INITIAL STUDY

FOR THE

DAISY ROAD INDUSTRIAL STORAGE PROJECT

Prepared for:

City of Adelanto
11600 Air Expressway
Adelanto, California 92301

Prepared by:

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1. Project Title: Daisy Road Industrial Storage Project

2. Lead Agency Name: City of Adelanto
   Address: 11600 Air Expressway, Adelanto, CA 92301

3. Contact Person: Christian Espinoza
   Phone Number: 760-246-2300, ext. 11136
   Email: cespinoza@adelantoca.gov

4. Project Location: The proposed project is located in the City of Adelanto, San Bernardino County, approximately 330 feet east of Daisy Road (improved) and 330 feet north of Cassia Road (dirt). The site is approximately 1.5 miles west of Highway 395. The closest major intersection near the site is Daisy Road and Rancho Road about 2,000 feet north of the site. The geographic coordinates of the proposed project are 34.3306, -117.2542 and the proposed project is located within the Victorville, CA USGS Topo 7.5-minute topographic map, within Section 5, Township 5 North, Range 5 West. See Figures 1 and 2 for regional and site locations.

5. Project Sponsor: Mike Kale, Director of Sales
   Reliable Crane Service
   7056 Archibald Ave Ste 102 #418
   Corona, CA 92880
   Office: 909.222.0202
   E-Mail: mike@reliablecraneservice.com

6. General Plan Designation: Manufacturing/Industrial (MI)

7. Zoning: Manufacturing/Industrial (MI)

8. Project Description:

Project Description

The City of Adelanto is located in the High Desert region of San Bernardino County just north of the San Gabriel Mountains. The developer, Mike Kale with Reliable Crane Service, proposes to develop an outdoor crane component and jobsite equipment storage yard on a 2.43-acre site in the City of Adelanto, San Bernardino County, California. The project site is comprised of Assessor Parcel Number (APN) 3128-101-17. The site is also legally described as parcel map 14618 parcel 3 book 175 page 40 by the San Bernardino County Assessor's Office. As shown on the site plan (Figure 3), the applicant proposes an outdoor crane component and equipment storage yard to store materials while they are not utilized on job sites. Components would come into and out of the storage yard approximately once a quarter. The cranes coming onto and leaving the property would occur approximately once every six months as the components for these tower crane and crawler crane projects generally stay on job sites for multiple years so components are needed only occasionally. Typical projects that utilize these cranes and equipment are high-rise commercial buildings. It is

important to note these tower cranes and stored components are electrically powered and tall tower components are stored horizontally.

The project proposes minimal improvements and only two (non-occupied) buildings onsite for equipment and parts storage planned near the southwest corner of the site (i.e., just north of the access gate). The project would install one prefabricated metal building that would be about 4,800 square feet (SF) in size, and a storage trailer that would be about 340 SF in size (refer to the site plan provided as Figure 3). The only tall (vertical) improvement on the site will be a high-mast light pole for security (approximately 40 feet). The cranes stored onsite would only be about 12.5-feet in height. There will be no onsite caretaker unit or management trailer but the site will be remotely monitored for security purposes. The site will not have any demonstrable grading, although some blading and leveling may occur initially as part of site preparation for crane storage and then infrequently as needed. Minor leveling will also be needed to make access, parking, and storage improvements near the southwest corner of the property. The project would include about 17,400 SF of paved area, with the remaining 93,851 SF area of the site supporting landscaping/native vegetation. The applicant anticipates the placement of up to 200 cubic yards (CY) of gravel to facilitate equipment storage and maintain all-weather access.

As part of the project, the applicant will improve the dirt road from Daisy Road east to the southwest corner of the project site, a distance of 330 feet. The entire property will have six-foot tall chain link fencing for security purposes. The only point of access will be a locked gate at the southwest corner of the site. To facilitate all-weather access, asphalt paving will be installed on the dirt access road from a point just west of the gate to approximately 100 feet to the east, then north a distance of 150 feet to a small asphalt-surfaced parking lot which can hold up to 14 vehicles (see Figure 3). The project would provide a total of 14 parking spaces, with 11 standard spaces, 2 loading spaces, and 1 handicapped accessible (ADA compliant) stall.

The applicant is requesting a Location and Development Plan (LDP) and Environmental Review from the City to operate the Daisy Road Industrial Storage Project.

At present, the site is vacant and supports mainly weedy and some scattered native vegetation. According to the site plan (**Figure 3**), the project will install a limited amount of asphalt surfacing near the site entrance at the southwest corner, including a small parking and storage trailer. These improvements will be made upon approval of the LDP and finalization of Environmental Review to expedite use of the site for crane storage. The project will install a minimum amount of landscaping given the lack of planned improvements and no habitable structures will be added. The surrounding area is either vacant land or industrial uses which similarly have limited landscaping.

Other than improving the dirt access road from Daisy Road to the site, no offsite road or utility improvements (e.g., water, sewer) are anticipated on Daisy Road or other streets in the surrounding area. Due to the limited amount of improvement needed for this use (less than a quarter acre), no drainage or water quality improvements are planned at this time. The only utility connection needed for the project is electricity for the high-mast lighting and activation of the gate. Once in operation, the project is not anticipated to support any onsite employees; only drivers and temporary workers will be required to move cranes and/or equipment on and off the site.

All construction activities will occur at one time and involve mainly scraping and limited asphalt paving. Operations will only occur onsite as equipment is moved onto or off of the site. Construction will begin in Quarter 4 of 2024 and is expected to conclude about 2 months later at the beginning of 2024, at which point the Daisy Road Industrial Storage Project will be fully operational.

9. Surrounding land uses and setting: (Briefly describe the project's surroundings)

The project site is located in an area planned for manufacturing/industrial uses, but contains extensive vacant land as well. It should be noted that west of Daisy Road in the vicinity of the project site is the Adelanto Power Conversion Station, a large parcel designated as Public Utilities (PU), and more vacant land. The land uses surrounding the project area are as follows:

- North: Contech Engineered Solutions (designated Manufacturing/Industrial)
- West: Amerigas Propane facility (designated Manufacturing/Industrial)
- South: Vacant land (designated Manufacturing/Industrial)
- East: Vacant land and low intensity industrial yard (designated Manufacturing/Industrial)

10. Other agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

    - San Bernardino County Fire Department

11. Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? Yes. The project site is located within the City of Adelanto which has been contacted pursuant to Public Resources Code section 21080.3.1 by the following California Native American tribes traditionally and cultural affiliated with the City of Adelanto:

    AB 52 consultation began in December of 2024. Letters were distributed to the three tribes that have requested consultation with the City: the Yuhaaviatam of San Manuel Nation, the Twenty-Nine Palms Band of Mission Indians and the Torres Martinez Desert Cahuilla Indians. As of publication of the Initial Study, only one response from

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

12. 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 proposed project will require the following approvals:

    - Location and Development Plan (LDP 24-09);
    - The Mitigated Negative Declaration (MND); and,
    - The Mitigation Monitoring and Reporting Program (MMRP).

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION (To be completed by the Lead Agency)

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

☐	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will 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.

Tom Dodson & Associates — Prepared by

12/30/24 — Date

Lead Agency (signature)

2.12.25 — Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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

SUBSTANTIATION: City of Adelanto General Plan, Land Use and Conservation Elements.

a. *Less Than Significant Impact* – The City of Adelanto is located in the High Desert of San Bernardino County, north of the San Bernardino and San Gabriel Mountains and southeast of the Shadow Mountains. Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. A review of the project area determined that there are no scenic vistas located on or in the general area surrounding the project site. The project site is located in an area that contains light industrial development intermixed with vacant land. The area has general views of the mountains in the distance, and the surrounding vacant land contains a mixture of native vegetation of the surrounding desert and disturbed non-native vegetation. The project site itself is relatively flat and contains no topographic relief, rock outcroppings, or trees. Therefore, the development of the project for equipment storage is not expected to impact any important scenic vistas within the project area.

   A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. The proposed development would not limit views in the area immediately surrounding the project site because the site will only store equipment that is one story or less in height and much of the site would remain vacant at various times depending on how much equipment was onsite versus being rented out at a time. The land to the east, north, and west contains relatively low intensity outdoor storage and light industrial uses with maximum two-story buildings. Because mountain views from the project area are at some distance, storing equipment on the project site will not limit mountain or desert views from surrounding roadways or other public areas, and furthermore, could conform to the existing industrial setting in the general vicinity of the project site. Therefore, development of the proposed project has a less than significant potential to have a substantial adverse effect on a scenic vista.

b. *No Impact* – The project site is currently vacant and contains sparce mixed weedy and native vegetation but no Joshua trees, which are protected by Title 8, Division 9 of the San Bernardino County Code and which is enforced by the City of Adelanto. There are no rock outcroppings, historic buildings, or other scenic features on the site. According to the San Bernardino Countywide Plan Scenic Highways Map (**Figure I-1**), the proposed project is not located within or in proximity to a state scenic highway and the City of Adelanto does not identify any locally important scenic roadways in

the project vicinity. Therefore, the proposed project cannot affect any scenic resources within a state scenic highway corridor. Based on the site condition and immediate surroundings, the project site itself does not contain any significant scenic resources that would be significantly impacted by the proposed project. Therefore, there would be no impacts to scenic resources as a result of the implementation of the proposed project.

c. *Less Than Significant Impact* – The proposed project is located in a non-urbanized area in the southern portion of the City, but the surrounding area supports low intensity light industrial uses to the west, north and east with vacant land to the south. The underlying land use and zoning classification for the site and surrounding area are for light industrial/manufacturing-type uses, which allows for outdoor storage areas for equipment and materials. Therefore, the visual impacts of the proposed project are consistent with the General Plan and zoning designation and with existing development in the area. Furthermore, there are no unique scenic resources in the project area although the entire area has distant views of the mountains to the south and east. Due to the project's location outside of major throughways in the City, public views to this site are limited, and as stated under issue I(a) above, such public views to these distant vistas in the project area are limited. Therefore, development of the proposed project would have a less than significant potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings.

d. *Less Than Significant Impact* – Implementation of the proposed project will create essentially one new source of light during project operation (i.e., one high-mast light structure near the center of the site). The proposed (non-occupied) buildings onsite are anticipated to contain interior sources of light, but this structure is not anticipated to be outfitted with windows such that light or glare would occur. The only other new source of lighting would be vehicular traffic accessing the site to move equipment onto and off of the site as needed. There are no residences in the immediate surrounding area, and as a result the new light pole is not anticipated to create any significant lighting impacts that could affect nearby residences. Furthermore, the new lighting is required to be consistent with the lighting standards set forth in the City of Adelanto zoning code by directing all lighting downwards. Through compliance with the City of Adelanto municipal code, potential light and glare can be controlled to a less than significant impact level.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				**X**
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?				**X**
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				**X**
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				**X**

SUBSTANTIATION: California Department of Conservation, Important Farmland Finder map, accessed May 2024, https://maps.conservation.ca.gov/DLRP/CIFF/; and, City of Adelanto General Plan, Land Use and Conservation Elements.

a. *No Impact* – The project site is currently vacant, and relatively flat and undisturbed. The project site is located within the City of Adelanto's Manufacturing/Industrial (MI) land use designation and zoning classification. The City of Adelanto does not contain a significant amount of land designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance. According to the California Important Farmland Finder map (**Figure II-1**), the project site and the land to the south are designated as Grazing Land, which is considered suited to the grazing of livestock. In addition, the lands to the north, east, and west of the project site are designated as "Urban and Built-Up Land" which means developed with no potential for agriculture. These designations are not related to Prime Farmland, Unique Farmland or Farmland of Statewide Importance. Furthermore, the proposed project site has been vacant with no activity for over 60 years. Construction and operation of the proposed project

will therefore, not convert farmland of any importance to non-agricultural use. No impacts are anticipated and no mitigation is required.

b. *No Impact* – As stated under issue II(a) above, the proposed project site is not designated for agricultural use by the City's General Plan. Furthermore, the site and adjacent properties are not designated for agricultural uses as shown on the California Important Farmland Finder map provided as **Figure II-1**. The activities associated with the proposed project will be confined to the project site; therefore, no potential exists for a conflict between the proposed project and agricultural zoning or Williamson Act contracts within the project area. No mitigation is required.

c. *No Impact* – According to the General Plan, the project site contains no stands or groves of trees, and is far removed from the San Gabriel and San Bernardino Mountains to the south, which are known to support forestry resources. Thus, the proposed project site is not located within forest land, timberland or timberland zoned for Timberland Production. Therefore, the proposed project will not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). No impacts are anticipated and no mitigation is required.

d. *No Impact* – The project site is not located within forest land and has no commercial trees on the property; therefore, the project will not result in the loss of forest land or conversion of forest land to non-forest production use. No impacts are anticipated and no mitigation is required.

e. *No Impact* – Implementation of the proposed project will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of valuable farmland to non-agricultural use or forest to non-forest uses. No forest or agricultural resources or uses occur within the general vicinity of the proposed project site, and therefore no agricultural uses would be impacted by the development or operation of the proposed project. Therefore, no adverse impacts to agricultural, forest or timberland resources will result from project implementation and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			**X**	
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?			**X**	
c) Expose sensitive receptors to substantial pollutant concentrations?			**X**	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			**X**	

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the Mojave Desert Air Quality Management District (MDAQMD) website, https://www.mdaqmd.ca.gov/, accessed in May 2024; and the California Air Resources Board (CARB) website, www.arb.ca.gov/adam/, accessed in May 2024. Additionally, a technical study that models project air quality and GHG emissions, titled "0 Daisy Road Air Quality and Greenhouse Gas Assessment" has been prepared by Urban Crossroads, dated June 13, 2024, and provided as Appendix 1 to this Initial Study.

