential for direct impacts exists, CDFW should be contacted to obtain information on applying for the a "take" permit for MGS.

BMP BIO-1. Best Management Practices. Further, the following best management practices are not mitigation measures pursuant to CEQA but are recommended to further reduce impacts to species that have potential to occur on the property: Confine all work activities to a pre-determined work area.

- To prevent inadvertent entrapment of wildlife during the construction phase of a Project, all excavated, steep-walled holes or trenches more than two feet deep should be covered at the close of each working day by plywood or similar materials. If the trenches cannot be closed, one or more escape ramps constructed of earthen fill, or wooden planks shall be installed. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals.
- Wildlife is often attracted to burrow- or den-like structures such as pipes and may enter stored pipes and become trapped or injured. To prevent wildlife use of these structures, all construction pipes, culverts, or similar structures with a diameter of four inches or greater should be capped while stored onsite.
- All food-related trash items such as wrappers, cans, bottles, and food scraps should be disposed of in securely closed containers and removed at least once a week from the construction or Project site.
- Use of rodenticides and herbicides on the Project site should be restricted. This is necessary to prevent primary or secondary poisoning of wildlife, and the depletion of prey populations on which they depend. All uses of such compounds should observe label and other restrictions mandated by the USEPA, California Department of Food and Agriculture, and other state and federal legislation. If rodent control must be conducted, zinc phosphide should be used because of a proven lower risk to predatory wildlife.

Threshold 4.4 – Biological Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✓

Impact Analysis

The site is separated from identified regional wildlife corridors and linkages by existing development and roadways, and undeveloped land, and there are no riparian corridors or creeks connecting the Project site to these areas.

Threshold 4.4 – Biological Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	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?				✓

Impact Analysis

The Project site is located within and adjacent to areas containing existing disturbances (e.g., paved and dirt roads,) and residential development to the west, and commercial development to the south. The Project site contains little cover that would only allow for local movement of wildlife. No migratory wildlife corridors or native wildlife nursery sites were identified within the Project site. Therefore, no impacts to wildlife corridors or nursery sites are expected to occur during the development of the Project site. According to the results of the preliminary aquatic resources delineation, no state or federally protected wetlands or Waters of the U.S. were identified on the Project site, therefore no impacts would occur.

Threshold 4.4 – Biological Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	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?				✓

Impact Analysis

The Project site is located within and adjacent to areas containing existing disturbances (e.g., paved and dirt roads,) and residential development to the west, and commercial development to the south. The Project site contains little cover that would only allow for local movement of wildlife. No migratory wildlife corridors or native wildlife nursery sites were identified within the Project site. Therefore, no impacts to wildlife corridors or nursery sites are expected to occur during the development of the Project site.

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

Impact Analysis

The Project site consisted of disturbed creosote bush scrub habitat. There are no trees on the Project site.

Threshold 4.4 – Biological Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No 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?				✓

Impact Analysis

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

Section 4.5 Cultural Resources

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

- Archaeological and Historic Built Environment Resources Inventory and Evaluation Report for the Adelanto Seneca Project, ECORP Consulting, Inc., February 2024, included as Technical Appendix C.

Threshold 4.5 – Cultural Resources Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			✓	

Impact Analysis

Records Search

To identify such resources, ECORP conducted a records search for the property at the South-Central Coastal Information Center (SCCIC) of the CHRIS at California State University-Fullerton on December 7, 2023 (Appendix A). The purpose of the records search was to determine the extent of previous surveys within a 1-mile (1,600- meter) radius of the Proposed Project location, and whether previously documented pre-contact or historic archaeological sites, architectural resources, or traditional cultural properties exist within this area

In addition to the official records and maps for archaeological sites and surveys in San Bernardino County, the following historic references were also reviewed: Built Environment Resource Directory (BERD; OHP 2020); the National Register Information System (National Park Service [NPS] 2022); OHP California Historical Landmarks (CHL; OHP 2022); CHL (OHP 1996 and updates); California Points of Historical Interest (OHP 1992 and updates); Directory of Properties in the Historical Resources Inventory (OHP 1999); Caltrans Local Bridge Survey (California Department of Transportation [Caltrans] 2019); Caltrans State Bridge Survey (Caltrans 2018); and *Historic Spots in California* (Kyle 2002). ECORP conducted a search for a local historical registry. The search did not locate any such registries for the City of Adelanto.

In addition to the records search, ECORP contacted the California Native American Heritage Commission (NAHC) on December 13, 2023, to request a search of the Sacred Lands File for the Project Area. This search will determine whether or not the California Native American tribes within the Project Area have recorded Sacred Lands, because the Sacred Lands File is populated by members of the Native American community with knowledge about the locations of tribal resources. In requesting a search of the Sacred Lands File, ECORP solicited information from the Native American community regarding TCRs, but the responsibility to formally consult with the Native American community lies exclusively with the federal and local agencies under applicable state and federal laws. The lead agencies do not delegate government-to-government authority to any private entity to conduct tribal consultation.

Field Survey

ECORP subjected the APE to an intensive pedestrian survey on December 14, 2023, under the guidance of the *Secretary of the Interior's Standards for the Identification of Historic Properties* (NPS 1983) using 10- to 15-meter transects (Figure 2). ECORP expended one person-day in the field. At the time, the ground surface was examined for indications of surface or subsurface cultural resources. The general morphological characteristics of the ground surface were inspected for indications of subsurface deposits that may be manifested on the surface, such as circular depressions or ditches. Whenever possible, ECORP examined the locations of subsurface exposures caused by such factors as rodent activity, water or soil erosion, or vegetation disturbances for artifacts or for indications of buried deposits. No subsurface investigations or artifact collections were undertaken during the pedestrian survey.

ECORP surveyed the Project Area for cultural resources on December 14, 2023. Ground surface visibility ranged from 60 percent in areas with modern refuse, to 100 percent in open areas. Creosote bush scrub dominates the Project Area. Disturbances include modern refuse which is found throughout the entire Project Area and a dirt road that bisects the area

Threshold 4.5 – Cultural Resources Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		✓		

Impact Analysis

Archaeological Setting

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

Mitigation Measure CUL-1: Contractor Awareness Training. The lead agency shall ensure that a Contractor Awareness Training Program is delivered to train equipment operators about cultural resources. The program shall be designed to inform construction personnel about: federal and state regulations pertaining to cultural resources and TCRs; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the lead agency of any occurrences; Project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for noncompliance with the program.

The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined

appropriate by the archaeologist. The training shall be provided to all construction supervisors, forepersons, and operators of ground- disturbing equipment. All personnel shall be required to sign a training roster. The Construction Manager is responsible for ensuring that all required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the lead agency as proof of compliance.

Mitigation Measure CUL-2: Archaeological Monitoring. Prior to the start of construction, the Project proponent shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were previously monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling).

The Monitoring Archaeologist shall meet or work under the direct supervision of someone meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 100 feet of any discovery of potential historical or archaeological resources to address unanticipated discoveries.

Mitigation Measure CUL-3: Post-Review Discoveries. The potential always remains for ground-disturbing activities to expose previously unrecorded cultural resources. Both CEQA and Section 106 of the NHPA require the lead agency to address any unanticipated cultural resource discoveries during construction of the Project. Therefore, ECORP recommends the following mitigation measures be adopted and implemented by the lead agency to reduce potential adverse impacts to less than significant:

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for pre- contact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The YSMN and the MBMI shall be contacted, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find to provide Tribal input with regards to significance and treatment.

The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a Historic Property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the San Bernardino County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no- work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

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

Impact Analysis

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

Section 4.6 Energy

This section was informed by:

- Air Quality Impact Analysis by Urban Crossroads, dated March 20, 2024, included as Appendix A to this Initial Study.
- Energy Analysis, Urban Crossroads, March 20, 2024, included as Appendix D to this Initial Study.
- Traffic Study by Translutions, Inc., dated July 30, 2024, included as Appendix I to this Initial Study.

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

Impact Analysis

Electricity Use

Construction

The SCE's general service rate schedule was used to determine the Project's electrical usage. As of January 1, 2024, SCE's general service rate is $0.14 per kilowatt hours (kWh) of electricity for industrial services (27). As shown on Table 4-3, the total electricity usage from on-site Project construction related activities is estimated to be approximately 161,514 kWh. Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, the construction-related impacts related to electricity and fuel consumption would be less than significant.

Operations

Project facility operational energy demands are estimated to result in approximately 3,970,839kBTU/year of natural gas and approximately 2,603,585 kWh/year for electricity and would be supplied by Southwest Gas Corp. and SCE. The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs.

Implementation of the Project would increase the demand for electricity at the Project site and petroleum consumption in the region during operation. However, the electrical consumption demands of the Project during operation would conform to the state's Title 24 and to CALGreen

standards, which implement conservation measures. Further, the proposed Project would not directly require the construction of new energy generation or supply facilities and providers of electricity are in compliance with regulatory requirements that assist in conservation, including requirements that electrical providers achieve state-mandated renewal energy production

requirements. With compliance with Title 24 conservation standards and other regulatory requirements, the Project would not be wasteful or inefficient or unnecessarily consume energy resources during construction or operation and would result in a less-than-significant impact with respect to consumption of energy resources.

Lastly, the Project will comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards will ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary.

Motor Vehicle Fuels

Construction

The proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. California Code of Regulations Title 13, Sections 2449 and 2485, limit idling from both on- road and off-road diesel-powered equipment and are enforced by the ARB. The proposed project would comply with these regulations. There are no policies at the local level applicable to energy conservation specific to the construction phase. Thus, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, construction-related energy efficiency and renewable energy standards consistency impacts would be less than significant.

Operations

Operational energy would also be consumed during vehicle trips generated by customers and employees traveling to and from the Project site. Based on CalEEMod energy use estimations, project-related vehicle trips would result in approximately 2,291,301 VMT and consume an estimated 93,291 gallons of gasoline and diesel combined, annually

The Project is located on an infill site that is surrounded by existing urban uses, the existing transportation facilities and infrastructure would provide future residents, visitors, and employees associated with the Project access to a mix of land uses in close proximity to the Project, thus further reducing fuel consumption demand. Additionally, the Project will also be providing parking and EV infrastructure that would further promote fuel efficient vehicles. For these reasons, operational-related transportation fuel consumption would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the operational impact related to vehicle fuel consumption would be less than significant.

Conclusion

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

Threshold 4.6 – Energy Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

Impact Analysis

The regulations directly applicable to the Project are Building Energy Efficiency Standards, Title 24, Part 6, and CALGreen Title 24, Part 11. Compliance with the aforementioned mandatory measures would ensure that future development projects would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, operational energy efficiency and renewable energy standards consistency impacts would be less than significant.

