

California Environmental Quality Act
Initial Study/Mitigated Negative Declaration

Adelanto Industrial Center Project
Location & Development Plan No. 23-06



Lead Agency

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

Project Proponent

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October 31, 2024

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- Appendix A Air Quality and GHG CalEEMod Data Sheets, KPC EHS Consultants, August 12, 2023
- Appendix B General Biological Resources Assessment, RCA Associates, Inc, July 20, 2023
- Appendix C Western Joshua Tree Census, RCA Associates, October 30, 2023
- Appendix D Cultural Resources Assessment, BCR Consulting, LLC, December 12, 2023
- Appendix E Hydrology Report, Blue Engineering and Consulting, Inc, January 2023
- Appendix F Noise Technical Memorandum, KPC EHS Consultants, LLC, August 30, 2023

SECTION 1.0 BACKGROUND INFORMATION

1. **Project Title:** Adelanto Industrial Center Project (Location & Development Plan 23-06).
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 is seeking approval to construct twelve 10,000-square-foot industrial buildings with associated parking, water quality basins, and landscaping on an approximately 9.11-acre vacant parcel. See Section 3.0, *Project Description/Environmental Setting* for additional details.
4. **Project Location:** The Project site is located on the southeast corner of Cassia Road and Daisy Road, and is also identified as Assessor's Parcel Number (APN) 3128-111-06.
5. **General Plan Land Use Designation and Zoning District:** Manufacturing/Industrial (MI).
6. **Other Public Agencies whose Approval is Required:**
 - Lahontan Regional Water Quality Control Board (National Pollutant Discharge Elimination System Permit and Report of Waste Discharge)
 - Mohave Desert Air Quality Management District (Authority to Construct)
7. **Native American Tribal Consultation:** The City commenced the AB 52 process by sending consultation invitation letters to tribes previously requesting notification according to Public Resources Code §21080.3.1. The Project site is located within Serrano ancestral territory and, therefore, is of interest to the Yuhaaviatam of San Manuel Nation (YSMN). As a result, Mitigation Measure TCR-1 is included in the project/permit/plan conditions.

8. Significant or Potentially Significant Environmental Factors

The following environmental factors have been evaluated in this Initial Study to determine if the development of the Project will result in a Significant or Potentially Significant impact(s) on the environment. The environmental factors checked below require Mitigation Measures to reduce impacts to a level of insignificance.

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

9. 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 potentially significant effects (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 imposed upon the proposed Project, nothing further is required.

☐

James Hirsch

City of Adelanto

Signature

Lead Agency

James Hirsch, City Planner

Printed Name/Title

10/31/24

Date

SECTION 2.0 INTRODUCTION

2.1 Project Location

Regionally, the Project site is located in the High Desert region of San Bernardino County in the City of Adelanto, as shown in Figure 1, *Regional Location Map*. Locally, the Project site is located at the southeast corner of Cassia Road and Daisy Road as shown in Figure 2, *Local Vicinity Map*.

Figure 2.1-1. Regional Location Map

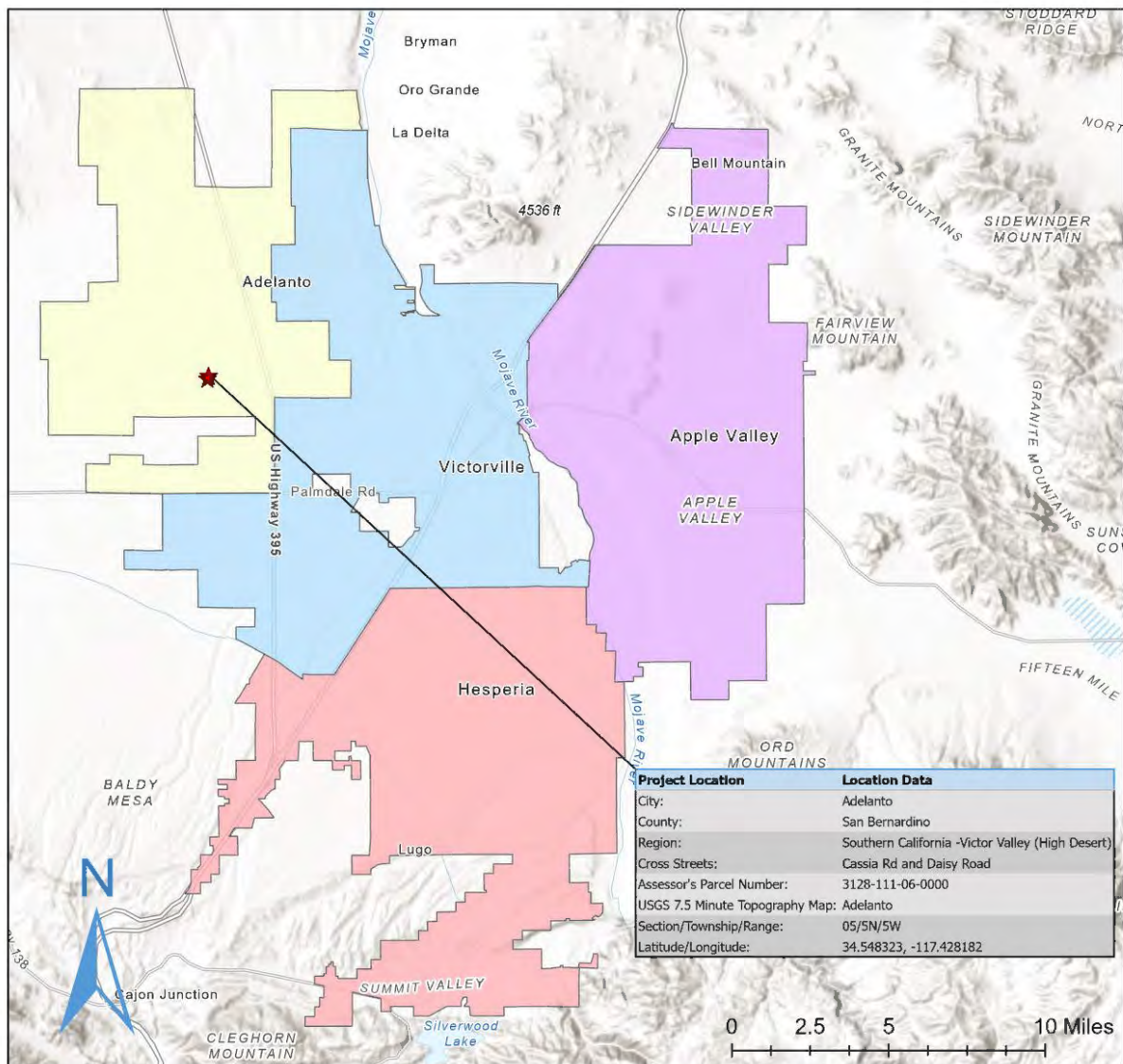
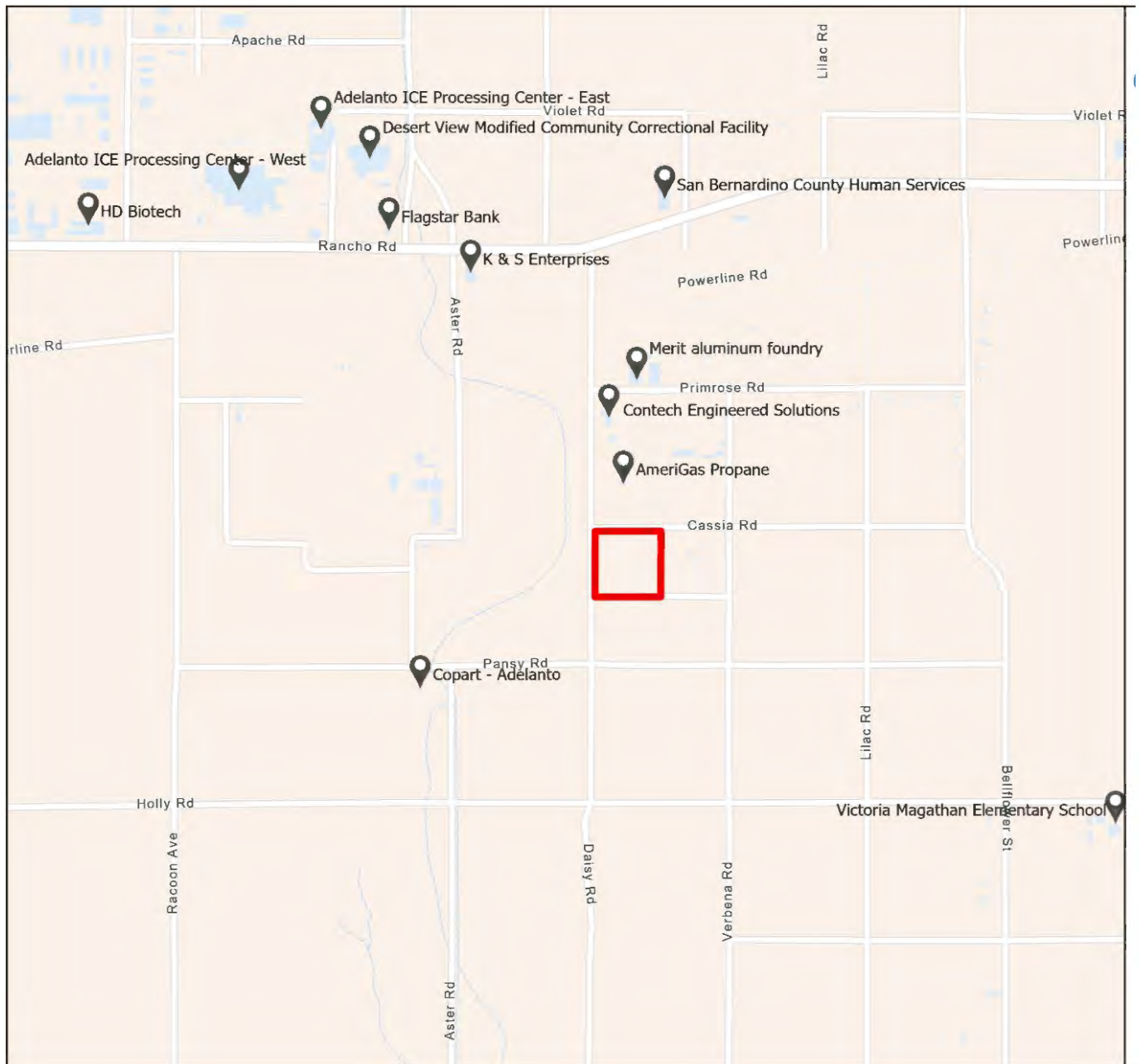


Figure 2.1-2 Local Vicinity Map



2.2 Purpose of the Initial Study

The purpose of the Initial Study is to determine whether the development of a project may cause a significant environmental impact. (Pub. Res. Code § 21080(c); Guidelines §§ 15063–15065.) The IS only informs the City of Adelanto and the public about the environmental consequences (if any) if they choose to approve a project. It does not make a recommendation on whether to approve or deny a project.

Depending on the Initial Study, a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report may be required.¹

Negative Declaration If the initial study concludes that the project will not cause a significant effect on the environment, the agency can prepare a negative declaration. (Pub. Res. Code § 21080(c); Guidelines § 15070 et seq. A negative declaration is a written statement that an EIR is not required because a project will not have a significant adverse impact on the environment. (Pub. Res. Code §§ 21064, 21080(c).)

Mitigated Negative Declaration An agency may attach conditions to a negative declaration for the purpose of mitigating potential environmental effects. This is referred to as a “mitigated negative declaration.” (Guidelines § 15070(b); Pub. Res. Code § 21064.5.) A mitigated negative declaration states that revisions in the project made or agreed to by the applicant would avoid the potentially significant adverse impacts, and that there is no substantial evidence that the revised project will have a significant effect on the environment. (Pub. Res. Code § 21064.5; Guidelines § 15070(b) (2).)

Environmental Impact Report (EIR) If the agency determines that the project may have a significant effect on the environment, an EIR must be prepared. (Pub. Res. Code §§ 21002.1, 21061, 21080, 21080.1 et seq.; Guidelines §§ 15080–15081.5.)

Based on the Initial Study, the City of Adelanto has determined that a **Mitigated Negative Declaration** is appropriate.

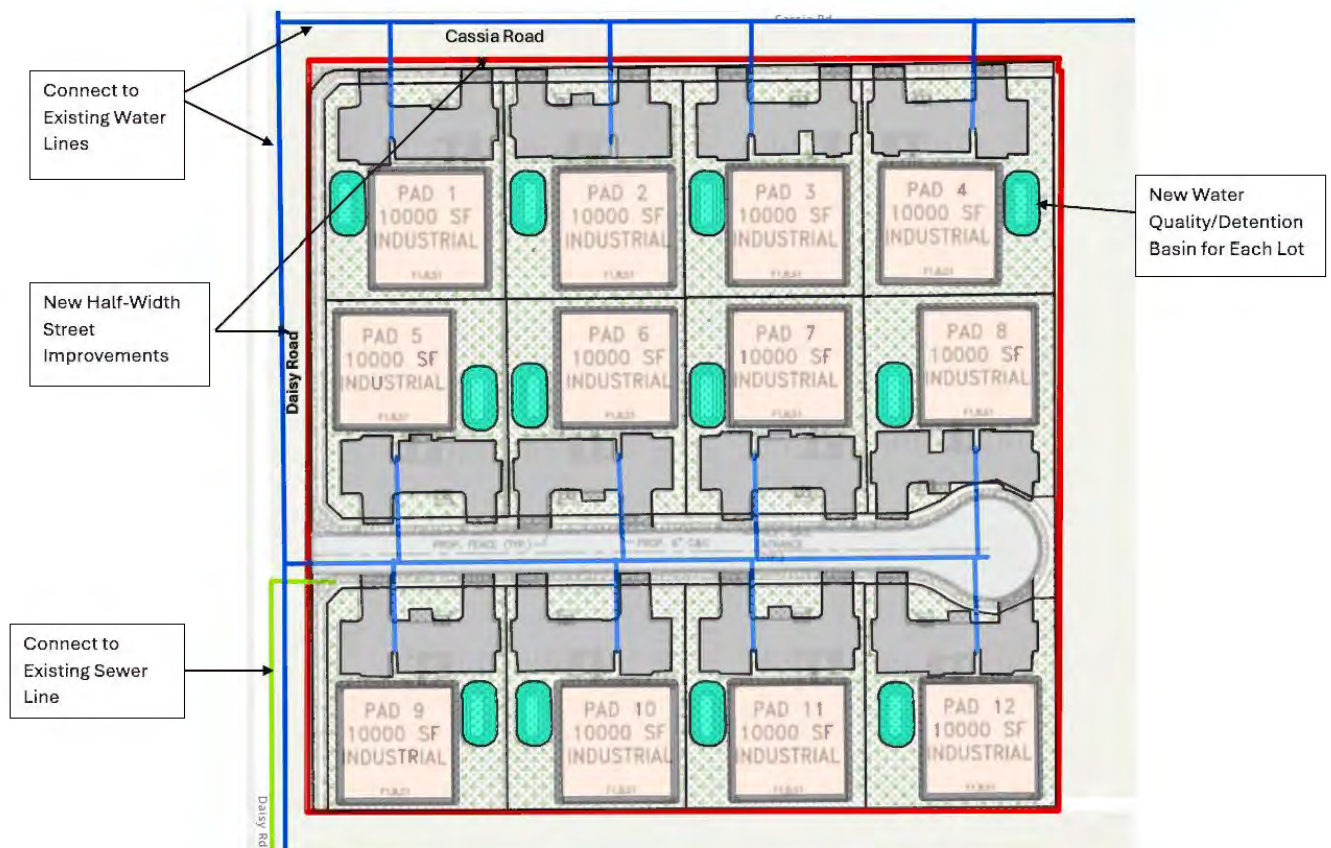
¹ Governor's Office of Planning & Research. https://lci.ca.gov/ceqa/docs/20210809-CEQA_101.pdf

SECTION 3.0 PROJECT DESCRIPTION/ENVIRONMENTAL SETTING

3.1 Project Description

The Project proposes to construct twelve 10,000-square-foot industrial buildings on twelve standalone building pads on an overall 9.11-acre development site. Each building pad is approximately $\frac{1}{4}$ an acre in size and provides separate driveway entrances from either Cassia Road or from a new internal public street that intersects with Daisy Road. Each building pad has a water-quality/ detention basin and landscaping. See Figure 3.1-1, *Site Plan*. A Tentative Tract Map would subdivide the overall 9.11-acre site into the twelve building pads for lease or sale. See Figure 2.5, *Tentative Tract Map*.

