INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

CUP 23-08 & LDP 23-10
TIRE RECYCLING FACILITY
NEC OF BEAVER ROAD AND CACTUS ROAD.
APN 3129-551-05
ADELANTO, CALIFORNIA

LEAD AGENCY:

CITY OF ADELANTO
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION
11600 AIR EXPRESSWAY
ADELANTO, CALIFORNIA 92301

REPORT PREPARED BY:

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
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NOVEMBER 14, 2024

ADLT 099

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Tire Recycling Facility (CUP 23-08 & LDP 23-10)

PROJECT APPLICANT: Mr. Alan Brown, Danivan LLC. P.O. Box 4643, Foster City, CA 94404.

PROJECT LOCATION: The proposed project site is located to the north of Cactus Road and to the east of Beaver Road, in the south-central portion of the City of Adelanto. There is no current address that has been assigned to this project site. The corresponding Assessor Parcel Number (APN) is 3129-551-05.

CITY AND COUNTY: City of Adelanto, San Bernardino County.

PROJECT: The proposed project site is located in the southern portion of the City of Adelanto. The project site is located east of the northwest corner of Cactus Road and Beaver Road. The project does not currently have an assigned address. The corresponding Assessor Parcel Number (APN) is 3129-551-05. The total land area of the project is 10 acres or 435,600 square feet. The site is currently vacant and undeveloped. The proposed project would consists of a 158,000 square foot building form use as a tire recycling facility. Parking would include 264 parking spaces including 8 ADA compliant spaces and 23 EV parking spaces. 8 truck dock high doors would be located along the building's northwest and northeast corner. Access to the project site would be two driveways: one driveway located southeast of the project site connected with north side of Cactus Road and another driveway located northwest of the site connected with the east side of Beaver Road. The site's zoning is *Manufacturing/Industrial (MI)*.

EVALUATION FORMAT: The attached initial study is prepared in accordance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of the attached Initial Study was guided by Section 15063 of the State CEQA Guidelines. The project was evaluated based on its effect on 21 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist includes a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

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

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

No Impact: No impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact: No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact with Mitigation: Possible significant adverse impacts have been identified or anticipated and mitigation measures are required as a condition of the project's approval to reduce these impacts to a level below significance.

Potentially Significant Impact: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation, the following finding is made:

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

Signature _____ Date _____

The project is also described in greater detail in the attached Initial Study.

TABLE OF CONTENTS

APPENDICES (UNDER A SEPARATE COVER)

SECTION 1. INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

The proposed project site is located in the southern portion of the City of Adelanto. The project site is located east of the northwest corner of Cactus Road and Beaver Road. The project does not currently have an assigned address. The corresponding Assessor Parcel Number (APN) is 3129-551-05. The total land area of the project is 10 acres or 435,600 square feet. The site is currently vacant and undeveloped. The proposed project would consists of a 158,000 square foot building as a tire recycling facility. Parking would include 264 parking spaces including 8 ADA compliant spaces and 23 EV parking spaces. 8 truck dock high doors would be located along the building's northwest and northeast corner. Access to the project site would be two driveways: one driveway located southeast of the project site connected with north side of Cactus Road and another driveway located northwest of the site connected with the east side of Beaver Road. The site's zoning is *Manufacturing/Industrial (MI)*.

The City of Adelanto is the designated *Lead Agency,* and as such, the City will be responsible for the project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.[1] As part of the proposed project's environmental review, the City of Adelanto has authorized the preparation of this Initial Study.[2] The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Adelanto with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration for a project;
- To facilitate the project's environmental assessment early in the design and development of the proposed project;
- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any impacts associated the proposed project.

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Adelanto, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.[3] This Initial Study and the *Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and

[1] California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions.* as Amended 2001. §21067.

[2] Ibid. (CEQA Guidelines) §15050.

[3] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.5, Section 21067 and Section 21069.* 2000.

comment. This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.[4] Questions and/or comments should be submitted to the following contact person:

Christian Espinoza, Planning Technician
City of Adelanto, Planning Division
11600 Air Expressway
Adelanto, California 92301

1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description* provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and the subsequent operation of the proposed project.
- *Section 4 Conclusions* summarizes the findings of the analysis.
- *Section 5 References* identifies the sources used in the preparation of this Initial Study.

[4] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.6, Section 2109(b).* 2000.

SECTION 2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed project site is located in the southern portion of the City of Adelanto. The City of Adelanto is located approximately 85 miles northeast of Downtown Los Angeles and 40 miles north of the City of San Bernardino. Adelanto is bounded on the north by unincorporated San Bernardino County; on the east by Victorville and unincorporated San Bernardino County; on the south by Hesperia and unincorporated San Bernardino County; and on the west by unincorporated San Bernardino County.[5] Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15), extends in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395, traverses the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), traverses the southern portion of the City in an east to west orientation.[6] The location of Adelanto, in a regional context, is shown in Exhibit 1. A citywide map is provided In Exhibit 2.

The proposed project site is located to the north of Cactus Road and to the west of Beaver Road, in the southern portion of the City of Adelanto. There is no current address that has been assigned to this project site. The corresponding Assessor Parcel Numbers (APN) is 3129-551-05. The project site occupies a portion of Section 12, Township 5 North, Range 6 West, San Bernardino Principal Meridian. It is depicted on the United States Geological Survey (USGS) Adelanto, California (1993) 7.5-minute topographic quadrangle. The proposed project's latitude and longitude is 34°32'11.83"N, -117°27'31.54W". A local vicinity map is provided in Exhibit 3.

2.2 ENVIRONMENTAL SETTING

The project site consists of 10 acres and is largely undeveloped and undisturbed. The relatively flat site is approximately 3,081 feet above mean sea level (AMSL) and contains little to no slope. The vegetation community present on site supports a disturbed desert scrub habitat encompassing mainly native plants and some non-native grasses. Common native plants onsite and in the area include creosote bush, Flatspine burr ragweed, Joshua trees, Nevada jointfir, white bursage, and various grasses.[7] The site and the surrounding area are illustrated in Exhibit 4. The project site's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*. Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* A construction material manufacturing facility extends along the project site's north side. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[8]
- *East of the project site:* Vacant, undeveloped land is located along the east side of the project site. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[9]
- *South of the project site:* Cactus Road is located along the south side of the project site. Cactus Road is the southern border of the City of Adelanto and Unincorporated San Bernardino is located south of Cactus Road. The land south of the aforementioned roadway is vacant and undeveloped. This area's General Plan and Zoning designation is *Rural Living*.

[5] Blodgett Baylosis Environmental Planning. 2024.

[6] Google Earth. Website accessed July 30, 2024.

[7] RCA Associates, Inc. *General Biological Resources Assessment, APN 3129-551-05, Danivan LLC., ARC Tire Recycling*. April 10, 2024.

[8] Google Maps. Site and Adelanto Zoning Map, Site Accessed, July 30, 2024.

[9] Blue Engineering. *Site Plan. Sheet 2.* July 29, 2024.