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Section 4.7 Geology and Soils

The information from this section was taken from:

- Phase 1 Environmental Site Assessment by Petra Geosciences, dated February 20, 2024, included as Appendix F to this Initial Study.
- Preliminary Geotechnical Evaluation, Petra Geosciences, November 17, 2023, included as Appendix F to this initial study.

Threshold 4.7 – Geology and Soils Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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.				✓

Impact Analysis

Based on Petra's review of the referenced geologic maps and literature, no active faults are known to project through the property. Furthermore, the site does not lie within the boundaries of an "Earthquake Fault Zone" as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act (CGS, 2018). The Alquist-Priolo Earthquake Fault Zoning Act (AP Act) defines an *active fault* as one that "has had surface displacement within Holocene time (about the last 11,000 years)." The main objective of the AP Act is to prevent the construction of dwellings on top of active faults that could displace the ground surface resulting in loss of life and property.

The site is not located within a currently designated State of California Alquist-Priolo Earthquake Fault Zone (CGS, 2023), nor is it within a San Bernardino County Fault Zone (County of San Bernardino, 2010). In addition, no known active faults have been identified on the site. While fault rupture would most likely occur along previously established fault traces, fault rupture could occur at other locations. However, the potential for active fault rupture at the site is considered to be very low.

However, it should be noted that according to the USGS Unified Hazard Tool website, the 2010 CGS Fault Activity Map of California, and the CGS Earthquake Hazard Zones (EQZapp) interactive map (CGS, 2023), the San Bernardino North segment of the San Andreas Fault zone, located approximately 16 miles (25.63 kilometers) south of the site, would probably generate the

most severe site ground motions and, therefore, is the majority contributor to the deterministic minimum component of the ground motion models.

Threshold 4.7 – Geology and Soils Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
ii) Strong seismic ground shaking?			✓	

Impact Analysis

The site is located in a seismically active area of southern California and will likely be subjected to very strong seismically related ground shaking during the anticipated life span of the project. Structures within the site should therefore be designed and constructed to resist the effects of strong ground motion in accordance with the 2022 California Building Code (CBC) and the seismic parameters included in the recommendations section herein. As a mandatory condition of Project approval, the Project would be required to construct the proposed structures in accordance with the seismic design criteria mandated by the Adelanto Municipal Code Title 14, Buildings and Construction. The purpose of this Title is, in part, to provide minimum standards to safeguard life or property by stipulating building and foundation requirements to withstand earthquakes.

Threshold 4.7 – Geology and Soils Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
iii) Seismic-related ground failure, including liquefaction?			✓	

Impact Analysis

Groundwater exceed 200 feet below the ground surface and the proposed development is not mapped within a zone with an expected liquefaction susceptibility (County of San Bernardino, 2010). The potential for liquefaction is considered very unlikely. Nevertheless, the Project would be required to comply with Development Code §16-5.02.060(b)(2), Soils Engineering Report, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

Threshold 4.7 – Geology and Soils Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
iv) Landslides?				✓

Impact Analysis

The site and immediate area exhibit level topography that is not prone to landsliding.

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

Impact Analysis

The most significant geotechnical factor affecting the project site is the presence of near-surface compressible soil materials. Such native materials consist of surficial topsoil and alluvium and are not considered suitable for support of fill or structural loads. As such, the native soils in building and pavement areas are subject to remedial over-excavation and re-compaction. The Project will not result in substantial soil erosion or the loss of topsoil, because the site will be paved and landscaped after it is developed. To control soil erosion during construction, the Project proponent is required to comply with Chapter 17.93 - Erosion and Sediment Control, of the Adelanto Municipal Code, which serves to implement the National Pollutant Discharge Elimination System requirements applicable to the Project area and prepare a Storm Water Pollution Prevention Plan (SWPPP). In addition, a Water Quality Management Plan (WQMP) is required that addresses post-construction soil erosion. Preparation and implementation of these plans is a mandatory requirement.

The SWPPP will identify potential sources of erosion and sedimentation loss of topsoil during construction and identify erosion control measures to reduce or eliminate the erosion and loss of topsoil, such as the use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, and hydroseeding. Post construction, much of the site will be covered with paving, structures, and landscaping, which will reduce soil erosion.

Threshold 4.7 – Geology and Soils Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No 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?			✓	

Impact Analysis

Landslide/Lateral Spreading

The site and immediate area exhibit level topography that is not prone to landsliding. According to the County of San Bernardino Hazard Maps, is not located in areas prone to landslides, and thus there are no slopes that may contribute to lateral spreading.

Subsidence

Subsidence is the downward movement of the ground caused by the underlying soil conditions. Certain soils, such as clay soils, are particularly vulnerable since they shrink and swell depending on their moisture content. Subsidence is an issue if buildings or structures sink, which causes damage to the building or structure. Subsidence is usually remedied by excavating the soil the depth of the underlying bedrock and then recompacting the soil so that it can support buildings and structures. Based on the site conditions, proposed grading, depth to groundwater exceeding 200 feet, and gentle topography across the site, landsliding, liquefaction, ground subsidence, ground lurching and lateral spreading are considered unlikely at the site.

Liquefaction

Liquefaction may occur during seismic ground shaking of relatively loose, granular soils that are saturated or submerged; this can cause soils to liquefy and temporarily behave as a dense fluid. Groundwater exceed 200 feet below the ground surface and the proposed development is not mapped within a zone with an expected liquefaction susceptibility (County of San Bernardino, 2010). The potential for liquefaction is considered very unlikely.

Based on the California Geological Survey, the site is not mapped within a zone of potentially liquefiable soils. Based on groundwater data (http://www.water.ca.gov/waterdatalibrary/). The site is also not included within the San Bernardino County Geologic Hazards Maps as being located within an area with a liquefaction hazard. As such, impacts would be less than significant, and no impacts related to subsidence, liquefaction, and collapse will occur through compliance with the California Building Standards Code also known as California Code of Regulations Title 24.

Threshold 4.7 – Geology and Soils Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No 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?			✓	

Impact Analysis

Expansive soils generally consist of clay that tends to expand (increase in volume) as it absorbs water, and it will shrink (lessen in volume) as water is drawn away. The results of laboratory tests performed on representative samples of near-surface soils within the site during evaluation indicate that these materials predominantly exhibit expansion indices that are less than 20, and are classified as non-expansive. Accordingly, the Project's Preliminary Geotechnical Evaluation provides recommendations for footings and floor slabs to be designed and constructed in accordance with the minimum criteria set forth in that document. As indicated in Section 1803.5.3 of 2022 California Building Code (2022 CBC), these soils are considered non-expansive and, as such, the design of slabs on-ground is considered to be exempt from the procedures outlined in Sections 1808.6.2 of the 2022 CBC and may be performed using any method deemed rational and appropriate by the Project structural engineer. However, the Preliminary Geotechnical Evaluation provides recommendations for conditions where the Project design team may require geotechnical engineering guidelines for design and construction of footings and slabs on-grade at the Poject site.

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

Impact Analysis

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

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

Impact Analysis

According to the General Plan EIR, there is potential for the disturbance of paleontological resources with future development in the northwestern portion of the Planning Area near the Shadow Mountains and along the Fremont Wash. The General Plan includes implementing programs to avoid or minimize the impact of buried paleontological resources. Implementing Program OS-14 is included in the General Plan and applies to all future development and infrastructure proposals subject to review pursuant to CEQA[6].

Implementing Policy OS-14 states in part: "In areas containing middle to late Pleistocene era sediments (Qof) where it is unknown if paleontological resources exist, prior to grading, an assessment shall be made by a qualified paleontological professional to establish the need for paleontological monitoring."[7]

The Project site is mapped as Recent unconsolidated silt, sand, and gravel derived from adjacent higher ground (Dibblee, Jr., 1960). A more recent geologic map identifies the site as being underlain by Holocene-age Young Alluvial Fan deposits consisting of unconsolidated to slightly consolidated boulder, cobble, sand, and silt deposits issued from a confined valley or canyon (Bedrossian, Hayhurst, and Roffers, 2010).[8]

Unique Geologic Feature

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

[6] *Adelanto North 2035 Comprehensive Sustainable Plan, P.168.* Available at: https://cms3.revize.com/revize/adelanto/Documents/Services/Community%20Development%20Services/Planning/General%20Plan/Adelanto%20North%202035%20Sustainable%20Plan.pdf, *accessed on August 17, 2024.*

[7] *Ibid, P.168.*

[8] *Preliminary Geotechnical Evaluation*, Appendix H of this Initial Study.

Section 4.8 Greenhouse Gas Emissions

The following documents were used in the preparation of this analysis:

- Greenhouse Gas Analysis, Urban Crossroads, March 20, 2024, included as Appendix E to this initial study
- Mojave Desert Air Quality Management District, California Environmental Quality Act (CEQA) And Federal Conformity Guidelines, February 2020.

Threshold 4.8 – Greenhouse Gas Emissions Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				✓

Impact Analysis

Greenhouse Gas Emissions and Climate Change

Greenhouse Gases trap heat in the atmosphere, creating a GHG effect that results in climate change. The Greenhouse Gas Report analysis evaluated emissions of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) because these gases are the primary contributors to Global Climate Change (GCC) from development projects.

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that current GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual project like the proposed Project evaluated in this GHGA cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC.

Mojave Desert Air Quality Management District Thresholds of Significance

According to CEQA Guidelines §15064.4, when making a determination of the significance of greenhouse gas emissions, the "lead agency shall have discretion to determine, in the context of a particular project, whether to use a model or methodology to quantify greenhouse gas

emissions resulting from a project, and which model or methodology to use." Moreover, CEQA Guidelines §15064.7(c) provides that "a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts" on the condition that "the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

Currently neither the CEQA statutes, OPR guidelines, nor the draft proposed changes to the CEQA Guidelines prescribe thresholds of significance or a particular methodology for performing an impact analysis; as with most environmental topics, significance criteria are left to the judgment and discretion of the Lead Agency. The MDAQMD has identified thresholds of 100,000 tons per year (90,718 $MTCO_2e$/year) or 548,000 pounds per day of CO_2e emissions for individual projects.

However, the 100,000 MT/year CO_2e threshold is more conducive to a large point sources emitter (e.g. power plants, steel plants, cement plants, smelters, industrial boilers, petroleum refineries, and manufacturing facilities.). Therefore, the City of Adelanto has opted to apply the South Coast Air Quality Management District (SCAQMD) Tier 3 GHG threshold.