Figure 3.1-1. Proposed Infrastructure Improvements



3.2 Construction and Operational Characteristics

Construction Schedule

Construction was estimated for a 279-day construction schedule, which includes site preparation; grading; building construction; paving; architectural coating, and paving schedules.

Operational Characteristics

The Project would operate as an industrial facility per the uses allowed in the M-I zone. Typical operational characteristics that are common to all uses include employees and customers traveling to and from the Project site and delivery of supplies by vans and trucks. It is assumed that the buildings could be operational 24 hours per day, 365 days per year. The buildings are designed such that business operations would be conducted within the enclosed building, except for vehicle movement in the parking lot and loading areas.

This space was intentionally left blank.

Figure 3.1-2. Site Plan

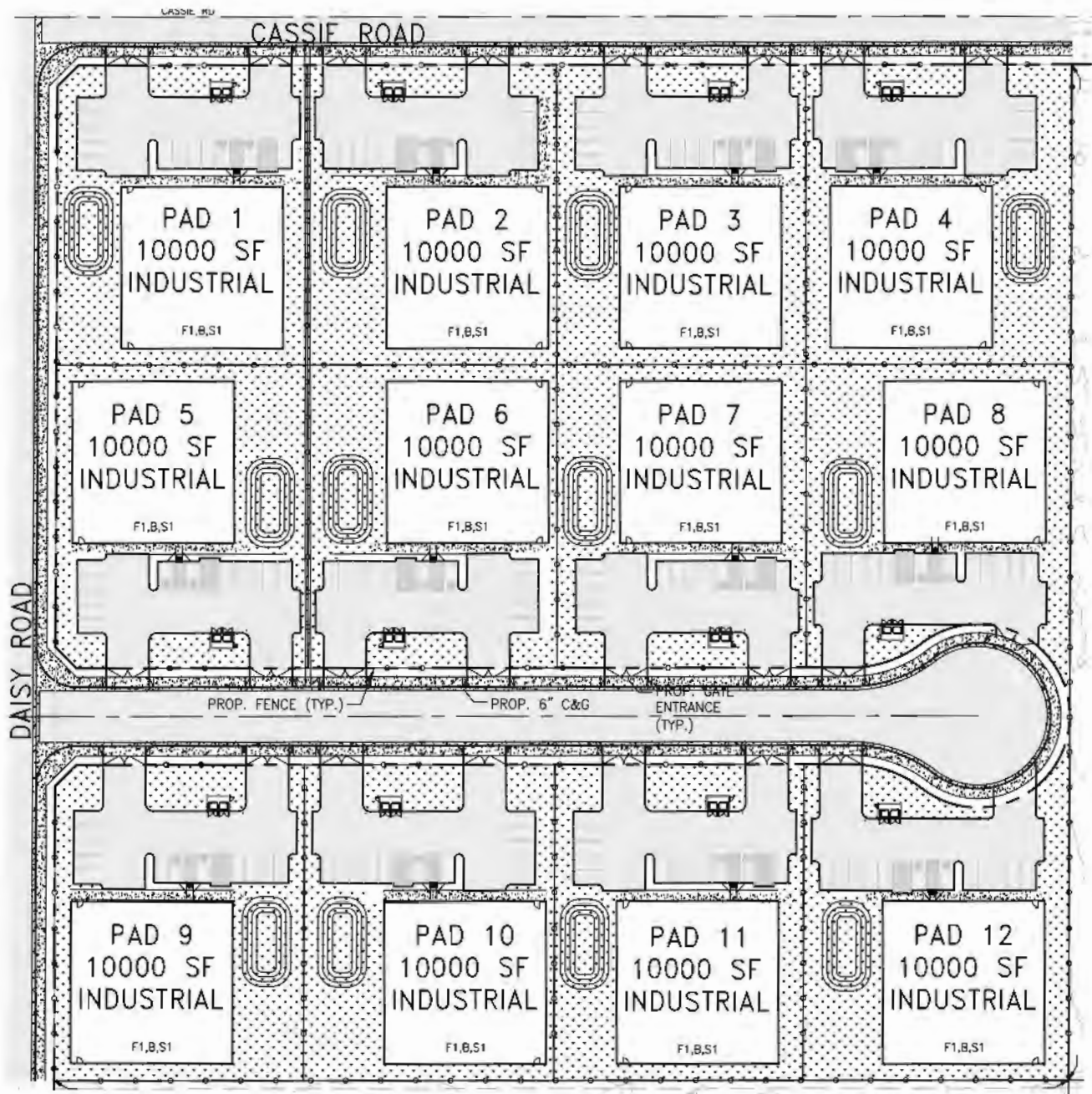


Figure 3.1-3. Tentative Parcel Map

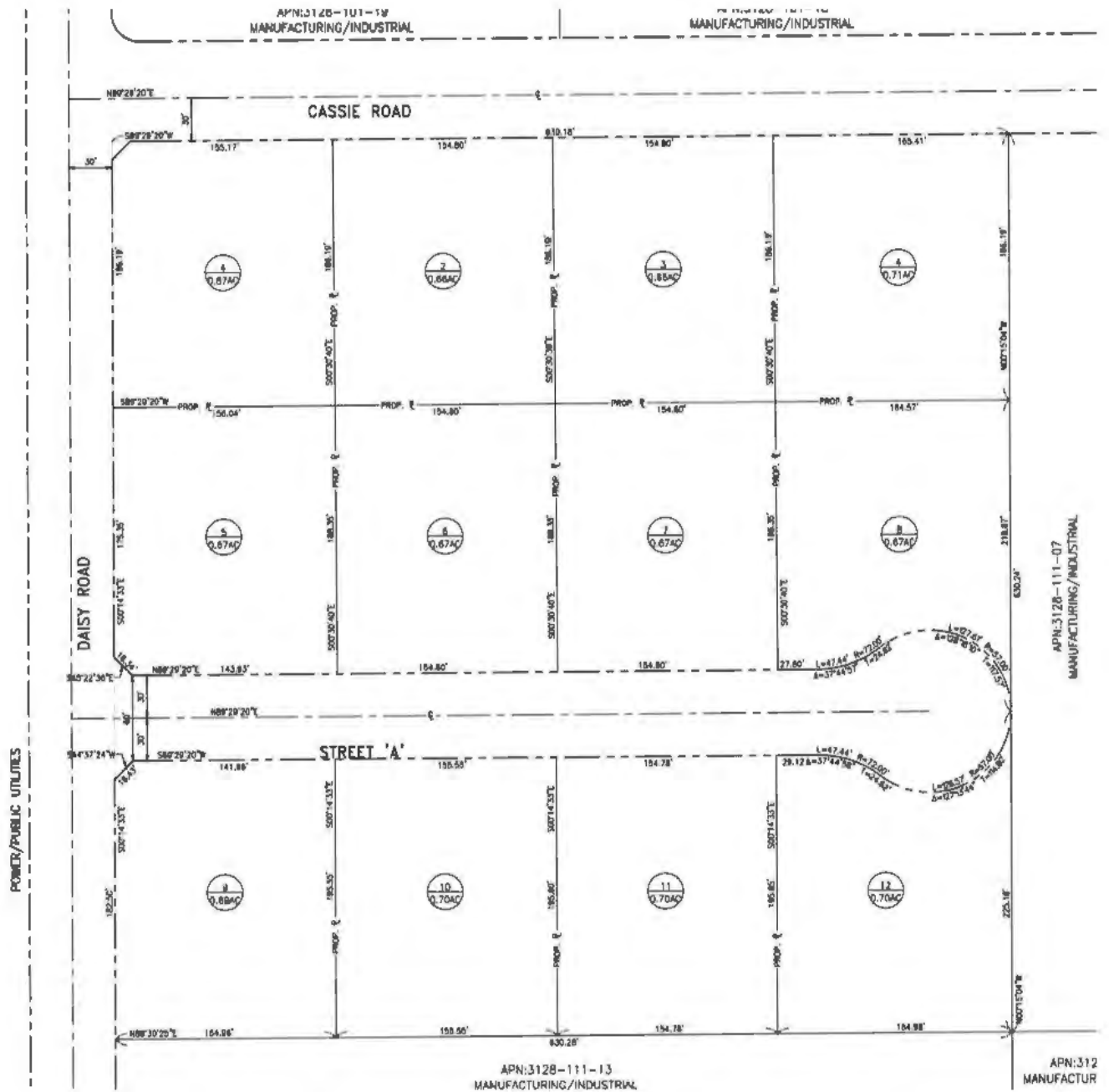
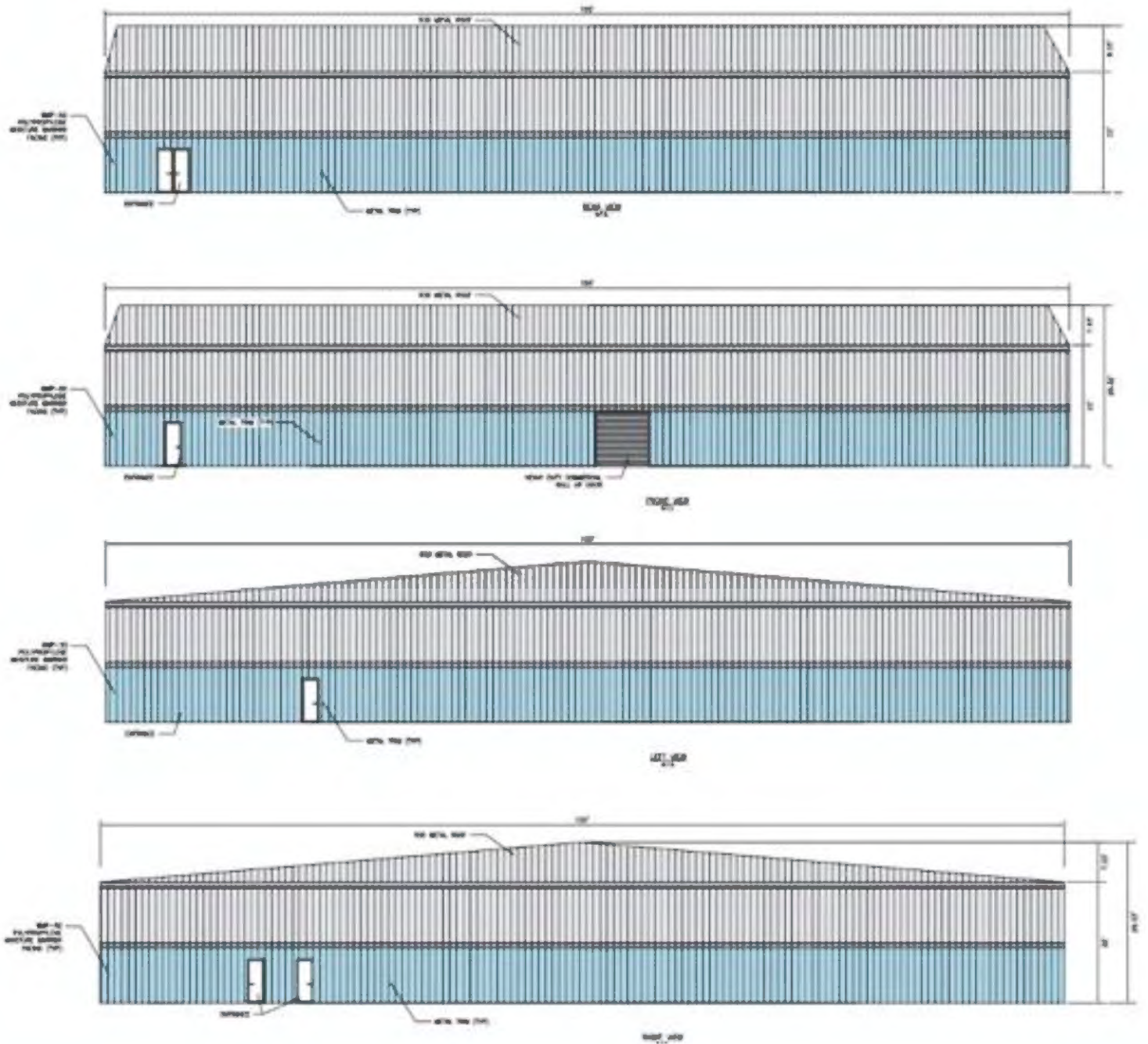


Figure 3.1-4. Building Elevations



3.3 Environmental Setting

As shown in Figure The Project site is located in an area that contains a mix of developed industrial land uses and vacant undeveloped land.

Figure 3.1-5. Aerial View of Surrounding Land Uses



Figure 3.1-6. Street Views

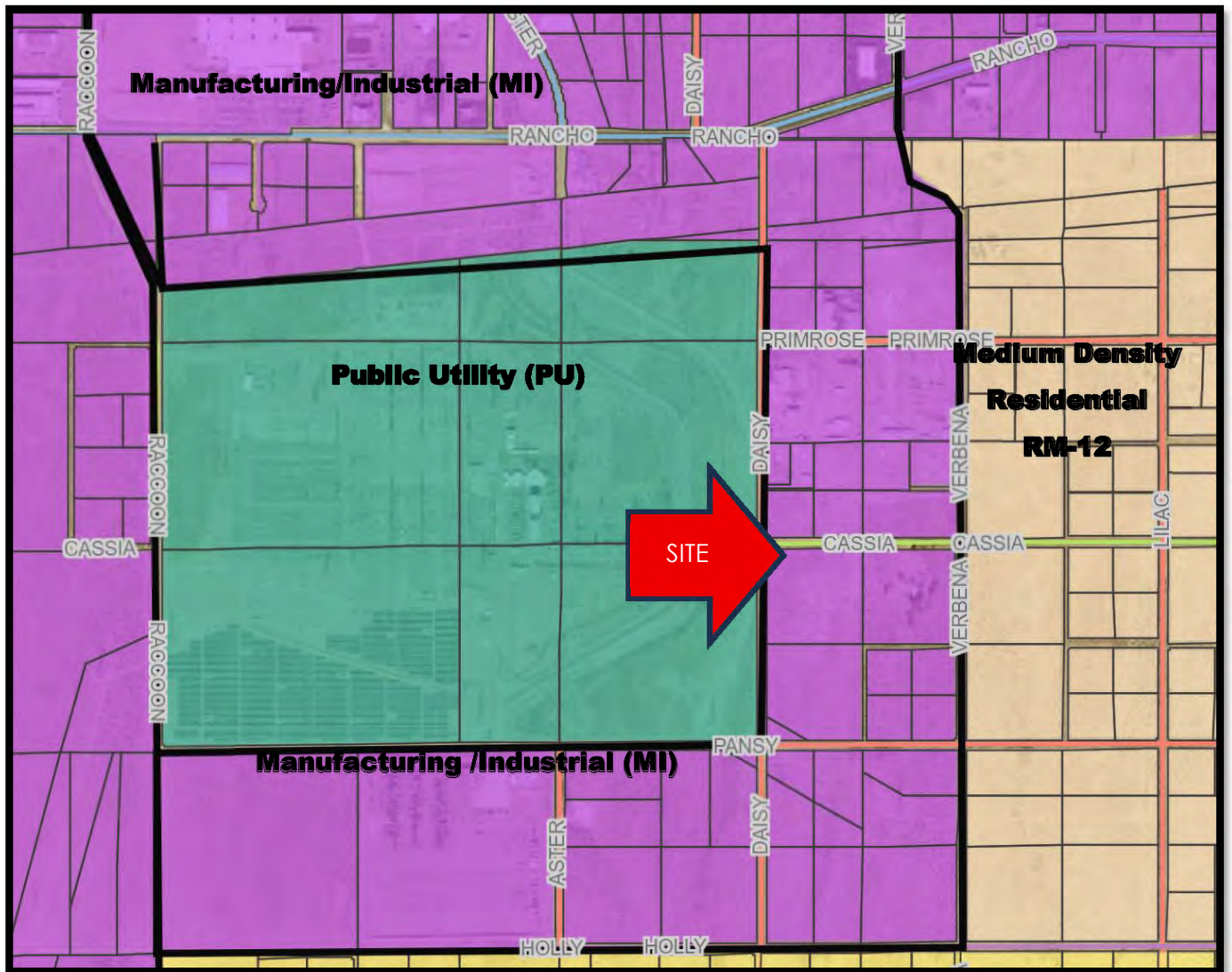
Looking Northeast from Daisy Road



Looking Southeast from the intersection of Daisy Road and Cassia Road



Figure 3.1-7. Zoning Classifications



SECTION 4.0 ENVIRONMENTAL IMPACT ANALYSIS

No Impact or Not Applicable Environmental Topics The proposed project would have no impact on the following environmental topics, or they would not be applicable, and as a result they are not discussed further in this initial study: . This section briefly explains the basis for this conclusion.