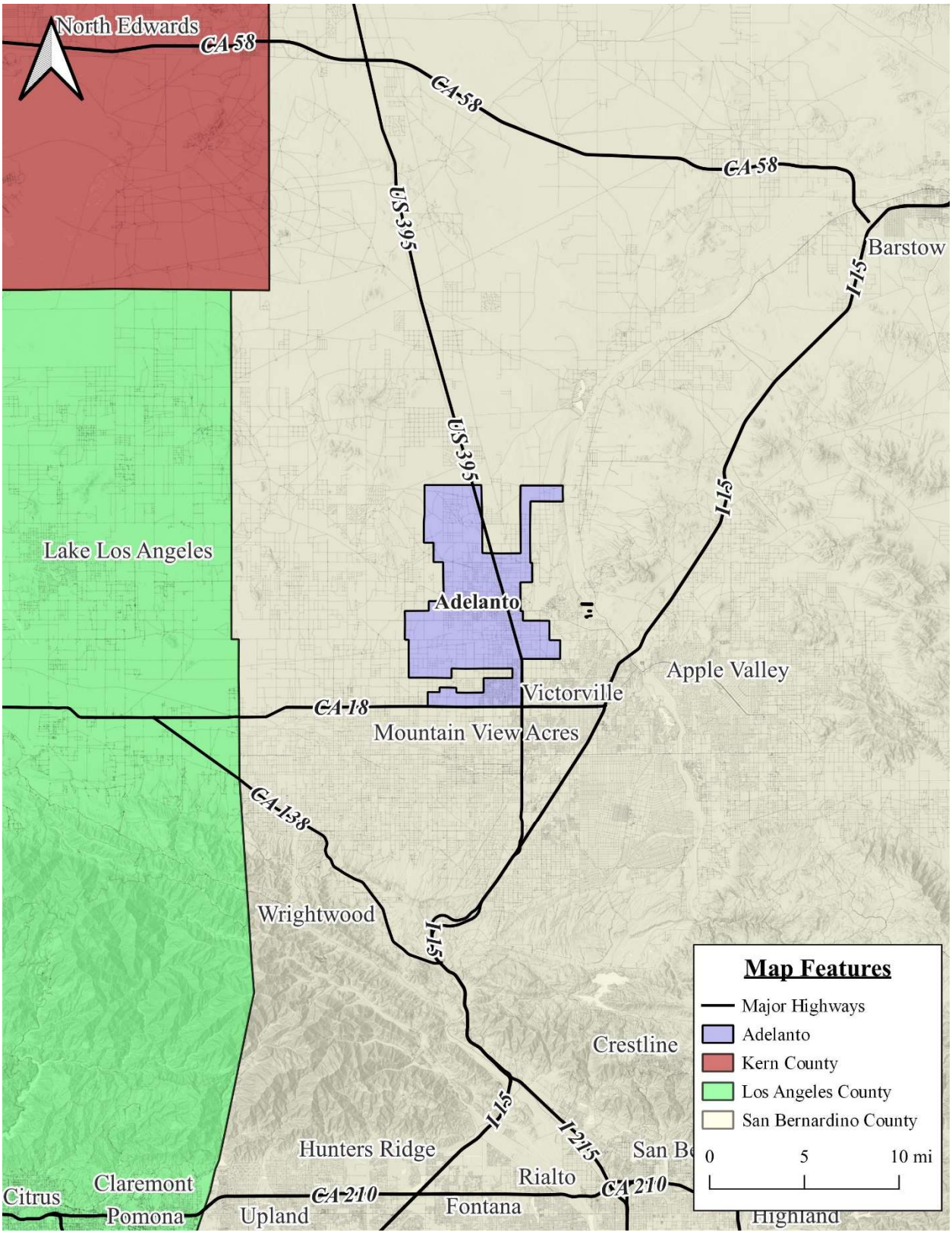

EXHIBIT 1 REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

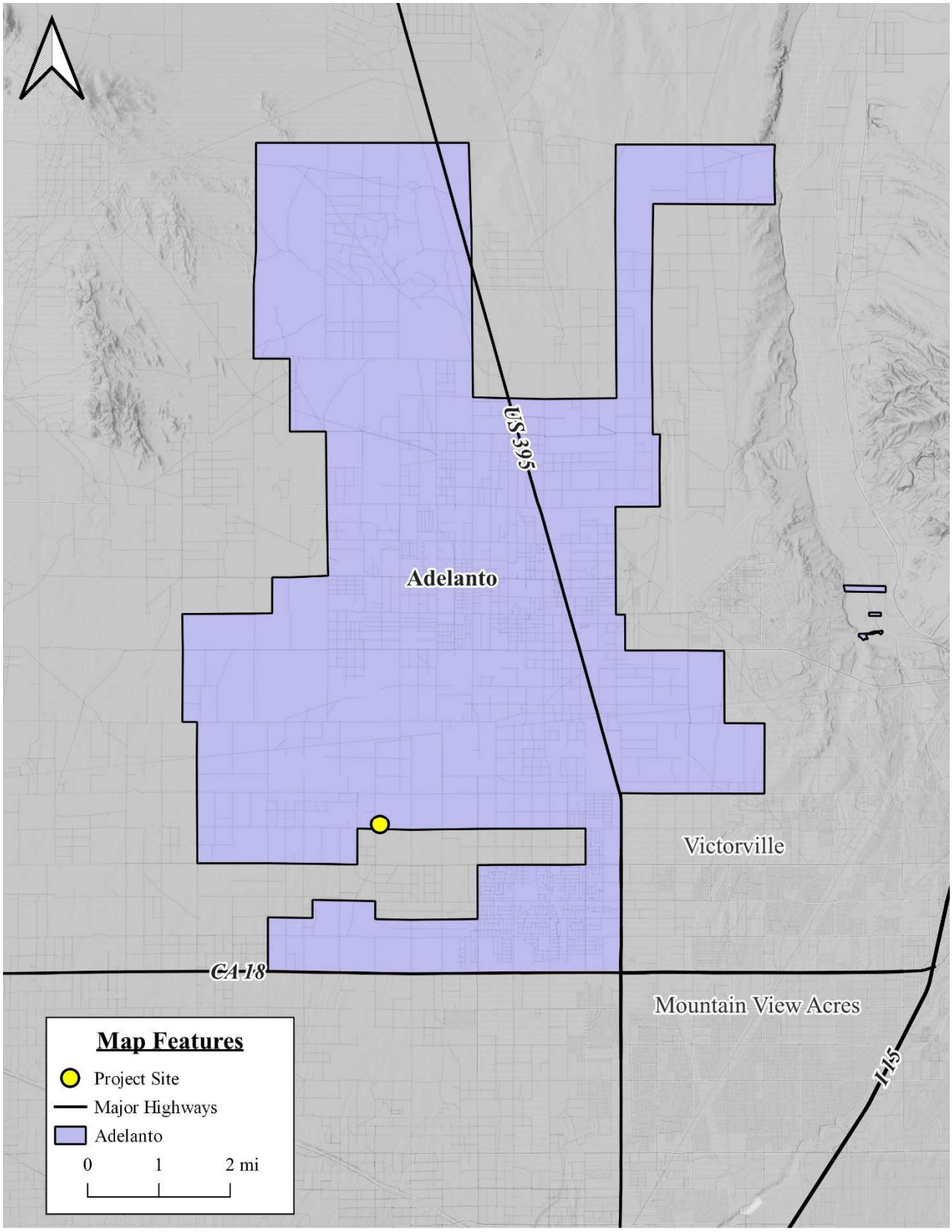

EXHIBIT 2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

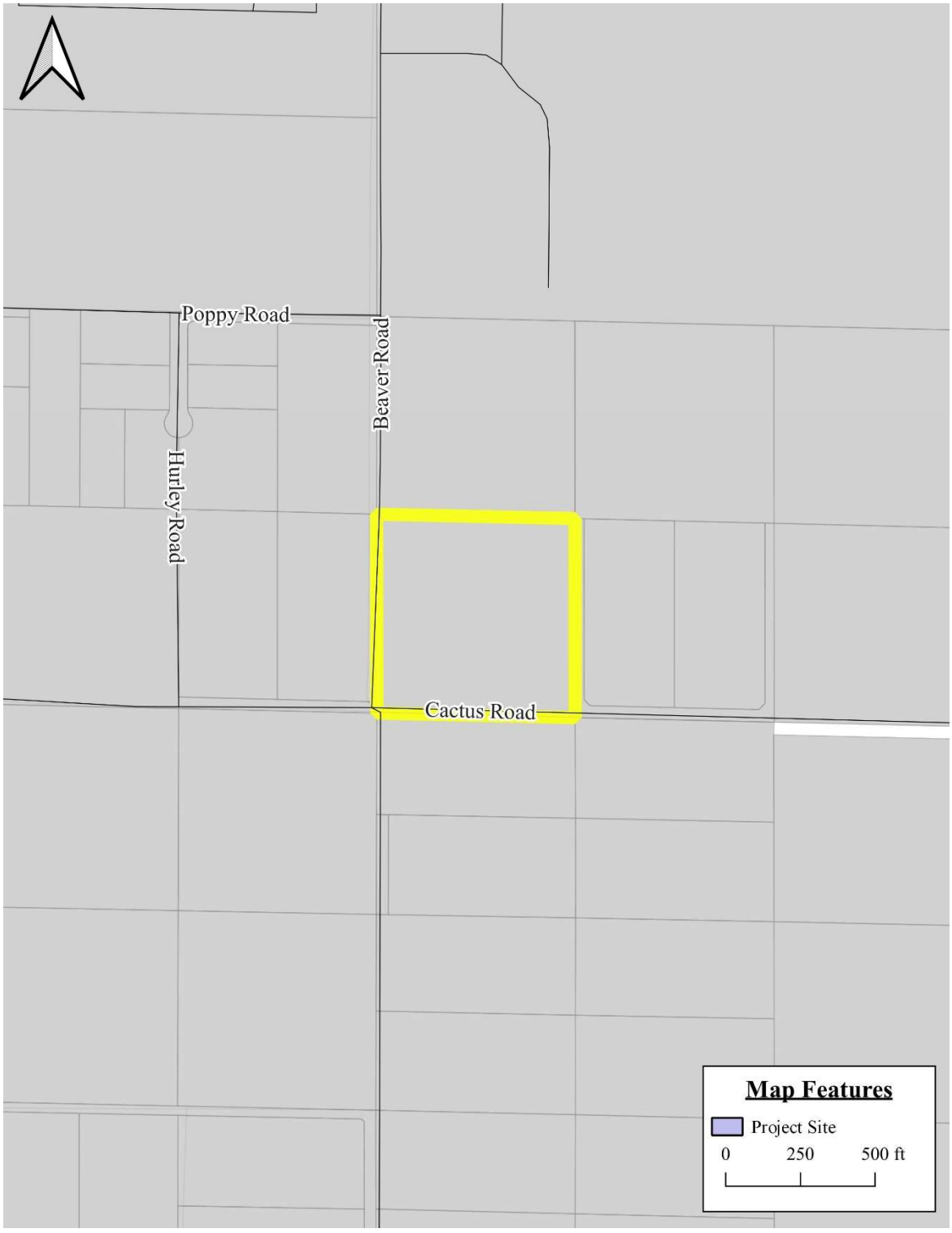

EXHIBIT 3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

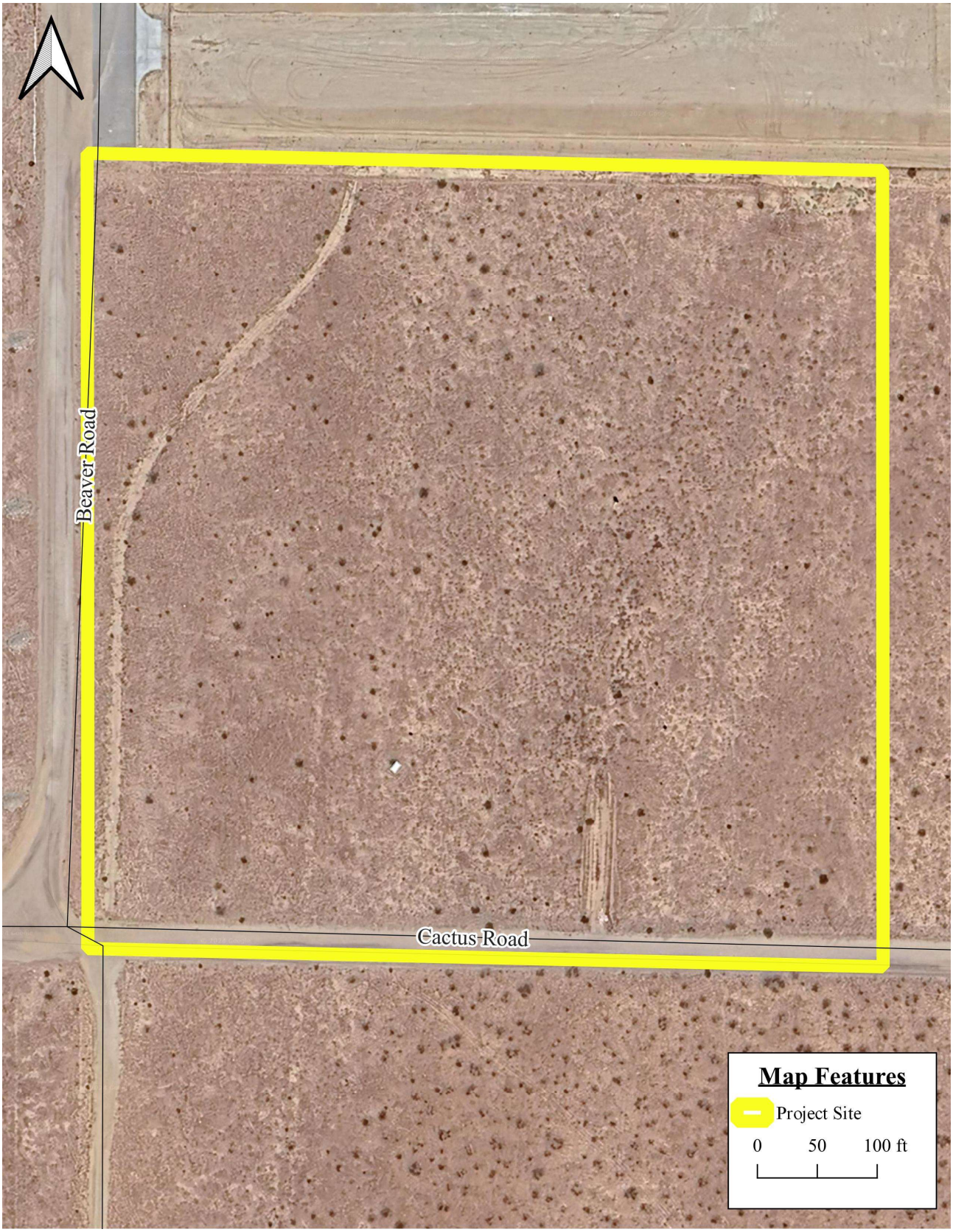

EXHIBIT 4 AERIAL IMAGE OF PROJECT SITE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *West of the project site:* Vacant, undeveloped land and single family homes are located to the west of the project site. This area's General Plan and Zoning designation is *Airport Park (AP).*[10]

The environmental setting is summarized in Table 1.

TABLE 1 SUMMARY OF ENVIRONMENTAL SETTING

Project Element	Existing Use	General Plan and Zoning
Project Site	Vacant Land	Manufacturing/Industrial (MI)
North of Project Site	Construction Material Facility	Manufacturing/Industrial (MI)
East of Project Site	Vacant Land	Manufacturing/Industrial (MI)
South of Project Site	Vacant Land	(San Bernardino Unincorporated area) Rural Living
West of Project Site	Vacant Land, Single Family Homes	Manufacturing/Industrial (MI)

Source: Blodgett Baylosis Environmental Planning

2.3 PROJECT DESCRIPTION

Key elements of the proposed project are summarized below and on the following page.

- *Proposed Site Plan*. The proposed development would be a tire recycling facility on a 10 acres site. The total floor area of the building would be 158,000 square feet. The main entrance is located on the building's south facing side while 8 truck dock high doors and two underground storage tanks would be located on the building's north facing side. The total landscaping for the project would be 74,564 square feet or 5%.
- *Proposed New Building*. The proposed new building would have a total floor area of 158,000 square feet. The main entrance is located on the building's south facing side while 8 truck dock high doors and two underground storage tanks would be located on the building's north facing side. The building would consist of a single level. The building would have a maximum height of 45-feet. The building's' construction would consist of Type III-B and it would be fully sprinklered.
- *Access*. Access to the proposed development would be provided by two new driveway connections located at the northwest and southeast corners of the site. The driveways would connect with the east side of Beaver Road and the north side of Cactus road, respectively.[11] Both Beaver Road and Cactus Road are currently unimproved.
- *Parking*. Parking would include 264 parking spaces including 8 ADA compliant spaces and 23 EV parking spaces. 8 truck dock high doors would be located along the building's northwest and northeast corner.[12] Truck loading areas would be located north of the building. Parking areas would be located along all sides of the building frontage.
- *Landscaping*. A proposed drainage basin would be located on the northeastern portion of the site. Landscaping would total 74,564 square feet and would be installed alongside the site's perimeter.[13]

[10] Blue Engineering. *Site Plan. Sheet 2*. July 29, 2024.

[11] Ibid.

[12] Ibid.

[13]Ibid.

- *Utilities*. Power (electrical) would be met with connections to the existing Southern California Edison utility lines. Water and sewer line connections would be extended to Cactus Road.[14]
- *Security*. On-site security will be provided twenty-four hours a day, seven days a week by security guards. In addition, security fencing, cameras, and shielded security lighting that would conform with all municipal lighting regulations will be installed on the premises.

The physical characteristics of the proposed project are summarized in Table 2. The proposed site plan is illustrated in Exhibit 5.

TABLE 2 SUMMARY OF PROPOSED PROJECT

Project Element	Description
Site Plan	10 acres
Total Floor Area	158,000 sq. ft.
Lot Coverage	36.27%
Parking	264 Spaces
Loading Docks	8 Docks
Landscaping	74,5674 sq. ft.

Source: Blue Engineering

2.4 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

The hours of on-site operations for the proposed new development will be Monday through Sunday, 8:00 AM to 5:00 PM with 24-hours a day security. The estimated employment is anticipated to be approximately 133 employees. This is based on an employment ratio of one employee for every 1,195 square feet of floor area.[15]

2.5 CONSTRUCTION CHARACTERISTICS

The proposed project would be a new 158,000 square foot tire recycling facility. The construction for the proposed project is assumed to commence in July 2025 and would take approximately eight months to complete. The key construction tasks that would occur during each of the four construction phases are outlined in the paragraphs below.

- *Task 1 Grading*. The project site would be graded and readied for the construction. The typical heavy equipment used during this construction phase would include graders, bulldozers, offroad trucks, back-hoes, and trenching equipment. This task would require one month to complete.
- *Task 2 Site Preparation*. During this phase, the building footings, utility lines, and other underground infrastructure would be installed. The typical heavy equipment used during this construction phase would include bulldozers, offroad trucks, back-hoes, and trenching equipment. This task would require one month to complete.

[14] Ibid.

[15] The Natelson Company, Inc. *Employment Density Study Summary Report*. Dated October 31, 2001

- *Task 3 Building Construction*. The new buildings would be constructed during this phase. The typical heavy equipment used during this construction phase would include offroad trucks, cranes, and fork-lifts. This task will take approximately 5 months to complete.
- *Task 4 Paving and Finishing*. This concluding task would involve the paving and finishing. The typical heavy equipment used during this construction phase would include trucks, backhoes, rollers, pavers, and trenching equipment. The completion of this phase will take approximately one month to complete.

2.6 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Adelanto) that calls for an exercise of judgment in deciding whether to approve a project. The following discretionary approvals are required:

- Approval of a Conditional Use Permit (CUP 23-08);
- Approval of a Location & Development Plan (23-10); and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

All potentially interested tribes identified by the NAHC were also contacted pursuant to AB-52 for information regarding their knowledge of cultural resources that were within or near the project area. These groups include: the San Manuel Band of Mission Indians, the Soboba Band Luiseno Indians, and the Serrano Nation.