> *"Tier 3. Numerical Screening Threshold: If GHG emissions are less than the numerical screening level threshold, project-level and cumulative GHG emissions are less than significant. For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a "bright-line" screening level threshold of 3,000 metric tons (MT) of CO2e (or MT CO2e) per year (or MT CO2e/year) for all land use types or, under Option 2, the following land use-specific thresholds: 1,400 MT CO2e commercial projects; 3,500 MT CO2e for residential projects; or 3,000 MT CO2e for mixed-use projects. This bright-line threshold is based on a review of the OPR database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the brightline thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions."*[9]

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO2 concentrations at 450 ppm, thus stabilizing global climate. For purposes of this analysis, the 3,000 MT CO2e for mixed-use projects is used.

[9] South Coast AQMD, Greenhouse Gases (GHG), CEQA Significance Thresholds. Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds, accessed August 21, 2024.

Table 4.8-1. Project Operational Greenhouse Gas Emissions (Annual)

Source	GHG Emissions (metric tons per year-MTCO2e/yr)			
	N_2O	CO_2	CH_4	CO_2e
Area	0.000	2.17	0.0	2.17
Energy	0.01	619.54	0.06	622.51
Mobile Sources	0.04	828.63	0.03	824.95
Waste	0.00	16.21	1.62	56.71
Water	0.03	41.36	1.09	76.32
30-year Amortized Construction GHG	9.13E-04	29.48	9.73E-04	29.79
Total				**1,632.60**
Threshold				3,000
			Exceeds Threshold?	**No**

Source: CalEEMod, Appendix 3.1
-- = Emission factor only provided in MT CO2e

Table 4.8-2 Project Construction Greenhouse Gas Emissions

GHG Emissions Source	CO_2	CH_4	N_2O	CO_2e	Exceeds Threshold?
Construction 2025	368.13	0.01	0.01	371.68	No
Construction 2026	516.20	0.02	0.02	521.94	No
Total GHG Emissions	884.33	0.03	0.03	893.62	No
Amortized Construction Emissions	29.48	9.73E-04	9.13E-04	29.79	No

As shown in Table 4.8-1, *Project Operational Greenhouse Gas Emissions (Annual)* Table 4.8-2, *Project Construction Greenhouse Gas Emissions,* the Project will result in approximately 1,632.60 MTCO2e/yr; the proposed project would not exceed the screening threshold of 3.000 MTCO2e/yr. Thus, project-related emissions would not have a significant direct or indirect impact on GHG, and climate change and no mitigation or further analysis is required.

Thresholds 8 – Greenhouse Gas Emissions Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Impact Analysis

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

In response to these initiatives, an informal project partnership, led by the San Bernardino Council of Governments (SBCOG), adopted the San Bernardino County Regional Greenhouse Gas Reduction Plan.[10] The Reduction Plan summarizes the actions that 23 jurisdictions selected to reduce jurisdictional GHG emissions, as well as state-mandated actions. The Reduction Plan is not mandatory for partnership jurisdictions. Instead, it provides information that can be used by partnership jurisdictions, if they choose so, to develop individual climate action plans (CAPs).

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

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

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

[10] San Bernardino County Regional Greenhouse Gas Reduction Plan , available at: https://www.gosbcta.com/wp-content/uploads/2019/09/San_Bernardino_Regional_GHG_Reduction_Plan_Main_Text_Mar_2021.pdf, accessed on August 17, 2024.

Section 4.9 Hazards and Hazardous Materials

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

Impact Analysis

Construction of the Project has the potential to create a hazard to the public or the environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, oils, solvents, and other materials.

Construction

Potential hazardous materials such as fuel, paint products, lubricants, solvents, and cleaning products may be used and/or stored on-site during construction of the proposed Project. These materials are typical of materials delivered to construction sites. The transport, use, and disposal of hazardous materials during construction would be regulated by the Hazardous Materials Division of the San Bernardino County Fire Department and the California Occupational Safety and Health Administration. Additionally, the United States Department of Transportation Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials by truck and rail on state highways and rail lines, as described in Title 49 of the Code of Federal Regulations and implemented by Title 13 of the CCR.

Operation

Similar to Project construction, the transport, use, and disposal of hazardous materials during Project operation would be regulated by the Hazardous Materials Division of the San Bernardino County Fire Department and the California Occupational Safety and Health Administration. Additionally, transport of hazardous materials by truck and rail on state highways and rail lines would be regulated by the United States Department of Transportation Office of Hazardous Materials Safety as described above.

Pursuant to California Health and Safety Code §25507, a business shall establish and implement a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material in accordance with the standards prescribed in the regulations adopted pursuant to §25503 if the business handles a hazardous material or a mixture containing a hazardous material that has a quantity at any one time above the thresholds described in §25507(a)(1) through (8).

These regulations inherently safeguard life and property from the hazards of fire/explosion arising from the storage, handling, and disposal of hazardous substances, materials, and devices, as well as hazardous conditions due to the use or occupancy of buildings. Therefore, impacts from the routine transport, use, or disposal of hazardous materials would be less than significant. Mitigation is not required.

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

Impact Analysis

Theodore Vick Elementary School is located approximately 0.77 miles (4,040.2 feet) to the west of the Project site. As discussed in the responses to Thresholds 4.9(b) and 4.9(c) above, all hazardous or potentially hazardous materials would comply with all applicable federal, state, and local agencies and regulations with respect to hazardous materials. Therefore, regardless of the proximity of Theodore Vick Elementary School, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste that would impact the school.

Threshold 4.9 – Hazards and Hazardous Materials Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓

Impact Analysis

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

- List of Hazardous Waste and Substances sites from the Department of Toxic Substances Control (DTSC) EnviroStor database.

- List of Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database.
- List of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels outside the waste management unit.
- List of "active" CDO and CAO from Water Board.
- List of hazardous waste facilities subject to corrective action pursuant to §25187.5 of the Health and Safety Code, identified by DTSC.

Based on a review of the Cortese List maintained by the California Environmental Protection Agency, the Project site is not identified on the list of hazardous materials sites compiled pursuant to Government Code §65962.5.[11]

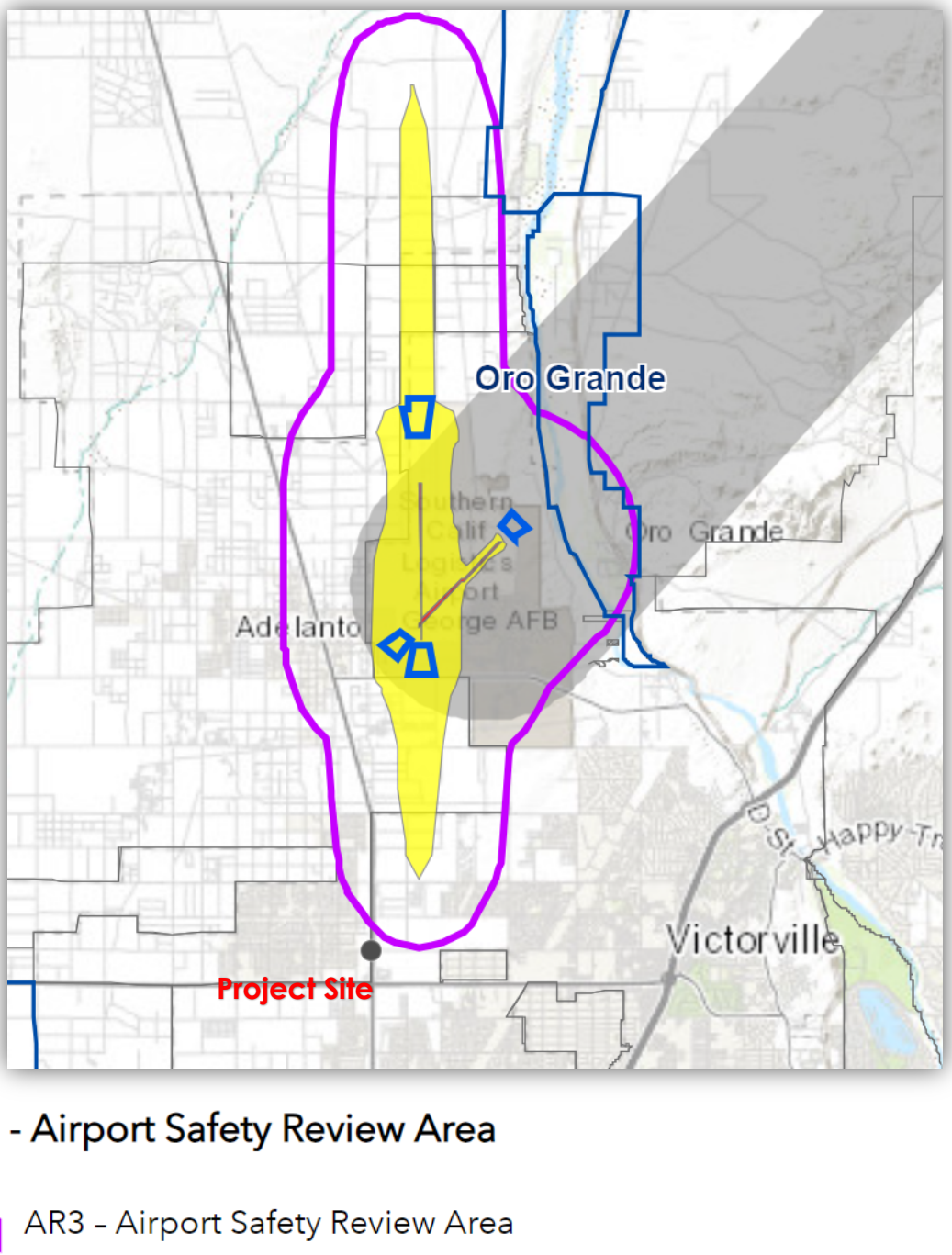
Threshold 4.9 – Hazards and Hazardous Materials Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✓

Impact Analysis

According to the *Southern California Logistics Airport Specific Plan*, (SCLA Airport Plan), the Project site is located outside of the Airport Influence Area (**Error! Reference source not found.**, Airport Influence Area Map). Based on this information, no impacts are anticipated.

[11] California Environmental Protection Agency, Cortese List Data Resources, https://calepa.ca.gov/sitecleanup/corteselist/ , accessed August 17, 2024.

Figure 4.9-1. Southern California Logistics Airport Influence Area Map[12]



[12] San Bernardino Countywide Plan, HZ-9 Airport Safety & Planning Areas, accessed August 1, 2024,available at: https://www.arcgis.com/apps/webappviewer/index.html?id=5dc02b81369c49c9a1947aedfc300a45

Threshold 4.9 – Hazards and Hazardous Materials Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	

Impact Analysis

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

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

Impact Analysis

According to the California Fire Hazard Severity Zone Maps maintained by Cal Fire, the Project site is not located within a high wildfire hazard area.[13] Also refer to analysis under Section4.20, Wildfire.