Agriculture and Forestry Resources,

The Project site is within an urbanized area in the City and County of San Francisco that does not contain any prime farmland, unique farmland, or farmland of statewide importance; forest land; or land under Williamson Act contract. The area is not zoned for any agricultural uses. Therefore, the project would have no impact, either individually or cumulatively, on agricultural or forest resources.

Mineral Resources,

The Project site is not located in an area with known mineral resources and would not extract mineral resources. Therefore, the proposed project would have no impact on mineral resources and would not have the potential to contribute to any cumulative mineral resource impact.

Recreation

The nearest public park to the Project site is Sierra Park, approximately 1.5 miles to the south. The Project would not directly increase the population within the City. Any indirect increase as a result of employees moving into the City would not increase the use of parks or recreational facilities to the degree that physical deterioration would occur or be accelerated.

Wildfire

According to the California Fire Hazard Severity Zone Viewer maintained by CAL FIRE, the Project site is not located within a high wildfire hazard area.² The Project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

² <https://egis.fire.ca.gov/FHSZ/>, accessed on December 10, 2023.

4.1 AESTHETICS

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are regulations, compliance with SERs is assumed when assessing the potential impacts of the Project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Aesthetics-1-General Design Compatibility and Enhancement. As required by Adelanto Municipal Code §17.10.130 (a) any new building or structure, any addition to an existing building or structure, and installation or construction of any site improvements shall be designed to create a unified functional and comprehensive site plan. The improvements shall have an integrated architectural theme that is compatible with and will complement and enhance the subject and surrounding properties, as determined by the Planning Director.

SER Aesthetics-2-Design Review. As required by Adelanto Municipal Code §17.15.020, a Design Review, is required for all industrial projects involving the issuance of a building permit for new construction on vacant property.

SER Aesthetics-3-Industrial Design Standards. As required by Adelanto Municipal Code §17.15.070 (a) through (m) new development in an area with an established character must be compatible with its surrounding development in intensity, design, setback, building form, scale, material, color, and landscaping. Specific design elements addressed in this regulation are (b) Site Design, (c) Building Design, (d) Parking and Circulation, (e) Landscaping, (f) Mechanical Equipment, (g) Loading, (h) Lighting, (i) Trash Enclosures, (j) Corporate and Professional Offices, (k) Warehouses, (l) Industrial Parks, and (m) Other.

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

Applicable SERs: None.

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 the Shadow Mountains and the Mojave River as local scenic vistas. The Mojave River is not visible from

the Project site because it is at a similar elevation as the Project site and approximately 7.2 miles to the east. The Shadow Mountains are located approximately 8 miles to the northwest of the Project site and are visible on the distant horizon. The public views of the Shadow Mountains are from Cassia Road and Daisy Road, facing to the northwest. The structures on the Project site are not in the line of sight of the views of the Shadow Mountains from Cassia Road and Daisy Road Shadow Mountains.

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

Impact Analysis

Applicable SERs: None.

According to the California Department of Transportation, the Project site is not located within a state scenic highway³.

Finding: 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

Applicable SERs:

SER Aesthetics-1-General Design Compatibility and Enhancement;

SER Aesthetics-2-Design Review.

SER Aesthetics-3-Industrial Design Standards.

³ 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 December 9, 2023.

According to US Census Bureau, Adelanto is located within the Victorville-Hesperia, CA Urbanized Area.⁴ 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 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. 23-06 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 23-06 and found the Project to be consistent with the City’s design standards.

Finding: Less than Significant 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
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?			✓	

Impact Analysis

Applicable SERs: The Following SERs apply to the project:

SER Aesthetics-3-Industrial Design Standards.

⁴ United States Census Bureau, 2010 Census Urban Area Reference Maps, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua90541_victorville--hesperia_ca/DC10UA90541_001.pdf; Accessed June 9, 2022.

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,⁵ 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

As required by SER Aesthetics-3, exterior light fixture design shall be compatible with the design and the use of the principal structure on the site. Light fixtures shall be equipped with appropriate reflectors and shielded to prevent illumination of the adjacent properties. The building will be painted to minimize glare.

Finding: Less than Significant Impact.

⁵ Zoning Ordinance.

4.2 Air Quality

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Air Quality 1-MDAQMD Rule 201 Permit to Construct. *A person shall not build, erect, install, alter, or replace any equipment, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants without first obtaining written authorization for such construction from the Air Pollution Control Officer. A permit to construct shall remain in effect until the permit to operate the equipment for which the application was filed is granted or denied, or the application is canceled.*

SER Air Quality 2- MDAQMD Rule 203 Permit to Operate. *A person shall not operate or use any equipment, the use of which may cause the issuance of air contaminants or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit from the Air Pollution Control Office. The equipment shall not be operated contrary to the conditions specified in the permit to operate. Rule*

SER Air Quality 3-MDAQMD Rule 204 Permit Conditions. *To assure compliance with all applicable regulations, the Air Pollution Control Officer may impose written conditions on any permit. Commencing work or operation under such a permit shall be deemed acceptance of all the conditions so specified.*

SER Air Quality 4- MDAQMD Rule 402 Nuisance. *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule also requires a cannabis business to submit a Cannabis Odor Compliance Form to the MDAQMD per California Business & Professions Code Division 10.*

SER Air Quality 6- MDAQMD Rule 403 Fugitive Dust Control. *The purpose of this rule is to reduce the amount of PM10 entrained in the ambient air from anthropogenic Fugitive Dust sources within the District by requiring actions to prevent, reduce, or mitigate Fugitive Dust.*

SER Air Quality 7- MDAQMD Rule 1113 Architectural Coatings. *The purpose of this rule is to limit the quantity of Volatile Organic Compounds (VOC) in Architectural Coatings that are applied during the construction of the buildings.*

SER Air Quality 8- MDAQMD Rule 1300 New Source Review General, Rule 1302 New Source Review Procedure, Rule 1303 New Source Review Requirements, and Rule 1320 - New Source Review for Toxics Air Contaminants. *These rules establish requirements for the preconstruction review of all new or modified facilities to ensure the construction or modification of facilities subject to the regulation do not interfere with the attainment and maintenance of Ambient Air Quality Standards and require that the New Source Review permit contain conditions to ensure calculated toxic risk is not exceeded.*

Topography and Climate

The Project site is located within the Mojave Desert portion of the Mojave Desert Air Basin (MDAB), bordered in the southwest by the San Bernardino Mountains, and separated from the San Gabriel Mountains by the Cajon Pass (4,200 feet). A lesser channel lies between the San Bernardino Mountains and the Little San Bernardino Mountains (the Morongo Valley). The MDAB is classified as a dry-hot desert (BWh), with portions classified as dry-very hot desert (BWwh), to indicate at least three months have maximum average temperatures over 100.4° F.⁶

Attainment 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 limits.

The Mojave Desert Air Basin is classified as:

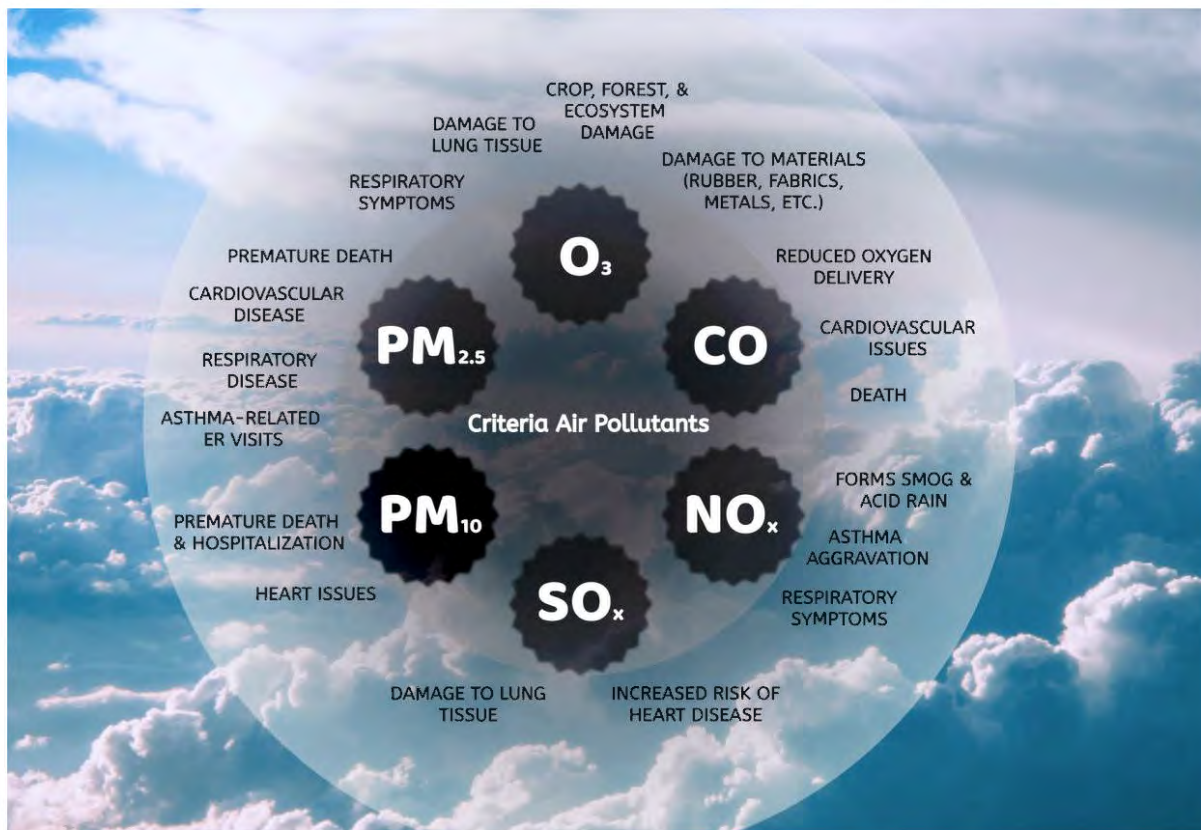
- **Ozone:** Non-Attainment for California and Federal standards.
- **PM₁₀:** Non-Attainment for California and Federal standards.
- **PM_{2.5}:** California (Non-Attainment, Federal (Attainment)).
- **NO₂:** Attainment of California and Federal standards.
- **SO₂:** Attainment for California and Federal standards.

⁶ MDAQMD CEQA Guidelines, February 2020, Page 6-7.

Air Pollutants and Health Effects

Air pollutants are foreign and/or natural substances occurring in the atmosphere that may result in adverse effects on humans, animals, vegetation, and/or materials. The air pollutants regulated by the MDAQMD that apply to the Project are described in Figure 4.3.1, *Air Quality and Health Effects*.⁷

Figure 4.2.1. Air Quality and Health Effects



⁷ <http://www.aqmd.gov/home/air-quality>

Threshold 4.2 – 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

Applicable SERs: The following SERs apply to the Project:

SER Air Quality-1: MDAQMD Rule 201 Permit to Construct.

SER Air Quality-8: MDAQMD Rule 1300 New Source Review General, Rule 1302 new Source Review Procedure, Rule 1303 New Source Review Requirements, and Rule 1320 - New Source Review for Toxics Air Contaminants.

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. According to the MDAQMD California Environmental Quality Act (CEQA) And Federal Conformity Guidelines, February 2020:

“A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast. An example of a non-conforming project would be one that increases the gross number of dwelling units, increases the number

*of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan)."*⁸

The Project would comply with SER Air Quality-1 through SER Air Quality-8 as described above. Additionally, as shown in Table 4.3.2, *MDAQMD Air Quality Significance Thresholds* below, the Project would not exceed the Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction or long-term operation. Accordingly, the Project would not delay the implementation of any applicable attainment or maintenance plan. Additionally, the current zoning classification for the site is Manufacturing/Industrial (MI). The MI land use designation was used by the MDAQMD to generate the growth forecasts for the air quality plans referenced above. Therefore, the Project is consistent with growth forecasts.⁹

Finding: Less than Significant.

Threshold 4.2 – 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

Applicable SERs:

SER Air Quality-4: MDAQMD Rule 402 Nuisance.

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.

⁸ <https://www.mdaqmd.ca.gov/home/showpublisheddocument/8510/638126583450270000>

⁹ City of Adelanto General Plan Update, May 1994.

Table 4.2-1. MDAQMD Air Quality Significance Thresholds

Criteria Pollutant	Daily Emissions Thresholds (pounds)
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})	82

Both construction and operational emissions for the Project were modeled using the California Emissions Estimator Model (CalEEMod), 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 2024 and last approximately 279 days. Construction phases are assumed to consist of site preparation; grading; building construction; paving; and architectural coating. The Project is expected to be operational in the year 2025. Construction phases are not expected to overlap. Construction activities produce combustion emissions from various sources (e.g., construction equipment 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.

Per SER Air Quality-4, the following measures were factored into CalEEMod and are based on data provided by MDAQMD:

- Utilize soil stabilizers – 30% PM₁₀ and PM_{2.5} reduction.
- Replace ground cover – 15% PM₁₀ and PM_{2.5} reduction.
- Water-exposed areas 2 times per day

Daily construction emissions based on the above-described parameters are shown in Table 4.2-2 below.

Table 4.2-2. Daily Construction Emissions

	Emissions (pounds per day)					
	NOx	VOC	CO	SOx	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	39.9	31.9	36.6	0.05	9.7	5.65
Regional Threshold	137	137	548	137	82	65
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: MDAQMD and CalEEMod 2020.4.0

Operational Emissions

The Project would be operated as an industrial park facility. Typical operational characteristics include employees and customers traveling to and from the site, delivery of goods and services to the residents, and maintenance activities. Table 4.2-3 *Operational Emissions* shows the MDAQMD thresholds for operational emissions compared to the Project's maximum daily emissions.

Table 4.2-3. Operational Emissions (Average of Summer and Winter)

	Emissions (pounds per day)					
	NOx	VOC	CO	SOx	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	3.73	5.43	25.6	0.65	5.0	1.38
Regional Threshold	137	137	548	137	82	65
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: MDAQMD and CalEEMod V.2022.1.1.21

As shown in Table 4.2-3 above, both construction and operational-related emissions would not exceed MDAQMD thresholds.

Threshold 4.2 – 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

Applicable SERs:

SER Air Quality – 8: MDAQMD Rule 1300 New Source Review General, Rule 1302 New Source Review Procedure, Rule 1303 New Source Review Requirements, and Rule 1320 - New Source Review for Toxics Air Contaminants.

Sensitive Receptor Land Uses Residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types

proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated using significance threshold criteria number 4 (*Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.*).

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

Because the Project is located within 1,000 feet of an existing non-conforming residential use, the following analysis is required.

Stationary Sources "Hot Spot" Analysis

Generally, a stationary source in air quality terminology is any fixed emitter of air pollutants, such as fossil fuel-burning power plants, petroleum refineries, petrochemical plants, food processing plants, and other heavy industrial sources. Typically, a major stationary source is any facility or plant that is on EPA's list of source categories and emits or has the potential to emit at least 100 tons per year (tpy) or more of any single criteria pollutant.