Background

The project site is located in the portion of the County of San Bernardino, California, that is part of the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the MDAQMD. The air quality assessment for the proposed project includes estimating emissions associated with short-term construction and long-term operation of the proposed project. A number of air quality modeling tools are available to assess the air quality impacts of projects. In addition, certain air districts, such as the MDAQMD, have created guidelines and requirements to conduct air quality analyses. The MDAQMD's current guidelines, included in its *California Environmental Quality Act and Federal Conformity Guidelines* (August 2011), were adhered to in the assessment of air quality impacts for the proposed project.

Climate

Air quality in the project area is not only affected by various emissions sources (mobile, industry, etc.) but is also affected by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains that dot the vast terrain rise from 1,000 to 4,000 ft above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in Southern California by differential heating are channeled through the MDAB. The MDAB is separated from the Southern California coastal and central California valley regions by mountains (highest elevation is approximately 10,000 ft), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, separated from the San Gabriel Mountains by the Cajon Pass (4,200 ft). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a

series of valleys (notably the Coachella Valley), whose primary channel is the San Gorgonio Pass (2,300 ft) between the San Bernardino and San Jacinto Mountains.

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

Snow is common above 5,000 ft in elevation, resulting in moderate snowpack and limited spring runoff. Below 5,000 ft, any precipitation normally occurs as rainfall. Pacific storm fronts normally move into the area from the west, driven by prevailing winds from the west and southwest. During late summer, moist high-pressure systems from the Pacific collide with rising heated air from desert areas, resulting in brief, high-intensity thunderstorms that can cause high winds and localized flash flooding.

Criteria Pollutants
Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3) (precursor emissions include NO_X and reactive organic gases (ROG), CO, particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The San Bernardino County portion of the MDAB is designated as a nonattainment area for the federal O_3 and $PM_{2.5}$ standards and is also a nonattainment area for the state standards for O_3, and PM_{10}.

Applicable Regulatory Requirements

MDAQMD Rules that are currently applicable during construction activity for this project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings).

MDAQMD Rule 403
This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth moving and grading activities. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

MDAQMD Rule 1113
This rule serves to limit the volatile organic compound (VOC) content of architectural coatings used on projects in the MDAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the MDAQMD must comply with the current VOC standards set in this rule.

Methodology

In August 2023, the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including MDAQMD, released the latest version of the CalEEMod Version 2022.1.1.23. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this project to determine construction and operational air quality and greenhouse gas emissions.

Air Quality Regional Emissions Thresholds
The MDAQMD has developed regional significance thresholds for criteria pollutants, as summarized at Table III-1. The MDAQMD's CEQA and Federal Conformity Guidelines (February 2020) indicate that any projects in the Mojave Desert Air Basin (MDAB) with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table III-1
MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Construction/ Operations
CO	548 lbs/day
NO_X	137 lbs/day
VOC	137 lbs/day
SO_X	137 lbs/day
PM_{10}	82 lbs/day
$PM_{2.5}$	65 lbs/day

lbs./day – Pounds Per Day

Impact Analysis

a. *Less Than Significant Impact* – The Federal Particulate Matter Attainment Plan and Ozone Attainment Plan for the Mojave Desert set forth a comprehensive set of programs that will lead the MDAB into compliance with federal and state air quality standards. The control measures and related emission reduction estimates within the Federal Particulate Matter Attainment Plan and Ozone Attainment Plan are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with these attainment plans for development projects is determined by demonstrating compliance the indicators discussed below:

Consistency Criterion No. 1

The City of Adelanto General Plan designates the project site for "Manufacturing/Industrial (MI)" uses. The primary purpose of areas designated "MI" is to minimize exposure to its surroundings from more employment-intensive developments such as correctional facilities, controlled hazard uses, renewable energy facilities, manufacturing, distribution and warehousing, and automotive related businesses. The Manufacturing/Industrial designation allows for a maximum FAR of 0.60.

The project would develop an outdoor crane component and jobsite equipment storage yard on 2.43 acres, which is consistent with the Adelanto General Plan land use designation. Additionally, it should be noted that the proposed development would not exceed regional thresholds for operational emissions and would therefore be considered to have a less than significant impact. As such, the development proposed by the project is consistent with the growth projections in the General Plan and is therefore considered to be consistent with the AQMP.

Consistency Criterion No. 2

All MDAQMD Rules and Regulations
The project would be required to comply with all applicable MDAQMD Rules and Regulations, including, but not limited to Rules 401 (Visible Emissions), 402 (Nuisance), and 403 (Fugitive Dust).

Consistency Criterion No. 3

Demonstrating that the project will not increase the frequency or severity of a violation in the federal or state ambient air quality standards
Consistency Criterion No. 3 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional significance thresholds were exceeded. As evaluated, the project's regional construction and operational emissions would not exceed applicable regional significance thresholds. As such, a less than significant impact is expected

AQMP Consistency Conclusion

The project would not have the potential to result in or cause NAAQS or CAAQS violations. Additionally, project construction and operational-source emissions would not exceed the regional or localized significance thresholds. Further, the project will not exceed the assumptions in the AQMP based on the years of project build-out phase. The project is therefore considered to be consistent with the AQMP and impacts under this issue are considered less than significant.

b. *Less Than Significant With Mitigation Incorporated* – The MDAQMD relies on the SCAQMD guidance for determining cumulative impacts. The SCAQMD has recognized that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. In this report the SCAQMD clearly states (Page D-3):

"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-

specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Construction Emissions
In May 2024 the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod2022.1.1.

Construction Activities
Construction activities associated with the project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following activities:

- Site Preparation
- Grading (Import/Export)
- Building Construction
- Paving
- Architectural Coating

Grading Activities
Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions”. Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. This analysis assumes that earthwork activities are expected to balance on site and no import or export of soils would be required. The CalEEMod default trip length of 20-miles will be used to analyze the emissions associated with export activities.

Off-Site Utility and Infrastructure Improvements
To support the project development, the project will include improvement to the dirt road from Daisy Road east to the southwest corner of the project site, a distance of 330 feet. The only utility connection needed for the project is electricity for the high-mast lighting and activation of the gate. Construction emissions from this off-site work would, therefore, be relatively short term, not concentrated in one area. The physical constraints would limit the amount of construction equipment that could be used, and any off-site and utility infrastructure construction would not use equipment totals that would exceed the equipment totals. As such, no impacts beyond what has already been identified in this report are expected to occur.

On-Road Trips
Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. Worker and hauling trips are based on CalEEMod defaults. It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity.

Construction Duration
For purposes of analysis, construction of the project is expected to commence in October 2024 and would last through December 2024. The construction schedule utilized in the analysis represents a “conservative” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent[1]. The duration of construction activity and associated

[1] As shown in the CalEEMod User’s Guide Version 2022, Appendix G “Table G-11. Statewide Average Annual Offoad Equipment Emission Factors” as the analysis year increases, emission factors for the same equipment pieces

equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

Construction Equipment
CalEEMod default parameters for equipment have been used. Consistent with industry standards and typical construction practices, each piece of equipment will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code.

Regional Construction Emissions Summary
The estimated maximum daily construction emissions without mitigation are summarized on Table III-2. Detailed construction model outputs are presented in Attachment A. Under the assumed scenarios, emissions resulting from the project construction will not exceed thresholds established by the MDAQMD for emissions of any criteria pollutant and no mitigation is required. Detailed Construction model outputs are presented in Attachment A to Appendix 1.

Table III-2
REGIONAL CONSTRUCTION EMISSIONS SUMMARY

Source	Emissions (lbs./day)					
	VOC	NOX	CO	SOX	PM10	PM2.5
Winter						
2024	30.31	19.53	23.55	0.04	3.33	1.95
Maximum Daily Emissions	**30.31**	**19.53**	**23.55**	**0.04**	**3.33**	**1.95**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
[1]PM10 and PM2.5 source emissions reflect 3x daily watering per MDAQMD Rule 403 for fugitive dust.						

Short-term emissions are primarily related to the construction of the project and are recognized to be short in duration and without lasting impacts on air quality. With the enhanced dust control mitigation measures listed below, construction activity air pollution emissions are not expected to exceed MDAQMD CEQA thresholds for any pollutant. Regardless, the PM-10 non-attainment status of the Mojave Desert area requires that Best Available Control Measures (BACMs) be used as required by the Mojave AQMD Rule 403. Recommended construction activity mitigation includes:

AQ-1 ***<u>Dust Control</u>. The following measures shall be incorporated into project plans and specifications for implementation:***

- ***Apply soil stabilizers such as hay bales or aggregate cover to inactive areas.***
- ***Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.***
- ***Stabilize previously disturbed areas if subsequent construction is delayed.***
- ***Water exposed surfaces and haul roads 3 times/day.***
- ***Cover all stockpiles with tarps.***
- ***Replace ground cover in disturbed areas quickly.***
- ***Reduce speeds on unpaved roads to less than 15 mph.***
- ***Trenches shall be left exposed for as short a time as possible.***

AQ-2 ***The following signage shall be erected no later than the commencement of construction: A minimum 48 inch high by 96 inch wide sign containing the***

decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day:

"[Site Name] {four-inch text}
[project Name/project Number] {four-inch text}
IF YOU SEE DUST COMING FROM {four-inch text}
THIS PROJECT CALL: {six-inch text}
[Contact Name], PHONE NUMBER {six-inch text}
If you do not receive a response, Please Call {three-inch text} The MDAQMD at 1-800-635-4617 {three-inch text}"

AQ-3 During project construction a 4,000-gallon water truck shall be available on-site at all times for dust control.

AQ-4 Wind breaks and/or fencing shall be developed in areas that are susceptible to high wind induced dusting.

AQ-5 The Developer shall use a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. If the site contains exposed sand or fines deposits (and if the project would expose such soils through earthmoving), water application or chemical stabilization will be required to eliminate visible dust/sand from sand/fines deposits.

AQ-6 The Developer shall formulate a high wind response plan that addresses enhanced dust control if winds are forecast to exceed 25-mph in any upcoming 24-hour period.

The project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed project construction-source air pollutant emissions would not result in exceedances of regional thresholds. With the above mitigation measures, any impacts related to construction emissions are considered less than significant on a project-specific and cumulative basis. No further mitigation is required.

Regional Operational Emissions
Operational activities associated with the project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational related emissions are expected from the following primary sources: area source emissions, energy source emissions, and mobile source emissions.

The project related operational air quality impacts derive primarily from vehicle trips generated by the project. Trip generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) for the Specialty Trade Contractor (ITE Land Use Code 180) land use category were utilized in this analysis.

The estimated operation-source emissions from the project are summarized on Table III-3. Detailed operation model outputs are presented in Attachment A of Appendix 1. As shown on Table III-3, operational-source emissions would not exceed the applicable MDAQMD regional thresholds for emissions of any criteria pollutant and no mitigation is required. Therefore, the proposed project operational-source emissions would be considered less than significant on a project-specific and cumulative basis.

Table III-3
TOTAL PROJECT REGIONAL OPERATIONAL EMISSIONS

Source	Emissions (lbs./day)					
	VOC	**NOX**	**CO**	**SOX**	**PM10**	**PM2.5**
Summer						
Mobile Source	0.00	0.20	0.05	0.00	0.05	0.02
Area Source	0.17	0.00	0.22	0.00	0.00	0.00
Energy Source	0.00	0.03	0.02	0.00	0.00	0.00
Total Maximum Daily Emissions	**0.17**	**0.23**	**0.29**	**0.00**	**0.05**	**0.02**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Mobile Source	0.00	0.21	0.05	0.00	0.05	0.02
Area Source	0.13	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.03	0.02	0.00	0.00	0.00
Total Maximum Daily Emissions	**0.14**	**0.24**	**0.07**	**0.00**	**0.05**	**0.02**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Conclusion
With the incorporation of mitigation measures (**MMs**) **AQ-1** through **AQ-6**, the development of the project would have a less than significant potential to 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. *Less Than Significant Impact* – The potential impact of project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. The nearest sensitive receptor is the existing residence located at 11051 Cassia Road, approximately 611 feet south of the project site.