[13] https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps, accessed on August 17, 2024.

Section 4.10 Hydrology and Water Quality

The following document was used in the preparation of this analysis:

- Preliminary Drainage Study, Encompass Associates, Inc., March 15, 2024, included as Appendix G to this initial study

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

Impact Analysis

Pre-Development Conditions

The subject property is bounded on the north by Seneca Road with undeveloped property beyond; on the west by Pearmain Street with a residential tract beyond; and on the east and south by undeveloped land. Based upon topography provided on a conceptual basin plan by Encompass Associates, Inc. (2023), the site slopes gently to the north with existing elevations on the order of 3,098 feet above mean sea level (msl) to 3,108 feet above msl. No indication of surface water was observed on the property or in close proximity at the time of our site field exploration.

Construction Impacts

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

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

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

Operational Impacts

Stormwater pollutants commonly associated with industrial land uses include sediments, nutrients, trash and debris, bacteria and viruses, oil and grease, and pesticides. City of Adelanto Municipal Code Chapter 17.93.060 requires the preparation of a Water Quality Management Plan (WQMP) for managing the quality of stormwater or urban runoff that flows from a developed site after construction is completed. The Project will comply with the City of Adelanto and the Phase II Small MS4 General Permit for the Mojave River Watershed as described below.

In the proposed condition, the site drainage is split into two areas. The northern half of the site drains to a basin on the northeast. The flow is transferred to the basin through a combination of storm drainpipe, and surface flow. The southern half of the site drains to a basin located in the southeast of the site. This basin receives the site drainage through a combination of storm drainpipe and surface flow as well.

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

Impact Analysis

Ground Water Supply Discussion

The Project would be served with potable water by the Adelanto Public Utility Authority. Adelanto has groundwater wells within its distribution system that are actively used to pump groundwater from the Mojave River Groundwater Basin, which lies beneath Victor Valley.[14] The Mojave Basin Area was the subject of a court ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area. The court ordered adjudication of the Mojave Basin Area allocates a variable free production allowance (FPA) to each purveyor that supplies more than 10 AFY, including Adelanto.

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

[14] City of Adelanto 2020 Urban Water Management Plan, June 1, 2021.

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

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

Groundwater Recharge Discussion

No groundwater was encountered in any of our test pits, excavated to the maximum depth of 9 feet below the ground surface (bgs). The site is located within the Upper Mojave River Valley Sub-basin 6-042 (California Department of Water Resources [CDWR, 2023], Water Data Library). No groundwater wells were observed or mapped on the property (CDWR, 2023). The closest mapped well to the subject property (State Well ID: 05N05W22E002S) is reported approximately 1,900 feet to the southeast, near the corner of Highway 395 and Highway 18. Between February 1960 and April 2008, this well reported a depth to groundwater ranging from approximately 302 to 383 feet bgs. In general, groundwater depth varies within the area and though flow direction specifically beneath the subject property is unknown, it is reasonable to estimate flow to follow regional topography to the north- northeast.

Sustainable Groundwater Management Discussion

California depends on groundwater for a major portion of its annual water supply, particularly during times of drought. This reliance on groundwater has resulted in overdraft and unsustainable groundwater usage in many of California's basins.[15] The Sustainable Groundwater Management Act (SGMA) was enacted to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The City of Adelanto is located within the Upper Mojave River Valley portion of the Mojave River Basin.

The Mojave River is an adjudicated basin (i.e., water rights are determined by court order).[16] Adjudicated basins are exempt from the SGMA because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of a basin. No component of the Project would obstruct or prevent the implementation of the management plan for the Mojave River Basin. As such, the Project would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.

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15 https://www.waterboards.ca.gov/water_issues/programs/gmp/, accessed on August 17, 2024.
16 https://gis.water.ca.gov/app/bp-dashboard/final/, accessed on August 17, 2024.

Conclusion

Regional groundwater or perched groundwater was not encountered in any of our exploratory test pits or borings, excavated to a maximum depth of 8.5 feet below the ground surface. Data provided in nearby public wells indicates groundwater is at depths exceeding 200 feet bgs. As such, regional groundwater is not anticipated to affect the subject development.

Threshold 4.10 – Hydrology and Water Quality Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			✓	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			✓	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			✓	
iv) impede or redirect flood flows?			✓	

Impact Analysis

Existing Condition/Pre-Development

The subject property is currently undeveloped with native grass and limited brush cover on approximately 9 acres. There are no improvements on the existing site. The site is served by Seneca Road along the north side, which will be widened to the ultimate width as part of this project. Pearmain Street bounds the site to the west, with vacant land on the other sides. The site is relatively flat, with existing drainage patterns generally conveying runoff northeasterly to Seneca Road, however a small portion of the site is tributary to the intersection of Pearmain Street and Seneca Road. There is runon from southerly off-site areas onto the property.

Proposed Condition

Site runoff will be by sheetflow and concentrated v-gutter, collected in drop inlets and ultimately to a proposed detention basin. Mitigated discharge from the site will be out onto Seneca Road toward the easterly property line. Off-site runon drainage will be collected in a perimeter v-gutter located along the south and east sides of the property. This gutter will drain to the proposed detention basin. A requirement of development is to limit proposed runoff to a condition below the existing peak flow. The aforementioned detention basin is proposed for this purpose.

Table 4.10-1. Pre-Development vs. Proposed Condition Storm Water Runoff

Description	Peak Flow Rate (cubic feet per second)
Existing Condition	30.7 cfs
Design Criteria (87% of 30.7 cfs).	26.7 cfs
Proposed Condition	35.1 cfs
Meets Requirement?	**No**

Source: Preliminary Drainage Study,(Appendix G to this ISMND).

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

Threshold 4.10 – Hydrology and Water Quality Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓

Impact Analysis

According to the Federal Emergency Management Agency (FEMA), the Project site is not located within a flood hazard zone.[17] According to the California Department of Conservation, California Official Tsunami Inundation Maps,[18] the site is not located within a tsunami inundation zone. In addition, the Project would not be at risk from seiche because there is no water body around the Project site capable of producing as seiche.

Threshold 4.10 – Hydrology and Water Quality Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

Impact Analysis

As discussed under Thresholds 4.10 (a) through 4.10 (c), with implementation of the proposed drainage system improvements and features, the Project will not conflict with the Lahontan Basin Plan or groundwater management programs

[17] https://www.fema.gov/flood-maps, accessed on August 10, 2024.
[18] California Department of Conservation, *California Official Tsunami Inundation Maps,* available at: https://www.conservation.ca.gov/cgs/tsunami/maps accessed August 10, 2024.

Section 4.11 Land Use and Planning

Thresholds 4. 11 – Hydrology and Water Quality Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				✓

Impact Analysis

Typical examples of projects that have the potential to divide an established community include the construction of a new freeway or highway through an established neighborhood. The Project site is in an area that consists primarily of vacant undeveloped land. The Project site is bordered on the north by Seneca Road then commercial zoned parcels of undeveloped land to the north, to the east, and to the south and residential communities to the west. The Project site is planned for commercial development by the General Plan. The properties to the north, east and south of the subject property are also planned for general commercial As such, the proposed project site is a logical continuation of the development pattern in the area as proposed by the General Plan and will not divide an established community.

Thresholds 11 – Hydrology and Water Quality Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			✓	

Impact Analysis

The applicable plans and policies relating to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect are evaluated throughout this Initial Study document as described below.

City of Adelanto General Plan

- Land Use Element: The General Plan Land Use and Zoning designation for the Project site is General Commercial (C) district which provides for retail centers that serve community-wide needs and neighborhood needs. The General Commercial district provides for commercial areas that include, but are not limited to, large retail uses such as "big box" stores, furniture stores, appliance and home electronics retailers; movie theaters; service commercial businesses; professional business offices; and restaurants. The district also provides for a wide range of smaller-scale business activities which serve the needs of residents who live nearby. As evidenced throughout this Initial Study, all

impacts have been identified as having no impact, a less than significant impact, or a less than significant impact with mitigation incorporated. As such, the Project is consistent with the new General Plan Land Use and Zoning designations.

- Circulation Element: Please refer to Section 4.17, Transportation, for the analysis.
- Conservation/Open Space Element: Please refer to Section 4.1, Aesthetics, and Section 4.4, Biological Resources, for the analysis.
- Noise Element: Please refer to Section 4.13, Noise, for the analysis.
- Safety Element: Please refer to Section 4.9, Hazards and Hazardous Materials, for the analysis.
- Community Design Element: Please refer to Section 4.1, Aesthetics, for the analysis.

City of Adelanto Zoning Ordinance

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

Mojave Desert Air Quality Management District Air Quality Management Plan

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

San Bernardino County Regional Greenhouse Gas Reduction Plan

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

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

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

Conclusion

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

Section 4.12 Mineral Resources

Threshold 4.12 – Mineral Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				✓

Impact Analysis

The naturally occurring mineral resources within the Planning Area include sand, gravel, or stone deposits that are suitable as sources of concrete aggregate. The Project site has been designated with a Mineral Land Classification of MRZ-3A, which is an area containing known mineral occurrences of undetermined mineral resource significance. This classification was based on a report by the California Department of Conservation, Division of Mines and Geology, entitled Mineral Land Classification of Concrete Aggregate Resources in the Barstow - Victorville Area, San Bernardino County, California. A review of the California Department of Conservation interactive web mapping indicates there are no active mines on the Project site[19]. In addition, a review of the California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the Project site.[20]

Accordingly, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California.

Thresholds 12 – Mineral Resources Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	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?				✓

Impact Analysis

The Project site is not being used for mineral resource recovery. The Project site is designated as General Commercial (G). If the Project site were intended for mineral recovery, it would be designated as such, and not commercial. As such, the Project is not delineated on the General Plan, a specific plan, or other land use plan as a locally important mineral resource recovery site

[19] California Department of Conservation , DOC Maps: Mines and Mineral Resources, available at: https://maps.conservation.ca.gov/mineralresources/, accessed on August 17, 2024.

[20] California, State of, Department of Conservation. California Oil, Gas, and Geothermal Resources Well Finder., available at: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14, accessed on August 17, 2024.

Section 4.13 Noise

Thresholds 4.13 – Noise Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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?			✓	

Impact Analysis

Existing Ambient Noise Levels

The primary sources for existing ambient noise in the Project area are traffic, residential, and commercial uses. Traffic generated noise is from adjacent Pearmain Street, Seneca Road, Palmdale Road (SR-18), and Highway 395, which is approximately 600 feet to the east.