The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (Air Toxics Act; Health and Safety Code (H&S Code) §§ 44300-44384) was adopted by the California Legislature and signed by the Governor in response to public concern about the release of toxic chemicals to the ambient air. The Air Toxics Act requires facility owners to produce and submit to the Mojave Desert Air Quality Management District (MDAQMD) a comprehensive inventory of routine releases of toxic chemicals to the ambient air. Using the content of this inventory the MDAQMD determines a prioritization score for the facility. The Air Toxics Act requires that those facilities that receive a high prioritization score to prepare and submit Health Risk Assessments (HRA) which estimates the impact of routine air toxics releases. If an HRA indicates a "significant health risk", the Air Toxics Act requires the facility to notify the affected public of this risk.¹⁰

Under the Air Toxics Act the MDAQMD is required to consider the magnitude of toxic air contaminant emissions from facilities, the toxicity of those emissions, and to identify a "Prioritization Score". A Prioritization Score does not mean the facility poses a significant risk to public health. Facilities are placed into one of the three Prioritization Categories based on their Prioritization Score: (1) High Priority Category – Facilities are required to prepare and submit an HRA. (2) Intermediate Priority Category – Facilities may be required to conduct an

¹⁰ MDAQMD Air Toxics "Hot Spots" Program Public Notification Procedures at:
<https://www.mdaqmd.ca.gov/home/showpublisheddocument/6010/636717542657030000>

HRA at a future date if toxic risk continues to increase. (3) Low Priority Category – Facilities are not required to conduct a Health Risk Assessment¹¹

Because the future occupants of the buildings are unknown, the MDAQMD can't identify a Prioritization Score until such time that a request for a Permit to operate is filed. It should be noted that given the small size of the buildings and the proposed occupancy, it is not expected that the Project would not emit the type and quantity of toxic emissions that would [pose a health risk to the single-family residence to the east. The Planning Division has reviewed the Project plans and determined they comply with SER Air Quality-8.

Mobile Source Emissions

Diesel particulate matter (DPM) which is a known carcinogen could be emitted from trucks operating on the Project site. In practice, A Health Risk Assessment (HRA) is typically required for land uses that involve truck idling and movement (such as, but not limited to, truck stops, warehouse/distribution centers, or transit centers), ship hoteling at ports, and train idling.¹²

As shown in Figure 3.1-2. Site , the Project is not designed to accommodate heavy-duty trucks (e.g. 3-axle tractor-trailer tractors) that transport cargo destined for or coming from California's ports and intermodal rail yards. Each building pad only provides two 12' x 20' loading spaces at the front of the building for trucks. Furthermore, recent health risk assessments (HRAs) for large warehouse developments that involve heavy-duty truck activity posed no significant health risks to sensitive receptors.¹³ As such, any potential impacts from DPM would be less than significant and no further analysis is warranted.

Finding: Less Than Significant. Impact.

Threshold 4.2 – 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

Applicable SERs:

¹¹ MDAQMD 2022 Air Toxics "Hot Spots" Program Annual Report at:
<https://www.mdaqmd.ca.gov/home/showpublisheddocument/10019/638355672924930000>

¹²

¹³ Adelanto Industrial Center EIR, <https://ceqanet.opr.ca.gov/2023120352/2>.

SER Air Quality-4: MDAQMD Rule 402 Nuisance.

The Project does not propose or require land uses that would be substantive sources of objectionable odors. Potential temporary and intermittent odors may result from construction equipment exhaust and the application of asphalt and architectural coatings. Temporary and intermittent construction-source emissions are controlled through existing requirements and industry BMPs addressing proper storage and application of construction materials.

Over the life of the Project, odors may result from the storage of municipal solid waste pending its transport to area landfills. 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 involve the use of diesel-powered construction equipment and diesel-powered vehicles pulling trailers for deliveries during operations. Diesel exhaust during construction may be noticeable temporarily at adjacent properties; however, construction activities would be temporary. During operations diesel vehicles entering the site are required to limit idling to less than 5 minutes, which will reduce the impacts of diesel odors.

Finding: Less than Significant Impact.

4.3 Biological Resources

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

- General Biological Resources Assessment: RCA Associates, Inc., June 20, 2023, included as Appendix B to this Initial Study.
- Western Joshua Tree Census: RCA Associates, Inc., October 30, 2023, included as Appendix C to this Initial Study.

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Biological Resources-1- General Plan Policy OS 2.3. *Ensure that new development and major transportation projects minimize encroachment into sensitive desert habitats and minimize direct or indirect impact on sensitive biological resources while optimizing the potential for mitigation.*

SER Biological Resources-2-General Plan Policy OS 2.1. *Survey and map potential habitats for sensitive biological resources, including special-status plant and wildlife species and sensitive natural communities.*

Threshold 4.3 – 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

Applicable SERs:

SER Biological Resources-1- General Plan Policy OS 2.3.

SER Biological Resources-2-General Plan Policy OS 2.1.

As part of the environmental review process, the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) data sources were reviewed. Following the data review, surveys were performed on-site on June 19, 2023, during which any biological resources located on-site and in the surrounding areas were documented by biologists from RCA Associates. As part of the surveys, the property and adjoining areas were evaluated for the presence of native habitats that may support populations of sensitive wildlife and plant species. The property was also evaluated for the presence of sensitive habitats including wetlands, vernal pools, riparian habitats, and jurisdictional areas. Habitat assessments were also conducted for the desert tortoise, burrowing owl, and Mohave ground squirrel based on data from USFWS, CDFW, and a search of the California Natural Diversity Database.

Sensitive Plant Species

The site supports a moderately disturbed Mojave Desert scrub plant community that covers the property. Species present on the site included Joshua trees, creosote bush, kelch grass, Asian mustard, Nevada joint fir, white bursage, California buckwheat, and rubber rabbitbrush.

Western Joshua Trees

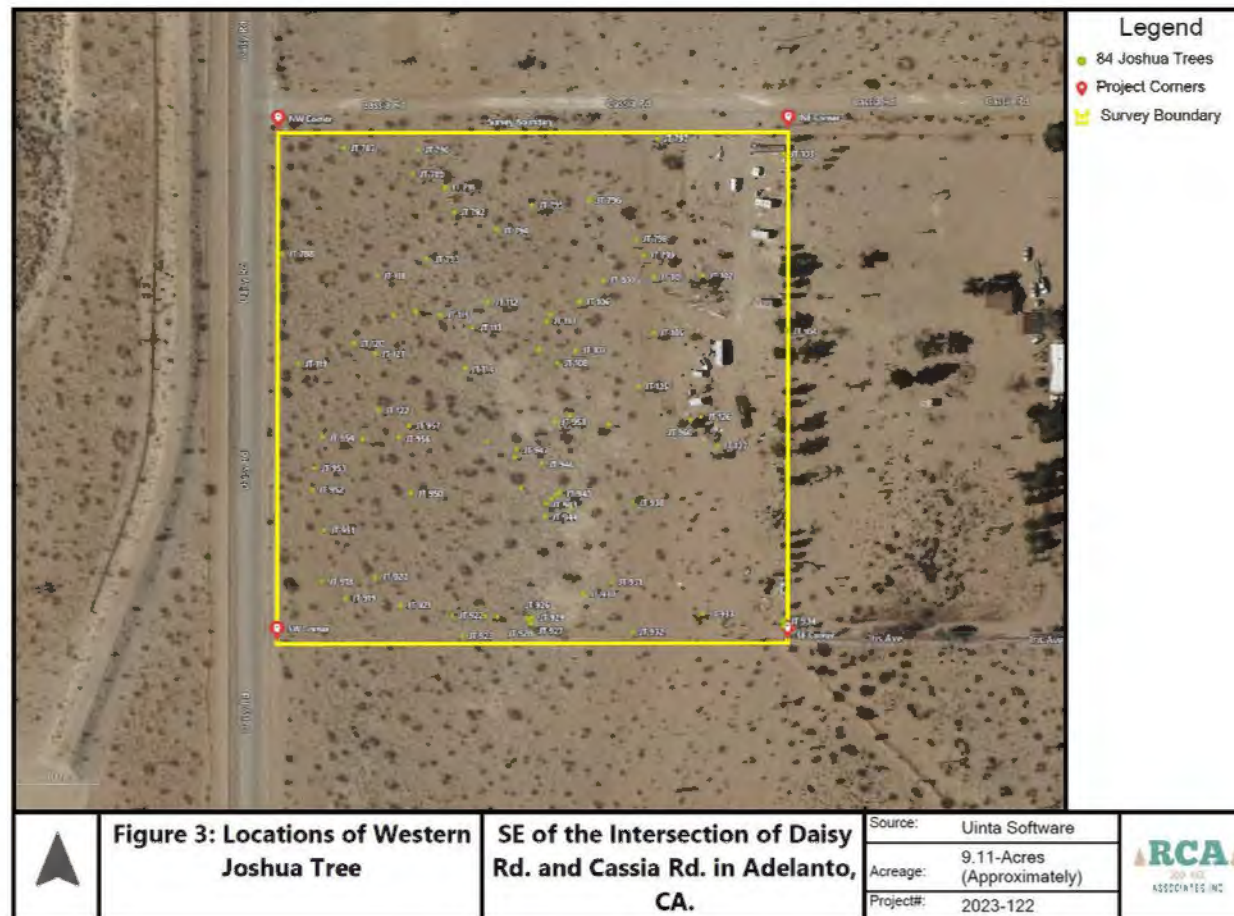
As shown in Table 4.3.1, *Number of Joshua Trees Subject to Preservation or Relocation*, there are a total of 84 Western Joshua trees located on the site, seven of which are dead. Thus 77 trees are considered in this analysis. Based on the CDFW *Western Joshua Tree Relocation Guidelines and Protocols*, 13 to 16 Joshua trees will need to be retained in place or relocated on the Project site depending on the relocation method used.

Table 4.3.1. Number of Joshua Trees Subject to Preservation or Relocation

Class	Size	No of Trees	Bare Root Relocation	Tree Spade Relocation
Class A	≤ 1 meter	16	5	2
Class B	≥ 1 meter and ≤ 5 meters	50	10	5
Class C	≥ greater than 5meters)	11	1	6
Total		77	16	13

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Figure 4.3.1. Location of Western Joshua Trees



Mitigation Measures (Sensitive Plant Species)

Mitigation Measure BIO-1. Western Joshua Tree Incidental Take Permit. If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an Incidental Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), or any other appropriate take authorization under CESA or under the Western Joshua Tree Conservation Act (Fish & G. Code, §§ 1927-1927.12), prior to the relocation, removal, or take. (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of western Joshua tree, a Candidate for Threatened CESA-listed species. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085 and §§ 1927-1927.12). Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, the development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof the document has been circulated.

Sensitive Wildlife Species

As shown in Table 4.4.1 below, with the exception of Burrowing Owl, no sensitive wildlife species were identified, and the Project site is not expected to support these species.

Table 4.3-12 Presence of Candidate, Sensitive, or Special Status Wildlife Species

Species	Status	Presence/Absence
Crotch's Bumble Bee	Federal: None State: Candidate	Not Present. Crotch's bumblebee inhabits grasslands and shrublands and requires a hotter and drier environment than other bumblebee species. Crotch's bumble was not observed in the June 2024 field investigation and is not expected to occur due to the lack of available preferred food sources on site. The two nearest occurrences are located over 12 miles away in the Apple Valley North and Phelan quadrangle and have no recent reporting in the past 70 years.
Desert Tortoise	Federal: Threatened State: Threatened	Not Present: The site is located within the known distribution of the species. An evaluation of the

Species	Status	Presence/Absence
		area and property was conducted, and no tortoises or suitable habitat was observed.
Mohave Ground Squirrel	Federal: None State: Threatened	Not Present: The site supports minimal habitat for the species with few suitable burrows. Species have not been identified on the site or in the immediate surrounding areas; therefore, the species is not likely to inhabit the site.
Swainson's Hawk	Federal: None State: Threatened	Not Present. No habitat supports the species and no Swainson's hawks were observed during the field survey,
Le Conte's thrasher	Federal: None State: None CDFW: Species of Special Concern	Not Present. The site does support suitable habitat for the species. Surveys conducted on site did not identify any thrashers and they are not expected to occur on the site in the future.
Burrowing Owl	Federal: None State: Candidate CDFW: Candidate	Not Present/Future Presence Possible. The site does support suitable habitat for the species; however, no owls or owl signs, or suitable burrows were observed during field surveys.

Wildlife Species Mitigation Measures

On October 10-11, 2024, the California Fish and Game Commission unanimously voted today to protect western burrowing owls throughout California as a "candidate" species under the California Endangered Species Act. Burrowing owls statewide will be protected while the California Department of Fish and Wildlife conducts a full status review, which could last 12 to 18 months. The Commission will then vote on whether to protect the burrowing owls as endangered or threatened under state law.

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 on-site, the site is located within the range of the burrowing owl, the desert tortoise, and nesting birds. Therefore, the following mitigation measures have been included to ensure any impacts are less than significant to these species.

Mitigation Measure BIO-2. Focused Surveys for Burrowing Owl: *Focused burrowing owl surveys shall be conducted by a qualified biologist according to the Staff Report on Burrowing Owl Mitigation (CDFG 2012 or most recent version). If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site*

monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls along with proposed relocation actions. The Permittee shall implement the Burrowing Owl Plan following CDFW review and approval.

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). Pre-construction surveys shall be conducted no less than 14 days before initial ground disturbance (e.g., grading, grubbing, construction). Burrowing owls may re-colonize a site after only a few days. Time lapses between Project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance. 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, Project activities shall be immediately halted. The qualified biologist shall coordinate with the CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities.

Mitigation Measure BIO-3. Desert Tortoise Mitigation Program

BIO-3 (a) Pre-Construction Survey. A CDFW-approved biologist shall conduct pre-construction presence/absence surveys for desert tortoise during the desert tortoise active season (April to May or September to October) 48 hours prior to initiation of Project activities and after any pause in Project activities lasting 30 days or more. Desert tortoise preconstruction surveys shall be conducted in accordance with the U.S. Fish and Wildlife Service (USFWS) 2019 desert tortoise survey methodology. Preconstruction surveys shall be completed using 100-percent visual coverage for desert tortoise and their sign and shall use perpendicular survey routes within the Project site and 50-foot buffer zone. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until two negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the survey shall be submitted to CDFW prior to start of Project activities. If the survey confirms desert tortoise absence, the CDFW approved biologist shall ensure that desert tortoises do not enter the Project area.

If desert tortoise presence is confirmed during the survey, the Project Proponent shall submit to CDFW for review and approval a desert tortoise specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") to desert tortoise. If complete

avoidance of desert tortoise cannot be achieved, the Project Proponent shall not undertake Project activities, and Project activities shall be postponed until appropriate authorization (i.e., California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Fish and Game Code §2081) is obtained.

If complete avoidance of desert tortoise is infeasible, CDFW recommends that the Project Proponent apply for a CESA ITP and prepare a site-specific Desert Tortoise Translocation Plan (Plan) that will provide details on the proposed recipient site, desert tortoise clearance surveys, and relocation, definitions for Authorized Biologists and qualified desert tortoise biologists, exclusion fencing guidelines, protocols for managing desert tortoise found during active versus inactive seasons, protocols for incidental tortoise death or injury, and shall be consistent with project permits and current USFWS and CDFW guidelines. The Plan shall also include a requirement for communication and coordination with the Bureau of Land Management (BLM) regarding the desert tortoise recipient site.

Prior to construction, the Plan shall be subject to the review and approval of the CDFW and the USFWS. Impacts shall be offset through acquisition of compensatory land within occupied desert tortoise habitat and/or mitigation bank credit purchase from a CDFW-approved mitigation bank mitigated at a ratio determined by CDFW after Project analysis.

BIO-3 (b). Deceased or Injured Tortoise Within the Project Site: USFWS and CDFW shall be informed of any injured or deceased desert tortoise (and other special-status species) found on site (verbal notice within 24-hours and written notification within 5 days).

BIO-3 (c). Species Avoidance: If during project activities a desert tortoise is discovered within the Project site, all activities shall immediately stop and the CDFW shall be immediately notified (within 24 hours). Coordination with respective state and federal resource agencies shall be required prior to restarting activities to determine appropriate avoidance, minimization, and mitigation measures.

Bio-3 (d) Mitigation Measure Environmental Awareness Training: A qualified biologist must present a biological resource information training for desert tortoise to project activities to all personnel that will be working within the project site. The same instruction shall be provided for any new workers prior to their performing any work on-site. Interpretation shall be provided for any non-English speaking workers.

Mitigation Measure BIO-4. Nesting Bird Pre-Construction Survey. Regardless of the time of year, a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, within 2 hours prior to initiating Project activities. Additionally, a nesting bird survey shall be conducted by a qualified biologist no more than 3 days prior to the initiation of Project activities, including, but

4.3 Biological Resources

not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests.