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

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The proposed project consists of outdoor crane components and jobsite equipment storage yard on a 2.43-acre site. Although the project site would be considered an industrial use and is located within 1,000 feet of existing residential uses, the project as shown in Table III-2 would be well below the applicable thresholds and would not expose sensitive receptors to substantial pollutant concentrations. Therefore, sensitive receptors would not be subject to a significant air quality impact during project construction and operational activities.

CO "Hot Spot" Analysis
As discussed below, the project would not result in potentially adverse CO concentrations or "hot spots." An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods . This "hot spot" analysis did not predict any exceedance of the 1-hour (20.0 ppm) or 8-hour (9.0 ppm) CO standards, as shown on Table III-4.

Table III-4
LOS ANGELES CO MODEL RESULTS

Intersection Location	CO Concentrations (ppm)		
	Morning 1-hour	Afternoon 1-hour	8-hour
Wilshire Boulevard/Veteran Avenue	4.6	3.5	3.7
Sunset Boulevard/Highland Avenue	4	4.5	3.5
La Cienega Boulevard/Century Boulevard	3.7	3.1	5.2
Long Beach Boulevard/Imperial Highway	3	3.1	8.4

Notes: Federal 1-hour standard is 35 ppm and the deferral 8-hour standard is 9.0 ppm.

It should be noted that MDAQMD has not established its own guidelines for CO hotspots analysis. Since the MDAQMD guidelines are based on SCAQMD methodology, it is appropriate to apply the SCAQMD criteria when analyzing CO hotspots within the MDAQMD. Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (*1992 CO Plan*), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, of the 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. intersection (i.e., the highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur.

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (21). Traffic volumes generating the CO concentrations for the "hot spot" analysis is shown on Table III-5. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively.

The proposed project considered herein would generate 3 trips and would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the proposed project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

Table III-5
LOS ANGELES TRAFFIC VOLUMES

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Wilshire Boulevard/Veteran Avenue	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset Boulevard/Highland Avenue	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374
La Cienega Boulevard/Century	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach Boulevard/Imperial Highway	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

d. *Less Than Significant Impact* – Substantial odor-generating sources include land uses such as Agricultural uses (livestock and farming), Wastewater treatment plants, Food processing plants, Chemical plants, Composting operations, Refineries, Landfills, Dairies, and Fiberglass molding facilities. The project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed project would also be required to comply with MDAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			**X**	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			**X**	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				**X**
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		**X**		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			**X**	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				**X**

SUBSTANTIATION: The following information is provided based on a study titled "*Biological Resources Assessment for the for Proposed Project Located at 0 Daisy Road in the City of Adelanto, San Bernardino County, California" (BRA)* prepared by ELMT Consulting, Inc. dated June 2024, provided as Appendix 2.

General Site Conditions

The project site occurs in an area that is primarily undeveloped with a few adjacent parcels allocated to commercial development and equipment storage as well as scattered rural residential and institutional developments throughout the general vicinity. The site is bounded to north, east, and west by commercial development with Primrose Road, Verbena Road, and Daisy Road beyond respectively, and to the south by undeveloped, vacant land with Cassia Road beyond. The site itself supports undeveloped, land which is currently used as an equipment storage yard. The site has been subjected to various anthropogenic disturbances such as weed abatement, grading, vehicle access, and surrounding development.

According to historic aerials, the site has supported undeveloped, vacant land since at least 2009. The earliest observable land uses in the vicinity of the site occurred prior to 1994 in association with storage for adjacent commercial development. The entire project site is disturbed with areas supporting a nonnative grassland plant community.

Vegetation
The project site supports one plant community that can be classified as non-native grassland, and one (1) land cover type that would be classified as disturbed.

The majority of the project site supports a disturbed land cover type that has been impacted by anthropogenic disturbances associated with onsite equipment storage operations. The site has also been subjected to historical grading and weed abatement. Portions of the site support a non-native grassland community. Plant species present within the nonnative grassland include mediterranean mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), red-stemmed filaree (*Erodium cicutarium*), Russian thistle (*Salsola tragus*), red brome (*Bromus medidentris*), London rocket (*sisymbrium irio*), cottonwood (*Populus fremontii*), and desert dandelion (*Malacothrix glabrata*).

Wildlife
Plant communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a discussion of those wildlife species that were observed or are expected to occur within the project site. The discussion is to be used as a general reference and is limited by the season, time of day, and weather conditions in which the field investigation was conducted. Wildlife detections were based on calls, songs, scat, tracks, burrows, and direct observation. The project site provides limited habitat for wildlife species except those adapted to a high degree of anthropogenic disturbances and development.

Fish: No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for fish were observed on or within the vicinity of the project site. Therefore, no fish are expected to occur, and are presumed absent from the project site.

Amphibians: No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for amphibian species were observed on or within the vicinity of the project site. Therefore, no amphibians are expected to occur on the project site and are presumed absent.

Reptiles: The project site and surrounding area provide suitable foraging and cover habitat for local reptile species adapted to a high degree of anthropogenic disturbance. No reptile species were observed onsite during the field investigation. Common reptilian species that could be expected to occur onsite include western side-blotched lizard (*Uta stansburiana elegans*), Great Basin fence lizard (*Sceloporus occidentalis*), and southern alligator lizard (*Elgaria multicarinata*).

Birds: The project site and surrounding area provide suitable foraging and nesting habitat for local bird species adapted to anthropogenic disturbance. Bird species detected during the field investigation include common raven (*Corvus corax*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), Eurasian collared dove (*Streptopelia decaocto*), and northern mockingbird (*Mimus polyglottos*).

Mammals: The project site and surrounding area provide suitable foraging and cover habitat for mammalian species adapted to a high degree of anthropogenic disturbance. No mammalian species were detected during the field investigation. Mammalian species that could be expected to occur onsite include California ground squirrel (*Otospermophilus beecheyi*), and feral cat (*Felis catus*). Perimeter fencing surrounding the project site likely precludes the presence of any additional mammalian species.

Impact Analysis

a. *Less Than Significant Impact* –

Sensitive Biological Resources
A BRA survey was conducted by ELMT Consulting in June 2024 to identify potential habitat for special status wildlife and habitats within the project area. The habitat assessment evaluated the conditions of the habitat(s) within the boundaries of the project site to determine if the existing plant

communities, at the time of the survey, have the potential to provide suitable habitat(s) for special-status plant and wildlife species.

The literature search identified seven (7) special-status plant species and twelve (12) special-status wildlife species as having potential to occur within the Adelanto USGS 7.5-minute quadrangle. No special-status plant communities were identified as having the potential to occur. Special-status plant and wildlife species were evaluated for their potential to occur within the project site based on habitat requirements, availability, and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity of the project site are presented in Attachment C: Potentially Occurring Special-Status Biological Resources of the BRA (Appendix 2)

Special Status Plants
According to the CNDDB and CNPS, seven (7) special-status plant species have been recorded in the Adelanto quadrangle (refer to Attachment C of the BRA, Appendix 2). Western Joshua tree was observed adjacent to the project site, but no western Joshua trees were observed within the proposed project footprint. No western Joshua trees were observed on the project site. However, one (1) live western Joshua tree and one (1) dead Joshua tree was observed outside the boundaries of the project, within a 50 foot buffer around the south to the south. Both trees measured greater than 5 meters in height. No direct impacts will occur to western Joshua tree from project implementation and a Western Joshua Tree Incidental Take Permit will not be required. Additionally, due to the level of routine disturbance onsite, it was determined that the project site does not have the potential to support western Joshua tree or any additional special status species known to occur in the area, and all are presumed to be absent.

Special Status Wildlife
According to the CNDDB, twelve (12) special-status wildlife species have been reported in the Adelanto (refer to Attachment C of the BRA, Appendix 2). No special-status wildlife species were observed during the field investigation. Based on habitat requirements for specific species and the availability and quality of on-site habitats, and proximity to known occurrences, it was determined that the proposed project site does not have the potential to support any special-status wildlife species, and all are presumed to be absent.

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

Burrowing Owl: The burrowing owl is currently listed as a California Species of Special Concern. It is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground. Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting. The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drainpipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

No burrowing owls or recent signs (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. The majority of the project site is minimally vegetated with a variety of invasive/weedy species what provide line-of-sight observation favored by burrowing owls. However, no suitable burrows (>4 inches) for roosting and nesting were observed within site boundaries. Further, the site is surrounding by tall equipment, perimeter fencing and utility poles that provide perching opportunities for raptors that may prey on burrowing owl. Therefore, burrowing owl is presumed to be absent from the project site and no further surveys are recommended.

Desert Tortoise: The Mojave population of the desert tortoise inhabits areas north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and southwestern Utah, and in the Sonoran Desert in California. Throughout the majority of the Mojave Desert, desert tortoises occur most commonly on gentle sloping soils characterized by an even mix of sand and gravel and sparsely vegetated low-growing vegetation where there is abundant inter-shrub space. Typical habitat for the Mojave desert tortoise has been characterized as Mojavean desert scrub below 5,500 feet in elevation with a high diversity of perennial and ephemeral plants. The dominant shrub commonly associated with desert tortoise habitat is creosote bush; however, other shrubs including burrobush (*Ambrosia dumosa*), Mojave yucca, cheesebush (*Ambrosia salsola*), and Mojave prickly pear (*Opuntia mojavensis*) also provide suitable habitat. The desert tortoise spends 95 percent of its life underground and will opportunistically utilize burrows of various lengths, deep caves, rock and caliche crevices, or overhangs for cover. Therefore, moderately friable soil is required to allow for burrow construction and ensure that burrows do not collapse.

No live desert tortoises, suitable burrows, or other signs were observed during the field investigation. Further, the nonnative grassland present within the project site does not constitute suitable habitat for desert tortoise. Additionally, the project site is isolated from known desert tortoise habitat by existing development, including roadways which support regular traffic. As such, desert tortoise are presumed to be absent from the project site and focused surveys are not recommended.

Mohave Ground Squirrel: The Mohave ground squirrel is endemic to the western Mojave Desert, California. It occupies portions of Inyo, Kern, Los Angeles, and San Bernardino counties in the western Mojave Desert. In general, the species ranges from near Palmdale on the southwest to Lucerne Valley on the southeast, Olancha on the northwest and the Avawatz Mountains on the northeast. The historical range of suitable habitat for this species as decreased by 10 to 16% due to urbanization and range-wide declines in trapping success over the last few decades suggesting that their populations are declining. This species was listed as threatened under the California Endangered Species Act in 1985.

The Mohave ground squirrel is a medium-sized ground squirrel that measures 8.3 to 9.1 inches (in; 21 to 23 centimeters; cm) in total length, 2.2 to 2.8 in (5.7 to 7.2 cm) in tail length, and 1.3 to 1.5 in (3.2 to 3.8 cm) in hind foot length. The Mohave ground squirrel occupies all major desert scrub habitats in the western Mojave Desert. It has been observed in the following habitats:

- Mojave creosote scrub, dominated by creosote bush and burrobush,
- Desert saltbush scrub, dominated by various species of saltbush (*Atriplex*),
- Desert sink scrub, which is similar in composition to saltbush scrub, but is sparser and grows on poorly drained soils with high alkalinity,
- Desert greasewood scrub, with very sparse vegetation generally located on valley bottoms and dry lake beds,
- Shadscale scrub, which is dominated by *Atriplex confertifolia* and/or *A. spinescens,* and
- Joshua tree woodland, which includes Joshua trees widely scattered over a variety of shrub species.

Mohave ground squirrel was not observed during the field investigation. Although a focused trapping survey was not performed, the habitat assessment conducted for this report and review of available information provided, allowed ELMT, the consulting firm that prepared the BRA, to offer its professional opinion as to the presence or absence of this species within the proposed project footprint.

Three criteria are typically used in assessing potential impacts to the Mohave ground squirrel:

Criteria 1: Is the site within the range of the species?
Per the *Current Status of the Mohave Ground Squirrel: an update covering the period 2013-2020,* the project site is within the historic range of Mohave ground squirrel. Although the project site is located within the historic range for Mohave ground squirrel, the site is near the southern boundary

of the range. Further, the site is not located within any core areas, nor is it located within or immediately adjacent to any corridors, conservation areas, or other known populations identified by Leitner.

The project does not support a plant community suitable for Mohave ground squirrel habitat. Based on the data provided in *Current Status of the Mohave Ground Squirrel: an update covering the period 2013-2020* MGS have not been detected in the immediate vicinity of the project site during protocol grid and regional surveys. The closest documented Mohave ground squirrel was captured on the western outskirts of Victorville to the southeast of the project site. Several areas in the vicinity of the project site have been surveyed to protocol level and regionally on several occasions, yet all of the surveys have been negative for Mohave ground squirrel in the vicinity of the project site. Per the *Current Status of the Mohave Ground Squirrel* Report trapping data, which provides more current data than the CNDDB, no MGS have been trapped in the areas surrounding the project site.