Sensitive Receptors (Noise Sensitive Land Uses)

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, churches, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks are considered noise sensitive. The nearest sensitive receptor to the Project site is occupied commercial and residential uses surrounding the Project area are listed in **Error! Reference source not found.**, Occupied Structures/Receptors, below with approximate distance(s) to the site nearest site boundary.

Table 4.13-1. Occupied Structures/Receptors

Receptor	Location	Distance
Residential	East of Pearmain Street	Occupied structures approximately 90 feet from east boundary
Residential	Northeast of Seneca Road	Occupied structures approximately 450 feet from northeast boundary
Stater Bros. Shopping Center	Southeast, west of Highway 395	Occupied structures approximately 952 feet from south boundary
Walmart Super Center Shopping Center	Southeast across Highway 395	Occupied structures approximately 1,027 feet from south boundary

Short-Term Construction Noise Impact Analysis

Construction activities that would create noise include site preparation, grading, building construction, paving, and architectural coating. Noise levels associated with the construction will vary with the different types of construction equipment, the duration of the activity, and distance from the source. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing levels within the Project vicinity. The nearest sensitive

receptors to the Project site are residential uses located approximately 90 feet from the eastern boundary.

To estimate the potential impact of construction noise at the nearest sensitive receptors, equipment that is expected to be used during construction was input into the Federal Highway Administration Roadway Construction Noise Model (RCNM) version 1.1 to generate anticipated noise levels. The RCNM generates the maximum noise levels (Lmax) and the equivalent continuous sound level (Leq). The Leq is a calculation of the anticipated steady sound pressure level which, over a given time period (day, evening, night) has the same total energy as the actual fluctuating noise. The RCNM also uses an acoustical use factor in the noise calculations. The acoustical use factor is the percentage of time each piece of construction equipment is assumed to be operating at the full power level and is used to estimate the Leq values from the Lmax values. For example, typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels will be loudest during the site preparation and grading phases. Table 4.13-2, Construction Equipment Noise Levels at the Nearest Receptor, identifies the level of noise generated by construction equipment.

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Table 4.13-2. Construction Equipment Noise Levels at the Nearest Sensitive Receptor

Source	Approximate Distance to Nearest Receptor [1] (Property Line to Construction Site) (feet)	Sound Level at Nearest Receptor		
		Lmax	Acoustical Use Factor (%)	Leq
Backhoe	90	72.5	40	68.5
Concrete Mixer Truck	90	73.7	40	69.7
Compressor (air)	90	72.6	40	68.6
Concrete Pump Truck	90	76.3	20	69.3
Crane	90	75.4	16	67.5
Dozer	90	76.6	40	72.6
Dump Truck	90	71.3	40	67.4
Excavator	90	75.6	40	71.6
Flat Bed Truck	90	69.1	40	65.2
Front End Loader	90	74.0	40	70.0
Generator	90	75.5	50	72.5
Grader	90	79.9	40	75.9
Man Lift	90	69.9	20	62.9
Paver	90	72.1	50	69.1
Pickup Truck	90	69.9	40	65.9
Pneumatic Tools	90	80.1	50	77.1
Roller	90	74.9	20	67.9
Scraper	90	78.5	40	74.5
Tractor	90	78.9	40	74.9
Welder / Torch	90	68.9	40	64.9

Source: FHWA – RCNM Version 1.1

The highest anticipated construction noise levels at nearest sensitive receptors, approximately located 90 feet east of the site boundary would be from the use of pneumatic tools with a level of 80.1 dBA Lmax and 77.1 dBA Leq.

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

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

17.90.020 (d) Construction Practices

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

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

(2) Stationary construction equipment that generates noise in excess of sixty-five (65) dBA at the project boundaries must be acoustically shielded and located at least one hundred feet (100') from occupied residences. The equipment area with appropriate acoustic shielding shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location throughout construction activities.

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

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

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

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

While the City establishes limits to the hours during which construction activity may take place, it does not identify specific noise level limits for construction noise levels. Therefore, to evaluate whether the Project will generate a substantial increase in the short-term noise levels at the offsite sensitive receptors (residences), the construction-related noise level threshold is based on the National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit (REL) for occupation noise exposure at 85 dBA, as an 8-hour time-weighted average (85 dBA – 8-hr TWA).

The highest individual equipment noise level at the nearest sensitive receptor as indicated in Table 4.13-2 will be at 80.1 dBA Lmax and 77.1 dBA Leq. During the construction phase the noise levels will be the highest during site preparation and grading as heavy equipment pass along the Project site boundaries. During the site preparation and grading phases, which produce the

highest noise levels, equipment will not be stationary, rather equipment will be moving throughout the site at varying speeds and power levels and as a result not operating at the maximum noise level for the entire workday.

The levels of noise at the nearest sensitive receptor as indicated in Table 4.13-2 are all below the NIOSH REL of 85 dBA 8-hour TWA and would be less than significant. Construction noise is of short-term duration and will not present any long-term impacts on the project site or the surrounding area.

Operational Off-Site Traffic Noise Impact Analysis

Vehicle noise is a combination of the noises produced by the engine, exhaust, and tires. The primary source of noise generated by the Project will be from the vehicle traffic generated by the vehicle ingress and egress to the Project site. Under existing conditions, the site does not generate any traffic noise that impacts the surrounding area.

According to the Federal Highway Administration, Highway Traffic Noise Analysis and Abatement Policy and Guidance, the level of roadway traffic noise depends on three things: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of the traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater numbers of trucks. These factors are discussed below.

Volume of Traffic

The Project site is vacant, and it is proposed to include a mix of retail, office, and storage facilities. Access to the project site will be provided on Seneca Road via two full-access driveways. The proposed project is forecast to generate 30 new trips in the a.m. peak hour, 51 new trips in the p.m. peak hour, and 466 new daily trips.[21] The existing peak hour traffic along Seneca Road is 874 trips in the a.m. peak hour and 980 trips in the p.m. peak hour, while existing peak hour traffic along Pearmain Street is 161 a.m. peak hour trips and 211 p.m. peak hour trips. According to Caltrans, the human ear can begin to detect sound level increases of 3 decibels (dB) in typical noisy environments.[22] A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable. Implementation of the Project will increase traffic volumes in the area occurring along Seneca Road and Pearmain Street but not to the extent that traffic volumes will be doubled creating a +3dBA noise increase or result in a perceivable noise increase. Therefore, operational noise impacts would be less than significant.

Speed of Traffic

Seneca Road is oriented in an east-west direction and is a 2-lane roadway and has a posted speed limit of 35 miles per hour. Seneca Road is designated as a four-lane Major Street in the City's Circulation Element. Pearmain Street is oriented in the north-south direction and is a 2-lane

[21] Seneca Road Business Park and Storage Traffic Study, Translutions, Inc., dated July 30, 2024. Appendix I of this Initial Study.
[22] Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.

roadway and has a posted speed limit of 25 miles per hour. Pearmain Street is designated as a Local Street in the City's Circulation Element. US-395 is oriented in the north-south direction and is a 4-lane roadway and has a posted speed limit of 55 miles per hour. US-395 is designated as a six-lane roadway in the City's Circulation Element. These low levels of speeds do not result in vehicles generating high levels of noise.

Number of Trucks in the Flow of the Traffic

The Project is a retail, office, and storage development and is not anticipated to generate noise from large trucks. Based on the number of daily vehicle trips of 466 and an estimated number of truck trips per day at 2% the total number of daily trips from trucks is calculated to be 10 ADT.

Truck traffic will also be required to use the City's designated truck routes which include Holly Road, Air Expressway, and Highway 395. The use of the truck routes will also decrease the impacts on sensitive receptors such as residential uses.

Facility Operations (Stationary Noise)

The on-site Project-related noise sources are expected to include rooftop heating ventilation and air conditioning units (HVAC), idling vehicles, truck activities, backup alarms, as well as loading and unloading activities, and parking lot vehicle movements.

The noise reference levels in Table 4.13-3 are intended to describe noise level impacts associated with the expected typical operational (stationary source) activities at the Project site.

Table 4.13-3. Reference Noise Level Measurements

Noise Source	Reference Distance (feet)	Reference Noise Level (dBA)	Distance to Receptor (feet)	Noise Level (dBA)
Rooftop HVAC [1]	1	88	90	48.9
Truck Loading & Unloading Activity [2]	50	63.6	90	58.5
Truck Backup Alarm [2]	50	75.0	90	69.9
Parking Lot Activity [2]	25	54.4	90	43.7

[1] *Reference Level Lennox 10-ton air handler unit (AHU) manufacturer specifications.*
[2] *Reference Level collected at Amazon Fulfillment Center ONT-6 (24208 San Michele Rd., Moreno Valley)*

The proposed facility will include truck loading and unloading. To determine the noise level impacts of the Project, short-term reference noise level measurements were collected at the Amazon Fulfillment Center located at 24208 San Michele Road in the City of Moreno Valley. The noise measurements represent a typical weekday warehouse loading/unloading operation on a large single-building distribution center, approximately 1.2 million square feet, with 200 trailer parking spaces and 90 docks. Operations during the noise measurements included multiple trucks being loaded/unloaded, forklift and truck/trailer movement. The proposed Project includes significantly less truck traffic and therefore the truck loading activities reference noise level represents a worse-case scenario.

The loading/unloading operations noise measurements were taken over a 15–minute period from an area approximately at the center of the docking stations at 50 feet from the building. The reference noise measurement obtained was 63.6 dBA L_{eq} and calculated attenuation for 90- foot distance at 58.5 dBA L_{eq}. The 90-foot distance is the closest distance from the estimated noise activities to the closest occupied residences on the east boundary of the site. No attenuation for shielding from buildings or walls was calculated as no detailed information on boundary walls/fencing was available for the Project at the time of the analysis.

Trucks at the Project site would utilize backup alarms during the loading/unloading activities, which according to ECCO, the first manufacturer of backup alarms, depending on the model, typically produce a noise level of 87 to 112 dBA at 1 feet[23] and at 90 feet with no sound barriers (walls or buildings) the noise level would be between 47.9 to 72.9 dBA. Reference noise level measurements taken at 50 feet during truck movement and backup alarm operation were measured at 75 dBA which would result in a 69.9 dBA noise level at 90 feet with no perimeter walls or buildings as shielding.

Parking lot areas for passenger vehicles were estimated to be located on the north side of the Project site north of proposed Buildings A and G whereas the RV Storage parking was estimated to be located on the south side of the proposed Buildings A and G. Traffic associated with parking lots is typically not at a sufficient level to exceed the community noise standards. The total parking spaces estimated for the Project 59 spaces the reference noise levels were taken at a parking lot that can accommodate approximately 1,000 truck stalls. The Project's parking lots are substantially smaller, and no significant noise impacts offsite from the parking lot use would be anticipated.