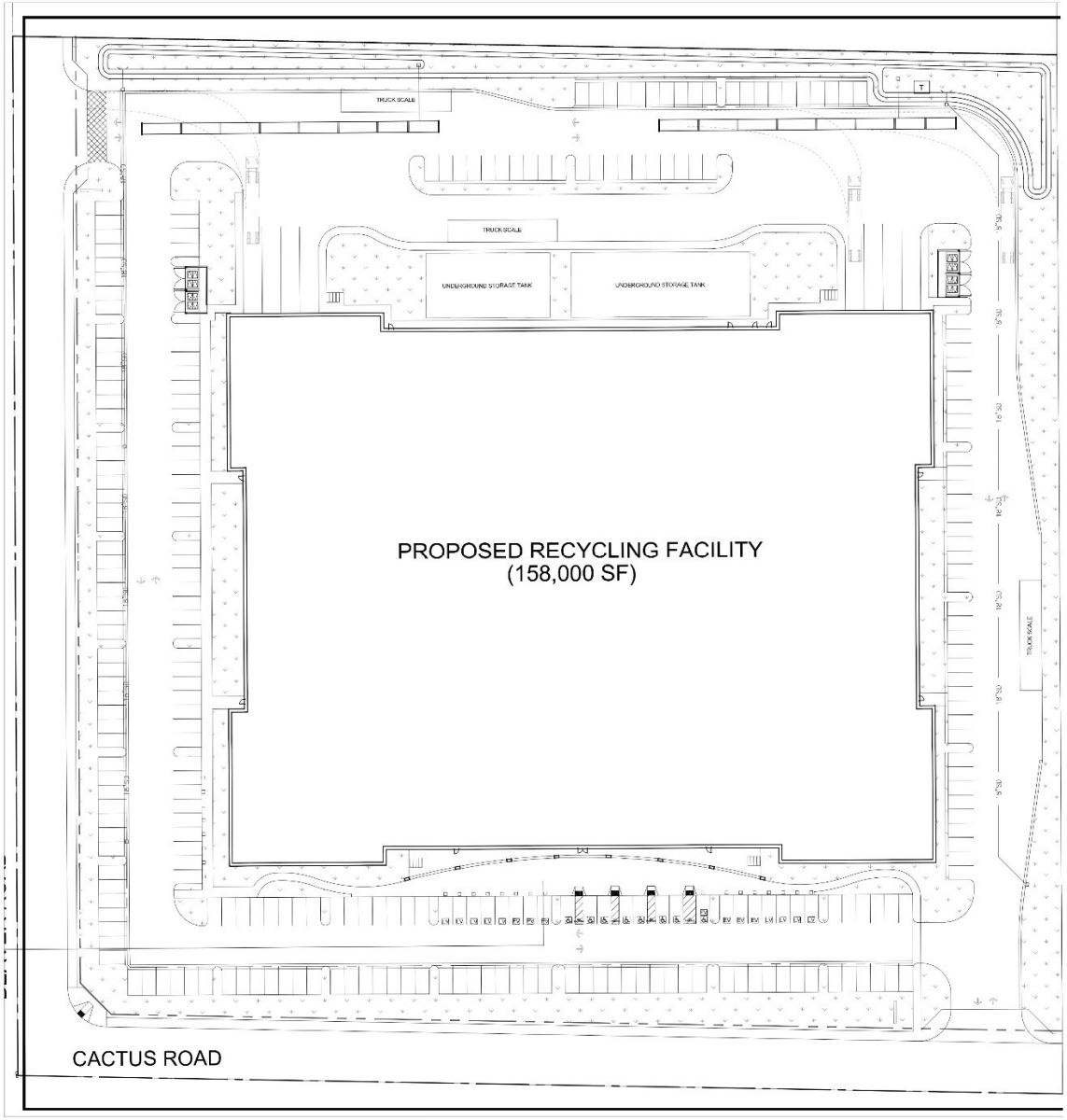

EXHIBIT 5 PROPOSED SITE PLAN

SOURCE: Blue Engineering

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SECTION 3. ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

Aesthetics (Section 3.1);
Agricultural & Forestry Resources (Section 3.2);
Air Quality (Section 3.3);
Biological Resources (Section 3.4);
Cultural Resources (Section 3.5);
Energy (Section 3.6);
Geology & Soils (Section 3.7);
Greenhouse Gas Emissions; (Section 3.8);
Hazards & Hazardous Materials (Section 3.9);
Hydrology & Water Quality (Section 3.10);
Land Use & Planning (Section 3.11);
Mineral Resources (Section 3.12);
Noise (Section 3.13) ;
Population & Housing (Section 3.14);
Public Services (Section 3.15);
Recreation (Section 3.16);
Transportation (Section 3.17);
Tribal Cultural Resources (Section 3.18);
Utilities (Section 3.19);
Wildfire (Section 3.20); and
Mandatory Findings of Significance (Section 3.21).

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?				✕
B. Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✕
C. Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✕
D. Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✕

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on aesthetics if it results in any of the following:

- The proposed project would have an adverse effect on a scenic vista, except as provided in PRC Sec. 21099.
- The proposed project would have an adverse effect on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- The proposed project would substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality. or,
- The proposed project would, except as provided in Public Resources Code Section 21099, create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The evaluation of aesthetics and aesthetic impacts is generally subjective, and it typically requires the identification of key visual features in the area and their importance. The characterization of aesthetic impacts involves establishing the existing visual characteristics including visual resources and scenic vistas that are unique to the area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), and existing light and glare characteristics (e.g., nighttime illumination). Changes to the existing aesthetic environment associated with the proposed project's implementation are identified and *qualitatively* evaluated based on the proposed modifications to the existing setting and the viewers' sensitivity. The

project-related impacts are then compared to the context of the existing setting, using the threshold criteria discussed above.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista? ● No Impact*

The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. Views from the mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. *As a result, no impacts will occur.*

B. *Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ● No Impact.*

According to the California Department of Transportation, none of the unimproved roads located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.[16] There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 12 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The City of Adelanto 2035 Sustainable Plan identifies prominent view sheds within the City. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.[17] Lastly, the project site does not contain any buildings listed in the State or National registrar. *As a result, no impacts would occur.*

C. *Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ● No Impact*

All of the tires would be located inside the new building. No outdoor storage would occur. There are no protected views in the vicinity of the project site and the City does not contain any scenic vistas. In addition, the City does not have any zoning regulations or other regulations governing scenic quality other that the development standards for which the new building will conform to. *As a result, no impacts would occur.*

[16] California Department of Transportation. *Official Designated Scenic Highways.*

[17] MIG Hogle-Ireland. *Adelanto North 2035 Comprehensive Sustainable Plan*. August 27, 2014.

D. *Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? • No Impact*

The nearest sensitive receptor is located 1,100 feet west of the project site. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.90.040 – Lighting of the City of Adelanto Municipal Code. The City's Code requirements includes the following requirements related to outdoor lighting:

- (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.

As a result, no light-related impacts are anticipated.

MITIGATION MEASURES

The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.90.040 – Lighting of the City of Adelanto Municipal Code. The analysis of aesthetics concluded that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?				✖
B. Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✖
C. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✖
D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✖
E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on agriculture and forestry resources if it results in any of the following:

- The proposed project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- The proposed project would conflict with existing zoning for agricultural use, or a Williamson Act contract.
- The proposed project would conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).
- The proposed project would result in the loss of forest land or conversion of forest land to non-forest use.
- The proposed project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories of land use designation based on soil quality and existing agriculture uses to produce maps and statistical data. These maps and data are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this analysis. The highest rated Important Farmland is Prime Farmland. The California Land Conservation Act of 1965, or the Williamson Act, allows a city or county governments to preserve agricultural land or open space through contracts with landowners. The County has areas that are currently agriculture preserves under contract with San Bernardino County through the Williamson Act of 1965. Contracts last 10 years and are automatically renewed unless a notice of nonrenewal is issued.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?* • *No Impact.*

According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The project site is on land that is classified as Grazing Land. The implementation of the proposed project

would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. *As a result, no impacts would occur*.[18]

B. *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?● No Impact.*

The project site is currently zoned as *Manufacturing/Industrial (MI)*. The property is vacant and undeveloped and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.[19] *As a result, no impact would occur*.

C. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section ● No Impact.*

The existing parcel is vacant. There are no forest lands or timber lands located within or adjacent to the site. Furthermore, the site's existing zoning designation does not contemplate forest land or timber land uses. *As a result, no impacts would occur.*

D. *Would the project result in the loss of forest land or conversion of forest land to a non-forest use?● No Impact.*

No forest lands are located within the project site. The proposed use will be restricted to the site and will not affect any land under the jurisdiction of the Bureau of Land Management (BLM). *As a result, no impacts would occur.*

E. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use? ● No Impact.*

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use because the project site is currently vacant and does not contain any significant vegetation. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

[18] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *California Important Farmland Finder*.

[19] California Department of Conservation. *State of California Williamson Act Contract Land*.

3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				✖
B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?			✖	
C. Would the project expose sensitive receptors to substantial pollutant concentrations?			✖	
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		✖		

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on air quality if it results in any of the following:

- The proposed project would conflict with or obstruct implementation of the applicable air quality plan.
- The proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- The proposed project would expose sensitive receptors to substantial pollutant concentrations.
- The proposed project would result in other emissions (such as those leading to odors adversely affecting a substantial number of people.

The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs, and damages materials and vegetation. Ozone is formed a by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).
- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).

- *Sulfur Dioxide* (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).
- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM_{10} and 65 pounds per day of $PM_{2.5}$.
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of "smog." The daily threshold is 137 pounds per day of ROG.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with or obstruct implementation of the applicable air quality plan? • No Impact.*

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The City is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes.[20] Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by Southern California Association of Governments (SCAG) are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Adelanto is projected to add a total of 38,900 new residents and 3,900 new employees through the year 2040.[21] The proposed project will not introduce new residents and is anticipated to employ approximately 67 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project's construction emissions would be below the thresholds of significance established by the MDAQMD (the project's daily construction emissions are summarized in Table 3). In addition, the proposed project's long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3). *As a result, no impacts would occur.*

[20] Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

[21] Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040.Demographics &Growth Forecast*. April 2016.

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? ● Less than Significant Impact.*

According to the MDAQMD, any project is significant if it triggers or exceeds the MDAQMD daily emissions threshold identified previously and noted at the bottom of Tables 3 and 4. In general, a project will have the potential for a significant air quality impact if any of the following are met:

- Generates total emissions (direct and indirect) that exceeds the MDAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3-1 and 3-2);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City's Zoning and General Plan); and,
- 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 (the proposed project will not expose sensitive receptors to substantial pollutant concentrations nor is the site located near any sensitive receptors).

The estimated construction emissions for the project are summarized below in Table 3. The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEModV.2022.1.1.26). For air quality modeling purposes, a twelve-month period of construction for all construction phases were assumed.

TABLE 3 ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Total Construction Emissions	40.6	31.7	31.6	0.05	21.3	11.4
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2022.1.1.26

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts would continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. The analysis of long-term operational impacts summarized in Table 4 also used the CalEEModV.2022.1.1.26 computer model. The analysis summarized in Table 4 indicates that the operational (long-term) emissions will be below the MDAQMD daily emissions thresholds.

TABLE 4 ESTIMATED OPERATIONAL EMISSIONS IN LBS./DAY

Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Total Operational Emissions	6.60	3.53	33.3	0.07	5.58	1.50
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEModV.2022.1.1.26

The analysis presented in Tables 3 and 4 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3 and 4, the impacts are considered to be less than significant. In addition, the MDAQMD Rule Book contains numerous regulations governing various activities undertaken within the district. Among these regulations is Rule 403.2 – Fugitive Dust Control for the South Coast Planning Area, which was adopted in 1996 for the purpose of controlling fugitive dust. Adherence to Rule 403.2 regulations is required for all projects undertaken within the district. Future construction truck drivers must also adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes.[3] Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will further reduce the potential impacts. *As a result, the impacts will be less than significant.*

C. *Would the project expose sensitive receptors to substantial pollutant concentrations? ● Less than Significant Impact.*

According to the MDAQMD, 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: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. No sensitive receptors are located near the project site. The nearest sensitive receptors are residential homes located approximately 1,100 feet west of the project site. *As a result, the impacts will be less than significant.*

D. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? ● Less than Significant Impact with Mitigation.*

The MDAQMD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.[22] As designed, the proposed project will not be involved in any of the aforementioned odor-generating activities. Future construction-related trucks must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes. Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. In addition, the project's contractors must adhere to Rule 403 regulations, which significantly reduce the generation of fugitive dust.

[22] South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. As amended 2017.

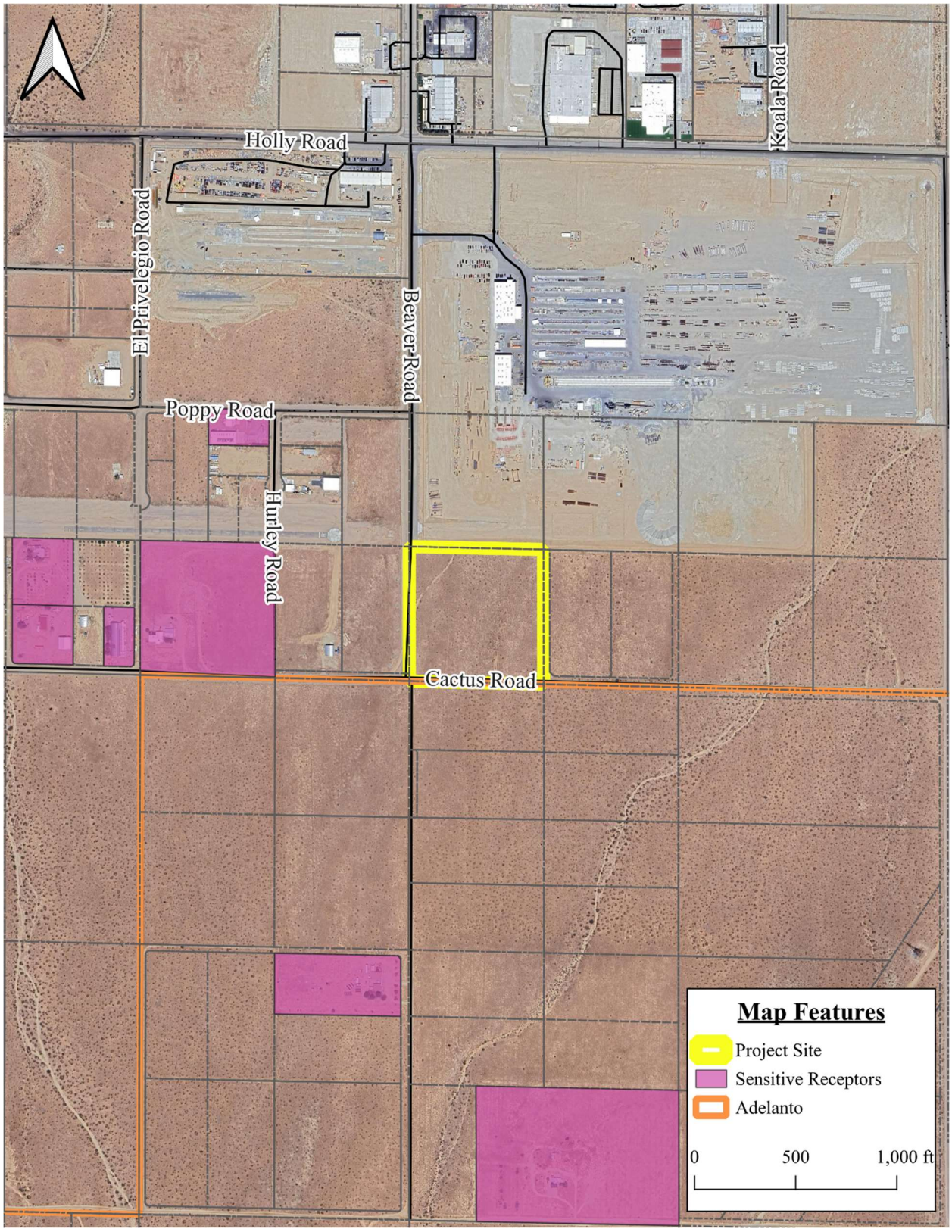

EXHIBIT 7 SENSITIVE RECEPTORS

SOURCE: Blodgett Baylosis Environmental Planning

Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will further reduce potential impacts. The project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. The project Applicant will also be required to prepare an Odor Management Plan pursuant to San Bernardino County Department of Public Health construction guidelines. Mitigation measures will be required to control odors and to ensure that the indoor air is safe for the workers. *These two mitigations would reduce the potential impacts to levels that are less than significant.*