Criteria 2: Is there native habitat with a relatively diverse shrub component?
There is no native habitat within the project site. The majority of the project site is barren and portions of the site support a nonnative grassland. Additionally, creosote bush, spiny hopsage, hoary saltbush, and winterfat, species that are favored by Mohave ground squirrel for cover and forage, were not observed onsite during the field investigation. Dr. Leitner postulated, based on trapping surveys in the southern portion of the Mohave ground squirrel range, that densities of < 24/ha for spiny hopsage and < 100/ha of winterfat on a site was considered poor forage and may be related to the absence of Mohave ground squirrel. Creosote and spiny hopsage occurred in very limited quantities. Further, no wildlife corridors are expected to exist between the closest core MGS population and the project site. The maximum documented movement of MGS is 3.9 miles. Therefore, the project site is not likely to provide the essential habitat necessary to support the occupancy of Mohave ground squirrel.

Criteria 3: Is the site surrounded by development and therefore isolated from potentially occupied habitat?
Based on the results of the field investigation, the project site occurs adjacent to surrounding development including roadways and residential structures. Further, the site has been subject to routine disturbance including grading, weed abatement and ongoing equipment storage.

Based on habitat requirements for Mohave ground squirrel, known distributions, site conditions, and regional trapping studies, it was determined this species is presumed absent from the project site. No further focused surveys are recommended.

Impact Conclusion
No special-status wildlife species were observed on-site during the field investigation. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the proposed project site would not support special status species. It was further determined that the project site does not provide suitable habitat for any of the other special-status wildlife species known to occur in the vicinity of the site. Thus, the proposed project would have a less than significant potential to 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS).

b. *Less Than Significant Impact* – Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the USFWS regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely

modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a Clean Water Act Permit from the United States Army Corps of Engineers [Corps]). If there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS.

The project site is not located with federally designated Critical Habitat. The nearest designated Critical Habitat is located approximately 5.33 miles to the northeast of the stie for southwestern willow flycatcher (*Empidonax traillii extimus*). Therefore, the loss or adverse modification of Critical Habitat will not occur as a result of the proposed project and consultation with the USFWS will not be required for impacts to Critical Habitat.. Thus, impacts are less than significant.

c. *No Impact* – The project site does not support any discernible drainage courses, inundated areas, wetland features, or hydric soils that would be considered jurisdictional by the Corps, Regional Board, or CDFW. A query of the National Wetlands Inventory (NWI) database found no potential blueline streams, riverine, or other aquatic resources within or adjacent to the project site, which was confirmed by the onsite survey. Therefore, project activities will not result in impacts to Corps, Regional Board, or CDFW jurisdictional areas and regulatory approvals will not be required and thus, the proposed project would have no potential to 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. *Less Than Significant With Mitigation Incorporated* – Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both anthropogenic disturbance and natural fluctuations in resources.

According to the San Bernardino County General Plan, the project site has not been identified as occurring within a Wildlife Corridor or Linkage. As designated by the San Bernardino County General Plan Open Space Element, the nearest major open space area documented in the vicinity of the project site is the Oro Grande Wash located approximately 5.51 miles northeast of the site. The site is separated from the Oro Grande Wash by existing development, roadways, and undeveloped land, and there are no riparian corridors or creeks connecting the project site to the wash.

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

However, nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds shall be conducted within three (3) days (72-hours) of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. A pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance through the following mitigation measure to minimize impacts to nesting birds:

BIO-1 ***All construction activities shall comply with the federal Migratory Bird Treaty Act of 1918 (MBTA) and California Fish and Game Code Sections 3503, 3511 and 3513. The MBTA governs the taking and killing of migratory birds, their eggs, parts, and nests and prohibits the take of any migratory bird, their eggs, parts, and nests. Compliance with the MBTA shall be accomplished by completing the following:***

Construction activities involving vegetation removal shall be conducted between September 1 and January 31. If construction occurs inside the peak nesting season (between February 1 and August 31), a pre-construction survey by a qualified Biologist shall be conducted within 72 hours prior to construction activities to identify any active nesting locations. If the Biologist does not find any active nests, the construction work shall be allowed to proceed. The biologist conducting the clearance survey shall document a negative survey with a report indicating that no impacts to active avian nests shall occur.

If the Biologist finds an active nest within the pre-construction survey area and determines that the nest may be impacted, the Biologist shall delineate an appropriate buffer zone around the nest. The size of the buffer shall be determined by the Biologist and shall be based on the nesting species, its sensitivity to disturbance, expected types of disturbance, and location in relation to the construction activities. These buffers are typically 300 feet from the nests of non-listed species and 500 feet from the nests of raptors and listed species. Any active nests observed during the survey shall be mapped on an aerial photograph. Only construction activities (if any) that have been approved by a Biological Monitor shall take place within the buffer zone until the nest is vacated. The Biologist shall serve as a Construction Monitor when construction activities take place near active nest areas to ensure that no inadvertent impacts on these nests occur. Results of the pre-construction survey and any subsequent monitoring shall be provided to the Property Owner/Developer and the City of Adelanto. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds.

Thus, with implementation of **MM BIO-1**, any effects on migratory birds, wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

e. *Less Than Significant Impact* – Certain desert plant species (i.e., smoke trees, cacti, Mojave yuccas [*Yucca schidigera*]) are regulated pursuant to Section 88.01.060 of the San Bernardino County Development Code and Section 80073 of the California Desert Native Plant Act. Therefore, impacts to these species should be avoided in all instances. In the event that avoidance is not feasible, the project applicant will be required to obtain a Tree or Plant Removal Permit from the County of San Bernardino, prior to removal of any regulated tree or plant. However, it is anticipated that, due to the flexibility of site design, the proposed project will avoid impacting desert plant species that require permit for removal from the County of San Bernardino. Furthermore, no desert plant species protected by the San Bernardino County Development Code and Section 80073 of the California Desert Native Plant Act were identified as part of the biological resource survey of the project site. Thus, through compliance with the County of San Bernardino Development Code and Desert Plant removal permitting therein, the proposed project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f. *No Impact* – The BRA provided as Appendix 2 concluded that the project site is not located in an area within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and implementation of the proposed project would therefore not result in a significant impact to any such plans. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?		**X**		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		**X**		
c) Disturb any human remains, including those interred outside of formal cemeteries?		**X**		

SUBSTANTIATION: City General Plan, Conservation Element.

Background

The High Desert portion of San Bernardino County has been occupied by Native Americans for thousands of years and by European settlers and their descendants for several hundred years. The purpose of this analysis is to determine whether the proposed project would cause substantial adverse changes to any "historical resources" or "tribal cultural resources," as defined by CEQA, that may exist in or around the project area. The purpose of this study is to provide the City with the necessary information and analysis to determine whether the project would cause a substantial adverse change to any "historical resources," as defined by CEQA, that may exist in or around the project area. It should be noted that local Native American tribal representatives have indicated that it is possible to find tribal artifacts, resources, or even burials anywhere in the High Desert and that the region in general should be considered sensitive for cultural resources.

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

The site is presently vacant, and the project proposes minimal improvements and only one (non-occupied) building onsite for equipment and parts storage planned near the southwest corner of the site (i.e., just north of the access gate), with the remainder of the site serving as crane storage. The project site does not appear to have been disturbed or graded in at least the recent past, and has been vacant for at least 60 years in similar or the same condition to that which exists at present. Given that the site is vacant, it is not anticipated that there are any historical resources of significance that would be encountered or impacted as part of construction of the proposed project. In addition, project construction will not involve grading or excavation. Only the ground surface would be impacted by implementation of the proposed project.

Regardless, the Yuhaaviatam of San Manuel Nation (YSMN) have requested in their response to the City's AB-52 consultation letter, that the following mitigation measures shall be implemented to minimize impacts to cultural resources:

CUL-1 In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be

hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

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

With the above mitigation incorporation, as well as the mitigation identified under Tribal Cultural Resources below, the potential for impacts to cultural resources will be reduced to a less than significant level. No additional mitigation is required.

c. *Less Than Significant With Mitigation Incorporated* – As noted in the discussion above, no available information suggests that human remains may occur within the project site boundaries and the potential for such an occurrence is considered very low (i.e., but not non-existent). If any human remains are discovered during project grading, they will need to be treated in accordance with the provisions of HSC §7050.5 and PRC §5097.98, which is mandatory. State law (Section 7050.5 of the Health and Safety Code) as well as local laws requires that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered regulatory compliance and not unique mitigation under CEQA. However, the in their response to the City's AB-52 consultation letter, the YSMN requested that the following mitigation measure shall be implemented in relation to discovery and treatment of human remains:

CUL-3 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

With the incorporation of the above mitigation measures, potential for impact to discovery and treatment of human remains will be reduced to a less than significant level. No additional mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VI. ENERGY: Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations?			**X**	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			**X**	

SUBSTANTIATION: City General Plan, Conservation Element

a. *Less Than Significant Impact* – Energy consumption encompasses many different activities. For example, construction can include the following activities: delivery of equipment and material to a site from some location (note it also requires energy to manufacture the equipment and material, such as harvesting, cutting and delivering wood from its source); employee trips to work, possibly offsite for lunch (or a visit by a catering truck), travel home, and occasionally leaving a site for an appointment or checking another job; use of equipment onsite (electric or fuel); and sometimes demolition and disposal of construction waste. However, the proposed project will utilize a minimum number of construction workers due to the limited level of improvements planned to support the project, and furthermore, would require only minimal construction, as no grading is proposed, minimal paving and gravel placement are proposed, and only two (non-occupied) buildings onsite. Thus, based on the minimal scope of construction, the project would not result in a significant impact during construction due to wasteful, inefficient, or unnecessary consumption of energy resources, and would also conform to the CARB regulations regarding energy efficiency.

The project will not generate additional population or permanent onsite employees because the purpose of the project is to develop an equipment storage yard for cranes and other industrial equipment. The only workers during operation of the project would be those involved in moving crane components and equipment onto or off of the site. Cranes would be moved on an off the site on an as needed basis. Storage of components would come into and out of the yard approximately once a quarter. The cranes coming into the property and leaving would happen roughly once every 6 months or so, as the components for these tower crane projects generally stay on site for multiple years as these projects are on high rise commercial projects typically. It is important to also note that the tower cranes and stored components are electrically powered, which is considered an efficient use of energy. Therefore, overall, operation of the site would not require consumption of significant quantities of diesel or gasoline fuel for vehicles, beyond the trips to and from the sites at which the equipment is delivered.

Furthermore, SCE is the primary provider for electricity at the site, and will continue to provide service though no expanded services are anticipated. According to SCE's website[2], SCE is committed to delivering power reliably and to meet demand; SCE is expanding and upgrading the transmission and distribution networks to meet the region's growing demand for electricity, and improve grid performance, while meeting California's ambitious renewable-power goals. As such, it is anticipated that SCE will continue to have ample power supply to serve the proposed project without the need for additional electrical capacity.

Thus, under the scenarios outlined above, neither construction nor operation of the proposed project would result in wasteful, inefficient, or unnecessary energy consumption. Therefore, impacts will be less than significant, and no mitigation is required. Please refer to the discussion of construction and

[2] SCE, 2024. Reliable, Affordable Power for you. https://www.sce.com/about-us/reliability/meeting-demand (accessed 05/28/24)

operational impacts under Air Quality, issue III(b) which determined construction and operational emissions will be well below SCAQMD thresholds.

b. *Less Than Significant Impact* – Based on the analysis in the preceding discussion, the proposed project will not conflict with current State energy efficiency or electricity supply requirements or any local plans or programs for renewable energy or energy efficiency requirements. The City of Adelanto has adopted State energy efficiency standards as part of its Municipal Code. Any impacts will be less than significant and no mitigation is required.