The USEPA identifies noise levels affecting health and welfare as exposure levels over 70 dBA over a 24-hour period. Noise levels for various levels are identified according to the use of the area. Levels of 45 dBA are associated with indoor residential areas, hospitals, and schools, whereas 55 dBA is identified for outdoor areas where typical residential human activity takes place. According to the USEPA levels of 55 dBA outdoors and 45 dBA indoors are identified as levels of noise considered to permit spoken conversation and other activities such as sleeping, working, and recreation, which are part of the daily human condition.[24] Levels exceeding 55 dBA in a residential setting are normally short in duration and not significant in affecting health and welfare of residents. As the Project site is located in an industrialized area that is zoned and planned for future industrial development. The nearest exiting sensitive receptor is the residential structure approximately 90 feet from the eastern project site boundary and no significant noise impacts are expected at that distance.

[23] ECCO Backup alarm manufacturer resources: https://www.eccoesg.com/us/en/SearchResults?searchText=backup+alarm+noise+levels accessed August 6, 2024.

[24] USEPA "EPA Identifies Noise Levels Affecting Health and Welfare. https://www.epa.gov/archive/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html Accessed August 6, 2024.

Conclusion

Through compliance with mandatory requirements to reduce noise during construction, the Project's construction noise impacts will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project. In addition, the properties immediately adjacent and surrounding the Project site are existing residential and commercial uses with residential and commercially zoned vacant parcels. The Project would be compatible with surrounding land uses and would not adversely impact sensitive receptors therefore the Project's operational noise would be less than significant.

Thresholds 4.13 – Noise Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?			✓	

Impact Analysis

During construction the operation and movement of heavy equipment create seismic waves that radiate along the ground-surface in all directions. These waves are felt as ground vibrations. Vibrations from construction can result in effects ranging from annoyance to people to structure damage. Vibration levels are impacted by geology, distance, and frequencies. According to the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018[25], while ground vibrations from construction activities do not often reach the levels that can damage structures, construction vibration may result in building damage or prolonged annoyance from activities such as blasting, piledriving, vibratory compaction, demolition, and drilling or excavation near sensitive structures. The Project does not require these types of construction activities.

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

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

Table 4.13-4. Reference Noise Level Measurements

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076

[25] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018, available at: https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123 , accessed August 4, 2024.the

Large bulldozer	0.089

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018

The closest sensitive receptor to the Project property line is minimally 90 feet from the eastern property line. The estimated construction vibration level from a large bulldozer (worst case scenario) measured at 15-feet would create a vibration level of 0.191 in/sec which does not exceed the 0.2 in/sec threshold. Therefore, the vibrations at the nearest sensitive receptor will remain well below the strongly perceptible annoyance criteria and potential residential vibration damage criteria thresholds listed in the City of Adelanto Municipal Code Section 17.90.030 (vibration). This threshold requires that no vibration greater than 0.2 PPV be felt at or beyond the lot line. The proposed Project therefore is not considered to result in exposure of people to excessive ground vibration.

During operations of the Project following construction the primary source of vibration would be from vehicle traffic, primarily truck traffic. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Typical vibration levels from heavy truck activity at normal traffic speeds are in the order of 0.004 in/sec PPV at 25 feet based on the FTA's Transit Noise Impact and Vibration Assessment (2018). Trucks once on site will be travelling at very low speeds and it is expected that truck vibration impacts off site would not exceed the 0.2 in/sec PPV threshold.

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

Conclusion

The Project's construction and operations vibration impacts as well as operational noise for mobile and operational noise impacts to the environment are less than significant.

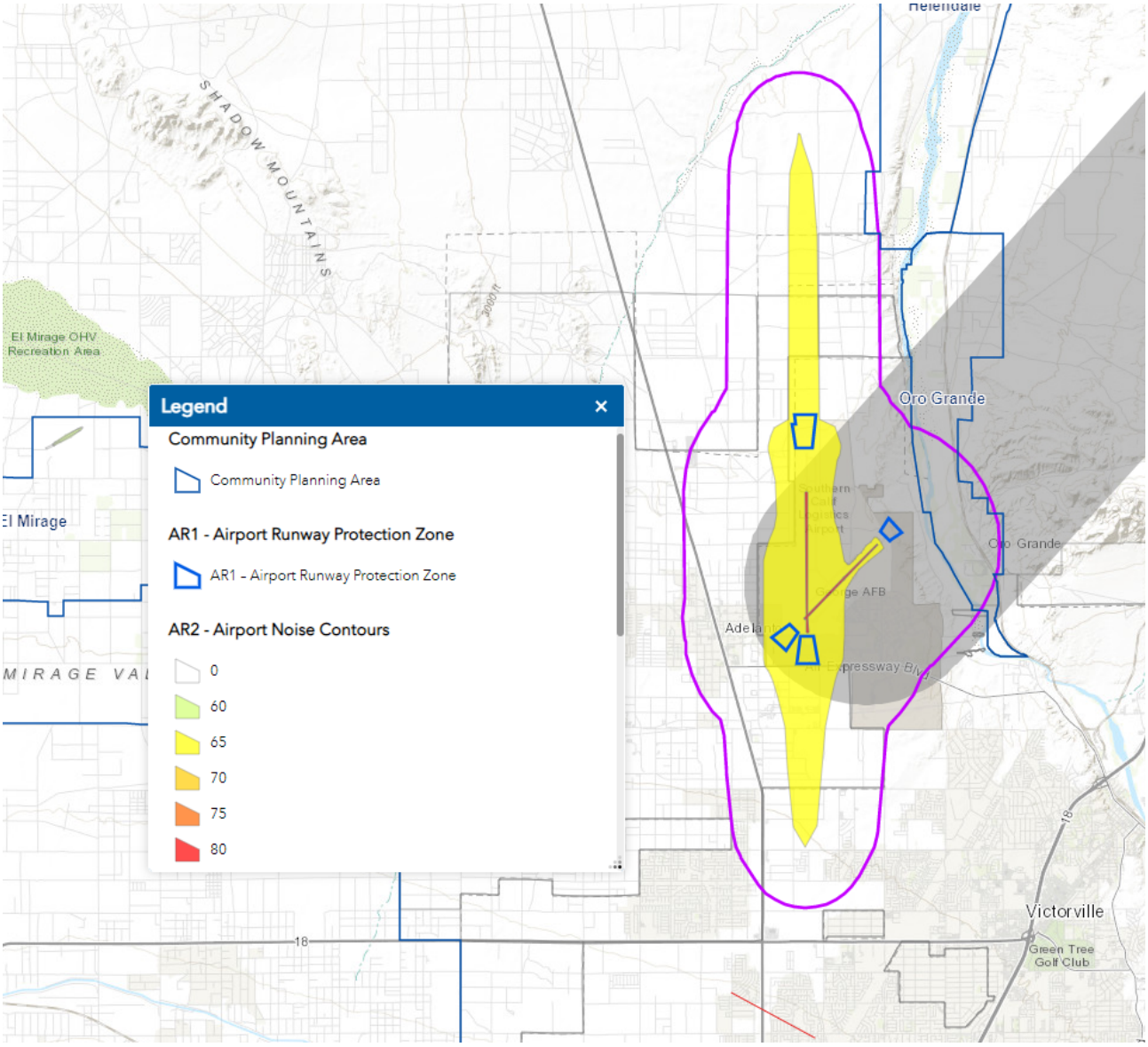
Thresholds 4.13 – Noise Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 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?			✓	

Impact Analysis

According to the San Bernardino Countywide Plan Policy Map HZ-9, *Airport Safety and Planning Areas*, the Project site is not located within an area exposed to excessive noise levels.[26]

[26] https://cms.sbcounty.gov/lus/Planning/AirportLandUse.aspx accessed on August 17, 2024.

Figure 4.13-5. SCLA Long-Range Noise Contours



Source: County of San Bernardino Countywide Plan, Map HZ-9, Airport Safety and Hazard Areas.
https://www.arcgis.com/apps/webappviewer/index.html?id=5dc02b81369c49c9a1947aedfc300a45

Section 4.14 Population and Housing

Threshold 4.14 – Population and Housing Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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)?			✓	

Impact Analysis

Population Growth

A project could induce population growth in an area, either directly (for example, by proposing new homes and/or businesses) or indirectly (for example, through extension of roads or other infrastructure). No residential uses would be developed as part of the Project. The Project would not result in the development of any new housing, and therefore, would not induce direct population growth in the City through new housing development. The addition of two office buildings and five self-storage buildings would increase employment within the City. Thus, the Project would lead to an increase in the employee population within the area. The additional employment created by the proposed Project has the potential to result in an indirect growth in the City's population, since the potential exists that future employees (and their families) that currently reside outside of the City could choose to relocate to the City.

Estimating the number of future employees who may choose to relocate to the City would be highly speculative, since many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). Additionally, housing opportunities exist for the Project's future employees in the communities surrounding the City. Although uncertainty exists regarding the number of new employees who may choose to relocate to the City, it is not anticipated that implementation of the proposed project would induce substantial population growth within the City either directly or indirectly.

Infrastructure Extensions

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

Threshold 4.14 – Population and Housing Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

Impact Analysis

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

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Section 4.15 Public Services

Threshold 4.15 – Public Services Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) 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:				
i) Fire protection?			✓	
ii) Police protection?			✓	
iii) Schools?			✓	
iv) Parks?			✓	
v) Other public facilities?			✓	

Impact Analysis

Fire Protection: The San Bernardino County Fire Department provides fire protection services to the Project area. The Project would be primarily served by the Adelanto Station #322, an existing station located approximately 3.75 roadway miles west of the Project site at 10370 Rancho Road. Development of the Project would impact fire protection services by placing an additional demand on existing County Fire Department resources if its resources are not augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with state and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access.

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

Police Protection: The San Bernardino County Sheriff's Department provides community policing to the Project area via the Victor Valley Sheriff Station located at 11613 Bartlett Street in Victorville, approximately 4.54 roadway miles northeast. Because the Project site is in an area near residential development, it would be routinely patrolled by the Sheriff's Department. The

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

Schools: The Project proposes to construct two office buildings, five self-storage buildings and covered recreational vehicle parking, which would not result in a substantial direct population growth within the City. However, the Project would be subject to the requirements of AB 2926 and SB 50, which allows school districts to collect development impact fees to minimize potential impacts to school districts as a result of new development. Pursuant to SB 50, payment of fees to the applicable school district is considered full mitigation for project impacts, including impacts related to the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for schools. Thus, upon payment of development fees by the project applicant consistent with existing state requirements, impacts in this regard would be less than significant.