MITIGATION MEASURES

The analysis of air quality impacts indicated that the projected emissions would be below the MDAQMD's thresholds of significance. However, the following mitigation would be required to address potential odor impacts:

Air Quality Mitigation Measure No. 1. Indoor air must be filtered so as to remove VOCs and carbon black dust from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✖		
B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			✖	
C. Would the project have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			✖	
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✖
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✖		
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- The proposed project would 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.
- The proposed project would 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 US Fish and Wildlife Service.
- The proposed project would 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.
- The proposed project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- The proposed project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- The proposed project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Sensitive biological resources include a variety of plant and animal species that are specialized and endemic to a particular habitat type. Due to loss of habitat, some of these species have been designated by either, or both, the federal and state government resource agencies as threatened or endangered. Species listed as threatened include those whose numbers have dropped to such low levels and/or whose populations are so isolated that the continuation of the species could be jeopardized. Endangered species are those with such limited numbers or subject to such extreme circumstances that they are considered in imminent danger of extinction. Other government agencies and resource organizations also identify sensitive species, those that are naturally rare and that have been locally depleted and put at risk by human activities. While not in imminent danger of jeopardy or extinction, sensitive species are considered vulnerable and can become candidates for future listing as threatened or endangered.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● Less than Significant Impact with Mitigation.*

General biological surveys were conducted on April 3, 2024, during which biologists from RCA Associates, Inc. initially walked meandering transects throughout the property. During the surveys, data was collected on the plant and animal species present on the site. As part of the surveys, the property and adjoining areas were evaluated for the presence of native habitats which may support populations of sensitive wildlife 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.[23]

The relatively flat site is approximately 939 meters above sea level and contains little to no slope. The vegetation community present on site supports a disturbed desert scrub habitat encompassing mainly native plants and some non-native grasses. The site is dominated by creosote bush (*Larrea tridentata*), Flatspine burr ragweed (*Ambrosia acanthicarpa*), Joshua tree (*Yucca brevifolia*), Nevada jointfir (*Ephedra nevadensis*), white bursage (*Ambrosia dumosa*), parish's poppy (*Eschscholzia parishii*), red brome (*Bromus madritensis*), rusty popcornflower (*Plagiobothrys nothofulvus*), shortpod mustard (*Hirschfeldia incana*) and cheatgrass (*Bromus tectorum*).

Birds observed included ravens (*Corvus corax*), rock pigeon *(Columba livia*), white crown sparrow (*Zonotrichia leucophrys*) and house finch (*Haemorhous mexicanus*). No mammals were present during the April 2024 survey. The Antelope ground squirrel (*Ammospermophilus leucurus*), jackrabbit (*Lepus californicus*) and desert cottontails (*Sylvilagus audubonii*) were not observed however we assume they are in area due to the number of occurrences in the surrounding area. Coyote (*Canis latrans)* scat and tracks were observed during the field investigations and the species is expected to traverse the site during hunting activities. Other wildlife species that may occur on site include California ground squirrels (*Otospermophilus beecheyi*) and Merriam's kangaroo rats (*Dipodomys merriami*) may also occur on the site given their wide-spread distribution in the region. No lizards were observed on site during the April 2024 field investigations. However, some reptiles that may inhabit the site include the Side-blotched lizard *(Uta stansburiana)* and Western Whiptail Lizard *(Cnemidophorus tigris)*.

In addition, no sensitive habitats (e.g., sensitive species, critical habitats, etc.) have been documented in the immediate area according to the CNDDB (2024) and none were observed during the field investigations. The following are the listed and special status species that have the ability to occur on the project site. It is not a comprehensive list of all the species in the quad. This information has been taken from the California Natural Diversity Database and is using the most current version.[24]

- *Desert Tortoise:* The site is located within the documented tortoise, a state and federal threatened species, habitat according to CNDDB (2024). The property supports marginal habitat for the desert tortoise based on the location of the site in a semi-developed area of Adelanto. No tortoises were observed anywhere within the property boundaries during the April 3, 2024, surveys. The species is not expected to move onto the site in the near future based on the absence of any potential burrows or sign, absence of any recent observations in the immediate area, and the presence of busy roadways and developments in the immediate area which may act as barriers to migration of tortoises. The survey results are valid for one year as per CDFW and USFWS requirements.
- *Mohave Ground Squirrel:* The Mohave ground squirrel is a California state threatened species that have a short, flat, furred, white, underside tail, uniformly brown (with no spots or stripes). They inhabit open desert scrub, alkali desert scrub, and annual grasslands on sandy to gravelly surfaces in the Mojave Desert. Occupiable burrows were found on the site, but no Mohave ground squirrels were detected. It is the opinion of RCA Associates, Inc. that the habitat is not prime Mohave ground squirrel habitat and is very unlikely to support populations of the species based on the following

[23] RCA Associates, Inc. *General Biological Resources Assessment, APN 3129-551-05, Danivan LLC., ARC Tire Recycling*. April 10, 2024.

[24] RCA Associates, Inc. *General Biological Resources Assessment, APN 3129-551-05, Danivan LLC., ARC Tire Recycling*. April 10, 2024.

criteria, that there have been two recent sightings, within 20 years, of the species in the Adelanto quadrangle.

- *Burrowing Owl:* The site is located within documented burrowing owl habitat according to CNDDB (2024). No owls were seen on the property during the survey and no active burrows were observed. No owl signs or castings were present during the field investigation. Burrowing owls are not expected to be active on site or in the surrounding area.
- *Le Conte's thrasher:* Le Conte's thrashers have not been recently observed in the area according to CNDDB (2024). Thrashers are not expected to occur on the site due to lack of critical vegetation used by the species, such as saltbush and catclaw acacia. Thrashers may be very infrequent in the area given the low population levels in the region as well as the lack of any recent sightings according to the CNDDB.
- *Crotch Bumble Bee:* As of September 30, 2022, the California Fish and Game Commission (CDFW) listed the Crotch bumble bee as a candidate species under the California Endangered Species Act (CESA). The Crotch's bumble bee (Bombus crotchii) is found between San Diego and Redding in a variety of habitats including open grasslands, shrublands, chaparral, desert margins including Joshua tree and creosote scrub, and semi-urban settings. It is near endemic to California, with only a few records from Nevada and Mexico.
- *Joshua Tree:* As of July 10, 2023, California legislature passed and signed the Western Joshua Tree Conservation Act (WJTCA, Senate Bill 122) into effect listing the western Joshua tree (*Yucca brevifolia*) as an endangered species. The WJTCA authorizes CDFW to oversee the various permitting processes dealing with mitigation and/or removal of western Joshua trees. Therefore, any attempt to remove a Joshua tree from its current position will require a California Endangered Species Act Incidental Take Permit (CESA, ITP) or a Western Joshua Tree Conservation Act Incidental Take Permit (WJTCA, ITP).

Future development of the site will impact the general biological resources present on site, because most if not all of the vegetation will be removed during future construction activities. The site is expected to support very few wildlife species which will be impacted by development activities. Those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. However, more mobile species (i.e., birds, large mammals) will be displaced into adjacent areas and will likely experience minimal impacts. Therefore, loss of about 10.1-acres of a relatively disturbed desert scrub habitat is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitat throughout the surrounding area.

No federal or State-listed species were observed on the site during the field investigations including the Mohave ground squirrel and desert tortoise. In addition, there are no documented observations of these species either on the site or in the immediate area. The site is not expected to support populations of the desert tortoise based on the absence of habitat, suitable burrows, or signs.

The mitigation measures are listed as *Biological Resources Mitigation Measure No. 1 through 6. The mitigations listed under mitigation measures will reduce the impacts to levels that are less than significant.*

B. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● Less than Significant Impact.*

The project is approximately 10 miles west of the Mojave River. A potential channel was observed during the April 2024 field survey located on the western section of the site and runs south to north from the southern boundary. It is the opinion of RCA Associates, Inc. that a comprehensive jurisdictional analysis may be required in the future.[25] *As a result, the impacts would be less than significant.*

C. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ● Less than Significant Impact.*

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act. The project falls within the southwestern region of the Mojave Watershed. This watershed encompasses roughly 4,500 square miles of land surrounding the Mojave River spanning from the Providence Mountains within the Mojave National Preserve in the east, west to the San Bernardino and Los Angeles County boundary, and from the Tiefort Mountains in the north near Fort Irwin, south to the San Bernardino National Forest. The project is approximately 10 miles west of the Mojave River.

A potential channel was observed during the April 2024 field survey located on the western section of the site and runs south to north from the southern boundary. It is the opinion of RCA Associates, Inc. that a comprehensive jurisdictional analysis may be required in the future.[26] *As a result, the impacts would be less than significant.*

D. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? ● No Impact.*

The project site was analyzed for sign of and potential for wildlife movement and corridors. While wildlife is known to utilize and move through the site, it does not constitute a wildlife corridor. There is an unofficial dirt walking path that crosses the site from north to south. During several survey visits, a man was observed walking this path during the morning hours traveling from the businesses north of Rancho Road., south across the project site, then returning to the businesses utilizing the path. This walking path appears to be a result of this individual's morning exercise routine. Vegetation onsite is conducive to the free movement of wildlife through the site and there are signs of rodent paths leading to burrows. Additionally, scat and digging of burrows observed onsite indicates that coyotes (Canis latrans) forage and pass through the site. It is expected that other mammals may occasionally pass through the site such as raccoons, skunks, and rabbits. However, the site is not characteristic of a wildlife corridor.

Existing industrial development to the north, east, and west has limited wildlife use of the site. While construction of the project would prohibit wildlife use of the site, it would concentrate development into a

[25] RCA Associates, Inc. *General Biological Resources Assessment, APN 3129-551-05, Danivan LLC., ARC Tire Recycling*. April 10, 2024.
[26] RCA Associates, Inc. *General Biological Resources Assessment, APN 3129-551-05, Danivan LLC., ARC Tire Recycling*. April 10, 2024.

centralized area, leaving vast regions of undeveloped desert to the west and smaller regions of undeveloped desert to the north, south, and east. Additionally, undeveloped parcels immediately east and 500 feet to the west of the site would allow for wildlife travel from north to south through this region. *As a result, no impacts are anticipated.*

E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact with Mitigation.*

Joshua trees are found throughout the Mojave Desert typically at elevations between 1,200 to 5,400 ft (366 to 1646 m) above mean sea level (amsl). Contrary to their name, Joshua trees are in fact arborescent succulents; while resembling trees in their growth and appearance, they are not trees. This species has been documented to reach 300 years of age (Gilliland et al. 2006) and provides valuable habitat for many birds, mammals, and insects. Along with many other species, Joshua trees are experiencing the negative impacts of climate change, urbanization, and increased fire frequency and have experienced a significant contraction to their range. It is forecasted that widespread population losses may continue to occur in response to climate change (Cole et al. 2011). In examining the potential impacts of climate change on this species, St. Clair and Hoines (2018) found increased reproduction, but decreased establishment success as a result of increasing temperatures. In response to the losses of Joshua trees, a petition was filed with the California Fish and Game Commission ("Commission") to provide protection for Joshua trees under the California Endangered Species Act (CESA). A formal vote on the listing of the species as endangered or threatened under CESA has yet to occur, thus Joshua tree retains its candidacy status for listing. In July 2023 the Western Joshua Tree Conservation Act (WJTCA) was passed to conserve western Joshua trees and their habitat. The WJTCA prohibits the importation, export, take, possession, purchase, or sale of any western Joshua tree in California unless authorized by CDFW. Additionally, the WJCTA authorizes CDFW to issue permits for incidental take of Joshua trees if the permittee meets certain conditions.

Permittees may pay fees in lieu of conducting mitigation activities which will contribute to the Western Joshua Tree Conservation Fund. There are up to ten Joshua trees present in scattered density throughout the project site. *Mitigation measures identified under mitigation measures would apply.*

F. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? • No Impact.*

The proposed project's implementation would not be in conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans. *As a result, no impacts are anticipated.*

MITIGATION MEASURES

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.

Biological Resources Mitigation Measure No. 1. Regardless of the time of year, a pre-construction clearance survey for nesting birds should be conducted no more than three (3) days prior to the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The qualified biologist conducting the clearance survey shall conduct

the survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If an active avian nest is discovered during the pre-construction clearance survey, within the work area or the Project's zone of influence (generally 100-300 feet), construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by the qualified wildlife 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. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. The qualified biologist should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Biological Resources Mitigation Measure No. 2. Prior to the start of Project activities, 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. Take avoidance surveys shall be conducted no less than 14 days prior to the start of Project-related activities. 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, in accordance with the Staff Report on Burrowing Own Mitigation (CDFG 2012 or most recent version). If the surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities.

Biological Resources Mitigation Measure No. 3. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the

Mojave Desert Tortoise (Gopherus agassizii). This would consist of one complete (100% coverage) survey of the action area prior to the initiation of construction at any time of year. The survey should be conducted within 7 days prior to construction beginning by a City Approved Biologist. If desert tortoise is found on the project site during preconstruction surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a Desert Tortoise Translocation Plan (DTRP) to be administered during the construction and operation of the project. The DTRP should be submitted to the City of Adelanto for review and approval and shall be updated and utilized for translocation and monitoring after construction. The DTRP should include, but not be limited to the following:

1. Discussion on temporary construction fencing (if any),
2. Description of clearance surveys of permanent exclusion areas,
3. Transportation and release procedures,
4. Construction schedule,
5. Translocation/relocation areas,
6. Monitoring and reporting.

Biological Resources Mitigation Measure No. 4. A qualified biologist familiar with the species' behavior and life history shall conduct focused surveys for Mohave ground squirrel throughout the Project site. Focused Mohave ground squirrel surveys shall follow the California Depart of the fish and game Mohave Ground Squirrel Survey Guidelines (CDFW 2023). If Mohave ground squirrel is observed on site or captured during any of the trapping sessions, the Project proponent shall secure an Incidental Take Permit (ITP) for Mohave ground squirrel before ground-disturbing activities commence. The ITP will specify avoidance, minimization, and mitigation conditions for temporary and/or permanent impacts to Mohave ground squirrel including habitat acquisition at a CDFW-approved location and mitigation ratio.