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

SUBSTANTIATION: California Department of Conservation, Alquist-Priolo Earthquake Fault Zones map; City General Plan, Safety Element, Geologic Hazard Overlay Map; United States Department of Agriculture (USDA), Web Soil Survey Map, https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx; San Bernardino County Land Use Plan General Plan, Geologic Hazard Overlay Map; and, Adelanto North 2035 Sustainable Plan.

a. i. Ground Rupture

No Impact – According to the regulatory map obtained from the California Department of Conservation showing Alquist-Priolo Earthquake Fault Zones (**Figure VII-1**) and other seismic hazards, the proposed project site is not located in an area that has been mapped as containing geologic hazards, and therefore is not located in an Alquist Priolo Earthquake Fault Zone. The nearest fault zones are about 18 miles to the north (the Helendale Fault Zone) and approximately 17 miles to the south at the San Bernardino Mountains (the San Andreas Fault Zone). As such, the project site

and general area do not contain any known faults, active or inactive. Therefore, no potential exists for the proposed project to experience any fault rupture along a delineated active fault. There will be no impact and no mitigation is required.

ii. Strong Seismic Ground Shaking

Less Than Significant Impact – As stated in the discussion above, several faults run through the region, and as with much of southern California, the only proposed structure that will be installed onsite will be subject to strong seismic ground shaking impacts should any major earthquakes occur in the future. According to the California Department of Conservation showing Alquist-Priolo Earthquake Fault Zones (**Figure VII-1**), the proposed project is not located in close proximity to any delineated active faults. However, due to the proximity of the active San Andreas Fault, about 17 miles to the south, and the active Helendale Fault about 18 miles to the northeast, the project site and area can be exposed to substantial ground shaking during major earthquakes on either of these regional faults. As a result, and like all other development projects in the City and throughout the Southern California Region, the proposed project will be required to comply with all applicable seismic design standards contained in the 2022 California Building Code (CBC), including Section 1613 Earthquake Loads. Compliance with the CBC will ensure that structural integrity will be maintained in the event of an earthquake. However, it should be noted the project site will not have any habitable structures or significant ground disturbance added to it as a result of the project. Therefore, impacts associated with strong ground shaking will be less than significant without mitigation.

iii. Seismic-Related Ground Failure Including Liquefaction

No Impact – According to the Adelanto North 2035 Comprehensive Sustainable Plan, liquefaction conditions are more likely to exist along the Mojave River, and in other sandy areas with high water tables. The project is removed from the Mojave River, and furthermore, is located in an area where the groundwater table is not near the ground surface. Thus, the project site is not anticipated to be susceptible to liquefaction. Although it contains sandy soils, groundwater levels in the project area are considered to be at depths of 100 feet or greater, essentially eliminating the potential for liquefaction. Therefore, it is not anticipated that the proposed project would be susceptible to seismic-related ground failure, including liquefaction. No impacts are anticipated and no mitigation is required.

iv. Landslides

No Impact – According to the San Bernardino County Land Use Plan General Plan, Geologic Hazard Overlay map, the project site is not located in an area with any known earthquake induced landslide hazards. Based on a site reconnaissance and aerial mapping the project site is essentially flat and there are no steep slopes in the surrounding area. As landslides typically occur in areas where the land is sloped, and as the project site itself is flat, the project is not anticipated to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts under this issue are anticipated and no mitigation is required.

b. *Less Than Significant Impact* – The project site is vacant with minimal non-native vegetation coverage and the site has been vacant and undisturbed for over 60 years. The project includes minimal onsite improvements and no road or utility extensions to serve the project. No grading is necessary to implement the proposed project. The topography is generally flat with a ± 3-foot elevation change within the entirety of the site. It is anticipated there will be no soil excavation so there would be no excess cut or fill that may require removal from or transport to the site. Thus, construction will result in only minor losses of topsoil or erosion. Furthermore, the City of Adelanto Municipal Code 17.93.050 requires standard erosion control practices (Best Management Practices [BMPs]) to be implemented for all construction, which would ensure that the project would not result in substantial soil erosion or the loss of topsoil. During operation, the areas in which movement would occur would be paved or would be covered with gravel to prevent substantial erosion from occurring. Therefore, any impacts under this issue are considered less than significant.

c. *No Impact* – Refer to the discussion under VII(a) above. Potential slope instability and liquefaction related to the project were determined to be negligible. The potential for shrinkage or subsidence at the site is also limited given the sandy nature of underlying soils. The risk for subsidence at the site is considered low because the soils within the project site do not contain substantial nutrients or organic matter, and are not of a clay type, and as such are not particularly susceptible to subsidence. Additionally, the groundwater at the site is very deep, thereby minimizing the potential for groundwater pumping related subsidence. The Project will not include any engineered fill or create any slopes. The Adelanto North 2035 Comprehensive Sustainable Plan does not identify any landslide or liquefaction potential within the project area. Given that there will be no grading or disturbance of onsite soils, and that the project site is not located in an area identified as containing any geological hazards, soil instability is considered minimal. Therefore, the potential for the project to be located on a geologic unit or soil that is unstable or for the project to cause the soils to become unstable is considered less than significant. No mitigation is required.

d. *No Impact* – According to the United States Department of Agriculture (USDA) Web Soil Survey map prepared for the project site, the entirety of the proposed project site is located on Bryman Loamy Fine Sand, 0 to 2 Percent Slopes. Expansive soils are generally of a clay type soil, not a sandy soil such as the Bryman Loamy Fine Sand series soils that underlay the project site. Normally compliance with the most current 2022 California Building Code (CBC) is sufficient to ensure that any proposed structures will conform to the underlying soils and thereby be constructed safely as habitable structures. However, in this case the project proposes two new unoccupied buildings along the western edge of the property. Based on the absence of clay-type soils on site, the proposed project would have a less than significant potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. There will be no impact and no mitigation is required.

e. *No Impact* – This project requires no connection to the regional wastewater collection system, and furthermore, will not utilize any subsurface septic tank-leach system. Therefore, determining if the project site soils are capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater does not apply. No impacts are anticipated and no mitigation is required.

f. *No Impact* – The potential for discovering paleontological resources during development of the project is considered low given the overall regional soil and geologic conditions in this portion of the high desert (i.e., relatively young and very deep alluvial and aeolian sand deposits). No unique fossil-bearing geologic features are known or suspected to occur on or beneath the site. Because fossils are typically found beneath the ground surface, they can only be discovered as a result of ground disturbance activities. However, this project will not involve grading or substantial ground disturbance, and furthermore does not require any excavation that could unearth such resources. Therefore, impacts to paleontological resources are not anticipated to occur as a result of project development. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VIII. GREENHOUSE GAS EMISSIONS: Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			**X**	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			**X**	

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the Mojave Desert Air Quality Management District (MDAQMD) website, https://www.mdaqmd.ca.gov/, accessed in May 2024; and the California Air Resources Board (CARB) website, www.arb.ca.gov/adam/, accessed in May 2024. Additionally, a technical study that models project air quality and GHG emissions, titled "0 Daisy Road Air Quality and Greenhouse Gas Assessment" has been prepared by Urban Crossroads, dated June 13, 2024, and provided as Appendix 1 to this Initial Study.

Climate Change Setting

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

An individual project like the proposed project evaluated in this memo cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, this memo will evaluate the potential for the proposed project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their

sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

Standards of Significance

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the *CEQA Guidelines* Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

Establishment of Significance Thresholds
The Adelanto has not adopted its own numeric threshold of significance for determining impacts with respect to greenhouse (GHG) emissions, thus the MDAQMD threshold of 90,718.5 $MTCO_2e$ per year will be utilized. If project-related GHG emissions do not exceed the 90,718.5 $MTCO_2e$ per year threshold, then project-related GHG emissions would clearly have a less-than-significant impact pursuant to Threshold GHG-1. On the other hand, if project-related GHG emissions exceed 90,718.5 $MTCO_2e$ per year, the project would be considered a substantial source of GHG emissions.

Impact Analysis

a. *Less Than Significant Impact* – The estimated GHG emissions for the project land use are summarized on Table VIII-1. The estimated GHG emission includes emissions from Carbon Dioxide (CO_2), Methane (CH_4), Nitrous Oxide (N_2O), and Refrigerants (R). As shown on Table VIII-1, the project would generate a total of approximately 52.01 $MTCO_2e$/yr. Detailed operation model outputs for the proposed project are presented in Attachment A of Appendix 1.

Table VIII-1
TOTAL PROJECT GHG EMISSIONS

Source	Emission (lbs./day)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Annual construction-related emissions amortized over 30 years	1.70	6.87E-05	1.69E-05	8.28E-05	1.71
Mobile	20.62	0.00	0.00	0.02	21.61
Area	0.08	0.00	0.00	0.00	0.08
Energy	22.88	0.00	0.00	0.00	23.00
Water	2.85	0.04	0.00	0.00	4.11
Waste	0.43	0.04	0.00	0.00	1.51
Total CO_2e (All Sources)	**52.01**				

The Adelanto has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO_2e (90,718.5 $MTCO_2e$) per year is sufficient to determine if additional analysis is required.

As shown in Table VIII-1, the project would result in approximately 52.01 $MTCO_2e$/yr; the proposed project would not exceed the screening threshold of 90,718.5 $MTCO_2e$/yr. Thus, project-related emissions would not have a significant direct or indirect impact on GHG, and climate change and no mitigation or further analysis is required.

b. *Less Than Significant Impact* – Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions.

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Finally, the project is consistent with the general plan land use designation, density, building intensity, and applicable policies specified for the project area in SCAG's Sustainable Community Strategy/Regional Transportation Plan, which pursuant to SB 375 calls for the integration of transportation, land-use and housing policies to plan for achievement of the GHG-emissions target for the region. Thus, a less than significant impact related to GHG emissions from project construction and operation would occur and no mitigation is required.

Conclusion

Results of the assessment indicate that the project is not anticipated to result in a significant impact during construction or operational activities associated with air quality and greenhouse gases.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				**X**
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				**X**
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				**X**
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				**X**
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				**X**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				**X**
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				**X**

SUBSTANTIATION: California Department of Toxic Substances Control (DTSC), EnviroStor website accessed May 2024, https://www.envirostor.dtsc.ca.gov/public/; California State Water Boards, Geotracker website accessed May 2024, https://geotracker.waterboards.ca.gov/; San Bernardino County Airport Land Use Commission (ALUC) website accessed May 2024, https://lus.sbcounty.gov/planning-home/airport-land-use/; Federal Aviation Administration (FAA) website accessed May 2024, https://www.faa.gov/airports/central/engineering/part77; and California Department of Forestry and Fire Protection (CAL FIRE), State Responsibility Area Fire Hazard Severity Zones website accessed May 2024, https://www.fire.ca.gov/Search-Results?search=State%20Responsibility%20Area%20maps&type=all.

a&b. *No Impact* – A project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (hazmat); or may 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. Typically, during construction of a development project, there is a potential for accidental release of petroleum products in sufficient quantity to pose a significant hazard to people and the environment. This can occur from above-ground accidents involving hazmat spills, or unanticipated underground hazmat may be found during grading. However, this project proposes such limited construction (i.e., no grading, a small amount of new paving, gravel placement, one prefabricated metal building that would be about 4,800 SF in size, and a storage trailer that would be about 340 SF in size [refer to the site plan provided as Figure

3]). so the potential for accidental release of hazardous materials is negligible. Due to the size of ground disturbance anticipated as part of development of the proposed project (i.e., less than one acre), the proposed project would not be subject to a Storm Water Pollution Prevention Plan (SWPPP). Thus, in order to reduce accidental release of hazardous materials to a less than significant level, the following condition will be required by the County to be implemented as a best management practice (BMP) during construction of the project.

Condition HAZ-1 **All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into construction contract as a BMP to be implemented during construction the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.**

In addition, operation of the project will be the storage of crane components and related equipment that does not involve the storage or use of hazardous materials such as vehicular fuels or fluids. Finally, the EnviroStor website maintained by the California Department of Toxic Substances Control (DTSC) and the GeoTracker website maintained by the California State Water Resources Control Board both indicate there are no hazardous materials contamination sites on or within one mile of the project site. Compliance with all Federal, State, and local regulations governing the storage and use of hazardous materials is required and will ensure that the project operates in a manner that poses no substantial hazards to the public or the environment. No impacts are anticipated and no mitigation is required.

c. *No Impact* – The project site is located greater than one-quarter mile from any public school. In fact, the nearest school—Victoria Magathan Elementary School at 11411 Holly Road in Adelanto—is located one mile southeast of the project site. Based on this information, and that operation of the proposed site use would not involve the use of a substantial amount of hazardous materials, implementation of the project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No adverse impacts are anticipated. No additional mitigation is required.

d. *No Impact* – The project site has been vacant for many years and currently supports non-native vegetation coverage. The project will not be located on a site that is included on a list of hazardous materials sites that are currently under remediation (Cortese List). According to the EnviroStor and GeoTracker websites, consistent with Government Code Section 65962.5, which includes information regarding Leaking Underground Storage Tanks (LUST) and Department of Toxic Substance Control (DTSC) cleanup sites, there are no open or closed LUST, DTSC, or other clean-up sites within 2,500 feet of the project site (**Figures IX-1 and IX-2**). Therefore, there is no potential for the project to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 thereby creating a significant hazard to the public or the environment. Project construction and operation of the site will have a less than significant potential to create a significant hazard to the population or to the environment from their implementation. No mitigation is required.

e. *No Impact* – According to the San Bernardino Countywide Plan Airport Safety & Planning Areas map (**Figure IX-3**), the proposed project is not located within 2 miles of an airport or located within the Airport Influence Area (AIA) of any Airport Land Use Compatibility Plan (ALUCP). The closest airport is the Southern California Logistics Airport (SCLA) which is 3 miles northeast of the site. The site is also located outside of the Airport Safety Review Area (AR3) of the SCLA, shown on **Figure IX-3**.