Parks: The nearest public park to the Project site is John Mgrdichian Park, approximately 0.83 miles to the west. The Project does not propose residential development, so it would not directly increase population within the City and therefore would not significantly increase the demand for parkland or other recreational facilities.

Other Public Facilities: As noted above, development of the Project could result in an indirect increase in the population of persons. The current population of the City is 38,783 (assuming all new residents of the Project came from outside the City). It is not anticipated the Project would increase the demand for public services, including public health services and library services to the degree that the construction of new or expanded public facilities would be required based on this small increase in population.

Section 4.16 Recreation

Threshold 4.16 – Recreation	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	

Impact Analysis

The nearest public park to the Project site is John Mgrdichian Park, approximately 0.83 miles to the west. The Project would not directly increase population within the City. Any indirect increase as a result of employees moving into the City to fill the estimated 4 jobs would not increase the use of parks or recreational facilities to the degree that physical deterioration would occur or be accelerated.

Threshold 4.16 – Recreation	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	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?				✓

Impact Analysis

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

Section 4.17 Transportation

The analysis in this section is based in part on the following Technical Reports:

- Traffic Study, Translutions Inc., July 30, 2024, included as Appendix I of this Initial Study.

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

Impact Analysis

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

Seneca Road

The Project will construct pavement for curbs, gutters, sidewalks, and landscaping. The site can be accessed through two driveways on Seneca Road.

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

Bicycle and Pedestrian Facilities

In October 2020, the City adopted the Adelanto Active Transportation Plan. Adelanto in Motion, An Active Transportation Plan ("Plan") that represents a new commitment to walking and biking in Adelanto. The project site is currently vacant, with no bike lanes on the adjacent streets. Pedestrian circulation in Adelanto is primarily provided via sidewalks. There are discontinuous sidewalks adjacent to the project on Pearmain Street and no sidewalks adjacent to the project on Seneca Road. Pedestrian and bicycle facilities under opening year (2026) conditions are anticipated to remain the same as under existing conditions.

Public Transit Facilities

Public transportation services within the City of Adelanto are provided by the Victor Valley Transit Authority (VVTA). There is no transit service adjacent to the site. The closet connection point to the VVTA transit system is Route No. 31 (El Evado Road WB and Seneca Road), located at the

west of Seneca Road. The Project is not proposing any improvements that would conflict with Route No. 31, or any future transit route in the area.

Conclusion

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

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

Impact Analysis

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt Vehicle Miles Traveled (VMT) as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. Impacts related to LOS will be evaluated through the City's development review process apart from CEQA. The City of Adelanto City Council recently adopted Resolution 20-41-A, which is a new screening criterion for small projects using Carbon Emission thresholds. The criterion considers a development that generates less than 3,000 metric tons (MT) of CO2 equivalent emissions annually to not have a significant impact on the environment. A Greenhouse Gas analysis has been conducted for the project and concluded that the project would generate a total of 1,632.60 MT of CO2 equivalents per year. Since the project would generate less than 3,000 MT of CO2 equivalents per year, the project is screened out from requiring a VMT analysis.

Conclusion

Based on the information above, the project does not require VMT analysis.

Threshold 4.17 – Transportation Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	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)?			✓	

Impact Analysis

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

Threshold 4.17 – Transportation Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
d) Result in inadequate emergency access?			✓	

Impact Analysis

The Project would propose roadway improvements to Seneca Road adjacent to the Project site per City standards. Emergency access would be available from Seneca Road connecting to the citywide circulation system. During the preliminary review of the Project, the Project's transportation design was reviewed by the City's Engineering Department, and Fire Department to ensure that adequate access to and from the site would be provided for emergency vehicles.

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Section 4.18 Tribal Cultural Resources

Threshold 4.18 – Tribal Cultural Resources	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		✓		
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or		✓		

Impact Analysis

Tribal cultural resources (TCRs) are defined in Section 21074 of the California PRC as sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible for inclusion in the CRHR, or are included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or are a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. Section 1(b)(4) of Assembly Bill (AB) 52 established that only California Native American tribes, as defined in Section 21073 of the California PRC, are experts in the identification of TCRs and impacts thereto.

A historical resource or archaeological resource may also be a tribal cultural resource if it conforms with the criteria described in Public Resources Code §21074(a) above. As discussed in Section 4.5 Cultural Resources, based on a records search and a pedestrian field survey, no historical or archaeological resources eligible for listing on the California Register of Historical Resources or a local register were encountered on the surface of the Project site. However, grading, utility trenching, and the construction of the water quality basin have the potential to reveal buried deposits below the surface. Therefore, it is anticipated that tribes will identify tribal cultural resources Mitigation Measures to include with this project. This threshold addresses tribal cultural resources that may also be found to be historic resources as defined by CEQA. According to PRC Chapter 2.5, §21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and items with cultural value to a California Native American tribe and that are listed or eligible for listing in the California Register of Historical

Resources or included in a local register of historical resources as defined in §5020.1(k). Tribal cultural resources that are not historic are addressed under Threshold b) below.

Threshold 4.18 – Tribal Cultural Resources	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		✓		

Impact Analysis

Sacred Lands File Search

ECORP contacted the California Native American Heritage Commission (NAHC) on December 13, 2023, to request a search of the Sacred Lands File for the Project Area. This search will determine whether or not the California Native American tribes within the Project Area have recorded Sacred Lands, because the Sacred Lands File is populated by members of the Native American community with knowledge about the locations of tribal resources. A search of the Sacred Lands File by the NAHC failed to indicate the presence of Native American cultural resources in the Project Area

However, during ground disturbing activities, the possibility exists that sub-surface tribal cultural resources may be discovered. Mitigation Measure CUL-1, Archaeological Monitoring shall be required to protect tribal cultural resources that may also be historic resources under CEQA, that may be found during construction. As required by Mitigation Measure CUL-2. Inadvertent Discovery of Archaeological Resources, in Section 4.4, Cultural Resources, of this EIR, in the event that artifacts of Native American origin are discovered, the Property Owner/Developer and Archaeologist shall notify the City of Adelanto and the Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department, and the Morongo Band of Mission Indians (MBMI) Tribal Historic Preservation Office of the discovery and the Project Archaeologist, in consultation with

the YSMN and MBMI, and the City, shall evaluate the resource(s) eligibility for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k).

Assembly Bill (AB) 52

Assembly Bill (AB) 52 created a process for consultation with California Native American Tribes in the CEQA process. Tribal Governments can request consultation with a lead agency and give input into potential impacts on tribal cultural resources before the agency decides what kind of environmental assessment is appropriate for a proposed project.

The City of Adelanto commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting notification pursuant to Public Resources Code §21080.3.1. The following tribes were contacted by the City:

- Agua Caliente Band of Cahuilla Indians.
- Morongo Band of Mission Indians.
- Soboba Band Luiseño Indians.
- Yuhaaviatam of San Manuel Nation.

The City has received responses from the Agua Caliente Band of Cahuilla Indians and the Soboba Band of Luiseño Indians, declining the invitation to consult and deferring to other tribes in the area. The Yuhaaviatam of San Manuel Nation (YSMN) responded that the proposed Project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe. However, due to the nature and location of the proposed project, and given the CRM Department's present state of knowledge, YSMN does not have any concerns with the project's implementation, as planned, at this time. As a result, YSMN requested the mitigation measures described below be adopted.

The Morongo Band of Mission Indians (MBMI) has not responded to date, but has previously indicated that Adelanto is within the ancestral territory and traditional use area of the Cahuilla and Serrano people of the MBMI and, therefore, projects in Adelanto are of interest to the Tribe. As stated by the Yuhaaviatam of San Manuel Nation during the AB52 Consultation with the City, they realize that there may be additional tribes claiming cultural affiliation to the area; however, Yuhaaviatam of San Manuel Nation can only speak for itself. The Tribe has no objection if the City wishes to consult with other tribes in addition to YSMN and if the City Agency wishes to revise the mitigation measures to recognize additional tribes. To this end, the mitigation measures include the MBMI in the event that they wish to participate in their implementation.

MM TCR-1. Discovery of Pre-contact and/or Historic-era Cultural Resources. The YSMN and the MBMI shall be contacted, as detailed in MM CUL-2, (See Section 4.4, *Cultural Resources*), of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist in coordination with the YSMN and MBMI, and all subsequent finds shall be subject

to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI and any other tribe noticed in accordance with AB 52 requirements for the remainder of the project, should YSMN and elect to place monitors on-site.

MM TCR-2. Copies of Archaeological/Cultural Documents. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI and any other tribe noticed in accordance with AB 52 requirements. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI and any other tribe noticed in accordance with AB 52 requirements throughout the life of the project.

MM TCR-3 Inadvertent Discoveries of Human Remains/Funerary Objects. In the event that any human remains are discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately who shall notify YSMN, MBMI, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to

(1) inspect the site of discovery and

(2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98. Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD, in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties. It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r)

Section 4.19 Utilities and Service Systems

Threshold 4.19 – Utilities and Service Systems Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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?		✓		

Impact Analysis

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

Water Service

The Project site will connect to the 12-inch public water main on Seneca Road. The project will install a new water meter along the sidewalk on Seneca Road.

Sewer Service

The Project will connect to the 8-inch public sanitary sewer line on Seneca Road. The project proposes to install a new sewer lateral across Seneca Road.

Storm Drainage Improvements

Surface drainage systems consisting of sloping concrete flatwork, graded earth swales and/or an underground area drain system are anticipated to be constructed to collect and direct all surface waters to the adjacent streets and storm drain facilities. In addition, the ground surface around the proposed buildings shall be sloped at a positive gradient away from the structures. The purpose of the precise grading is to prevent ponding of surface water within the level areas of the site and against building foundations and associated site improvements. The drainage systems shall be properly maintained throughout the life of the proposed development.

It should be emphasized that the slopes away from the structures area drain inlets and storm drain structures to be properly maintained, not to be obstructed, and that future improvements not to alter established gradients unless replaced with suitable alternative drainage systems.

Electric Power Facilities

The Project will connect to the existing Southern California Edison electrical distribution facilities available in the vicinity of the Project site.

Natural Gas Facilities

The Project will connect to the existing Southwest Gas Corporation natural gas distribution facilities available in the vicinity of the Project site.

Telecommunication Facilities

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

Conclusion

Construction or installation of utilities and service systems may impact Biological Resources, Cultural Resources. Paleontological Resources, and Tribal Cultural Resources. Mitigation Measures BIO-1 through **Error! Reference source not found.**, CR-1, CR-2, CR-3.