The survey shall be conducted by a qualified biologist. Surveys shall include any potential habitat (including trees, shrubs, the ground, or nearby structures) that may be impacted by activities resulting in nest destruction or abandonment. If nesting bird activity is present, a no-disturbance buffer zone shall be established by the qualified biologist around each nest to prevent nest destruction or abandonment. If nesting bird activity is present, a no-disturbance buffer zone shall be established by the qualified biologist around each nest to prevent nest destruction and disruption of breeding or rearing behavior. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests, as confirmed by a qualified biologist. A qualified biologist shall inspect the active nest to determine whether construction activities are disturbing the nesting birds or nestlings. If the qualified biologist determines that construction activities pose a disturbance to nesting, construction work shall be stopped in the area of the nest and the 'no disturbance buffer' shall be expanded. If there is no nesting activity, then no further action is needed for this measure.

Findings: Less than Significant Impact with Mitigation Incorporated.

Threshold 4.3– 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

Applicable SERs: None.

The Project 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.

Finding: No Impact.

4.3 Biological Resources

Threshold 4.3– 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

Applicable SERs: None.

The Project site does not support any discernible drainage courses, inundated areas, wetland features, or hydric soils that would be considered jurisdictional by the Corps, Regional Board, or CDFW. A query of the National Wetlands Inventory (NWI) database determined that no potential blueline streams, riverine, or other aquatic resources occur within or adjacent to the Project site.

Finding. No Impact.

Threshold 4.3– 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

Applicable SERs: None.

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. A habitat corridor can be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space

4.3 Biological Resources

can provide a buffer against both anthropogenic disturbance and natural fluctuations in resources.

The undeveloped land near the Project site provides local wildlife movement opportunities for wildlife species moving through the immediate area; however, the Project site does not function as a major wildlife movement corridor or linkage. As such, implementation of the proposed Project is not expected to have a significant impact on wildlife movement opportunities or prevent local wildlife movement through the area since there is ample habitat adjacent to the project site to support wildlife movement opportunities.

Finding: Less than Significant Impact.

Threshold 4.3 – 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

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

Threshold 4.3 – 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

Applicable SERs: None.

Regional multiple-species conservation plans offer long-term assurances for the 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

4.3 Biological Resources

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.

Findings: No Impact.

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4.4 Cultural Resources

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

- Cultural Resources Assessment: BCR Consulting, LLC. December 12, 2023, included as Appendix D to this Initial Study.

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Cultural Resources-1 - General Plan Policy OS 10.1. Identify, protect, and minimize impacts to archaeological and paleontological resources.

SER Cultural Resources-2 -General Plan Policy OS 10.2. Review proposed development for the possibility of cultural resources and compliance with the cultural resources program.

SER Cultural Resources-3- Human Remains. 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.

Threshold 4.4– 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

Applicable SERs:

SER Cultural Resources-1 - General Plan Policy OS 10.1.

SER Cultural Resources-2 -General Plan Policy OS 10.2.

Records Search

BCR Consulting conducted a historical/archaeological resources records search, initiated a Native American Sacred Lands File search, pursued historical background research, and carried out an intensive-level field survey. The purpose of the records search was to compile an inventory of previously identified cultural resources and existing cultural resources studies

4.4 Cultural Resources

within a half-mile radius of the project location. Previously identified cultural resources include properties designated as California Historical Landmarks, Points of Historical Interest, and San Bernardino County Landmarks, as well as those listed in the National Register of Historic Places, the California Register of Historical Resources, or the California Historical Resources Inventory.

Through the various avenues of research, this study did not encounter any “historical resources” within or adjacent to the Project site. Therefore, BCR Consulting recommends to the City of Adelanto finding No Impact regarding “historical resources.”

Field Survey

On July 12, 2023, BCR Consulting archaeologists carried out the field survey of the project area. The survey was completed at an intensive level by walking a series of parallel transects spaced 15 meters (approximately 50 feet) apart. In this way, the ground surface in the entire project area was systematically and carefully examined for any evidence of human activities dating to the prehistoric or historic period (i.e., 50 years or older). All soil exposures were inspected carefully for cultural resources. The survey was conducted between 70 and 80 percent surface visibility.

The field survey found no cultural resources of any kind within the Project boundary. The area has been cleared of almost all vegetation except for low scrub consisting mainly of creosote scrub and Joshua Trees. Disturbances in the area resulted from modern dumping, aeolian deflation, sheetwashing, accumulation of soil on the northern boundary, buried utility cable on the southern boundary, and asphalt debris on the east side of the property. In conclusion, no surface historic cultural resources would be impacted by the Project.

Finding: No Impact.

Threshold 4.4 – 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

Applicable SERs:

SER Cultural Resources-1- General Plan Policy OS 10.1.

SER Cultural Resources-2 -General Plan Policy OS 10.2.

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 CR-1: Resource Discovery. *If cultural resources are discovered during project activities, all work near the find (within a 60-foot buffer) shall cease, and a qualified archaeologist meeting the Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the Project outside the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.*

Mitigation Measure CR-2: Monitoring and Treatment Plan. *If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the Project and implement the Plan accordingly.*

Finding: Less than Significant with Mitigation Incorporated.

Threshold 4.4 – 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

Applicable SERs:

SER Cultural Resources-3- Human Remains.

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.

Findings: Less Than Significant.

4.5 Energy

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Energy-1-California Green Building Standards Code (CCR Title 24, Part 11): Commonly referred to as the CALGreen Code. These regulations include but are not limited to the use of energy-efficient heating and cooling systems, water-conserving plumbing, and water-efficient irrigation systems. Energy-saving and sustainable design features and operational programs would be incorporated into the Project as per CALGreen. Before the issuance of the building permit the Project's facility energy efficiencies were documented as part of the City's building permit process.

SER Energy-2-Building Energy Efficiency Standards for Residential and Nonresidential Buildings. Commonly referred to as the Energy Code: These regulations contain provisions for energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the CEC to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space.¹⁴

¹⁴ <https://www.energy.ca.gov/publications/2022/2022-nonresidential-and-multifamily-compliance-manual-2022-building-energy>, Table 3-2 Emission Reductions by Sector for Adelanto

Threshold 4.5 – 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

Applicable SERs: The following SERs apply to the Project:

SER Energy-1-California Green Building Standards Code (CCR Title 24, Part 11)

SER Energy- 2- Building Energy Efficiency Standards for Residential and Nonresidential Buildings. Commonly referred to as the Energy Code

The Project consists of twelve separate buildings 10,000 square feet each on individual building pads that range from 0.66 acres to 0.71 acres. Because of these size limitations, the Project would not support a large-scale industrial use that would require larger amounts of energy such motor vehicle fuels and natural gas. The primary source of energy would be electricity used to support cannabis cultivation. Producing and using electricity more efficiently reduces both the amount of fuel needed to generate electricity and the amount of greenhouse gases and other air pollution emitted as a result.¹⁵

Natura Gas Consumption

Natural gas would be supplied to the Project by Southwest Gas Corporation. Use of natural gas is not anticipated to be used during construction. As noted above, because the buildings are 10,000 square feet in size, the Project does not support manufacturing uses that require large amounts of natural gas. It is anticipated that 3,292,802 kBTU/year of natural gas would be consumed by the Project and would be comparable to other small scale industrial buildings of similar scale and configuration. Additionally, the Project will also comply with the applicable Title 24 standards.

Motor Vehicle Fuel Consumption

Construction

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

¹⁵ US EPA, Energy and the Environment. webpage: <https://www.epa.gov/energy/learn-about-energy-and-its-impact-environment#impact>

would be temporary and would not represent a significant demand for available supplies. Given the physical characteristics of the site and the type of development proposed, there are no unusual Project characteristics or construction processes that would require the use of equipment that would use more fuel than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). In addition, as required by state law,¹⁶ idling times of construction vehicles are limited to no more than 5 minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Equipment employed in the construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel.

Operations

Fuel that would be consumed by Project-generated traffic is a function of total Vehicles Miles Traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site. The Project will result in 2,192,680 annual VMT¹⁷ and an estimated annual fuel consumption of 83,182.1 gallons of fuel.¹⁸

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

Electricity Consumption

Construction

The Project would require the use of electric power tools. The anticipated construction schedule assumes the Project would require approximately 279 days for completion of the build-out. The consumption of electricity would be temporary and would not represent a significant demand for available supplies.

Operations

Electricity would be supplied by Southern California Edison. Occupancy of the buildings for non-cannabis use would result in the consumption of 2,094,226 kWh/year of electricity.¹⁹

Additionally, the Clean Energy and Pollution Reduction Act (Senate Bill 350) established clean energy, clean air, and greenhouse gas (GHG) reduction goals, including reducing GHG to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050. SB 350

¹⁶ California Code of Regulations Title 13, Motor Vehicles, §2449(d)(3) Idling.

¹⁷ Cassia and Daisy CalEEMod Datasheets.

¹⁸ EPA, 2020 Automotive Trend Report, <https://www.epa.gov/automotive-trends/explore-automotive-trends-data>, accessed December 11, 2023.

¹⁹ Appendix A, Cassia & Daisy CalEEMod Datasheets.

requires large utilities (i.e. SCE) to develop and submit integrated resource plans (IRPs). These plans detail how utilities will meet their customers' resource needs, reduce GHG emissions, and ramp up the use of clean energy resources. SCE adopted the 2022 Integrated Resource Plan, as well as supporting Appendices, and filed it with the Public Utilities Commission on October 16, 2023. The IPR will indirectly affect the Facility because future electricity delivered to the facility by SCE will be provided using cleaner energy.

Finding: Less than Significant. Impact.

Threshold 4.5 – 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

Applicable SERs:

SER Energy-1-California Green Building Standards Code (CCR Title 24, Part 11)

SER Energy- 2- Building Energy Efficiency Standards for Residential and Nonresidential Buildings. Commonly referred to as the Energy Code

The Project is required to demonstrate compliance with these regulations as part of the building permit and inspection process. These regulations include but are not limited to the use of energy-efficient heating and cooling systems, water-conserving plumbing, and water-efficient irrigation systems.

Finding: Less than Significant.

4.6 Geology and Soils

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Geotechnical-1-Soils- Engineering Report. 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.

SER Earthquake-1 Seismic Design Requirements. As required by Adelanto Municipal Code Title 14, Buildings and Construction every structure, and portion thereof, including nonstructural components that are permanently attached to structures and their supports and attachments, shall be designed and constructed to resist the effects of earthquake motions in accordance with Chapters 11, 12, 13, 15, 17 and 18 of ASCE 7, as applicable. The seismic design category for a structure is permitted to be determined in accordance with Section 1613 or ASCE 7.

Threshold 4.6 – 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

Applicable SERs: None.

4.6 Geology and Soils

Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California. (A trace is a line on the earth's surface defining a fault.) Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally 50 feet).²⁰ According to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located within an Alquist-Priolo Earthquake Fault zone.²¹

Finding: No Impact.

Threshold 4.6 – 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

Applicable SERs:

SER Geotechnical -1 Soils-Engineering Report.

SER Earthquake-1 Seismic Design Requirements.

The Project site is in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the Southern California area.

Finding: Less than Significant Impact.

²⁰ <https://www.conservation.ca.gov/cgs/alquist-priolo>

²¹ <https://maps.conservation.ca.gov/geologichazards/#dataviewer>, accessed December 10, 2023.

4.6 Geology and Soils

Threshold 4.6 – 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

Applicable SERs:

SER Geotechnical -1 Soils-Engineering Report.

SER Earthquake-1 Seismic Design Requirements.

According to the California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located in a liquefaction zone.²² Notwithstanding, the Project would be required to comply with SER Geotechnical-1.

Finding: Less than Significant Impact.

Threshold 4.6 – 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

Applicable SERs: None.

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

Finding: No Impact.

²² <https://maps.conservation.ca.gov/geologichazards/#dataviewer>, accessed December 10, 2023.

Threshold 4.6– 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

Applicable SERs:

SER Geotechnical -1 Soils-Engineering Report.

SER Earthquake-1 Seismic Design Requirements.

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 (NPDES) requirements applicable to the Project site 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 will 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. As detailed in Threshold 4.9 (a), Hydrology and Water Quality, stormwater will be controlled using a twelve-infiltration basin designed to implement water quality and flood control requirements. Each industrial pad will have one infiltration basin, a total of twelve for the Project. Stormwater treatment will be provided by the bottom 1 to 2 feet of the basin, where the required volume will infiltrate into the ground, and any soil erosion materials will be managed. (Also see analysis under Section 4.9, Hydrology and Water Quality.)

Finding: Less than Significant Impact.

Threshold 4.6 – 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

Applicable SERs:

SER Geotechnical -1 Soils-Engineering Report.

SER Earthquake-1 Seismic Design Requirements.

Landslide/Lateral Spreading

Lateral spread or flow are terms referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water. All the land within the Project site is relatively flat and, according to the County of San Bernardino Hazard Maps, is not located in areas prone to landslides, 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 to the depth of the underlying bedrock and then recompact the soil so that it can support buildings and structures.

Liquefaction or Collapse

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

Based on the California Geological Survey, the site is not mapped within a zone of potentially liquefiable soils. Based on groundwater data (<http://www.water.ca.gov/waterdatalibrary/>), it is estimated that groundwater is at a depth of 880 feet below the existing grade. The site is also not included within the San Bernardino County Geologic Hazards Maps as being located within an area with a liquefaction hazard. Liquefaction is not considered to be a hazard at

the subject site due to the great depth of groundwater (greater than 880 feet) and the current geologic hazard mapping.

Finding: Less than Significant Impact

Threshold 4.6 – 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

Applicable SERs:

SER Geotechnical -1 Soils-Engineering Report.

SER Earthquake-1 Seismic Design Requirements.

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. According to the Natural Resources Conservation Service, United States Department of Agriculture, and Web Soil Survey, the Project site primarily consists of soils classified as Bryman Loamy Fine Sand.²³

Clay soils are generally classified as “expansive.” This means that a given amount of clay will tend to expand (increase in volume) as it absorbs water, and it will shrink (lessen in volume) as water is drawn away. The Bryman series of soils consists of deep, well drained soils that formed in mixed alluvium dominantly from granitic sources. Because they are not clay soils, they are not susceptible to expansion. Notwithstanding, the Project would be required to comply with Adelanto Municipal Code § 16.04.050, which sets forth the procedures governing the requirements for soils reports, which includes data regarding the nature, distribution, and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

Finding: Less than Significant Impact.

²³ Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at the following link: <http://websoilsurvey.sc.egov.usda.gov/>. Accessed June 15, 2022.

Threshold 4.6 – 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 wastewater disposal systems where sewers are not available for the disposal of waste water?				✓

Impact Analysis

Applicable SERs: None.

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.

Finding: No Impact.

Threshold 4.6 – 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

Applicable SERs: None.

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

The property is situated in the Mojave Desert geomorphic province. The Mojave Desert province is a wedge-shaped area that is enclosed on the southwest by the San Andreas fault zone, the Transverse Ranges province, and the Colorado Desert province, on the north and northeast by the Garlock fault zone, the Tehachapi Mountains and the Basin and Range province, and on the east by the Nevada and Arizona state lines, and the Colorado River. The area is dominated by broad alluvial basins that are mostly aggrading surfaces that are

receiving non-marine continental deposits from the adjacent upland areas. More specific to the subject property, the site is in an area geologically mapped to be underlain by Quaternary Alluvium. Alluvium is deposited in lakes, playas, and terraces and has the potential to contain paleontological resources. Therefore, the following mitigation measures are required.

Mitigation Measures

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

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

Finding: Less than Significant with Mitigation Incorporated.

Unique Geologic Feature

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

4.7 Greenhouse Gas Emissions

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Energy-1-California Green Building Standards Code (CCR Title 24, Part 11): Commonly referred to as the CALGreen Code. These regulations include but are not limited to the use of energy-efficient heating and cooling systems, water-conserving plumbing, and water-efficient irrigation systems. Energy-saving and sustainable design features and operational programs would be incorporated into the Project as per CALGreen. Before the issuance of the building permit the Project's facility energy efficiencies were documented as part of the City's building permit process.