Additionally, the project proposes no tall buildings that could interfere with operations of any airport in the region as defined by the Federal Aviation Administration (FAA), as the maximum height on site would be a high-mast light pole at 40 feet in height, with the cranes only reaching a height of 12.5 feet and the storage structure reaching 20' feet in height. Therefore, there are no impacts relative to this issue and no mitigation is required.

f. *No Impact* – The proposed project site is located over 1,000 east of Daisy Road which is not a major roadway within the City. As shown on the Evacuation Route Map prepared for the San Bernardino Countywide Plan (**Figure IX-4**), the adopted evacuation route is Highway 395 to the east of the project site. Development of the project at this location would not interfere with access to emergency evacuation routes, as the proposed project will be constructed entirely within the boundaries of the project site. Ingress and egress from the site is provided along Daisy Road. The project will provide a small amount of new paving at the gated entrance to the site which would incrementally improve emergency access to the site itself if needed. No aspect of project construction or operation would affect regional emergency access. There are no critical emergency facilities within or surrounding project site. Therefore, development of the project would not physically interfere with any adopted emergency response plans, or evacuation plans. No impacts are anticipated and no mitigation is required.

g. *No Impact* – According to the CAL FIRE, there are no fire hazard zones within the City of Adelanto that are of state responsibility. According to the San Bernardino Countywide Plan Fire Hazard Severity Zones Map (**Figure IX-5**), the proposed project is located in an area with Moderate wildfire risk. The proposed project is located in in a relatively flat rural area with scattered light industrial uses north, west, and further east of the project site. The remaining land is vacant which contains native desert and non-native weedy vegetation within and surrounding the site. As shown on **Figure IX-5,** the area immediately to the east of the project site is considered non/wildland/non-urban, with no fire risk. This is an area with very little fuel load in the surrounding area that could be susceptible to wildfires. Therefore, because the proposed project is located outside of the area identified as a high fire hazard zone by CAL FIRE, the proposed project has no significant potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. HYDROLOGY AND WATER QUALITY: Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?		**X**		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?			**X**	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation onsite or offsite?		**X**		
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?		**X**		
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?; or,		**X**		
(iv) impede or redirect flood flows?			**X**	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			**X**	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			**X**	

SUBSTANTIATION: Lahontan Regional Water Quality Control Board (RWQCB) website, accessed May 2024, https://www.waterboards.ca.gov/lahontan/; City of Adelanto Water Department (AWD) website, accessed May 2024, https://ci.adelanto.ca.us/services/water___sewer/index.php; AWD 2020 Urban Water Management Plan (UWMP), prepared by AWD 8-25-2021; State Water Resources Control Board (SWRCB), Division of Drinking Water website, accessed May 2024, https://www.waterboards.ca.gov/drinking_water/programs/; California Department of Public Health website, accessed May 2024, https://www.cdph.ca.gov/Pages/results.aspx?k=#k=drinking%20water%20standards; City General Plan, Safety Element, Flooding Map; San Bernardino Countywide Plan Policy Maps, Figure HZ-4, Flood Hazards; State of California Department of Water Resources, 2018 Sustainable Groundwater Management Basin Prioritization: Process and Results, https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Basin-Prioritization/Files/2018-Sustainable-Groundwater-Management-Act-Basin-Prioritization.pdf.

a. *Less Than Significant With Mitigation Incorporated* – The proposed project is located within a developed area within the Mojave River watershed which is within the Adelanto Planning Area of the Lahontan Regional Water Quality Control Board (RWQCB). The City of Adelanto Water Department (AWD) is responsible for the water supply to the City. The City's water supply comes solely from

groundwater production from 15 potable wells in three pressure zones, transmission and distribution pipelines, booster stations and reservoirs. AWD is required to meet potable water quality requirements of the Division of Drinking Water, State Water Resources Control Board (SWRCB), as well as the California Department of Public Health.

Typically, the three main sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal wastewater, stormwater runoff, and potential discharges of pollutants, such as accidental spills. Municipal wastewater is delivered to AWD and is processed at the City's activated sludge wastewater treatment facility (WTF) through an operations and maintenance contract with PERC Water Corporation, which meets the waste discharge requirements imposed by the RWQCB.

The proposed project may result in very minor soil erosion during construction activities because the proposed project would be developed within some undisturbed areas but would not require substantial ground disturbance to facilitate the installation of the project. Due to the small size of the ground disturbance associated with the proposed project (less than one acre), a SWPPP, which would typically address means by which to control potential sources of water pollution that could violate any standards or discharge requirements during construction, is not required. The Applicant shall instead implement Best Management Practices (BMPs) during construction, which will be enforced through implementation of **MM HYD-1**.

HYD-1 ***The Applicant shall require that the construction contractor to implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the District include the following:***

- ***The use of silt fences or coir rolls;***
- ***The use of temporary stormwater desilting or retention basins;***
- ***The use of water bars to reduce the velocity of stormwater runoff;***
- ***The use of wheel washers on construction equipment leaving the site;***
- ***The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;***
- ***The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and***
- ***Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.***

Implementation of **MM HYD-1** in addition to City identified BMPs, would ensure that project-related after development surface runoff meets discharge requirements over the short- and long-term. The BMPs will establish requirements for capturing, retaining, and treating onsite stormwater once the project has been developed.

Once constructed, the proposed project will not include substantial aboveground permanent structures. The project proposes no grading and only a minimal amount of development (i.e., a small amount of new paving at the gated entrance, a small parking lot, one prefabricated metal building that would be about 4,800 SF in size, a storage trailer that would be about 340 SF in size [refer to the site plan provided as Figure 3] and one high-mast lighting tower). The site contains no identified drainage channels or conveyances and all site runoff sheet flows toward the northwest. Therefore, development of the site will not change surface drainage patterns and only incrementally increase

the amount of runoff from the site by adding a small amount of paving in the southwest portion of the site.

Additionally, the City will impose standard conditions of approval that would require compliance with its water quality regulations and standards (e.g., parking lot runoff, paved access runoff, etc.). Onsite drainage will be managed during operation pursuant to City requirements. Therefore, with only minimal changes anticipated as a result of operational impacts, implementation of these mandatory plans and their BMPs, compliance with regulatory requirements identified by the Municipal Code, as well as **MM HYD-1** and **Condition HAZ-1** above, will prevent a violation of any water quality standards or waste discharge.

b. *Less Than Significant Impact* – Implementation of the proposed project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin. The project will be supplied water by the AWD, which utilizes groundwater to supply its customers. The City of Adelanto does not currently have standard water demand factors for various land uses. However, this project proposes no new buildings that would be occupied and no activities that require workers for other than temporary periods of time. Therefore, the project will not generate a need for potable water service either during construction or operation.

According to the AWD 2020 Urban Water Management Plan (UWMP) indicates that, as of 2020, the City was less than 20% built out. The proposed project would technically contribute an additional 2.43 acres to the total developed industrial uses in the City, however, the project proposes little permanent improvements and represents a very low intensity use of the site that would not require a potable water connection. Furthermore, the 2020 UWMP indicates that AWD's planned water supply exceeds demand from through 2045. Therefore, no significant adverse impacts to groundwater resources are forecast to occur from implementing the proposed project, nor will the project contribute to cumulative groundwater depletion and no mitigation is required.

c(i-iii). *Less Than Significant With Mitigation Incorporated* – No substantial impact to drainage patterns or structures will result from implementing this project. The project proposes no grading and only a minimal amount of development (i.e., a small amount of new paving at the gated entrance, a small parking lot, one prefabricated metal building that would be about 4,800 SF in size, a storage trailer that would be about 340 SF in size [refer to the site plan provided as Figure 3] and one high-mast lighting tower). Once the proposed improvements are made to the project site, the site itself will generate essentially the same amount of stormwater as they do at present because no significant change in drainage patterns is anticipated. The drainage pattern of stormwater within the site is not anticipated to be significantly altered due to the type of development that is proposed. However, as discussed above, under issue X(a), above, the proposed project will be required to implement BMPs throughout the duration of construction through the implementation of **MM HYD-1**, which would ensure proper management of stormwater drainage. In addition, the project will be required to adhere to regulatory requirements identified by the City's Municipal Code to ensure that stormwater runoff is controlled. Thus, no substantial change to the existing drainage pattern will result from project implementation. Adequate drainage facilities exist to accommodate pre- and post-project drainage flows, and when combined with the drainage management proposed as part of this project, the project would result in a less than significant impact. Based on the data outlined above, this project will not substantially alter the existing drainage pattern of the site or area; will not substantially alter the course of a stream or river in such a manner that will result in substantial erosion or siltation either on or off the project footprint; or contribute runoff water that could exceed the capacity of the existing drainage facilities. No additional sources of polluted runoff will result and impacts are considered less than significant. No additional mitigation is required.

c(iv). *Less Than Significant Impact* – According to the San Bernardino Countywide Plan Flood Hazard Map (Figure X-1), the proposed project is located in a 500-year flood hazard area. The project is located less than a quarter mile from an historical intermittent stream that is within a State Department of Water Resources 100-year Flood Awareness Zone. Development of this site is not anticipated to

redirect or impede flood flow at the project site, particularly given the small amount of construction planned for the project, as the project proposes no grading and only a minimal amount of development (i.e., a small amount of new paving at the gated entrance, a small parking lot, one prefabricated metal building that would be about 4,800 SF in size, and a storage trailer that would be about 340 SF in size [refer to the site plan provided as Figure 3] and one high-mast lighting tower). Onsite improvements will be required to meet San Bernardino County drainage control requirements if necessary through standard City conditions of approval. Therefore, the proposed project would have a less than significant potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would impede or redirect flows. No mitigation is required.

d. *Less Than Significant Impact* – Please refer to response IX(c) above. The proposed project is not located within a flood hazard, tsunami, or seiche zone. Implementation of the project will not expose people or structures to a significant risk of inundation by seiche, tsunami, or other flood hazards. According to the San Bernardino Countywide Plan Dam & Basin Hazards Map (Figure X-2), the project is not located within the limit of an inundation area delineated as such as a result of a nearby dam. The project site is located more than 75 miles from the Pacific Ocean and is positioned beyond the San Gabriel Mountains that separate the ocean from the project site, and thereby eliminates the potential for a tsunami to impact the project area. Additionally, a seiche would not occur within the vicinity of the project because there are no lakes or enclosed bodies of water near the site that could be result in a seiche event. It is anticipated that through compliance with the City's Municipal Code and minimal modifications to the existing drainage patterns within the site, inundation hazards within the project area would be reduced to a level of less than significant. Therefore, the proposed project would have a less than significant potential to risk release of pollutants due to project inundation.

e. *Less Than Significant Impact* – Please refer to the discussion under issue X(b) above. In 2014, Governor Brown signed into law the Sustainable Groundwater Management Act, also known as SGMA. The Act took effect in 2015. It "requires for the first time in state history that groundwater resources be sustainably managed by local agencies through the formation of Groundwater Sustainability Agencies (GSAs) in each basin that are deemed high-priority or medium-priority by the Department of Water Resources. In such basins, GSAs are required to develop and implement Groundwater Sustainability Plans."[3] Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline."[4] The San Bernardino Countywide Plan, **Figure X-3**, Groundwater Basin Map, indicates that the Mojave River Basin is under very low priority (**Figure X-3**). As the Mojave River Basin is under very low priority, it is currently not required to prepare a sustainable groundwater management plan and the project will not interfere with the overall water quality of the Mojave Basin Area (MBA) as discussed above. The MBA Watermaster replaces overdrafts through fees collected from water users that is used to purchase additional water supplied through the State Water Project. Finally, the proposed Daisy Road Industrial Storage Project is not expected to make any demands for potable water and will not have any occupied structures onsite. As such, it is anticipated the proposed project would not have a significant potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

[3] Western Municipal Water District, 2024. Sustainable Groundwater Management Act https://www.wmwd.com/461/Sustainable-Groundwater-Management-Act (accessed 05/17/24)
[4] California Department of Water Resources, 2024. Sustainable Groundwater Management Act (SGMA) https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management (accessed 05/17/24)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XI. LAND USE AND PLANNING: Would the project:				
a) Physically divide an established community?				**X**
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				**X**