Threshold 4.19 – Utilities and Service Systems Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	

Impact Analysis

Projected Water Supply

The City will continue to use groundwater as the sole source of potable water supply combined with supplemental water through an intertie with MWA. The City's projected supply is the available FPA, which is currently 2,851 AFY, which may be adjusted annually by the Watermaster. Transfers between MWA and the City are also from groundwater; future year projections are determined based on the difference between available FPA and forecasted demand, although more would be available as needed. Recycled water will begin delivery for irrigation uses by 2025, increasing through 2045.

Figure 4.19-2. City of Adelanto Projected Water Supply (AFY)

Water Supplies – Projected to 2045						
Water Supply	Additional Detail on Water Supply	Projected Water Supply Reasonably Available Volume (AF)				
		2025	2030	2035	2040	2045
Safe Yield of Alto Subarea						
Alto Subarea	Production Safe Yield[1]	64,406	64,406	64,406	64,406	64,406
Reasonably Available Volume (AF)						
City of Adelanto	FPA of Safe Yield	2,851	2,851	2,851	2,851	2,851
Mojave Water Agency	Intertie with MWA	2,145	2,409	2,575	2,733	2,915
Recycled Water	Non-Potable	20	23	25	25	27
	Totals	**5,016**	**5,283**	**5,451**	**5,609**	**5,793**
NOTES: *DWR Submittal Table 6-9. [1] MWA Watermaster Report Water Year 2019-20, May 2021, Table 5-1						

Source: City of Adelanto 2020 Urban Water Management Plan, available at: https://cms3.revize.com/revize/adelanto/Documents/Services/Water%20&%20Sewer/ADELANTO%202020%20UWMPWSCP/Adelanto%202020%20UWMP_2.pdf, accessed July 21, 2024.

Project Water Demand

To compare the Project's water demand to the projected supply and demands in the 2020 UWMP, the Project's Proposed Site Plan was used to determine acreage of the Project site and multiplied by a water demand factor (WDF) to determine the total projected water demand. WDF's are applied to development units either by acre or square feet (sqft). The WDF was calculated using the Adelanto 2020 UWMP and Water Master Plan. The 2020 UWMP determined the actual gallons per capita per day (GPCD) to be 116 gallons per day (gpd). The City's Water Master Plan established Equivalent Residential Dwelling Units (EDUs) for calculating nonresidential usage. The EDU for industrial project is 2 EDU per acre times GPCD. Using this method, the Project's total acres of 9.67 acres, times the Water Demand Factor (WDF) of 232 gpd, times 2 EDU for a total of 4,487 gpd or 5.03 AFY. The WDF and calculated demand were compared to other WSAs recently performed in the region for similar land uses to validate the calculations.

Water Supply Reliability

The sole source of water in the City is from groundwater in the Mojave River Groundwater Basin, commonly referred to as the Mojave Basin Area (MBA). The MBA is an adjudicated basin and

pursuant to the Judgment, the Court appointed the Mojave Water Agency (MWA) as Watermaster of the MBA.

For management purposes under the Mojave Basin Judgment, MWA subdivided the Mojave River watershed and associated groundwater basins into five subareas: Alto, Baja, Centro, Este, and Oeste. The City of Adelanto lies within MWA's Alto Subarea. Adelanto and the other purveyors in the area supply water to their customers from local groundwater. MWA replenishes the groundwater supply, primarily with imported water purchased from the State Water Project (SWP).

The court ordered adjudication of the Mojave Basin Area allocates a variable free production allowance (FPA) to each purveyor that supplies 10 acre-feet per year (AFY) or more, including Adelanto. The FPA can vary from year to year depending on the Watermaster's safe yield projections for the Basin.

The General Commercial land use designation for the site was used in preparing the 2020 UWMP. Therefore, the projected water demand for the proposed Project is within the scope of the analysis contained in the 2020 UWMP, and there is an ample water supply to serve the uses planned in the proposed Project.

Threshold 4.19 – Utilities and Service Systems Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	

Impact Analysis

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

Municipal wastewater is generated in Adelanto's service area from a combination of residential, commercial, and industrial sources. The quantities of wastewater generated are generally proportional to the population and water usage in the service area. It is estimated that Adelanto's customers generate wastewater roughly proportional to 60 to 70 percent of the City's water demand. Based on the Projects water demand of 5.03 AFY, and based on a 70% water-to-wastewater calculation, the Project is estimated to generate 3.52 AFY (3,143 gallons per day). The Project's wastewater represents only 0.003143 MGD of wastewater per day or

0.08% of the 4.0 MGD treatment capacity available at the Adelanto Wastewater Treatment Facility. The City would have adequate capacity to serve the Project's wastewater needs and would not significantly impact existing commitments. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Threshold 4.19 – Utilities and Service Systems Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	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?			✓	

Impact Analysis

Construction Related Impacts

The California Green Building Standards Code (CALGreen) requires all newly constructed buildings to prepare a Waste Management Plan and divert construction waste through recycling and source reduction methods. The City of Adelanto Building and Safety Department reviews and approves all new construction projects required to submit a Waste Management Plan. Mandatory compliance with CALGreen solid waste requirements will ensure that impacts are less than significant.

Operational Related Impacts

The Project is estimated to generate 181 tons of solid waste per year or 0.5 tons per day.[27] The amount of estimated solid waste generated by the Project is derived from the California Emissions Estimator Model, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with construction and operations from a variety of land use projects. The model also quantifies the amount of solid waste generated by a project. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses.

Although solid waste may ultimately be disposed of at various landfills, the closest landfill to the Project site is the Victorville Sanitary Landfill located at 18600 Stoddard Wells Road. According to the CalRecycle website, the Victorville Sanitary Landfill has a maximum permitted daily throughput of 3,000 tons per day and a remaining capacity of 79,400,000 cubic yards. The

[27] Air Quality Impact Analysis, Appendix 3.1, Urban Crossroads, March 20, 2024, Appendix A of this Initial Study.

expected closure is October 1, 2047.[28] The Project's estimated 0.05 tons per day solid waste generation is 0.02 percent of the landfill's 3,000 tons per day throughput. As such, there is adequate landfill capacity to serve the Project.

Threshold 4.19 – Utilities and Service Systems Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

Impact Analysis

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

[28] Cal Recycle, available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652 accessed August 28, 2024 .

Section 4.20 Wildfire

Threshold 4.20 – Wildfire If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 a wildfire or the uncontrolled spread of a wildfire?				✓
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
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?				✓

Impact Analysis

A wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. As stated in the State of California's General Plan Guidelines: "California's increasing population and expansion of development into previously undeveloped areas is creating more 'wildland-urban interface' issues with a corresponding increased risk of loss to human life, natural resources, and economic assets associated with wildland fires." To address this issue, the state passed Senate Bill 1241 to require that General Plan Safety Elements address the fire severity risks in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs).

According to the California Fire Hazard Severity Zone Maps maintained by CAL FIRE, the Project site is not located within a high wildfire hazard area.[29] The Project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, Thresholds 4.20 (a) through 4.20 (d) require no response.

[29]Cal Fire, *LRA Fire Hazard Severity Zone Maps, available at:* https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps, accessed on August 18, 2024.

Section 4.21 Mandatory Findings of Significance

Threshold 4.21 – Mandatory Findings of Significance	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		✓		

Impact Analysis

As indicated in this initial study, biological resources, cultural resources, and soil and geology (paleontological) resources may be adversely impacted by project development. The following mitigation measures are required to reduce impacts to less than significant levels:

- BIO-1: Pre-construction Rare Plant Clearance Survey
- BIO-2: Pre-Construction Surveys for Burrowing Owl
- BIO-3: Pre-Construction Nesting Bird Survey
- BIO-4: Biological Monitoring
- BIO-5: Pre-Construction Survey for Desert Tortoise
- BIO-6 : Pre-Construction Survey for Mojave Ground Squirrel
- CUL-1: Contractor Awareness Training
- CUL-2: Archeological Monitoring
- CUL-3: Post-Review Discoveries

Threshold 4.21 – Mandatory Findings of Significance	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.)		✓		

Impact Analysis

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

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

Biological Resources

As discussed in Section 0, *Biological Resources*, of this Initial Study, future development of the site will impact the general biological resources present on the site, and most of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during construction phases. More mobile species (i.e., birds and large mammals) will be displaced into adjacent areas and will likely experience minimal impacts.

Although wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service were not detected, the Project site is located within the range of the Burrowing Owl, Mohave Ground Squirrel, Desert Tortoise, and Nesting Birds. Therefore, the **Mitigation Measures MM BIO-1** through **MM BIO-6** are included to ensure any impacts are less than significant to these species.

Overall, the loss of about 9.67-acres of disturbed desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitats throughout the surrounding desert region. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Cultural Resources

As discussed in Section 0, Cultural Resources, of this Initial Study, the records search and field survey did not identify any historical resources or unique archaeological resources within the Project site boundaries. Research results combined with surface conditions have failed to indicate sensitivity for buried cultural resources. No additional cultural resources work, or monitoring is necessary during the proposed activities associated with the development of the earthmoving activities. If previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation, if necessary, as required by **Mitigation Measures MM CUL-1** through **MM CUL-3**. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Utilities and Service Systems

As discussed in Section 0 Utilities and Service Systems, of this Initial Study, the installation and construction of the sewer, water, and storm drainage facilities described below will result in earth moving that may impact Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. Potential impacts to these resources are mitigated by **Mitigation Measures MM BIO-1** through **MM BIO-6, MM CUL-**1 through **MM CUL-3,** and **MM TCR-1** through **MM TCR- 3.** Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Threshold 4.21 – Mandatory Findings of Significance	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			✓	

Impact Analysis

As indicated by this Initial Study, the Project will not result in potentially significant environmental impacts that directly affect human beings (i.e., Air Quality, Agriculture and Forestry Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Recreation, Transportation, and Utilities and Service Systems). Although air quality emissions do not exceed MDAQMD significance thresholds, to ensure that air quality impacts are reduced to the maximum extent feasible, the Project will comply with mandatory rules of the CARB or the MDAQMD through implementation of the following Best Management Practices (BMPs):

BMP AQ-1. RULE 403. The following measure shall be incorporated into Project plans and specifications as implementation of Rule 403:

- Use periodic watering for short-term stabilization of Disturbed Surface Area to minimize visible fugitive dust emissions. For purposes of this Rule, use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered sufficient to maintain compliance. Take actions sufficient to prevent project-related trackout onto paved surfaces.

BMP AQ-2. RULE 1113. The following measures shall be incorporated into Project plans and specifications as implementation of MDAQMD Rule 1113:

Only "Low-Volatile Organic Compounds (VOC)" paints consistent with MDAQMD Rule 1113 shall be used.