SER Energy-2-Building Energy Efficiency Standards for Residential and Nonresidential Buildings. Commonly referred to as the Energy Code: These regulations contain provisions for energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the CEC to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space.²⁴

²⁴ <https://www.energy.ca.gov/publications/2022/2022-nonresidential-and-multifamily-compliance-manual-2022-building-energy>, Table 3-2 Emission Reductions by Sector for Adelanto

4.7 Greenhouse Gas Emissions

Threshold 4.7 – Greenhouse Gas Emissions Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	

Impact Analysis

Applicable SERs:

SER Energy-1-California Green Building Standards Code (CCR Title 24, Part 11).

SER Energy-2-Building Energy Efficiency Standards for Residential and Nonresidential Buildings.

Greenhouse Gas Emissions and Climate Change

Greenhouse gases (also known as GHGs) are gases in the earth's atmosphere that trap heat. During the day, the sun shines through the atmosphere, warming the earth's surface. At night, the earth's surface cools, releasing heat back into the air. Some of the heat is trapped by the greenhouse gases in the atmosphere. The emission of GHGs through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities, contributes to global warming.

Figure 4.7.1. Impacts of Climate Change on California

 Wildfires	Of the twenty largest wildfires ever recorded in California, nine occurred in 2020 and 2021. The worst wildfire season in California's recorded history was in 2018, with over 24,226 structures damaged or destroyed and over 100 lives lost. The largest wildfire season ever recorded in state history was in 2020, where more than 4.3 million acres burned, albeit at different intensity and with varying ecological impacts, and over 112 million metric tons of carbon dioxide (CO2) emitted into the atmosphere. ¹⁰⁰
 Droughts	Drought is a recurring feature of the California climate that has been intensified by increasingly warmer average temperatures. Anthropogenic climate trends have exacerbated drought conditions; human-caused climate change accounts for 19 percent of drought severity and 42 percent of the soil moisture deficit in this region since 2000. ¹⁰¹
 Extreme heat events	California's hottest summer on record was 2021.42 Death Valley recorded the world's highest reliably measured temperature (130°F) in July 2021 ¹⁰² . : the daily maximum average temperature, an indicator of extreme temperature shifts, is expected to rise 4.4°F–5.8°F by 2050 and 5.6°F–8.8°F by 2100. ¹⁰³

Source: California Air Resources Board, 2022 AB32 Scoping Plan, pps. 15-19. Available at: <https://www2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.

GHG Thresholds of Significance

According to CEQA Guidelines §15064.4, when deciding on 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.”

The Mojave Desert Air Quality Management District (MDAQMD) has developed regional significance thresholds for regulated pollutants. The MDAQMD's *CEQA and Federal Conformity Guidelines* (February 2020) has identified a threshold of 100,000 tons per year (90,718 MTCO₂e/year) or 548,000 pounds per day of CO₂e emissions for individual projects. However, the 100,000 MT/year CO₂e threshold is more conducive to a large stationary point source emitter and not general industrial uses.

In 2008, the South Coast Air Quality Management District (SCAQMD) adopted interim GHG thresholds for stationary point source projects for which the District is the CEQA Lead Agency. The SCAQMD GHG thresholds provide several options. Under the Tier 3 Option, 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 is recommended. The primary source of GHG emissions in Adelanto is from the vehicle miles traveled (VMT) from cars and trucks, not stationary sources. The City of Adelanto has adopted a VMT Screening Threshold of GHG emissions of less than 3,000 Metric Tons of Carbon Dioxide Equivalent (CO₂e). Projects that generate less than 3,000 are considered to have a less than significant impact on VMT, which is the primary cause of GHG emissions in the city. For this reason, this analysis uses the SCAQMD threshold even though the Project is under the jurisdiction of the MDAQMD. This is consistent with many other projects in the High Desert Region who are using the 3,000 MTCO₂e threshold.

GHG emissions for the Project were estimated using the 2022 California Emissions Estimator Model (CalEEMod), 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 both construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the SCAQMD. SCAQMD significance thresholds were used to determine the project's impacts. Construction and operation emissions are presented in Table 4.8.2 and summarized in Table 4.8.3.

Table 4.7-1. Project Greenhouse Gas Emissions (Annual)

Source	GHG Emissions (metric tons per year)			
	N ₂ O	CO ₂	CH ₄	CO ₂ e
Area	0.0005	21.5	0.00005	21.5
Energy	0.03	3,098	0.29	3,113
Mobile Sources	0.24	5,938	0.18	6,037
Solid Waste	0.00	80.2	8.02	281
Water/Wastewater	0.13	153	5.13	585.24
30-year Amortized Construction GHG				28.34
Total	metric tons per year			613.58
SCAQMD Threshold	3,000 metric tons per year			3,000
Exceed Threshold?				No

*Per SCAQMD _____

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

Finding: Less than Significant.

Threshold 4.7 – 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

Applicable SERs:

SER Energy-1-California Green Building Standards Code (CCR Title 24, Part 11).

SER Energy-2-Building Energy Efficiency Standards for Residential and Nonresidential Buildings.

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.²⁵ 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).

At the project level, before issuance of a building permit, the Project Proponent would be 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.

Finding: Less than Significant.

²⁵ 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 June 10, 2022.

4.8 Hazards and Hazardous Materials

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Hazardous Materials-1 Business Plan. *California Health and Safety Code, CHAPTER 6.95. Hazardous Materials Release Response Plans and Inventory [25500 - 25547.8]. Businesses that handle hazardous materials (including hazardous waste) or extremely hazardous substances are required to submit an HMBP via the [California Environmental Reporting System \(CERS\)](#) if using, handling, or storing hazardous materials in quantities equal to or greater than:*

- 55 gallons of a liquid,
- 500 pounds of a solid, or
- 200 cubic feet of compressed gas, or
- Extremely hazardous substances above the threshold planning quantities.

Threshold 4.8 – 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

Applicable SERs:

SER Hazardous Materials-1 Business Plan.

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.

4.8 Hazards and Hazardous 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.

Under 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 following the standards prescribed in the regulations adopted according 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.

Finding: Less than Significant.

Threshold 4.8 – 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

Applicable SERs: None.

4.8 Hazards and Hazardous Materials

Victoria Magathan Elementary School is located approximately 1 mile to the southeast 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 Victoria Magathan Elementary School, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste that would impact the school.

Finding: Less than Significant Impact.

Threshold 4.8 – 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

Applicable SERs: None.

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 according to §25187.5 of the Health and Safety Code, identified by DTSC.

4.8 Hazards and Hazardous Materials

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 according to Government Code §65962.5.²⁶

Finding: No Impact.

Threshold 4.8 – 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

Applicable SERs: None.

The Project site is not located within an airport land use plan and is not within 2 miles of an airport.

Finding: No Impact.

Threshold 4.8 – 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

Applicable SERs: None.

Access to the Project site is proposed from Cassia Road and Daisy 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.

²⁶ California Environmental Protection Agency, Cortese List Data Resources, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed December 10, 2023.

4.8 Hazards and Hazardous Materials

Finding: Less than Significant Impact.

Threshold 4.8 – 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

Applicable SERs: None.

According to the California Fire Hazard Severity Zone Viewer maintained by Cal Fire, the Project site is not located within a high wildfire hazard area.²⁷ Also refer to analysis under Section 4.20, Wildfire.

Finding: No Impact.

²⁷ <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>, accessed on December 10, 2023.

4.9 Hydrology and Water Quality

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER-Hydrology-1- Storm Water Pollution Prevention Plan: *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 (NPDES) requirements applicable to the Project site 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.*

SER Hydrology-2-Water Quality Management Plan: *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.*

SER Hydrology-3- Drainage Master Plan 5.3: *Assure that storm infrastructure is designed to carry flows as outlined in the Drainage Master Plan.*

SER Hydrology-4-Flood Protection- General Plan Policy PF 5.6: *Enforce requirements for new constructions' protection against flooding.*

SER Hydrology-5-General Plan Policy PF 6.4: *Ensure developers comply with current standards for stormwater management and consistent with State Water Resources Control Board requirements.*

SER Hydrology-6- Storm Water Discharge Permit: *Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. Dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under*

4.9 Hydrology and Water Quality

the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION AND LAND DISTURBANCE ACTIVITIES (GENERAL PERMIT) ORDER WQ 2022-0057-DWQ NPDES NO. CAS000002

https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html

Threshold 4.9– 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

Applicable SERs:

Pre-Development Conditions

Currently, the site is undeveloped. The site generally slopes from southwest to northeast. There are no existing storm drains within the Project site. The slopes within the Project site range from flat to mild slopes, ranging from 0% to 5% in some areas. With the majority of the site being type C soils, the drainage percolates into the ground, and the remaining runoff flows to Cassia Road²⁸.

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, various chemicals, oil, diesel fuel, 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.

²⁸ USDA Soil Survey, <https://websoilsurvey.sc.egov.usda.gov/app/WebSoilSurvey.aspx>, accessed 12/19/23.

4.9 Hydrology and Water Quality

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 would construct twelve infiltration basins next to each of the twelve buildings that would collect and infiltrate stormwater runoff.

Finding: Less than Significant Impact.

Threshold 4.9 – 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

Applicable SERs: None.

Ground Water Supply Discussion

The Project would create an environmental impact if it contributed to the over-drafting of the Alto Subbasin and substantially decreased the amount of groundwater available to meet the projected water demands of the region. 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.²⁹ The Mojave Basin Area was the subject of a court-ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals,

²⁹ 2020 Urban Water Management Plan, Victorville Water District, June 1, 2021, p. 6-3, accessed on June 10, 2022.

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 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

Groundwater was not encountered during subsurface field evaluation to the maximum explored depth of approximately 880 feet below existing ground surface. Historic high groundwater is anticipated to be greater than 50 feet below existing grade. The California Department of Water Resources Water Data Library indicates that several wells existed within approximately 1 mile of the site; however, the wells were not frequently monitored. Based on the data, it appears that groundwater between the 1950s and early 1960s was between approximately 100 to 200 feet deep, while in the mid-1990s it was over 300 feet deep. Seasonal fluctuations of groundwater elevations should be expected over time. In general, groundwater levels fluctuate with the seasons and local zones of perched groundwater may be present within the near-surface deposits due to local seepage or during rainy seasons. Groundwater conditions below the site may be variable, depending on numerous factors including seasonal rainfall, local irrigation, and groundwater pumping, among others.

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

4.9 Hydrology and Water Quality

unsustainable groundwater usage in many of California's basins.³⁰ 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).³¹ 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.

Based on the analysis above, the Project is not forecast to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net

Finding: Less than Significant Impact.

Threshold 4.9 – 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

Applicable SERs: None.

Based on the results of the Preliminary Hydrology Study (Appendix E) shows there is a slight increase in peak flow rate for the project site but the detention basins for each lot would

³⁰ https://www.waterboards.ca.gov/water_issues/programs/gmp/, accessed on December 10, 2023.

³¹ <https://gis.water.ca.gov/app/bp-dashboard/final/>, accessed on December 10, 2023.

4.9 Hydrology and Water Quality

ensure that the 10-year storm event is contained below the top of the curb and the computed 100-year storm event would be contained within the street right-of-way.

Finding: Less than Significant Impact

Threshold 4.9– 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

Applicable SERs: None.

According to the Federal Emergency Management Agency (FEMA), the Project site is not located within a flood hazard zone.³² In addition, according to the California Department of Conservation, California Official Tsunami Inundation Maps, the site is not located within a tsunami inundation zone.³³ In addition, the Project would not be at risk from seiche because there is no water body around the Project site capable of producing a seiche.

Finding: No Impact.

Threshold 4.9– 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

Applicable SERs: None.

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

³² <https://www.fema.gov/flood-maps>, accessed on December 10, 2023.

³³ California Department of Conservation, *California Official Tsunami Inundation Maps*, accessed December 10, 2023.

Finding: Less than Significant.

4.10 Land Use and Planning

Standard Environmental Regulations (SERs)

There are no SERs that apply.

Threshold 4.10 – Land Use and Planning 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

Applicable SERs: None.

An example of a Project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project site is in an area that consists primarily of vacant and undeveloped land. The Project site is bordered on the north by Cassia Road, with undeveloped land and Amerigas Propane located further north; on the south by undeveloped land; on the east by a single-family residential dwelling unit; and on the west by Daisy Road, followed by the Adelanto Power Conversion Station located further west. The Project site is planned for industrial manufacturing by the General Plan. The properties in the immediate area are also planned for industrial manufacturing and public utilities.

The development of the Project site is a logical continuation of the development pattern in the area as proposed by the General Plan and will not divide an established community.

Finding: No Impact.

Threshold 4.10 – Land Use and Planning 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

Applicable SERs: None.

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 Manufacturing/Industrial (MI). The Manufacturing/Industrial (MI) district provides uses for renewable energy facilities, manufacturing, distribution and warehousing, automotive-related businesses, and cannabis cultivation/processing/distribution. 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.

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.

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 to avoid or mitigate an environmental effect, with compliance with mandatory regulatory requirements or mitigation measures.

Finding: Less than Significant Impact

4.11 Noise

This section was informed by:

- Noise Technical Memorandum, KPC EHS Consultants, August 30, 2023, included as Appendix F to this initial study.

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Noise-1- Noise Standards 17.90.020 (b)

(1) The noise standards contained in Table VIII-2, "Land Use Compatibility Guidelines Related to Noise Exposure" in the Noise Element of the General Plan shall apply to land uses city-wide and shall be used to define acceptable and unacceptable noise levels.

(2) No person shall operate or cause to operate any source of sound at any location or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes the noise level, when measured on any other property, either incorporated or unincorporated, to exceed:

A. The noise standard plus three (3) dBA for that receiving land use specified in Table VIII-2 of the General Plan Noise Element for a cumulative period of more than thirty (30) minutes in any hour; or

B. The noise standard plus five (5) dBA for a cumulative period of more than five (5) minutes in any hour; or

C. The noise standard plus ten (10) dBA for a cumulative period of more than three (3) minutes in any hour; or

D. The noise standard plus fifteen (15) dBA for a cumulative period of more than one (1) minute in any hour; or

E. The noise standard plus twenty (20) dBA for any period of time.

(3) If the measured ambient level exceeds any of the first four (4) noise limit categories above, the allowable noise exposure standard shall be increased to reflect the ambient noise level. If the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level.

(4) If the alleged offense consists entirely of impact noise or simple tone noise, each of the noise levels in Section 17.90.020(b)(2)A. shall be reduced by five (5) dBA.

SER Noise-2- Construction Noise Control. *Per Municipal Code §17.90.020 (d, to reduce potential noise and air quality nuisances, the following items shall be listed as "General Notes" on the construction drawings:*

(1) Construction activity and equipment maintenance is limited to the hours between 7:00 a.m. to dusk on weekdays. 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.

SEIR Noise 3-Mechanical and Electrical Equipment. Per Municipal Code §17.90.060, all such equipment, including air conditioners, antennas, pumps, transformers, and heating and ventilating equipment, shall be located and operated in a manner that does not disturb adjacent uses and activities. Typical equipment (air conditioners, heat pumps, pool filters, etc.) used for residential service installed and operated in conformance with manufacturer's guidelines and the requirements of this Zoning Code shall be exempt from this requirement. [Ord. No. 474, Section 5, 5/28/08.]

SER Noise-4 -Exterior Noise Limits. General Plan Policy NS 1.10. Ensure through the design review process that exterior noise levels at commercial and industrial areas do not exceed 75 dBA.

SER Vibration-1. Per Municipal Code §17.90.030 Vibration, no ground vibration shall be allowed which can be felt without the aid of instruments at or beyond the subject property line, nor will any vibration be permitted which produces a particle velocity greater than or equal to two-tenths of an inch (0.2") per second measured at or beyond the lot line.

Threshold 4.11 – 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

Applicable SERs:

SER Noise-1- Noise Standards 17.90.020 (b)

SER Noise-2- Construction Noise Control.

SEIR Noise 3-Mechanical and Electrical Equipment.

SER Noise-4 -Exterior Noise Limits. General Plan Policy NS 1.10.