SUBSTANTIATION: City General Plan, Land Use Element, City Zoning Ordinance, City Land Use/Zoning Map

a. *No Impact* – The project site consists of one parcel of land which is zoned for and designated as Manufacturing/Industrial (MI). The surrounding uses are similarly designated with developed light industrial uses and storage yards to the east, north, and further to the east, and with vacant land to the south. The project site is currently undeveloped and has been vacant for over 60 years. The site contains scattered native vegetation characteristic of the High Desert area. The addition of the proposed crane components and equipment storage yard at this location would be consistent with both the uses surrounding the project and the surrounding land use designations and zoning classifications. Consequently, the development of the project site with the proposed use will not divide any established community in any manner. Therefore, no adverse impacts under this issue are anticipated and no mitigation is necessary.

b. *No Impact* – The project site is zoned for Manufacturing/Industrial (MI) and designated as Manufacturing/Industrial (MI) use4 within the City of Adelanto. With approval of the Location and Development Plan (LDP) application on this property, the proposed project will be fully consistent with both the General Plan designation and Zone classification for the project site. Therefore, the implementation of this Project at this site will be consistent with surrounding land uses, and current land use/zoning designation of the site. Based on this information, implementation of the proposed project would not conflict with any applicable any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impacts are anticipated under this issue and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XII. MINERAL RESOURCES: Would the project:				
a) 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?				**X**
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				**X**

SUBSTANTIATION: California Department of Conservation, California Geological Survey website accessed May 2024, https://www.conservation.ca.gov/cgs/.

a&b. *No Impact* – The proposed site for the crane component and equipment storage facility is located within land designated for Manufacturing/Industrial (MI) use which is a designation that does not include mining operations as a permitted use. According to the City General Plan, the only designation in which mineral resource mining is permitted are in Open Space uses. Given that the project is designated MI and is not designated for mineral resource-related land uses, the development of the project will not cause any loss of mineral resource values to the region or residents of the state, nor would it result in the loss of any locally important mineral resources identified in the City's General Plan. No impacts would occur under this issue. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIII. NOISE: Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			**X**	
b) Generation of excessive groundborne vibration or groundborne noise levels?			**X**	
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?				**X**

SUBSTANTIATION: State California Office of Planning and Research, General Plan Guidelines, Appendix D: Noise Element Guidelines, Land Use Compatibility for Community Noise Exposure, October 5, 2023; Federal Transit Authority (FTA), Noise and Vibration Impact Assessment Manual, February 27, 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf; Adelanto Municipal Code, Section 17.90.020, Noise Ordinance, May 28, 2008; and U.S. Environmental Protection Agency, Noise Control Act, 9-6-2023.

Background

Noise is generally described as unwanted sound. The unit of sound pressure ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over one million times within the range of human hearing. A logarithmic loudness scale, similar to the Richter scale for earthquake magnitude, is therefore used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all sound frequencies within the entire spectrum. Noise levels at maximum human sensitivity from around 500 to 2,000 cycles per second are factored more heavily into sound descriptions in a process called “A-weighting,” written as “dBA.” In addition, Leq is a time-averaged sound level; a single-number value that expresses the time-varying sound level for the specified period as though it were a constant sound level with the same total sound energy as the time-varying level. Its unit is the decibel (dB). The most common averaging period for Leq is hourly.

Because community receptors are more sensitive to unwanted noise intrusion during more sensitive evening and nighttime hours, state law requires that an artificial dBA increment be added to quiet time noise levels. The State of California has established guidelines for acceptable community noise levels that are based on the Community Noise Equivalent Level (CNEL) rating scale (a 24-hour integrated noise measurement scale). The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. The State Guidelines, Land Use Compatibility for Community Noise Exposure, single-family homes are "normally acceptable" in exterior noise environments up to 60 dB CNEL and "conditionally acceptable" up to 70 dB CNEL based on this scale. Multi-family residential uses are "normally acceptable" up to 65 dB CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable" up to 70 dB CNEL, as are office buildings and business, commercial and professional uses with some structural noise attenuation.

Background noise levels in the project area are shown on **Figure XIII-1**. Future background noise levels in the project area are shown on **Figure XIII-2**. Both Figures are extracted from the San Bernardino Countywide Plan.

Impact Analysis

a. *Less Than Significant Impact* – The proposed project is located in an area designated for Manufacturing/Industrial (MI) uses including a variety of light industrial, assembly, storage, and light manufacturing uses. There are no residences in the surrounding area. Background noise is anticipated to be within the City of Adelanto Municipal Code noise standard for Industrial uses. The proposed project site is currently vacant and as such currently does not generate any noise.

Short Term Noise

Short-term noise impacts may occur during construction of the proposed project; however, such activities will be limited to a small amount of paving installed at the gated entrance at the southwest corner of the site. In addition, one prefabricated metal building that would be about 4,800 SF in size, and a storage trailer that would be about 340 SF in size [refer to the site plan provided as Figure 3] will be constructed in this same area, along with one high-mast lighting tower in the center of the site. There will be no grading and the noisiest type of equipment typically used for this level of construction ranges from 82 to 85 dB at 50 feet from the source. Stationary source noise diminishes at a rate of about 6 dB for each doubling of the distance from the source so temporary construction noise levels at the nearest receptor would be under 60 dBA. Refer to Table XIII-4, which shows construction equipment noise levels at 25, 50 and 100 feet from the noise source.

Table XIII-4
NOISE LEVELS OF CONSTRUCTION EQUIPMENT AT 25, 50 AND 100 FEET (in dBA Leq) FROM THE SOURCE

Equipment	Noise Levels at 25 feet	Noise Levels at 50 feet	Noise Levels at 100 feet
Earthmoving			
Front Loader	85	79	73
Backhoes	86	80	74
Dozers	86	80	74
Tractors	86	80	74
Scrapers	91	85	79
Trucks	91	85	79
Material Handling			
Concrete Mixer	91	85	79
Concrete Pump	88	82	76
Crane	89	83	77
Derrick	94	88	82
Stationary Sources			
Pumps	82	79	70
Generator	84	78	72
Compressors	87	81	75
Other			
Saws	84	78	72
Vibrators	82	76	70

Source: U.S. Environmental Protection Agency “Noise”

Section 17.90.020 of the Adelanto Municipal Code limits the hours of construction as follows:

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

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

The Adelanto Municipal Code also limits stationary construction equipment from exceeding 65 dBA at the nearest residence and enforces that all construction-related truck trips must be limited to the Adelanto designated truck routes. The proposed project would be constructed in compliance with the City's Noise Performance Standards and therefore construction of the project would be less than significant. In addition, many of the Mojave Desert Air Quality Management District (MDAQMD) regulations and requirements to control construction equipment air pollutant emissions also help reduce potential noise impacts as well (e.g., limits on idling, having equipment in turn with functioning mufflers, etc.). Because there are no sensitive noise receptors within the vicinity of the project (at greater than 1,000 feet from the project site), potential construction-related noise impacts will be less than significant with regulatory compliance.

Long-Term Noise

Noise typically generated by light industrial activities would generally attenuate to less than significant levels at 1,000 feet or greater from an industrial project site. In this case, there are no residences or sensitive receptors within 1,000 feet of the site and the project proposes relatively low intensity and infrequent use of the site for storing crane-related components and equipment. Noise would be generated when equipment was being brought onto or moved off of the site, and during that time vehicles and 3-5 workers would be present for 1-2 days at a time. This type of activity could occur once every 2-3 months but the timing is dependent on the needs of specific high-rise construction projects the timing of which is not known at present. The primary source of noise generated by project operation will be vehicular traffic entering, exiting and accessing the site for equipment delivery or removal.

The City of Adelanto does not identify exterior noise standards for industrial land uses and the Land Use Compatibility Guidelines Table VIII-2 (also provided as Figure XII-1) indicates that, unless a sensitive use in proximity to a site would be impacted, industrial uses do not have a CNEL limit within which to operate. The project is not anticipated to operate at a level greater than 75 CNEL at any residences because there are none within 1,000 feet or more of the site. It should be noted that noise attenuates at a rate of approximately 6 decibels per doubling of distance, and much like construction noise, equipment required to operate the project will generate some noise, anticipated to range from approximately 70 dBA to 75 dBA at 50 feet from the source. Given the distance from the nearest residence to the project site is greater than 1,000 feet, the ambient noise environment in the area surrounding the project site will be well within the levels deemed acceptable by the City under the proposed project. No sensitive receptors are nearby so the proposed project will not expose of persons to or generation of noise levels in excess of established standards. Based on the existing noise environment within this manufacturing/industrial area and the low level of activity anticipated by the project, neither operation or construction of the proposed project would violate noise standards outlined in the City of Adelanto Development Code. Impacts under this issue are considered less than significant and no mitigation is required.

b. *Less Than Significant Impact* – Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noises. Sources of groundborne vibrations include natural phenomena (e.g. earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g. explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second) and discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration. Vibration impacts related to human development are generally associated with activities such as train operations, construction, and heavy truck movements.

The Federal Transit Authority (FTA) Noise and Vibration Assessment Manual states that in contrast to airborne noise, ground-borne vibration is not a common environmental problem. Although the motion of the ground may be noticeable to people outside structures, without the effects associated with the shaking of a structure, the motion does not provoke the same adverse human reaction to people outside. Within structures, the effects of ground-borne vibration include noticeable movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. The FTA Manual further states that it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. However, some common sources of vibration are trains, trucks on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment. The FTA guidelines identify a level of 80 VdB for sensitive land uses. This threshold provides a basis for determining the relative significance of potential Project related vibration impacts.

Due to the large size of the project site, the minimal construction necessary to facilitate implementation of the proposed project, and the lack of any sensitive receptors within a reasonable distance of the project site, the proposed project will not expose people to generation of excessive groundborne vibration or groundborne noise levels. During construction, certain construction activities have some potential to create vibration, but due to the size of the site and lack of sensitive receptors, any impacts are considered less than significant. Furthermore, the City of Adelanto Municipal Code Section 17.90.030 places restrictions on vibration such that no ground vibration shall be allowed which can be felt without the aid of instruments at or beyond the subject property line. The proposed project would comply with this restriction because no sensitive receptors exist within the vicinity of the project that would be impacted by project related vibration, and furthermore, neither construction nor operation would require use of substantial vibration generating equipment. Additionally, because the rubber tires and suspension systems of heavy trucks and other on-road vehicles provide vibration isolation and reduced noise, it is unusual for on-road vehicles to cause noticeable groundborne noise or vibration impact. Most problems with on-road vehicle-related noise and vibration can be directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. Smoothing a bump or filling a pothole will usually solve the problem. The proposed project would be constructed with smooth new pavement throughout the project and would not result in significant groundborne noise or vibration impacts from vehicular traffic. Thus, any impacts under this issue are considered less than significant and no mitigation is required.

c. *No Impact* – As previously stated, the proposed project site is located 3 miles southwest of the SCLA boundaries. The project site is not located within the SCLA Land Use Plan and is located outside of the airport noise contours (refer to **Figure IX-3**). No private airstrips are located in the vicinity of the project. Therefore, given that the project is not located within the airport noise contours, construction and operation of the project at this location would not expose people residing or working in the project area to excessive noise levels in a safety hazard for people residing or working in the project area as a result of proximity to a public airport or private airstrip. No impacts are anticipated and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the project:				
a) Induce substantial 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)?				**X**
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				**X**

SUBSTANTIATION: Southern California Association of Governments (SCAG), Connect SoCal website accessed May 2024, https://scag.ca.gov/connect-socal.

a. *No Impact* – Implementation of the reservoir project will not induce substantial population growth in the area, either directly (e.g., by supporting the construction of new homes and businesses) or indirectly (e.g., through extension of roads or expansion of water-related or other infrastructure). The proposed project will only employ workers temporarily during construction and operation of the project; it is not expected to result in any new permanent workers in the City of Adelanto or surrounding communities. During operation, workers would only be needed temporarily to move crane-related equipment onto or off of the site, which would occur infrequently for short periods of time given the typical use of this equipment (i.e., for high-rise construction over long periods of time). These activities are not expected to result in any changes to the population or workforce of the City either now or into the future as projected the Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments (SCAG) (a.k.a. Connect SoCal).[5] Thus, based on the type of project, and that the proposed project would not contribute to increment indirect population growth, project implementation will not induce substantial population growth that exceeds either local or regional projections. There will be no impacts in this regard and no mitigation required.

b. *No Impact* – No occupied structures exist within the project site and as such, no residences or persons are located on the project site. Therefore, implementation of the proposed project will not displace substantial numbers of existing housing or persons, necessitating the construction of replacement housing elsewhere. No impacts will occur and no mitigation is required.