Biological Resources Mitigation Measure No. 5. The western Joshua tree is a candidate threatened species under the California Endangered Species Act. Prior to construction, and initiation of western Joshua tree removal, relocation, replanting, trimming or pruning or any activity that may result in take of WJT on site, the project proponent is required to obtain California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Section 2081(b) of the CESA, or under the Western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927-1927.12) through CDFW for the take of western Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Adelanto falls within an area

of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1. Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.

Biological Resources Mitigation Measure No. 6. A comprehensive jurisdictional analysis may be required in the future to analyze the impacts and area of the channel located on site.

3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				✖
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?		✖		
C. Would the project disturb any human remains, including those interred outside of formal cemeteries?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- The proposed project would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- The proposed project would disturb any human remains, including those interred outside of formal cemeteries.

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.[27]

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines? ● No Impact.*

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. No cultural resources have been previously identified within its boundaries.[28] The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing

[27] U. S. Department of the Interior, National Park Service. National Register of Historic Places. http://nrhp.focus.nps.gov. 2010.

[28] U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed July 30, 2024

on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[29] The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO). The project site is vacant and does not have any historical or cultural significance. *Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.*

B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines? ● Less than Significant Impact with Mitigation.*

The project is located on Holocene age (*Qa*) sediments. If previously unidentified cultural and/or paleontological materials are unearthed during construction, work shall be halted in that area until a qualified archaeologist/paleontologist can assess the significance of the find. If human remains are encountered during grading, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Future ground disturbing activities have the potential to reveal buried deposits not observed on the surface during previous surveys. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

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

Therefore, mitigation is required and listed under mitigation measures. *Adherence to the mitigations would reduce potential impacts to levels that are less than significant.*

[29] California Department of Parks and Recreation. *California Historical Resources*. Website accessed on July 30, 2024.

C. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*
• Less than Significant Impact.

There are no dedicated cemeteries located within or in the vicinity of the project site.[30] The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

> "A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures."

Additionally, Section 5097.98 of the Public Resources Code states:

> "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

Adherence to the standard condition will ensure potential impacts remain at levels that are less than significant.

MITIGATION MEASURES

The following mitigation measures will be required to address potential cultural resources impacts:

Cultural Resources Mitigation Measure No. 1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

Cultural Resources Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous

[30] Google Earth. Website accessed July 30, 2024.

units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

Cultural Resources Mitigation Measure No. 3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

Cultural Resources Mitigation Measure No. 4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final.

3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✖	
B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on energy resources if it results in any of the following:

- The proposed project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during the proposed project's construction or operation.
- The proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod. In addition, it was assumed the new buildings would be constructed pursuant to the 2022 CALGreen standards, which was considered in the CalEEMod inputs.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient,*

or unnecessary consumption of energy resources during project construction or operation? ● Less than Significant Impact with Mitigation.

The proposed project's electric power service would be provided by the Southern California Edison Company (SCE). Energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod. In addition, it was assumed the new buildings would be constructed pursuant to the 2022 CALGreen standards, which was considered in the CalEEMod inputs. According to the CalEEMod, the proposed project would consume approximately 2,657 kWh of electricity on a daily basis. Table 5 indicates the estimated energy consumption for the project.

TABLE 5 ESTIMATED ANNUAL ENERGY CONSUMPTION

Project	Daily Consumption Rate	Electrical Consumption
Electrical Consumption	2,657 kWh/day	970,154 kWh/year
Natural Gas Consumption	8,229 kBTU/day	3,003,687 kBTU/year

Source: CalEEModV.2022.1.1.26

The proposed project would be constructed pursuant to the 2022 energy standards of the California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24). *As a result, impacts will be less than significant.*

B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ● Less Than Significant Impact.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned industrial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. The Adelanto Municipal Code (Section 14.28.10) has adopted and incorporated by reference the 2022 California Energy Code published by the California Building Standards Commission and to be codified in California Code of Regulations Title 24, Part 6. *As a result, the potential impacts will be less than significant.*

MITIGATION MEASURES

The analysis of energy indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?			✖	
B. Would the project result in substantial soil erosion or the loss of topsoil?			✖	
C. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✖	
D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property?			✖	
E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			✖	
F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✖		

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on geology and soils if it results in any of the following:

- The proposed project would, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides?
- The proposed project would result in substantial soil erosion or the loss of topsoil.
- The proposed project would 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.
- The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

- The proposed project would have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
- The proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed project's potential seismic and soils risk was evaluated in terms of the site's proximity to earthquake faults and unstable soils.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides? • Less than Significant Impact.*

The most relevant local geologic units expected to be present at the site are summarized in this section. A general description of the dominant soils that form the geologic units is provided as follows: *Quaternary (map symbol Q).* These consists predominately of alluvium, lake, playa, and terrace deposits that are mostly nonmarine, but includes marine deposits near the coast. The deposits are generally unconsolidated and semi-consolidated.[31] Significant ground shaking will likely impact the site within the design life of the proposed project, due to the project being located in a seismically active region. The subject property is not located within an Alquist-Priolo Fault Rupture Hazard Study Zone, established by the State of California to restrict the construction of habitable structures across identifiable traces of known active faults. No active faults are known to project through the proposed project. As defined by the State of California, an active fault has undergone surface displacement within the past 11,700 years or during the Holocene epoch.

The nearest known "active faults" are part of the San Andreas system approximately 16 miles southwest of the project site (USGS Earthquake Hazards Program, Unified Hazard Tool for Conterminous U.S. 2014 (v4.1.1) Deaggregation), capable of producing horizontal ground accelerations of ~8.01 (USGS, 2002). The Mirage Valley Fault is mapped approximately 7 miles to the northwest and does roughly trend towards the subject property. However, the potential for surface fault rupture to adversely affect the proposed development is low.

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The closest fault to the project site is the Mirage Valley Fault, from the Late Quaternary period, which is located approximately 1.6 miles west of the City.[32] Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site

[31] California Department of Conservation. *Geologic Map of California.*
[32] California Department of Conservation. Mirage Valley Fault

than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is in a moderate liquefaction zone.[33] According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. From the California Department of Conservation Landslides Map, the City of Adelanto is not located within an area of landslides.[34] *As a result, the potential impacts are less than significant.*

B. *Would the project result in substantial soil erosion or the loss of topsoil? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by Cajon, Manet, Kimberlina, and Helendale soils associations consisting of Cajon sands with 0 to 2 percent slopes.[35] The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. Prior to initiating construction, contractors must obtain coverage under an NPDES permit, which is administered by the State. In order to obtain an NPDES permit, the project Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP). The County has identified sample construction Best Management Practices (BMPs) that may be included in the mandatory SWPPP. The use of these construction BMPs identified in the mandatory SWPPP will prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. *As a result, the impacts will be less than significant.*

C. *Would the project 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? ● Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.[28] The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not

[33] San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

[34] California Department of Conservation. *SGS Information Warehouse: Landslides*. Website Accessed July 30, 2024.

[35] UC Davis. *SoilWeb*. Website accessed July 30, 2024.

[28] United States Department of Agriculture, Soil Conservation Service. *California – Palm Spring Area*. Report dated 1978.

result in the direct extraction of groundwater. *As a result, the potential impacts will be less than significant.*

D. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by Cajon, Manet, Kimberlina, and Helendale soils associations consisting of Cajon sands with 0 to 2 percent slopes.[36] According to the U.S. Department of Agriculture (USDA), these soils are acceptable for the development of smaller commercial buildings.[37] The applicant is required to adhere to all requirements detailed by the USDA. *As a result, the potential impacts will be less than significant.*

E. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?● Less than Significant Impact.*

The proposed project will be required to connect to and utilize the sanitary sewer system. According to the City of Adelanto Sewer Map, there are sewer lines located west to the project site.[38] No septic tanks systems will be used. *As a result, impacts will be less than significant.*

F. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ● Less than Significant Impact with Mitigation.*

The proposed project site is located on a 10-acre parcel that is currently vacant. The proposed development will be constructed in the central-south portion of the City of Adelanto. The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The closest fossil vertebrate locality is LACM7786, between Adelanto and the former George Air Force Base. This location produced a fossil specimen of meadow vole, *Microtus*. The mitigations listed under mitigation measures would be applicable during earth-disturbing activities as a means to protect potential paleontological resources.

MITIGATION MEASURES

The following mitigation measures will be required to address potential paleontological resources impacts:

Geology & Soils Mitigation Measure No. 1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

Geology & Soils Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan

[36] UC Davis. *SoilWeb*. Website accessed July 30, 2024.

[37] United States Department of Agriculture. Natural Resources Conservation Service. Website accessed July 30, 2024.

[38] City of Adelanto. Sewer Map. Updated January 10, 2013.

sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

Geology & Soils Mitigation Measure No. 3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

Geology & Soils Mitigation Measure No.4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the San Bernardino County Museum prior to building final.

3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✖	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The proposed project site is located on a 10-acre parcel that is currently vacant and undisturbed. The proposed development will be constructed in the central-south portion of the City of Adelanto. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above

natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. The major GHG that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. While water vapor is not considered a pollutant, while it remains in the atmosphere it maintains a climate necessary for life. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. When water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation. This will allow less energy to reach the Earth's surface thereby affecting surface temperatures.
- *Carbon Dioxide (CO_2)*. The natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO_2 include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities have increased the atmospheric concentrations of CO_2.
- *Methane (CH_4)*. CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO_2. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO_2, N_2O, and Chlorofluorocarbons (CFCs). CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants).
- *Nitrous Oxide (N_2O)*. Concentrations of N_2O also began to increase at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant.
- *Chlorofluorocarbons (CFC)*. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents.
- *Hydrofluorocarbons (HFC)*. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Concentrations of HFC-152a are about 1 ppt. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.
- *Perfluorocarbons (PFC)*. PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). Concentrations of CF_4 in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

- *Sulfur Hexafluoride (SF_6).* SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO_2. Concentrations in the 1990s where about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.*

The State of California requires CEQA documents to do an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Carbon dioxide equivalent, or CO2E, is a term that is used for describing different greenhouses gases in a common and collective unit. The MDAQMD established the 10,000 MTCO2 threshold for industrial land uses. As indicated in Table 6, the entire GHG emissions for the project would be 9,971.5 MTCO2E.

TABLE 6 GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR)

Source	GHG Emissions (Metric Tons per Year [MT/year])			
	CO2	CH4	N2O	CO2E
Long-Term – Mobile Emissions	1,004	0.03	0.04	1,019
Long-Term – Area Emissions	2.31	--	--	2.32
Long-Term – Energy Emissions	393	0.03	--	395
Long-Term – Total Operational Emissions	1,475	2.57	0.07	1,563
Short-Term – Construction Emissions	298	0.01	0.01	302
Construction Emissions Amortized over 30 Years				10.1
Project Emissions – Long Term w/ Amortized Construction				**1,573.1 MTCO2E**
Significance Threshold				**10,000 MTCO2E**

Source: CalEEModV.2022.1.1.26

No public customers will visit the project site since the new business will be closed to the general public. Because of security protocols, the mobile emissions related to operations will be limited to employees, vendors, deliveries, and repair/maintenance personnel. As indicated in Table 6, the total project GHG emissions (1,573.1 MTCO2E/year) is less than the significance threshold. As *a result, the potential impacts are considered to be less than significant.*

B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Less than Significant Impact.*

The City of Adelanto adopted the North Adelanto Sustainable Community Plan which is a City planning framework that contains many transportation and land use-related actions to reduce vehicle-related GHG emissions throughout the region. This community plan supports the goals of SB 375 and the Sustainable Communities Strategy (On Road-STATE-SCS) through a wide range of actions which include the following.

- Integrate state, regional, and local sustainable community/smart growth principles into the development and entitlement process.
- Develop a system of trails and corridors that facilitates and encourages bicycling and walking.
- Require new development to provide transit facilities, such as bus shelters, transit bays, and turnouts, as necessary.
- Require the future development of community-wide servicing facilities to be sites in transit-ready areas that can be served and made accessible by public transit.
- Provide development-related incentives for projects that promote transit use.
- Designate and maintain a network of City truck routes that provide for the effective transport of goods while minimizing negative impacts on local circulation and noise sensitive land uses.
- Transition the City fleet to low emission/fuel-efficient vehicles as they are retired from service. λ Encourage carpooling.
- Work with the regional transit provider to provide shade, weather protection, seating, and lighting at all stops.

Key general plan policies that support the City of Adelanto's GHG reduction measures or would contribute to GHG reductions and sustainable practices in the City are listed below:

- *Policy NR 1.4:* All new developments will be required to implement energy conservation techniques into the development design.
- *Policy NR 1.6:* Conservation techniques shall be required for proposed development (both domestic and industrial) to minimize consumption levels of renewable and non-renewable natural resources including water resources.
- *Policy NR 1.1:* The City shall promote the development and use of alternative energy sources, such as passive solar in industrial, commercial, and residential developments.
- *Policy NR 1.1:* The City shall promote the development and use of alternative energy sources, such as passive solar in industrial, commercial, and residential developments.
- *Policy NR 1.6:* Conservation techniques shall be required for proposed development (both domestic and industrial) to minimize consumption levels of renewable and non-renewable natural resources including water resources.
- *Policy AQ 1.1:* The City shall continue to work with the Mojave Desert Air Quality Management District and any other agencies in order to enforce and implement regional air quality plans.
- *Policy WQ 1.1:* The City will require that development be designed and constructed to conserve water utilizing low flow irrigation and plumbing fixtures and facilities.
- *Policy WQ 1.5:* The City will require that all new development utilize water conservation techniques to conserve water resources, such as the use of low-flow irrigation and plumbing systems in new and existing development.

The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. *As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.*

MITIGATION MEASURES

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✖	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✖	
C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✖
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✖
E. Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			✖	
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✖
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hazards and hazardous materials if it results in any of the following:

- The proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- The proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- The proposed project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

- The proposed project would result in a safety hazard or excessive noise for people residing or working in the project area 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.
- The proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- The proposed project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phases include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. Once operational, the facility would produce indoor particulates consisting of "carbon black." Carbon black is used as a colorant and reinforcing filler in tires, and other rubber products; pigment and wear protection additive in plastics, paints, and ink pigment. However, the following air quality mitigation would be required to address potential indoor fugitive dust impacts:

> *Air Quality Mitigation Measure No. 1.* Indoor air must be filtered so as to remove VOCs and carbon black dust from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

As a result, less than significant impacts will occur.

B. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? • Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. The EPA does not consider scrap tires

a hazardous waste. However, once there is a fire, the tire product breaks down into hazardous compounds including gases, heavy metals, and oil. Experience at large tire fires indicates for every million tires consumed by fire, about 55,000 gallons of unburned run-off oil can pollute the environment unless contained. The average passenger car tire is estimated to produce more than two gallons of oil. Tire fire run-off oil is a significant environmental pollutant that can get into ground water and contaminate well water. In addition to run-off oil, at least 32 toxic gases are produced by tire fires. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As indicated in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Environstor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project's construction phase is remote. *As a result, the impacts will be less than significant.*

C. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ● No Impact.*

There are no schools located within one-quarter of a mile from the project site. Adelanto High School is located approximately 4,500 feet southeast of the project site. Columbia Middle School is located approximately 2.08 miles to the southeast. The proposed project will not create a hazard to any local school. *As a result, no impacts are anticipated.*

D. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ● No Impact.*

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.[32] *Therefore, no impacts will occur.*

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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ● Less than Significant Impact.*

The project site is not located within an airport land use plan nor is the site located within two miles of a public airport or public use airport.[39] The nearest public airport to the city is the Southern California Logistics Airport located approximately 5.2 miles northeast of the project site.[40] The Airport Park Overlay District is located approximately 1,000 feet west of the project site.[41] The Overlay District is intended to guide development around Adelanto Airport-52CL, which is a privately owned airport managed by the

[32] CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*.
[39] Toll-Free Airline. *San Bernardino County Public and Private Airports, California*.
[40] Google Earth. Website accessed July 30, 2024.
[41] Google Maps and City of Adelanto Zoning Map. Website accessed July 30, 2024.

Adelanto Airport Property Owner's Association.[42] This district consists of single-family residences with private hangers located in close proximity to the runways. The city's municipal code offers descriptions of land uses that are hazardous to the safety of airport operations which include the following:

- Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at the airport, other than an FAA approved navigational signal light or visual slope indicator;
- Any use which would cause sunlight to be reflected toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport;
- Any use which would generate smoke or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within this area;
- Any use which would generate electrical interference that would be detrimental to the operation of aircraft and/or aircraft instrumentation; and
- Any land use involving, as the primary activity, the manufacture, storage, or distribution of explosives or flammable or hazardous materials.[43]

The project site is outside of the overlay district and does not fall under any of the above criteria. The project will not introduce a structure that will interfere with the approach and take off of airplanes utilizing any regional airports. *As a result, less than significant impacts would occur.*

F. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

At no time will any adjacent street be completely closed to traffic during the proposed project's construction. In addition, all construction staging must occur on-site. *As a result, no impacts are associated with the proposed project's implementation.*

G. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? ● No Impact.*

The project site is not located within a "moderate fire hazard severity zone."[33] *As a result, no impacts will result.*

MITIGATION MEASURES

The analysis of potential impacts related to hazards and hazardous materials indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

[42] Adelanto Airport. Website accessed July 30, 2024.
[43] Adelanto Zoning Ordinance. Section 17.45.040 Special Considerations in the Airport Park Overlay District
[33] CalFire. *Fire Hazard Severity Zones in State Responsibility Area.*

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✖	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✖	
C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; 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, impede or redirect flood flows?			✖	
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				✖
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hydrology and water quality if it results in any of the following:

- The proposed project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- The proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- The proposed project would 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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, impede or redirect flood flows.
- The proposed project would risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.
- The proposed project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? ● Less than Significant Impact.*

The project Applicant will be required to adhere to Chapter 17.93 – Erosion and Sediment Control, of the municipal code regulates erosion and sediment control. These regulations are outlined in Section 17.93.050 – Soil Erosion and Sediment Control Plan. The project Applicant will also be required to conform to Section 17.93.060 – Runoff Control of the City's Municipal Code. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. *As a result, the construction impacts will be less than significant.*

B. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ● Less than Significant Impact.*

Water used to control fugitive dust will be transported to the site via truck. No direct ground water extraction will occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. These BMP controls may include, but not be limited to, the following:

- Stabilization practices for all areas disturbed by construction and grading.
- Structural practices for all drainage/discharge locations.
- Stormwater management controls, including measures used to control pollutants occurring in stormwater discharges after construction activities are complete.
- Velocity dissipation devices to provide nonerosive flow conditions from the discharge point along the length of any outfall channel.
- Other controls, including waste disposal practices that prevent discharge of solid materials.

In addition, there would be no direct groundwater withdrawals associated with the proposed project's implementation. *As a result, the impacts are considered to be less than significant.*

C. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; 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, impede or redirect flood flows? ● Less than Significant Impact.*

The project site consists of 10 acres and is largely undeveloped and undisturbed. The relatively flat site is approximately 3,081 feet above mean sea level (AMSL) and contains little to no slope. The vegetation community present on site supports a disturbed desert scrub habitat encompassing mainly native plants and some non-native grasses. Following development, the majority of the site (approximately 90%) would be covered over in impervious surfaces (buildings, parking areas, and internal roadways). A potential

channel was observed during the April 2024 field survey located on the western section of the site and runs south to north from the southern boundary. It is the opinion of RCA Associates, Inc. that a comprehensive jurisdictional analysis may be required in the future.[44]

The proposed project's location would be restricted to the proposed project site and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. All of the provided drainage would be designed so that the stability of the graded slopes should not be adversely affected. However, satisfactory slope and building pad drainage is essential for the long term performance of the site. Concentrated drainage would not be allowed to flow uncontrolled over any descending slope. As recommended by the project landscape architect, engineered slopes should be landscaped with deep rooted, drought tolerant, maintenance free plant species. Maintaining control over drainage throughout the site is important for the long term performance of the proposed improvements. Roof gutters or an equivalent type of roof collection system for the proposed structures would be provided. Pad and roof drainage would be routed in non-erosive drainage devices to driveways, adjacent streets, storm-drain facilities, or other locations approved by the building official. Drainage should not be allowed to pond on the building pad or near any foundations. Planters located within retaining wall backfill should be sealed to prevent moisture intrusion into the backfill. Planters located next to structures should be sealed to the depth of the footings. Drainage control devices require periodic cleaning, testing and maintenance to remain effective. Building pad drainage should be designed to meet the minimum gradient requirements of the CBC, to divert water away from foundations. These requirements would be standard conditions and are included in the engineer's recommendations. *As a result, the potential impacts will be less than significant.*

D. *Would the project be located in flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?● No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Adelanto, the proposed project site is located in a flood hazard zone, labeled as "Zone ." Thus, properties located in "Zone X" are areas of undetermined flood hazards, but possible.[45] The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 70 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.[46] As a result, no impacts are anticipated.

D. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ● No Impact.*

The proposed project is required to be in compliance with Chapter 17.93 the City of Adelanto Municipal Code. Chapter 17.93 of the City of Adelanto Municipal Code is responsible for implementing the NPDES and MS4 stormwater runoff requirements. In addition, the project's operation will not interfere with any groundwater management or recharge plan since there are no active groundwater management recharge activities on-site or in the vicinity. *As a result, no impacts are anticipated.*

[44] RCA Associates, Inc. *General Biological Resources Assessment, APN 3129-551-05, Danivan LLC., ARC Tire Recycling*. April 10, 2024.
[45] FEMA. Glossary. Flood Zones. Website accessed July 30, 2024.
[46] Google Earth. Website accessed July 30, 2024.

MITIGATION MEASURES

A potential channel was observed during the April 2024 field survey located on the western section of the site and runs south to north from the southern boundary. It is the opinion of RCA Associates, Inc. that a comprehensive jurisdictional analysis may be required in the future. As indicated previously, no natural off-site streams will be impacted by the proposed project's implementation. In addition, no water quality impacts are anticipated. The project would be required to conform to *Biological Resources Mitigation Measure No. 6*. As a result, no mitigation is required.

3.11 LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				✖
B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would physically divide an established community.
- The proposed project would 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.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide an established community? ● No Impact.*

The site and the surrounding area are illustrated in Exhibit 4. The project site's General Plan and Zoning designation is *Manufacturing/Industrial (MI)* (refer to Exhibit 8). Land uses and development located in the vicinity of the proposed project site are outlined below:

- *North of the project site:* A construction material manufacturing facility extends along the project site's north side. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI)*.[47]

[47] Google Maps. Site and Adelanto Zoning Map, Site Accessed, July 30, 2024.

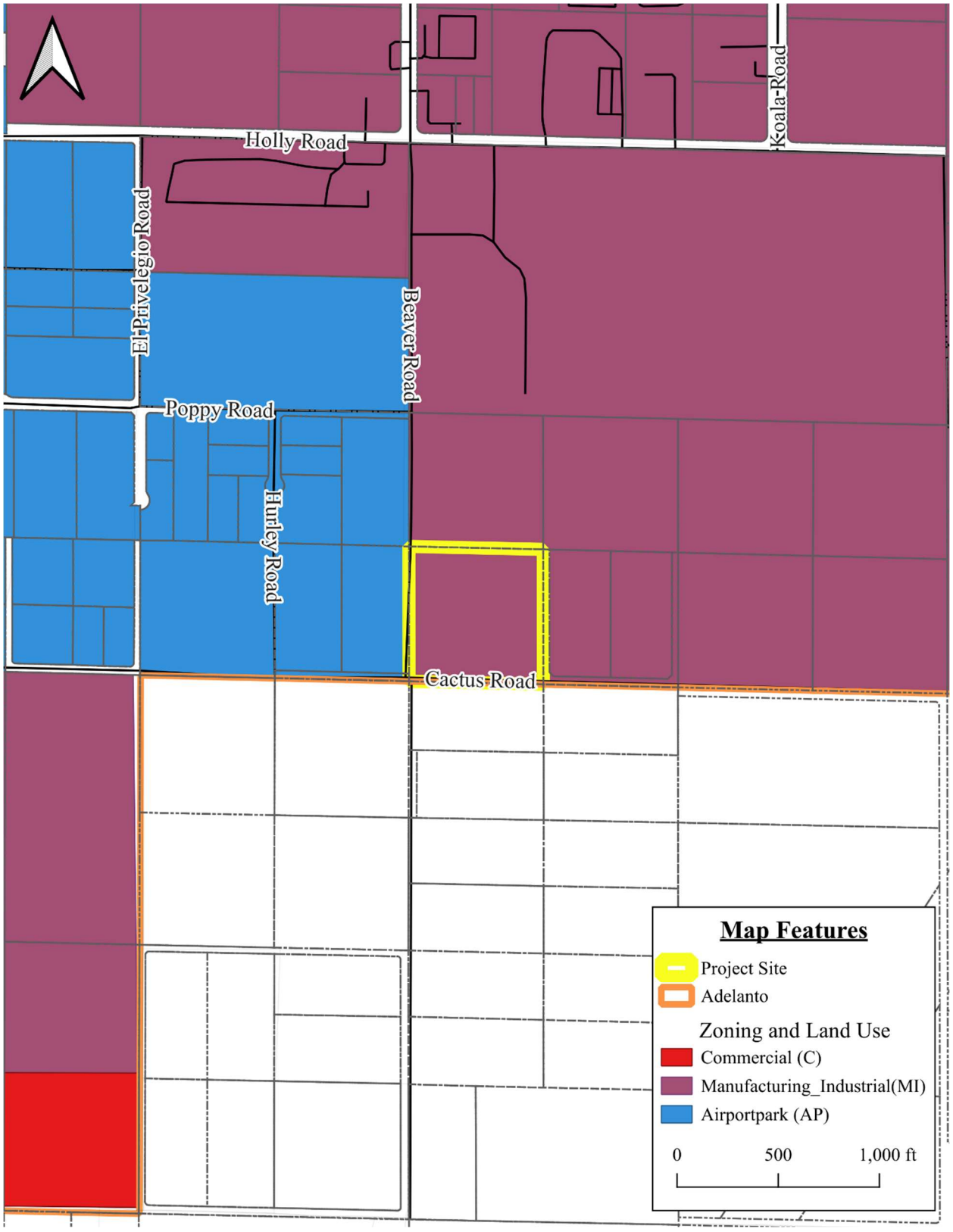

EXHIBIT 8 LAND USE MAP

SOURCE: City of Adelanto Zoning Map

- *East of the project site:* Vacant, undeveloped land is located along the east side of the project site. This area's General Plan and Zoning designation is *Manufacturing/Industrial (MI).*[48]
- *South of the project site:* Cactus Road is located along the south side of the project site. Cactus Road is the southern border of the City of Adelanto and Unincorporated San Bernardino is located south of Cactus Road. The land south of the aforementioned roadway is vacant and undeveloped. This area's General Plan and Zoning designation is *Rural Living*.
- *West of the project site:* Vacant, undeveloped land and single family homes are located to the west of the project site. This area's General Plan and Zoning designation is *Airport Park (AP).*[49]

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood. *As a result, no impacts will occur.*

B. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? • No Impact.*

The project site's General Plan and Zoning designation is *Manufacturing/Industrial (MI).* A CUP is required for this project. No general plan amendment or zone change is required for the project. The project would not 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. As a result, no impacts will occur.*

MITIGATION MEASURES

The analysis determined that no impacts on land use and planning would result upon the implementation of the proposed project. As a result, no mitigation measures are required.

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✖
B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✖

[48] Blue Engineering. *Site Plan. Sheet 2.* July 29, 2024.

[49] Ibid.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project would result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgrade it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ● No Impact.*

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[50] The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. As indicated previously, there are no active mineral extraction activities occurring on-site or in the adjacent properties. *As a result, no impacts to mineral resources would occur.*

B. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? ● No Impact.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. No mineral extraction activities are located on the adjacent properties. Moreover, the proposed project will not interfere with any resource extraction activity. *Therefore, no impacts would result from the implementation of the proposed project.*

[50] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*.

MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the approval of the proposed project and its subsequent implementation. As a result, no mitigation measures are required.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✖	
B. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?			✖	
C. For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on noise if it results in any of the following:

- The proposed project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- The proposed project would result in the generation of excessive ground borne vibration or ground borne noise levels.
- For a proposed 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?

Noise levels may be described using a number of methods designed to evaluate the "loudness" of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. Noise level increases of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? • Less than Significant Impact.*

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. Chapter 9.110 of the City of Adelanto Municipal Code serves as the City's Noise Control Ordinance. The "standard" noise level for the manufacturing zones is 75 dB(A). Unless otherwise permitted, noise levels shall not exceed this ambient noise level by the following dB(A) levels for the cumulative period of time specified below:

A. Less than five (5) dB(A) for a cumulative period of more than thirty (30) minutes in any hour;

B. Less than ten (10) dB(A) for a cumulative period of more than fifteen (15) minutes in any hour;

C. Less than fifteen (15) dB(A) for a cumulative period of more than five (5) minutes in any hour;

D. Less than twenty (20) dB(A) for a cumulative period of more than one (1) minute in any hour; and,

E. Twenty (20) dB(A) or more for any period of time.

Construction, alteration, and demolition activity on private properties are exempt during the construction period as long as such activities are essential to the completion of a project.