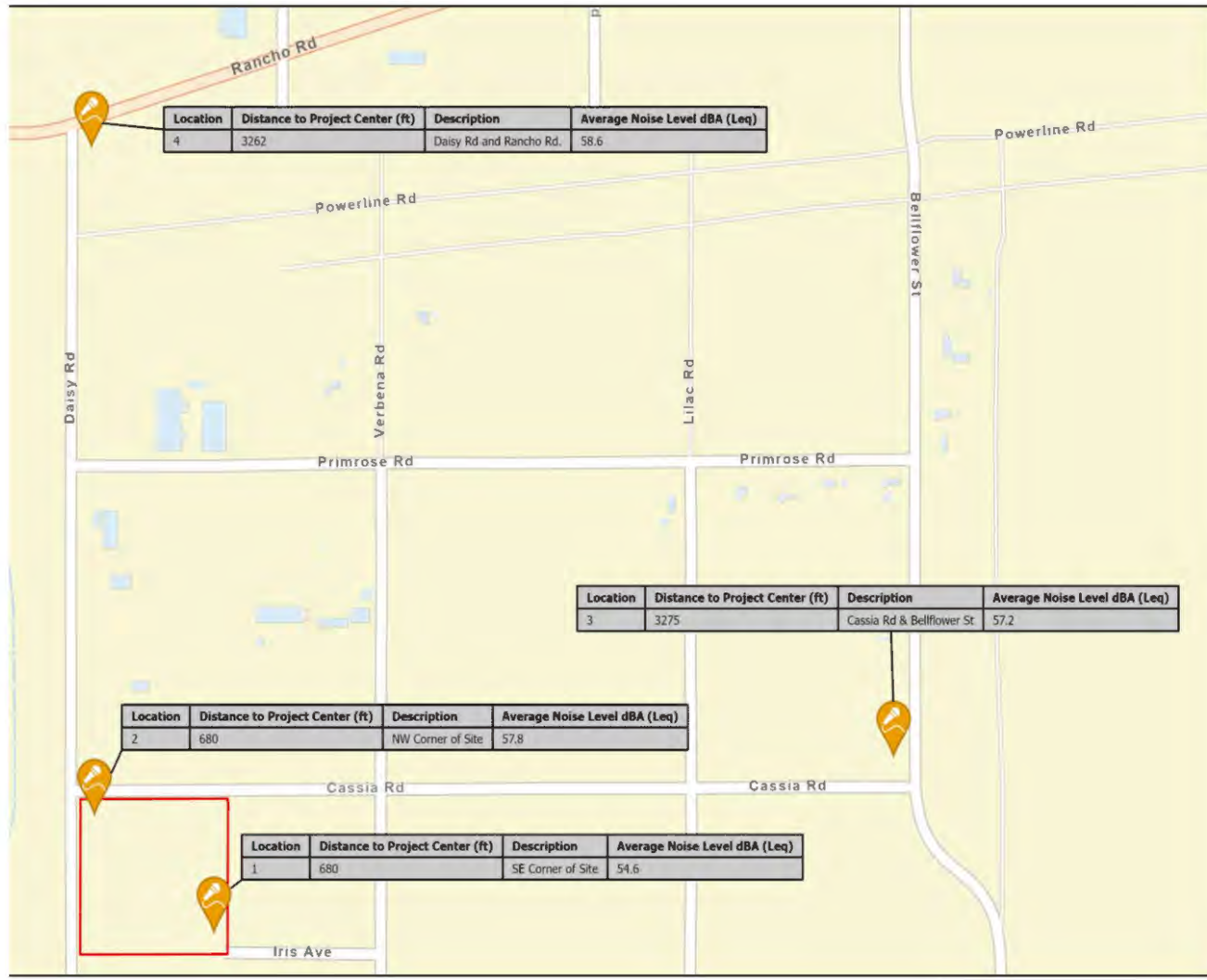
SER Vibration-1. Municipal Code §17.90.030 Vibration.

The primary sources for existing ambient noise in the Project area are traffic and industrial uses. Traffic generated noise is from adjacent Cassia Road and Daisy Road. To assess the existing noise level environment, short-term noise measurements were obtained from four locations in the Project study area. Table 4.13.1 provides the locations of the noise level measurements, and Table 4.13.2 provides the noise measurements.

Table 4.11-1. Ambient Noise Level Measurements

Location	Distance to the Project Center	Description	Average Noise Level dBA (Leq)
#1	680 ft	Southeast Corner of Site	54.6
#2	680 ft	Northwest Corner of Site	57.8
#3	3,275 ft	Cassia Road & Bellflower Street	57.2
#4	3,262 ft	Daisy Road & Adelanto Road	58.6

Figure 4.11.1. Noise Measurement Locations



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 the single-family residence located adjacent to the site on the east.

Table 4.11-2. Distance to Receiver Locations

Business/Residential	Location	Distance
Residential	East	725 feet
AmeriGas Propane	North	1,015 feet
Contech Engineered Solutions	North	1,365 feet
Adelanto Power Conversion Station	Northwest	1,875 feet
Merit Aluminum Foundry	North	2,000 feet
Copart	Southwest	2,290 feet

Short-Term Construction Noise Impact Analysis

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). Using the equipment from the Air Quality GHG Technical Memorandum CalEEMod data for the Site Preparation and Grading Phases, each piece of equipment operating at the same time in the same location for a full 8-hour period was calculated with results provided in Table 4.13.5, Worst Case Construction Noise Levels (Site Preparation and Grading).

Table 4.11-3. Worst Case Construction Noise Levels (Site Preparation and Grading)

Phase	Equipment Type	Number of Units	Leq dBA/Unit	Leq dBA Total
Site preparation	Tractor/loader/backhoe	4	56.4	62.4
Site preparation	Rubber tired dozer	3	60.5	66.5
	Total noise level	–	–	67.9
Grading	Grader	1	63.6	63.9
Grading	Tractor/loader/backhoe	3	56.4	61.2
Grading	Rubber tired dozer	1	60.5	60.5
Grading	Excavator	1	59.6	59.6
	Total noise level	–	–	67.6

The highest equipment noise level at the nearest sensitive receptor as indicated in **Error! Reference source not found.** above will be 68 dBA (Lmax) and 65 dBA (LEQ). During the construction phase, the noise levels will be the highest as heavy equipment passes 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 **Error! Reference source not found.** 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 Noise Impact Analysis

Off-site Traffic Noise Impacts

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 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

Upon buildout, the proposed Project is expected to generate approximately 584 average daily vehicle trips from passenger cars and trucks. This additional traffic generated during peak hours will increase the ambient traffic noise level in the vicinity of the Project site in comparison to the existing site conditions. According to Caltrans, the human ear can begin to detect sound level increases of 3 decibels (dB) in typical noisy environments. 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 Daisy Road and Cassia Road but not to the extent that traffic volumes will be doubled creating a +3-dBA noise increase or resulting in a perceivable noise increase. Therefore, operational noise impacts would be less than significant.

Speed of Traffic

Daisy Road is a 2-lane road, paved north of Pansy Road and unpaved (dirt) south of Pansy Road. Daisy Road is classified as a Major Boulevard with future improvements of 4 lanes. Cassia Road north of the Project site is an undeveloped unpaved (dirt) road. Daisy Road and Cassia Road have a prima facie speed limit of 25 mph. 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 site is not designed to accommodate heavy-duty diesel trucks because the small size of each lot does not provide enough area for maneuvering, nor are there truck loading docks. The trucks that would access the site would be delivery vans and light-duty trucks.

Facility Operations (Stationary Noise)

At the time the noise analysis was prepared, the future tenants of the proposed Project were unknown. The on-site project-related noise sources are expected to include rooftop heating, ventilation, air conditioning units (HVAC), refrigeration units, and parking lot vehicle movements from delivery vans and light-duty trucks. This noise analysis is intended to describe noise level impacts associated with the expected typical operational (stationary source) activities at the Project site.

Table 4.11-4. 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	100	48.0
Parking Lot Activity ²	25	54.4	100	42.4

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 Road, Moreno Valley)

Traffic associated with parking lots is typically not at a sufficient level to exceed the community noise standards. The total parking estimated for the Project is 12 loading spaces. 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 24 hours. 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.³⁴ Levels exceeding 55 dBA in a residential setting are normally short and not significant in affecting the health and welfare of residents. As the Project site is located in an industrialized area that is zoned and planned for future industrial development, the nearest existing sensitive receptor is the residential structure approximately 750 feet from the eastern Project site boundary and no significant noise impacts are expected at that distance.

³⁴ USEPA "EPA Identifies Noise Levels Affecting Health and Welfare" <https://archive.epa.gov/epa/aboutepa/epa-identifies-noiselevels-affecting-health-and-welfare.html> accessed February 7, 2023.

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.

Finding: Less than Significant Impact.

Threshold 4.11 – 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

Applicable SERs:

SER Vibration-1. Municipal Code §17.90.030 Vibration.

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, 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.³⁵ The Project does not require these types of construction activities. Vibration amplitude and impact decrease with distance and perceptible groundborne vibration is generally limited to areas within 1 to 200 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 peak particle velocity (PPV) greater than or equal to two-tenths of an inch per second measured at or beyond the lot line.³⁶

³⁵ <https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123>.

³⁶ City of Adelanto Municipal Code Section 17.90.030 (vibration).

Table 4.11-5. Vibration Source Levels for Construction Equipment

Equipment	PPV (inches per second) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded trucks	0.076
Large bulldozer	0.089

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

The closest sensitive receptor to the Project property line is minimally 750 feet from the property line. The estimated construction vibration level from a large bulldozer (worst case scenario) measured at 15 feet would create a vibration level of 0.191 in/sec, which does not exceed the 0.2 in/sec threshold. Therefore, the vibrations at the nearest sensitive receptor will remain well below the strongly perceptible annoyance criteria and potential residential vibration damage criteria thresholds listed in the City of Adelanto Municipal Code Section 17.90.030 (vibration).

This threshold requires that no vibration greater than 0.2 PPV be felt at or beyond the lot line. The proposed Project therefore is not considered to result in exposure of people to excessive ground vibration. During operations of the Project following construction, the primary source of vibration would be from vehicle traffic, primarily truck traffic. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Typical vibration levels from heavy truck 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 traveling at very low speeds and it is expected that truck vibration impacts off-site will not exceed the 0.2 in/sec PPV threshold.

Groundborne 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 annoy people or damage to buildings in the vicinity.

Finding: Less than Significant.

Threshold 4.11 – 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

Applicable SERs: None.

The Project site is approximately 3.6 miles southeast of the Southern California Logistics Airport. According to San Bernardino Countywide Plan Policy Map HZ-9, Airport Safety, and Planning Areas, the Project site is not located within an area exposed to excessive noise levels.³⁷

Finding: Less than Significant Impact.

³⁷ <https://cms.sbcounty.gov/lus/Planning/AirportLandUse.aspx>, accessed on December 18, 2023.

4.12 Population and Housing

Standard Environmental Regulations (SERs)

There are no SERs applicable to the Project.

Threshold 4.12– 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

Applicable SERs: None.

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 the 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 new industrial development on a previously vacant site would increase employment within the City. Thus, the Project would lead to an increase in the employee population within the area. The additional employment created by the proposed Project has the potential to result in an indirect growth in the City's population since the potential exists that future employees (and their families) who 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. The potential population growth associated with the Project would be accounted for in the General Plan as the Project is consistent with the Manufacturing/Industrial land use and zoning designation.

Infrastructure Extensions

The Project site occupied frontage along Daisy Road and Cassia Road. No roadway extensions are required to serve the site. The Project would connect to the existing water, storm drain, electric, gas, and communication facilities located adjacent or close to the site. No infrastructure extensions will be needed to serve the Project.

Finding Less than Significant Impact.

Threshold 4.13 – 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

Applicable SERs: None.

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

Finding: No Impact.

4.13 Public Services

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER-Public Services-1. Chapter 14.36.020 Development Impact Fee. *Development impact fees shall be required as a condition of issuance of a building permit for construction of all new buildings, or where a building permit is not required for any development or use of private property, other than permitted as a temporary use in Chapter 17.155 of the Zoning Code. Fees shall be paid prior to the final inspection of a building or certificate of occupancy. Where a building permit is not required, fees shall be paid prior to initiation of use of the property. No occupancy of a new building or use of private property other than temporary use as specified above shall be considered permitted until applicable development impact fees have been paid to the City.*

Threshold 4.13– 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

Applicable SERs:

SER-Public Services-1. Chapter 14.36.020 Development Impact Fee.

Fire Protection: The San Bernardino County Fire Department provides fire protection services to the Project area. The Project would be primarily served by Adelanto Station #322, an existing station located approximately 1.1 roadway miles northwest 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 Adelanto, approximately 3.5 roadway miles northeast. The city collects a Development Impact Fee to assist the city in providing 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 constructing 12 industrial buildings totaling 120,000 square feet of floor area, which would not result in substantial direct population growth within the City. However, the Project would be subject to the requirements of AB 2926 and SB 50, which allow school districts to collect development impact fees to minimize potential impacts to school districts as a result of new development. According 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, to maintain acceptable service ratios or other performance objectives for schools. Thus, upon payment of development fees by the Project Proponent

consistent with existing state requirements, impacts in this regard would be less than significant.

Parks: The nearest public park to the Project site is Sierra Park, approximately 1.5 miles to the south. The Project does not propose residential development, so the Project would not directly increase the population within the City and therefore would not significantly increase the demand for parkland or other recreational facilities.

Other Public Facilities: As noted above, the development of the Project could result in an indirect increase in the City's population. Nevertheless, 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 since no direct increase in population would result.

Finding: Less than Significant. Impact.

4.14 Transportation

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

SER Transportation-1-Pedestrian Circulation. Standards. *Per Municipal Code §13.20.050:*

- A. Sidewalks shall be required on public streets as determined by the reviewing authority. Sidewalks shall be constructed of concrete, with a minimum width of six (6) feet, exclusive of the curb. Any sidewalk constructed within two and one-half (2-1/2) feet from the face of the curb shall join to the back of the curb. Considerations in design are to be given for handicapped persons so that a clear path of travel of at least four (4) feet is provided, in accordance with current State and Federal Americans with Disabilities Act requirements.*
- B. Additional sidewalks on site may be required through the design review process, the sidewalk system shall provide for a safe, continuous pedestrian circulation and access system to all parts of the development. Pedestrian access shall be provided from public streets and parking lots to building entries, and walkways provided on-site shall connect with those off-site.*
- C. Pedestrian Circulation Standards shall conform with the Engineering Department Standards, Drawings and Specifications approved by the City Engineer.*

Threshold 4.14 – 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

Applicable SERs:

SER Transportation-1-Pedestrian Circulation. Standards.

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:

Cassia Road and Daisy Road

The Project will construct pavement for travel lanes, curbs, gutters, and sidewalks. The site can be accessed through four 26-foot driveways off of Cassia Road and one 60-foot driveway off of Daisy 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 roadways to allow access for transit service.

Bicycle and Pedestrian Facilities

In October 2020, the City adopted the Adelanto Active Transportation Plan. Adelanto in Motion, the Active Transportation Plan ("Plan") represents a new commitment to walking and biking in Adelanto. There are no bicycle or pedestrian projects proposed adjacent to the Project site. Thus, the Project would not interfere with proposed bicycle and pedestrian facilities planned elsewhere in the City.

Public Transit Facilities

Public transportation services within the City of Adelanto are provided by the Victor Valley Transit Authority (VVTA). There is no transit service adjacent to the site. The closest VVTA transit system bus route is Route No. 33 (Highway 395 & Palmdale Road-Bartlett & Greening), located at the intersection of Rancho Road and Verbena Road, heading westbound. The Project is not proposing any improvements that would conflict with Route No. 33, or any future transit route in the area.

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.

Finding: Less than Significant Impact.

Threshold 4.14 – 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

Applicable SERs: None.

Background

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt Vehicle Miles Traveled (VMT) as a

replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. Impacts related to LOS will be evaluated through the City's development review process apart from CEQA. The City of Adelanto City Council adopted Resolution No. 20-41 on June 24, 2020, which approved VMT thresholds for CEQA compliance purposes.

Methodology

The Project VMT analysis was conducted using the City of Adelanto's Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (LOS) (Guidelines), dated July 2020. The guidelines included project screening criteria which were reviewed for the project evaluation. The project does qualify for VMT screening under any of the established screening criteria.

The Project proposes 12 10,000-square-foot pads equaling 120,000 square feet of floor area. Because the Project is not greater than 256,000 square feet in floor area, the Project is screened out from further VMT analysis. The project does not constitute a significant impact for both "project generated VMT" and "project's effect" on VMT.

Finding: Less than Significant Impact.

Threshold 4.14 – 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

Applicable SERs:

SER Transportation-1-Pedestrian Circulation. Standards.