The nearest sensitive receptor are residential homes located approximately 1,100 feet west of the project site. Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. All of the industrial process for the tire recycling facility will occur indoors. In addition, the operation of the facility will not expose any surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. As a result, the proposed project will not expose sensitive receptors to excessive operational noise levels. *As a result, the impacts would be less than significant.*

B. *Would the project result in generation of excessive ground borne vibration or ground borne noise levels? • Less than Significant Impact.*

Once in operation, the proposed project will not significantly raise ground-borne noise levels. All of the industrial process for the tire recycling facility will occur indoors. In addition, no noise sensitive land uses are located in the area. The project site is located within a manufacturing zone district. The nearest sensitive receptor are residential homes located approximately 1,100 feet west of the project site. Slight increases in ground borne noise levels could occur during the construction phase. The limited duration of construction activities and the distance to any noise sensitive receptors would reduce the potential impacts to levels that are less than significant. *As a result, the impacts would be less than significant.*

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? ● Less than Significant Impact.*

The project site is not located within an airport land use plan nor is the site located within two miles of a public airport or public use airport.[51] The nearest public airport to the city is the Southern California Logistics Airport located approximately 5.2 miles northeast of the project site.[52] The Airport Park Overlay District is located approximately 1,000 feet west of the project site. [53] The Overlay District is intended to guide development around Adelanto Airport-52CL, which is a privately owned airport managed by the Adelanto Airport Property Owner's Association.[54] This district consists of single-family residences with private hangers located in close proximity to the runways. The city's municipal code offers descriptions of land uses that are hazardous to the safety of airport operations which include the following:

- Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at the airport, other than an FAA approved navigational signal light or visual slope indicator;
- Any use which would cause sunlight to be reflected toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport;
- Any use which would generate smoke or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within this area;
- Any use which would generate electrical interference that would be detrimental to the operation of aircraft and/or aircraft instrumentation; and
- Any land use involving, as the primary activity, the manufacture, storage, or distribution of explosives or flammable or hazardous materials. [55]

The project site is outside of the overlay district and does not fall under any of the above criteria. The project will not introduce a structure that will interfere with the approach and take off of airplanes utilizing any regional airports. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The analysis of potential noise impacts indicated that no significant adverse impacts would result from the proposed project's construction and operation. As a result, no mitigation measures are required.

[51] Toll-Free Airline. *San Bernardino County Public and Private Airports, California*.
[52] Google Earth. Website accessed July 30, 2024.
[53] Google Maps and City of Adelanto Zoning Map. Website accessed July 30, 2024.
[54] Adelanto Airport. Website accessed July 30, 2024.
[55] Adelanto Zoning Ordinance. Section 17.45.040 Special Considerations in the Airport Park Overlay District

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✖
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on population and housing if it results in any of the following:

- The proposed project would 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).
- The proposed project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?● No Impact.*

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development*. The site is currently undeveloped. All land use surrounding the property has been previously designated for industrial uses.
- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only.
- *Extension of infrastructure and other improvements*. The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.
- *The removal of housing requiring replacement housing elsewhere*. The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services*. The project will result in a limited increase in employment which can be accommodated by the local labor

market. The tire recycling facility is projected to employ 133 persons at full capacity. The normal peak hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.

- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The proposed project will not result in any unplanned growth as it is already accounted for by the SCAG. The jobs for this project would be filled by the local labor market. *Therefore, no impacts would result.*

B. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? • No Impact.*

The proposed project would be a new 158,000 square foot tire recycling facility. The estimated employment is anticipated to be approximately 133 employees. This is based on an employment ratio of one employee for every 1,195 square feet of floor area.[56] The project site is vacant though it has been disturbed. This property and surrounding areas have a General Plan and zoning designations for manufacturing and industrial uses. No housing units will be permitted, and none will be displaced as a result of the proposed project's implementation. *Therefore, no impacts would result.*

MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			✖	
i). Would the project result in substantial adverse physical impacts associated with Fire protection?			✖	
ii). Would the project result in substantial adverse physical impacts associated with Police protection?			✖	
iii). Would the project result in substantial adverse physical impacts associated with Schools?			✖	
iv). Would the project result in substantial adverse physical impacts associated with Parks?			✖	
v). Would the project result in substantial adverse physical impacts associated with Other public facilities?			✖	

[56] The Natelson Company, Inc. *Employment Density Study Summary Report*. Dated October 31, 2001

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- The proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks or other public facilities.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in* fire protection; police protection; schools; parks; or other public facilities? ● *Less than Significant Impact.*

i). *Would the project have fire protection? Less than Significant Impact.*

The City of Adelanto contracts fire protection services with the San Bernardino County Fire Department from two fire stations located within the City limits. The nearest fire station is the San Bernardino County Fire Station 322 located 1.84 miles northeast of the project site. The Fire Department currently reviews all new development plans. The proposed project will be required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires).

Tire recycling facilities can face fire hazards from stockpiles of waste tires. Rubber tires are made of very combustible compounds, including carbon, oil, benzene, toluene, rubber and sulfur. Although tires are difficult to ignite, once they burn, they can be almost impossible to extinguish and can burn for months. Tires are not easy to ignite because they are designed to absorb the heat generated by the friction of road contact. Once ignition takes place, however, this same ability of tires to absorb heat makes extinguishment difficult. The high carbon content and steel cords serve as a heat sink, absorbing and storing heat within the tire. Tires burn with a higher per-pound heat output than most coal, and the high heat production of tire rubber makes extinguishment very difficult. When tires burn, they release toxic fumes, heavy metals, gases, and oil that can pollute the air, soil, and water. Such fires become hazardous materials incidents that may affect entire communities, often requiring neighborhood evacuations, protracted fire operations, and causing contamination of the air, waterways, and water table. This pollution can affect ecosystems and pose risks to human health through the food chain and drinking water sources.

The lack of pre-planning compromises the efficiency and effectiveness of fire operations. Fire departments often try ineffective water or foam extinguishment strategies or attempt to locate needed excavation equipment after the incident begins. Effective and efficient extinguishment requires heavy equipment such as excavators, bulldozers, and front-end loaders specifically suited for piled tire product operations.

Despite these challenges, the incidence and impact of large tire pile fires can be reduced through strict code enforcement and appropriate fire safety practices. Standards for the storage of rubber tires should be rigidly enforced. A pre-plan utilizing the Incident Command System should be established. The pre-plan should include development of maps, diagrams of the tire pile and surrounding areas, including water supply sources, and resource lists for needed equipment and personnel.

Although extinguishment cools the tire from open flaming to a smoldering stage, the stored tire heat can re-ignite the tires. Extinguishment of tire pile fires is facilitated by the separation of unburned product from the fire to lessen the fuel load. Once adequate separation is accomplished, an earthen berm should be built around the burning tire pile for containment. The burning material removed from the pile can be doused with water and submerged or buried to ensure extinguishment. The direct application of water and/or foams generally does not provide effective extinguishment in tire fires. Rather, water is best used to keep the unburned tires from igniting. Class B foam is generally considered ineffective at extinguishing such fires but can be used to prevent run-off oil from igniting. Class A foams and wetting agents are useful if applied in the ignition and propagation phases of the fire.

The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. The project would not hinder the fire station's operations such as response times. In addition, the proposed project would be required to implement all pertinent Fire Code Standards including the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by County Fire officials to ensure adequate fire service and safety as a result of project implementation. *As a result, the impacts would be less than significant.*

ii). *Would the project have police protection? Less than Significant Impact.*

Law enforcement services within the City are provided by the San Bernardino County Sheriff's Department which serves the community from one police station. The San Bernardino County Sheriff's Department is located approximately 3.93 miles northeast of the project site. The proposed project will not be open or accessible to the general public. On-site security would include security personnel, gates, cameras, and detailed background checks of employees. The facility would be closed to the public at all times. Non-employees would only be allowed to enter the facility with a permitted escort. The proposed facility will also be required to comply with the County and City security requirements. *As a result, the impacts will be less than significant.*

iii). *Would the project be near schools? Less than Significant Impact.*

The Adelanto High School is located approximately 4,500 feet southeast of the project site. Colombia Middle School is located approximately 2.08 miles to the southeast. Due to the nature of the proposed project, no direct enrollment impacts regarding school services would occur. The proposed project would not directly increase demand for school services. In addition, the proposed project would be required to pay school impact fees. *As a result, the impacts will be less than significant.*

iv). *Would the project be near parks? Less than Significant Impact.*

The nearest park to the project site is Sierra Park, located 1.68 to the southeast of the project site. The proposed project would not result in any local increase in residential development (directly or indirectly) which could potentially impact the local recreational facilities. *As a result, the impacts will be less than significant.*

v). *Would the project have other public facilities? Less than Significant Impact.*

The proposed project would not create direct demand for other governmental service. *As a result, the impacts will be less than significant.*

MITIGATION MEASURES

The analysis of public service impacts indicated that no significant adverse impacts are anticipated, and no mitigation is required with the implementation of the proposed project.

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✖
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on recreation if it results in any of the following:

- The proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- The proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? • No Impact.*

The nearest park to the project site is Sierra Park, located 1.68 to the southeast of the project site. Given the proposed project's industrial use, no significant increase in the use of City parks and recreational facilities

is anticipated to occur. No parks are located adjacent to the site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. *As a result, no impacts are anticipated.*

B. *Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? • No Impact.*

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site. The nearest park to the project site is Sierra Park, located 1.68 to the southeast of the project site. *As a result, no impacts will occur.*

MITIGATION MEASURES

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✖	
B. Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?			✖	
C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✖	
D. Would the project result in inadequate emergency access?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on transportation and circulation if it results in any of the following:

- The proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- The proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- The proposed project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- The proposed project would result in inadequate emergency access.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? • Less than Significant Impact.*

Access to the proposed development would be provided by two new driveway connections located at the northwest and southeast corners of the site. The driveways would connect with the east side of Beaver Road and the north side of Cactus road, respectively.[57] Both Beaver Road and Cactus Road are currently unimproved. Parking would include 264 parking spaces including 8 ADA compliant spaces and 23 EV parking spaces. 8 truck dock high doors would be located along the building's northwest and northeast corner. From Appendix D – Traffic Impact Analysis from Kunzman Associates, the project trip generation is based on "Trip Generation, 11th Edition", published by the Institute of Transportation Engineers (ITE). The applicable trip generation rates for the proposed tire recycling facility are provided in Table 7.

TABLE 7 PROJECT TRIP GENERATION

Land Use Trip Type	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
General Light Industrial (ITE Code 110)	1.0	TSF	4.87	0.65	0.09	0.74	0.09	0.56	0.65
Projected Trip Generation									
General Light Industrial (ITE Code 110)	158.000	TSF	769	103	14	117	14	88	102

Source: Institute of Transportation Engineers, 11th Edition

TSF = Thousand Square Feet

Table 7 shows the trip generation for the proposed use. The proposed project's total daily trip generation would be 769 vehicle trip ends. Of this total, 117 trips would be AM (morning) peak hour trips and 102 trips would be PM (evening) peak hour trips. The CEQA threshold for this issue is whether or not the proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed project is consistent with the land use designation that is assigned to the project site. Furthermore, the proposed development would not be inconsistent with the policies included in the City's Mobility Plan. *As a result, the impacts will be less than significant.*

B. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? • Less Than Significant No Impact.*

The City of Adelanto has adopted vehicle miles travelled (VMT) thresholds based on the California Emission Estimator Model (CalEEMod) as its preferred method to evaluate VMT impacts. In other words, the City's adopted threshold assumes that if a project's GHG emissions are below thresholds for that land use, the project could be screened out from a VMT analysis. The threshold for GHG emissions is 10,000 MTCO2e per day. a less than significant impact to the environment. As indicated herein in Section 3.8, the Greenhouse gas emissions would be below this threshold. It is also important to note that the proposed project is also consistent with the City's Zoning and General Plan. As a result, the proposed project would

[57] Ibid.

also conform to all regional growth projections. *As a result, the impacts will be less than significant.*

C. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? • Less than Significant Impact.*

Access to the proposed development would be provided by two new driveway connections located at the northwest and southeast corners of the site. The driveways would connect with the east side of Beaver Road and the north side of Cactus road, respectively.[58] Both Beaver Road and Cactus Road are currently unimproved. The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. *As a result, the potential impacts would be less than significant.*

D. *Would the project result in inadequate emergency access? • No Impact.*

The proposed project would not affect emergency access to any adjacent parcels. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts are associated with the proposed project's implementation.*

MITIGATION MEASURES

The analysis of potential impacts related to traffic and circulation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	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 section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place?			✖	
B. Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 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 I of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k)?			✖	

[58] Ibid.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
- The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place?, or object with cultural value to a California Native American Tribe, and that is: listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 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 I of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? ● Less than Significant Impact.*

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 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 I of Section 5024.1. In applying the criteria set forth in subdivision I 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.
- 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.

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

In accordance with Public Resources Code Section 21080.3.1, subs. (b), the City of Adelanto formally requested AB-52 consultation with the following tribes.

- Denise Torres, Cultural Resources Manager, *Morongo Band of Mission Indians;*
- Ryan Nordness, San Manuel Director of Cultural Resources Management, San Manuel Band of Mission Indians;
- Wayne Walker, Co-Chairperson, Serrano Nation; and,
- Joseph Ontiveros, Tribal Historic Preservation Officer, *Soboba* Band of Luiseño Indians.

The Applicant's adherence to the mitigation measures outlined in Section 3.3 herein would ensure that cultural resources encountered during ground disturbance activities would be conserved. Additionally, Section 5097.98 of the Public Resources Code states:

> "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant.

B. *Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 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 I of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k)? ● Less than Significant Impact.*

The project site is located on recognized Yuhaaviatam/Maarenga'yam (Serrano) ancestral territory.[59] A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no Native historic resources was listed within the City of Adelanto. Since the project's implementation will not impact any Federal, State, or locally designated historic resources. *As a result, no impacts will occur.*

MITIGATION MEASURES

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant. As a result, no mitigation is required.