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

Finding: Less than Significant Impact.

Threshold 4.14 – 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

Applicable SERs:

SER Transportation-1-Pedestrian Circulation. Standards.

The Project would propose roadway improvements to Cassia Road and Daisy adjacent to the Project site per City standards. Emergency access would be available from Cassia Road and Daisy 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, Fire Department, and Sheriff's Department to ensure that adequate access to and from the site would be provided for emergency vehicles.

Finding: Less than Significant Impact.

4.15 Tribal Cultural Resources

Standard Environmental Regulations (SERs)

There are no SERs applicable to the Project.

Threshold 4.15 – 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

Applicable SERs: None.

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

- (a) "Tribal cultural resources" are either of the following:
 - (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 - (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique

archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Register of Historical Resources/Local Register of Historical Resources

A historical resource or archaeological resource may also be a tribal cultural resource if it conforms with the criteria described in Public Resources 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, Mitigation Measures CR-1 and CR-2 under Section 4.5, Cultural Resources shall apply. These measures require that the Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department be contacted, as detailed within CR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the discovery, to provide Tribal input with regard to significance and treatment. In addition, if significant pre-contact cultural resources, as defined by CEQA, are discovered, and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment.

Finding: Less than Significant with Mitigation Incorporated.

Threshold 4.15 – 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

Applicable SERs: None.

Sacred Lands File Search

A Sacred Lands File request was sent by BCR Consulting to the State of California Native American Heritage Commission (NAHC) for a records search. The NAHC is the State of California's trustee agency for the protection of "tribal cultural resources," as defined by California Public Resources Code §21074 and is tasked with identifying and cataloging properties of Native American cultural value, including places of special religious, spiritual, or social significance and known graves and cemeteries throughout the state. The Sacred Lands File yielded negative results for Native American cultural resources in the vicinity of the project area.

Assembly Bill (AB) 52

The Legislature added requirements regarding tribal cultural resources for CEQA in Assembly Bill 52 (AB 52) that took effect July 1, 2015. AB 52 requires consultation with California Native American tribes and consideration of tribal cultural resources in the CEQA process. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. Because the Project site is located within the ancestral territory of Yuhaaviatam of San Manuel Nation (YSMN), the possibility exists that Native American Tribal Cultural Resources may be discovered during ground-disturbing activities. Mitigation Measures TCR-1 is made a part of the project/permit/plan conditions.

Mitigation Measure TCR-1. Contact Yuhaaviatam of San Manuel Nation

1. *The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. If the find is deemed significant, as defined by CEQA (as amended, 2015), a cultural resource Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.*
2. *Any and all archaeological/cultural documents created as a part of the project (e.g., isolate records, site records, survey reports, testing reports) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.*

4.15 Tribal Cultural Resources

Note: Yuhaaviatam of San Manuel Nation realizes 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 agency, developer, and/or archaeologist wishes to consult with other tribes in addition to YSMN and if the Lead Agency wishes to revise the conditions to recognize additional tribes.

Finding: Less than Significant impact with Mitigation Incorporated.

4.16 Utilities and Service Systems

Standard Environmental Regulations (SERs)

The SERs include local, regional, state, and federal regulations, including the City's Standard Conditions of Approval. Because they are existing plans, policies, and programs, compliance with SERs is assumed when assessing the potential impacts of the project. This assumption may lead to the conclusion that a project will have less than significant impacts. The following SERs apply to the Project:

Threshold 4.16– 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

Applicable SERs: None.

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

Water Service

The Project site will connect to the 12-inch public water main located to the northwest within Daisy. The 12-inch water line will be extended south along Daisy Road and then to the east along Cassia Road along the northern boundary of the property line.

Sewer Service

The Project is proposing to connect to the existing sewer line Cassia Road.

Storm Drainage Improvements

The existing site is undeveloped. The existing site generally slopes from southwest to northeast. There are no existing storm drains within the Project site. The slopes within the Project site range from flat to mild slopes, ranging from 0% to 5% in some areas. With the majority of the site being type C soils, the drainage percolates into the ground, and the remaining runoff flows to Cassia Road.

4.16 Utilities and Service 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.

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 4, CR-1, CR-2, PALEO-1, PALEO-2, and TCR-1 are required.

Finding. Less than Significant with Mitigation Incorporated.

Threshold 4.16 – 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

Applicable SERs: None.

Water Supply Reliability

As required by Municipal Code Chapter 17.80.081, *Cannabis Cultivation Water Requirements*, each Cultivation Permittee maintains a standard curbside water meter for consumption and billing purposes ("Standard Meter") and maintains a separate water meter that exclusively measures and monitors the amount of water used for cultivation purposes ("Cultivation Meter"). Each Cultivation Permittee is required to report to the City the monthly quantity of water registered by its Cultivation Meter. This data is then provided to the MWA and the California Department of Water Resources for overall management of the Mojave River Groundwater Basin, which includes the Alto Subbasin.

As noted above, based on water bills obtained from the City of Adelanto Water Department, the actual water used in 2023 by the Licensees within the Facility was 312,816 gallons per day or 350 AFY. This exceeds the minimum amount of water demand identified in the MND. Under CEQA, a potentially significant impact would occur if:

1) By providing water to the Facility, new water infrastructure (e.g. water lines, storage tanks, new wells, etc.) would result in significant physical impacts on the environment or,

2) An overdraft of the groundwater basin (Alto Sub-basin) would occur resulting in physical impacts to the environment.

Regarding Criterion 1, the Facility is currently being served using the existing water infrastructure (i.e. the Water Department's groundwater well system and the water lines) used to convey water to the Facility). As such, no new water infrastructure is required.

Regarding Criterion 2, the potential overdraft of the Mojave Basin 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 the MWA as Watermaster of the Mojave Basin Area. The Stipulated Judgment in *City of Barstow, et al., vs. City of Adelanto, et al.* and related cross-complaints, which were consolidated into Case No. CIV208568 addresses water supply shortages in the Mojave Basin Area through the creation of a "Physical Solution."

The Physical Solution's purpose is to control overdrafts and provide a funding mechanism to raise money to purchase imported water to offset any annual deficit. The Watermaster is responsible for monitoring flows, verifying water production, reporting to the Court, collecting assessments, and conducting studies.

As part on the ongoing monitoring of the Mojave Basin Area, MWA has prepared the *Watermaster Annual Report for Water Year 2022-23*, May 1, 2024. The results of Annual Report are summarized below.

*"After experiencing above-average precipitation during 2021-22, the precipitation in the Mojave River Watershed during 2022-23, as measured at Lake Arrowhead was again above average at about 248 percent of the 60 Year Base Period average. The combined flow of the West Fork Mojave River and Deep Creek during the 2022-23 Water Year was about 305 percent of the 60-Year Base Period average."*³⁸

"Water year 2023 was a significantly wetter than average year, with approximately 250,250 acre-feet measured at the Forks, of which about

³⁸ <https://www.mojavewater.org/wp-content/uploads/2024/04/30AR2223.pdf>. P.19

50,590 acre-feet was imported by Mojave Water Agency and measured with the total flow at West Fork Mojave River; resulting natural inflow of 199,660 acre-feet. Water supply conditions for the past 12 years have still been drier than the 60-year Base Period Average (1931-1990) (63.5% of Base Period average). Continuation of dry conditions will result in water level declines. However, based on future recharge of approximately 17,500 acre-feet per year, released to the Mojave River to offset the indicated deficit in Alto, we expect improved conditions, in water levels, flow at Lower Narrows and continued support to the Transition Zone."

Accordingly, MWA has reliable water supplies available to meet normal, single dry, and five consecutive dry-year water demands through 2065. As a result, the City can provide a reliable water supply to its customers from the local groundwater aquifer through its wells in normal, single dry, and five consecutive dry years.

City of Adelanto Water Shortage Contingency Plan

Additionally, to ensure that there is not a water shortage, the Water Department is responsible for conserving the available water supply, protecting the integrity of water supply facilities (infrastructure), and implementing a contingency plan in times of drought, supply reductions, failure of water distribution systems or emergencies. The Water Department has developed a *Water Shortage Contingency Plan* (WSC Plan) following California Water Code (CWC) Section 10632, which is part of the Urban Water Management Planning regulatory requirements.³⁹ The WSC includes a Water Reliability Assessment that compares the total water supply sources available to the Water Department with long-term projected water use over the next 20 years, in five-year increments, for a normal water year, a single dry water year, and a drought lasting five consecutive water years. The WSC also includes a Drought Risk Assessment that evaluates a drought period that lasts five consecutive water years starting from the year following when the assessment is conducted.

Because the City obtains all of its water supply from the Mojave River Groundwater Basin managed by the MWA serving as Watermaster per the Stipulated Judgement referenced above, it relies upon the available supply allocated by the MWA. According to the Watermaster, MWA, has indicated despite long-term changes in State Water Project supply availability to replenish the Basin, regional water supplies – groundwater and surface water – within the MWA service area boundaries are reliable during normal, single dry, and five consecutive dry years through 2065.⁴⁰

³⁹

https://cms3.revize.com/revize/adelanto/Documents/Services/Water%20&%20Sewer/ADELANTO%202020%20UWMPWSC/P/City%20of%20Adelanto%202021%20WSCP_1.pdf. P. 5. Accessed on May 31, 2024.

⁴⁰

https://cms3.revize.com/revize/adelanto/Documents/Services/Water%20&%20Sewer/ADELANTO%202020%20UWMPWSC/P/City%20of%20Adelanto%202021%20WSCP_1.pdf

4.16 Utilities and Service Systems

Additionally, the California Department of Water Resources (DWR), as directed by the California Water Code (CWC) §10644(c)(1)(B), prepared the *2023 Annual Water Supply and Demand Assessment Summary Report, A Report to the State Water Resources Control Board pursuant to California Water Code Section 10644(c)(1)(B)*, California Department of Water Resources, Water Use Efficiency Branch, September 2023. This report provides a mechanism for the Water Department to demonstrate to the State that it has adequately developed and is following the adopted Water Shortage Contingency Plans (WSCP). According to Appendix A- *Summary of Urban Water Supplier's Reported Shortage Assessments*, of that document the City of Adelanto projected a 12.6% surplus.

If the available water supply is greater than the anticipated customer demand for the upcoming year, (i.e. Surplus) then the Water Department does not need to take any further action. If the anticipated customer demand for the upcoming year is greater than the available water supplies, the City can initiate water conservation actions as detailed in the WSC Plan.⁴¹

As demonstrated above, although the minimum amount of water exceeded the allocation identified in the MND, there was, and is expected to be, adequate water supplies available to serve the Facility for the next 5 years and beyond.

Based on the analysis in this study, the water demand projections are expected to increase slightly due to the proposed project; however, these demands as indicated in the Water Supply Assessment, are not anticipated to exceed the supply capacity of the City and the ground water subbasins. 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.

Finding: Less than Significant Impact.

Threshold 4.16 – 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

Applicable SERs: None.

⁴¹ <https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Water-Use-And-Efficiency/Files/2023-Summary-Report.pdf>

4.16 Utilities and Service Systems

The MND found that with the recent expansion of the Adelanto Wastewater Treatment Plant (WWTP) to 4.0 MGD, the City would have adequate capacity to serve the Facility's wastewater needs and would not significantly impact existing commitments. Therefore, no significant adverse impacts were identified or anticipated, and no mitigation measures were required.

According to the *Adelanto WWTP Asset Management Monthly Report*, PERC Water Corp., April 2024, the Adelanto WWTP received 87,704,000 million gallons of raw sewage and successfully treated the full amount during April 2024, making the total treated amount of water recycled at the Adelanto WWTP about 10.718 billion gallons (since operating services began in April 2012).⁴² During May, the daily influent flow recorded averaged 2.974 million gallons per day. The WWTP is permitted for 4.0 MGD, the capacity is 3.0 MGD, and current flows and loading are do not exceed the average annual flow.⁴³

Finding: No Impact.

Threshold 4.16 – 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

Applicable SERs: None.

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 Victorville 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.

⁴³ Personal communication, Dave Kachelski, Area Operations Manager, PERC Water Corporation, May 31, 2024.

Operational Related Impacts

The Project is estimated to generate 149 tons of solid waste per year.⁴⁴ 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 daily throughput of 3,000 tons per day and a remaining capacity of 93,400,000 cubic yards. The expected closure is October 1, 2047.⁴⁵ As such, there is adequate landfill capacity to serve the Project.

The MND found that the Facility would generate approximately 1,560 tons of solid waste per year. At that time, the Victorville Landfill had a permitted disposal capacity of 3,000 tons per day with a remaining capacity of 79,400,000 tons. The Victorville Landfill is estimated to reach capacity, at the earliest time, in 2047. As such, there was adequate capacity to handle the solid waste generated by the Facility.

According to the Cal Recycle Facility/Site Summary Details website accessed on May 21, 2024, Victorville Landfill's permitted disposal capacity is still 3,000 tons per day with a remaining capacity of 79,400,000 tons. The Victorville Landfill is estimated to reach capacity in 2047 has not changed.

Additionally, according to the *Annual Report*, Burrtec Waste Industries, Inc. April 30, 2024, the City of Adelanto's total tonnage of solid waste taken to the Victorville Landfill was 30,171 tons. This represents 2.75% of the total annual capacity of the Victorville Landfill. The solid waste generated by the Facility is 0.14% of the total annual capacity. Based on the data, there is sufficient capacity in the Victorville Landfill to continue to serve the Facility.

Finding: Less than Significant Impact.

⁴⁴ Appendix C Cassia & Daisy CalEEMod Datasheets.

⁴⁵ <https://www.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652>, accessed on December 11, 2023.

4.16 Utilities and Service Systems

Threshold 4.16– 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

Applicable SERs: None.

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.

Finding: Less than Significant Impact.

4.17 Mandatory Findings of Significance

Threshold 4.17 – 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, Soils and Geology, and Tribal Cultural Resources may be adversely impacted by Project development. The following mitigation measures are required to reduce impacts to less than significant levels:

- BIO-1: Western Joshua Tree Incidental Take Permit
- BIO-2: Focused Burrowing Owl Survey.
- BIO-3 : Desert Tortoise Mitigation Program.
- BIO-4: Nesting Bird Pre-Construction Surve
- CR-1: Resource Discovery
- CR-2: Monitoring and Treatment Plan
- PALEO-1: Inadvertent Discovery of Paleontological Resources
- PALEO-2: Paleontological Treatment Plan
- TCR-1: Contact Yuhaaviatam of San Manuel Nation
- TCR-2: Tribal Cultural Documents

4.17 Mandatory Findings of Significance

Threshold 4.17 – 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), Tribal Cultural Resources, and Utilities and Service Systems (installation of facilities that involves disturbance of previously undisturbed land). For these resources, Mitigation Measures are required to reduce impacts to less than significant levels as discussed below.

Biological Resources

As discussed in Section 4.4, Biological Resources, of this Initial Study, future development of the site will impact the general biological resources present on the site, and most of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. More mobile species (i.e., birds 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. Western Joshua trees are also located on the Project site. Therefore, the Mitigation Measures

BIO-1 through BIO-4 are included to ensure any impacts are less than significant to these species.

Overall, the loss of about 9.11 acres of 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 4.5, Cultural Resources, of this Initial Study, the records search and field survey did not identify any historical resources or unique archaeological resources within the Project site boundaries. Research results combined with surface conditions have failed to indicate sensitivity for buried cultural resources. No additional cultural resources field surveys 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 CR-1 and CR-2. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Geology and Soils (Paleontological Resources)

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

Tribal Cultural Resources

As discussed in Section 4.18, Tribal Cultural Resources, of this Initial Study, the construction and operation of the Project could potentially impact tribal cultural resources. Pending results of the AB 52 tribal consultation process, Mitigation Measures TCR-1 and TCR-2 are required. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

4.17 Mandatory Findings of Significance

Utilities and Service Systems

As discussed in Section 4.19 Utilities and Service Systems, of this Initial Study, the installation and construction of the sewer, water, 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 BIO-1 through BIO-4, CR-1 CR-2, PALEO-1, PALEO-2, and TCR-1 and TCR-2. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Threshold 4.17 – 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., Agriculture and Forestry Resources, Air Quality, 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 would comply with mandatory rules of the CARB and the MDAQMD through the implementation of the following Best Management Practices (BMPs):