3.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✖	
B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✖	
C. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✖	
D. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✖	
E. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

[59] Native Land.ca. Website Accessed July 30, 2024

- The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- The proposed project would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
- The proposed project would negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals.
- The proposed project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? • Less than Significant Impact.*

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The Treatment Plant is operated by the City of Adelanto and manages the sewage generation from residents, industries, and commercial users in the City of Adelanto. The facility is located at the intersection of Johnathan Street and Auburn Avenue, located approximately 3.2 miles northeast from the project site. Wastewater from Adelanto's water service area is collected and treated at the City-owned 4.0 MGD activated sludge wastewater treatment facility through an operations and maintenance contract with the PERC Water Corporation. There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The project site is currently undeveloped and undisturbed. *As a result, the potential impacts would be less than significant.*

B. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?• Less than Significant Impact.*

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 27,139 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario. The anticipated water demand for the proposed project (47,400 gallons per day) is summarized in Table 8. The applicant will need a letter from the Adelanto Water Department (VWD) in order to ensure water can be served to the site. The proposed project will be required to implement all pertinent water conservation measures. *As a result, the impacts will be less than significant.*

TABLE 8 PROJECTED WATER CONSUMPTION

Project	Consumption Rate	Project Consumption
Tire Recycling Facility (158,000 sq. ft.)	0.3 gals./sq. ft./day	47,400 gals./day
Total		47,400 gals./day

Source: Blodgett Baylosis Environmental Planning.

C. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? • Less than Significant Impact.*

The City operates a 1.5-million-gallons-per-day activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program. The City is currently constructing a 2.5-million-gallons-per-day upgrade that will increase wastewater treatment capabilities to 4.0 million gallons per day and produce treated water that can be used for lawn/public parks irrigation, construction and dust control and other beneficial uses. The projected effluent generation is summarized below in Table 9.

TABLE 9 PROJECTED EFFLUENT GENERATION

Project	Consumption Rate	Project Consumption
Tire Recycling Facility (158,000 sq. ft.)	0.2 gals./sq. ft./day	31,600 gals./day
Total		31,600 gals./day

Source: Black & Veatch. Wastewater Collection System Master Plan. Report dated October 18, 2013

The effluent that would be generated by the proposed project would be minimal and limited to effluent from the recycling facility and restrooms. *As a result, the impacts are expected to be less than significant.*

D. *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? • Less than Significant Impact.*

In the United States, 240 million tires are disposed of each year, and 75 percent of these are added to existing stockpiled tire dumps or discarded in landfills. The ever-increasing number of discarded tires poses serious problems, not only in land use, but also in environmental and fire protection. In years past, tires were commonly buried in landfills, a practice that continues in some states. Tires are not desirable landfill material because tire casings trap air and buried tires often move, interfering with future landfill reclamation. Generally, the diminishing permitted landfill space is needed for more suitable trash.

California waste tire laws, found in Division 30, Chapter 16 of the California Public Resources Code, create a regulatory program designed to protect public health and safety and the environment by preventing the improper storage of waste tires. Persons intending to store or stockpile 500 or more waste tires in California are required to comply with the waste tire storage standards and do one of the following from CalRecycle:

- apply for and obtain a major or minor waste tire facility permit.
- apply for and receive a waste tire facility permit exemption.
- qualify for and notify CalRecycle that they are excluded from facility permitting requirements.

Assembly Bill 1843 established the waste tire program in 1990, commencing with section 42800 in Chapter 16 of the Public Resources Code. Under Chapter 16 the CalRecycle (formerly the CIWMB) is vested with responsibility for the administration of waste tire programs and must protect public health, safety, and the environment by establishing technical standards and a permitting program for waste tire facilities and technical standards for solid waste facilities, which handle tires for storage and disposal. Senate Bill (SB) 744 established the Waste Tire Hauler Registration and Manifest Program in Chapter 19, commencing with section 42950 of the Public Resources Code. Senate Bill (SB) 876 (Escutia, Statutes of 2000, Chapter 838) expanded CalRecycle's authority to oversee the management of waste and used tires and also charged CalRecycle with implementing a new and improved "California Uniform Waste and Used Tire Manifest System."

Solid waste collection services are provided by AVCO for disposal into area landfills and materials recovery facilities (MRFs). The nearest landfill to the project site is the Victorville Sanitary Landfill located at 18600 Stoddard Wells Road. According the CalRecycle, 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. As such, there is adequate landfill capacity to serve the Project. The projected solid waste generation is summarized below in Table 10.

TABLE 10 PROJECTED SOLID WASTE GENERATION

Project	Generation Rate	Project Generation
Tire Recycling Facility (158,000 sq. ft.)	8.93 lbs./day/1,000 sq. ft.	1,411 lbs./day
Total		1,411 lbs./day

Source: Blodgett Baylosis Environmental Planning.

The proposed project is anticipated to generate approximately 1,411 pounds per day of solid waste. The project would conform to all California waste tire laws found in Division 30, Chapter 16 of the California Public Resources Code. *As a result, the potential impacts would be less than significant.*

E. *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? • No Impact.*

Avco Disposal 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. The proposed project, like all other development in Adelanto and San Bernardino County, would be required to adhere to City and County ordinances with respect to waste reduction and recycling. In addition, Chapter 8.01 includes provisions for waste collection, recycling, and disposal, recycling, and food waste. The proposed project would be required to conform to all pertinent to City requirements. The project would conform to all California waste tire laws found in Division 30, Chapter 16 of the California Public Resources Code. *As a result, no impacts related to State and local statutes governing solid waste are anticipated.*

MITIGATION MEASURES

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.20 WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				✖
B. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✖
C. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✖
D. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on wildfire risk and hazards if it results in any of the following:

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan? • No Impact.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[60] Surface streets that will be improved at construction will serve the project site and adjacent area. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts will occur.*

B. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? • No Impact.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[61] The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 20 miles north and northwest of the San Gabriel and San Bernardino Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. *As a result, no impacts would occur.*

C. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? • No Impact.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[62] The project site is not located in an area that is classified as a moderate fire risk severity within a State Responsibility Area (SRA), and therefore will not require the installation of specialized infrastructure such as fire roads, fuel breaks, or emergency water sources. *As a result, no impacts would occur.*

D. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.*

According to California Department of Forestry and Fire Protection, the project site is not located within or near a fire hazard zone.[63] There is no risk from wildfire within the project site or the surrounding area given

[60] CalFire. *Fire Hazard Severity Zones in State Responsibility Area.*
[61] Ibid.
[62] Ibid.
[63] Ibid.

the project site's distance from any area that may be subject to a wildfire event. In addition, the site is not located within a moderate fire risk and state responsibility area. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of wildfires impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	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?				✖
B. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✖
C. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✖

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

A. The proposed project *would not* 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. *As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.*

B. The proposed project *would not* have impacts that are individually limited, but cumulatively considerable. *The environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.*

C. The proposed project *would not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. *As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.*

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SECTION 4. CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *would not* 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 an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *would not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *would not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Adelanto can make the following additional findings:

The following mitigation measures have been incorporated herein to further reduce the potential air quality impacts to levels that are less than significant.

Air Quality Mitigation Measure No. 1. Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.

Biological Resources Mitigation Measure No. 1. Regardless of the time of year, a pre-construction clearance survey for nesting birds should be conducted no more than three (3) days prior to the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The qualified biologist conducting the clearance survey shall conduct the survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If an active avian nest is discovered during the pre-construction clearance survey, within the work area or the Project's zone of influence (generally 100-300 feet), construction activities should stay outside of a no-disturbance

buffer. The size of the no-disturbance buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by the qualified wildlife 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. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. The qualified biologist should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Biological Resources Mitigation Measure No. 2. Prior to the start of Project activities, 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. Take avoidance surveys shall be conducted no less than 14 days prior to the start of Project-related activities. 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, in accordance with the Staff Report on Burrowing Own Mitigation (CDFG 2012 or most recent version). If the surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities.

Biological Resources Mitigation Measure No. 3. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). This would consist of one complete (100% coverage) survey of the action area prior to the initiation of construction at any time of year. The survey should be conducted within 7 days prior to construction beginning by a City Approved Biologist. If desert tortoise is found on the project site during preconstruction surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and state

CESA permitting, and via an approved translocation plan pursuant to the above permits. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a Desert Tortoise Translocation Plan (DTRP) to be administered during the construction and operation of the project. The DTRP should be submitted to the City of Adelanto for review and approval and shall be updated and utilized for translocation and monitoring after construction. The DTRP should include, but not be limited to the following:

1. Discussion on temporary construction fencing (if any),
2. Description of clearance surveys of permanent exclusion areas,
3. Transportation and release procedures,
4. Construction schedule,
5. Translocation/relocation areas,
6. Monitoring and reporting.

Biological Resources Mitigation Measure No. 4. A qualified biologist familiar with the species' behavior and life history shall conduct focused surveys for Mohave ground squirrel throughout the Project site. Focused Mohave ground squirrel surveys shall follow the California Depart of the fish and game Mohave Ground Squirrel Survey Guidelines (CDFW 2023). If Mohave ground squirrel is observed on site or captured during any of the trapping sessions, the Project proponent shall secure an Incidental Take Permit (ITP) for Mohave ground squirrel before ground-disturbing activities commence. The ITP will specify avoidance, minimization, and mitigation conditions for temporary and/or permanent impacts to Mohave ground squirrel including habitat acquisition at a CDFW-approved location and mitigation ratio.

Biological Resources Mitigation Measure No. 5. The western Joshua tree is a candidate threatened species under the California Endangered Species Act. Prior to construction, and initiation of western Joshua tree removal, relocation, replanting, trimming or pruning or any activity that may result in take of WJT on site, the project proponent is required to obtain California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Section 2081(b) of the CESA, or under the Western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927-1927.12) through CDFW for the take of western Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Adelanto falls within an area of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1. Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all

trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.

Biological Resources Mitigation Measure No. 6. A comprehensive jurisdictional analysis may be required in the future to analyze the impacts and area of the channel located on site.

The following mitigation measures will be required to address potential cultural resources impacts:

Cultural Resources Mitigation Measure No. 1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

Cultural Resources Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

Cultural Resources Mitigation Measure No. 3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

Cultural Resources Mitigation Measure No. 4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final.

The following mitigation measures will be required to address potential paleontological resources impacts:

Geology & Soils Mitigation Measure No. 1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

Geology & Soils Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they

are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

Geology & Soils Mitigation Measure No. 3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

Geology & Soils Mitigation Measure No.4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the San Bernardino County Museum prior to building final.

The monitoring and reporting for the mitigation measures, including the period for implementation, monitoring agency, and the monitoring action, are identified in Table 4-1.

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
AIR QUALITY			
Air Quality Mitigation Measure No. 1. Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
BIOLOGICAL RESOURCES			
Biological Resources Mitigation Measure No. 1. Regardless of the time of year, a pre-construction clearance survey for nesting birds should be conducted no more than three (3) days prior to the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The qualified biologist conducting the clearance survey shall conduct the survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If an active avian nest is discovered during the pre-construction clearance survey, within the work area or the Project's zone of influence (generally 100-300 feet), construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by the qualified wildlife 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. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. The qualified biologist should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 2. Prior to the start of Project activities, 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. Take avoidance surveys shall be conducted no less than 14 days prior to the start of Project-related activities. 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, in accordance with the Staff Report on Burrowing Own Mitigation (CDFG 2012 or most recent version). If the surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 3. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). This would consist of one complete (100% coverage) survey of the action area prior to the initiation of construction at any time of year. The survey should be conducted within 7 days prior to construction beginning by a City Approved Biologist. If desert tortoise is found on the project site during preconstruction surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise should only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a Desert Tortoise Translocation Plan (DTRP) to be administered during the construction and operation of the project. The DTRP should be submitted to the City of Adelanto for review and approval and shall be updated and utilized for translocation and monitoring after construction. The DTRP should include, but not be limited to the following: 1. Discussion on temporary construction fencing (if any), 2. Description of clearance surveys of permanent exclusion areas, 3. Transportation and release procedures, 4. Construction schedule, 5. Translocation/relocation areas, 6. Monitoring and reporting.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Biological Resources Mitigation Measure No. 4. A qualified biologist familiar with the species' behavior and life history shall conduct focused surveys for Mohave ground squirrel throughout the Project site. Focused Mohave ground squirrel surveys shall follow the California Depart of the fish and game Mohave Ground Squirrel Survey Guidelines (CDFW 2023). If Mohave ground squirrel is observed on site or captured during any of the trapping sessions, the Project proponent shall secure an Incidental Take Permit (ITP) for Mohave ground squirrel before ground-disturbing activities commence. The ITP will specify avoidance, minimization, and mitigation conditions for temporary and/or permanent impacts to Mohave ground squirrel including habitat acquisition at a CDFW-approved location and mitigation ratio.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
Biological Resources Mitigation Measure No. 5. The western Joshua tree is a candidate threatened species under the California Endangered Species Act. Prior to construction, and initiation of western Joshua tree removal, relocation, replanting, trimming or pruning or any activity that may result in take of WJT on site, the project proponent is required to obtain California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Section 2081(b) of the CESA, or under the Western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927-1927.12) through CDFW for the take of western Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Adelanto falls within an area of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1. Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Biological Resources Mitigation Measure No. 6. A comprehensive jurisdictional analysis may be required in the future to analyze the impacts and area of the channel located on site.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	*Prior to the start of any construction related activities.* Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
CULTURAL RESOURCES			
Cultural Resources Mitigation Measure No. 1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	Prior to the start of any construction related activities. Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Cultural Resources Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	During the project's construction phase. Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Cultural Resources Mitigation Measure No. 3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	Prior to the start of any construction related activities. Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Cultural Resources Mitigation Measure No. 4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	Prior to the start of any construction related activities. Mitigation ends at the completion of the construction phase.	Date: Name & Title:

Table 4-1 Mitigation Monitoring Program

MEASURE	ENFORCEMENT AGENCY	MONITORING PHASE	VERIFICATION
GEOLOGY & SOILS			
Geology & Soils Mitigation Measure No. 1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	Prior to the start of any construction related activities. Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Geology & Soils Mitigation Measure No. 2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	During the project's construction phase. Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Geology & Soils Mitigation Measure No. 3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	Prior to the start of any construction related activities. Mitigation ends at the completion of the construction phase.	Date: Name & Title:
Geology & Soils Mitigation Measure No.4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the San Bernardino County Museum prior to building final.	City of Adelanto Community Development Department *(The Applicant is responsible for implementation)*	Prior to the start of any construction related activities. Mitigation ends at the completion of the construction phase.	Date: Name & Title:

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SECTION 5. REFERENCES

5.1 PREPARERS

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5.2 REFERENCES

The references that were consulted have been identified using footnotes.

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