[5] SCAG, 2024. Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839 (accessed 05/17/24)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			**X**	
b) Police protection?			**X**	
c) Schools?			**X**	
d) Parks?			**X**	
e) Other public facilities?			**X**	

SUBSTANTIATION: San Bernardino County Fire Department (SBCFD) website, accessed May 2024, https://main.sbcounty.gov/category/county-fire/; San Bernardino County Sheriff's Department (SBCSD) website, accessed May 2024, https://wp.sbcounty.gov/sheriff/; Adelanto Elementary School District website, accessed May 2024, https://www.aesd.net/; Victor Valley Union High School District website, accessed May 2024, https://www.vvuhsd.org/; and City General Plan.

a. *Less Than Significant Impact* – The City is served by the San Bernardino County Fire Department (SBCFD) which provides fire protection and emergency medical services. The Adelanto Station #322 is located at 10370 Rancho Road in Adelanto approximately one (driving) mile northwest of the project site. It would take under two minutes for SBCFD to reach the site from Station #322 assuming an average speed of 35 miles per hour. The proposed project will incrementally add to the existing demand for fire protection services. Cumulative impacts on fire protection services are mitigated through the payment of a Fire Impact Fee, which is intended to provide funds directed towards fire protection. Additionally, standard conditions will be imposed by the City and the Fire Department to ensure adequate fire flow is available to the proposed crane component and equipment storage facility. The project will be required to adhere to the California Fire Code, which ensures that new structures are designed to minimize fire risks related to human safety (including that of emergency responders), loss of property, and other impacts to the environment. There is no identified short-term need to expand facilities in a manner that could have adverse impacts on the environment. As such, these requirements are considered adequate measures to prevent any significant impacts under this issue, thus no mitigation is required.

b. *Less Than Significant Impact* – The City of Adelanto receives police services through the San Bernardino County Sheriff Department (SBCSD). The SBCSD enforces local, state, and federal laws; performs investigations and makes arrests; administers emergency medical treatment; and responds to County emergencies. The Victor Valley Patrol Station is located at 11613 Bartlett Avenue in Adelanto, approximately 3 miles northeast of the project site. The Victor Valley Station has one captain, one lieutenant, eight sergeants, seven detectives, 58 patrol deputies, three sheriff's service specialist, seven office specialists, two office assistants, one secretary and one automotive officer. The proposed project will result in a marginal increase in demand for police services. Access to the site for police protection services will be provided at the entrance to the project site off of Daisy Road via a Knox Box that allows emergency access. The proposed project will incrementally add to the existing demand for police protection services although the site will be monitored via cameras on the high-mast lighting tower. These incremental impacts are compensated through the contribution to the

City's General Fund through property tax revenues generated by the project. This contribution is deemed sufficient to minimize impacts to police protection to a less than significant level.

c. *Less Than Significant Impact* – The proposed project is a crane component and equipment storage facility that will not generate any new direct demand for the area schools. The Adelanto Elementary School District and the Victor Valley Union High School District require residential and commercial developments to pay School District Fees. Industrial development such as the proposed project is not required to pay these fees. Given that the proposed project is not expected to generate any new short- or long-term employment, the proposed project will not generate a substantial increase in elementary, middle, or high school population, and therefore, the potential for the proposed project to create a measurable demand for school services is less than significant.

d. *Less Than Significant Impact* – The proposed project will not directly add to the existing demand on local recreational facilities. The City of Adelanto collects a park and recreation impact fee from residential projects. At present, the City does not require industrial development such as the proposed project to contribute fees to parks and recreation facilities. The proposed project is not anticipated to generate any new direct demand for other parks within the City, and therefore, with no existing or planned park facilities located within the project site, and no required payment of fees, the proposed project would have a less than significant impact on parks and recreation facilities.

e. *Less Than Significant Impact* – Other public facilities include library and general municipal services. Because the project will not directly induce substantial population growth, it is not forecast that the use of such facilities will substantially increase as a result of the proposed project. The project will contribute to the City's General Fund through property tax revenues which may be used in support of Library services and which are considered sufficient to offset any impacts to other public facilities as a result of implementing the project. Thus, any impacts under this issue are considered less than significant, and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				**X**
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				**X**

SUBSTANTIATION: City General Plan, Open Space and Conservation Element, Land Use Element.

a. *No Impact* – As addressed in the discussion under XIII and XVI(d) above, the proposed project does not include a use that would substantially induce population growth. As stated in the discussion under Population and Housing, the project would not create any new permanent short-term or long-term employees. However, the proposed project will still contribute to the City's General Fund through payment of property taxes. Additionally, the proposed project will be developed on land that is designated by the City's General Plan for Manufacturing/Industrial (MI) use, which does not support recreational facilities, and furthermore, the project site is not listed in any planning documents as desirable land for future park development. Therefore, the proposed project would have a less than significant potential to physically deteriorate park or recreational facilities through increased use. No mitigation is required.

b. *No Impact* – The proposed project consists of developing a crane component and equipment storage facility within the City of Adelanto. The project will need or include any recreational facilities, nor will it require the construction of new recreational facilities or expansion of new recreational facilities because the proposed project is not anticipated to substantially induce any population growth. The site is currently vacant with no existing recreational facilities on or near the project site, and the project site is in an area of the City that is designated for light industrial and manufacturing uses. As a result, no recreational facilities—existing or new—are required to serve the project, thus any impacts under this issue are considered less than significant. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVII. TRANSPORTATION: Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			**X**	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			**X**	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous inter-sections) or incompatible uses (e.g., farm equipment)?			**X**	
d) Result in inadequate emergency access?			**X**	

SUBSTANTIATION: City General Plan, Circulation Element, Circulation Map (1-2023); City Circulation Element, Proposed Mobility Plan, 10-4-2022; Victor Valley Transit Authority (VVTA), Comprehensive Transit Plan, 2023; VVTA Bus Routes Guide (online); and Google Earth.

a. *Less Than Significant Impact* – Implementation of the proposed project will not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located 1,150 feet east of Daisy Road and south of Rancho Road in the southern portion of the City of Adelanto. The site is west of Highway 395 and south of Rancho Road. According to the City General Plan Circulation Element, Rancho Road is intended to be a Major Street (4 lanes, 128' ROW), Cassia Road to the south of the site is planned to be a Collector (4 lanes, 112' ROW), while Daisy Road to the west of the site is planned as a Local Street (2 lanes, no set ROW). Due to the nature and low intensity of the project, very little traffic is expected to be generated by the project during either construction or operation. Construction may require 5-15 workers for a week which could generate 10-30 trips per day while construction was in progress. Once completed, operation of the site will only require workers on a very infrequent basis, possibly up to 20 workers at a time but only for 1-2 days, so a maximum of 40 daily trips for up to 2 days approximately four times per year every 2-3 months). The remainder of the year crane equipment would be stored onsite with no workers present on a regular basis. The site would be monitored remotely with cameras mounted on the high-mast lighting tower. Security would be provided by a private monitoring and patrol service or, if needed, through a response from the County Sheriff's Department. These traffic levels do not exceed any total or peak hour traffic thresholds for preparing a more detailed Level of Service (LOS) Analysis because the project would not generate more than 110 peak hour trips. Based on the planned capacities of the adjacent roadways, and that the project will contribute a minimal amount of traffic to the surrounding roadways, the proposed project has a less than significant potential to conflict with a program, plan, ordinance or policy addressing the roadway circulation system.

   The Victor Valley Transit Authority (VVTA) Comprehensive Transit Plan outlines service improvements and addresses general changes that can benefit the entire VVTA network. The closest VVTA bus routes to the project site are Route 33 along Rancho Road 0.4-mile north of the site and Mojave Road about 1.6 miles south of the site. In addition, Route 31 also runs along Mojave Drive about 1.6 miles south of the site.

   There are no sidewalks along Daisy Road just west of the site, nor are there sidewalks supporting any of the other local roadways in the surrounding area. Rancho Road 0.4-mile to the north has no improved sidewalks and no bicycle lanes.

At present the project area has a lack of available alternative modes of transportation, but the project is not expected to generate any permanent employees or workers that would need alternative modes of transportation. Therefore, the project will have a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. No mitigation is required.

b. *Less Than Significant Impact* – In the fall of 2013, SB 743 was passed by the legislature and signed into law by the governor. SB 743 requires that delay-based metrics such as roadway capacity and level of service (LOS) will no longer be the performance measures used for the determination of the transportation impacts of projects in studies conducted under CEQA. Instead, the new performance measure was Vehicle Miles Traveled (VMT).

The proposed project would develop a crane component and equipment storage facility within the City of Adelanto. The City of Adelanto's Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (July 2020) outlines the policies and methods for complying with the new CEQA expectations for VMT analysis and the applicable Adelanto General Plan consistency requirements, which requires performing intersection LOS analysis. The City of Adelanto utilizes the San Bernardino County Travel Demand Model (SBTAM) as its preferred methodology to measure average trip lengths and the California Emission Estimator Model (CalEEMod) as its preferred method to calculate greenhouse gas emissions so as to establish the 3,000 MTCO2e as a threshold for determining new VMT development threshold with a less than significant impact to the environment. As indicated herein in Section VIII, the greenhouse gas emissions generated by the proposed project will be below this threshold. For these reasons, the proposed project is not anticipated to result in significant impact related to vehicle miles travelled, and thus would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts under this issue are considered less than significant and no mitigation is required.

c. *Less Than Significant Impact* – The proposed project operations will occur entirely within the project site boundaries. Construction activities will include limited onsite paving, as well as gravel placement, mainly near the entrance at the southwest corner of the site and paving a small parking lot and installing one prefabricated metal building that would be about 4,800 SF in size, and a storage trailer that would be about 340 SF in size [refer to the site plan provided as Figure 3] just north of the entrance along the western boundary of the site. No improvements to Daisy Road are needed due to the low level of traffic expected during both construction and operation. Trucks delivering equipment can enter the site without major conflicts with the flow of traffic on the roadways used to access the site. Additionally, the proposed project would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. Emergency response and evacuation procedures would be coordinated with the City, as well as the local police and fire departments. All of the intersections that would serve project traffic have standard two- or four-legged configurations with no skew angled legs. Operation of the proposed project would generate very little regular traffic and would be compatible with uses in the surrounding uses, and the design of the project would not create any hazards to surrounding roadways. As any emergency response and evacuation procedures would be coordinated with the City and County, the proposed project would have a less than significant potential to substantially increase hazards due to a geometric design feature or incompatible uses. No mitigation is required.

d. *Less Than Significant Impact* – The proposed project will take access off of Daisy Road 1,150 feet west of the site along an existing dirt road. Due to the low volume of project traffic anticipated, adequate emergency access along Daisy Road will be maintained. Due to the low level of anticipated traffic and the lack of adverse impact on local circulation, the project has little potential for significant impacts on emergency access either during construction or operation. Impacts will be less than significant and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, 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 the California Native American tribe, and that is:				
a) 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		**X**		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in sub-division (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.		**X**		

SUBSTANTIATION: City AB 52 Native American Consultation Process results

A Tribal Resource is defined in the 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 (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purpose of this paragraph, the lead agency shall consider the significance of the resources to a California 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 resource if it conforms with the criteria of subdivision (a).

a&b. *Less Than Significant With Mitigation Incorporated* – The project site is located within the City of Adelanto, which has been contacted pursuant to Public Resources Code section 21080.3.1 by the following California Native American tribes traditionally and cultural affiliated with the City of Adelanto:

- Torres Martinez Desert Cahuilla Indians
- San Manuel Band of Mission Indians
- Twenty-Nine Palms Band of Mission Indians.

The City contacted these tribes to initiate the AB-52 process on XX, 2024 to notify the tribes of the proposed project through mailed letters. As stated under the Cultural Resources section above, the

project site consists of crane-related component and equipment storage with the remainder of the property containing scattered native and non-native vegetation. There is no grading proposed so the City did not require preparation of a Phase I Cultural Resource Assessment. Due to the lack of grading, there is little or no potential to unearth tribal cultural resources of importance during construction.

As of January 2025, only the Yuhaaviatam of San Manuel Nation have responded to the initial AB 52 consultation letter that began the 30-day consultation period in December of 2024. As of publication of this document, no other tribes have responded as part of AB 52 consultation. The Yuhaaviatam of San Manuel Nation (YSMN) have requested mitigation measures to be included as part of this project to minimize potential impacts to tribal cultural resources. Given the amount of existing disturbance within the proposed project footprint, the Tribe (YSMN) has simply requested the following language be included regarding inadvertent discoveries, in addition to the incorporation of **MMs CUL-2** through **CUL-4** intended to further minimize impacts to cultural resources:

TCR-1 ***The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in CUL-1, of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.***

TCR-2 ***Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.***

Should additional requests be made by the remaining tribes during the public review period for this Initial Study, the City will take these requests into consideration as additional mitigation in an effort to ensure that impacts to tribal cultural resources are fully minimized to a level of less than significant. With these measures, the project is not anticipated to cause a change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape, or object with 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. Impacts will be less than significant with the recommended mitigation.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			**X**	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				**X**
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				**X**
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				**X**
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				**X**

SUBSTANTIATION: Lahontan Regional Water Quality Control Board (RWQCB) website, accessed May 2024, https://www.waterboards.ca.gov/lahontan/; City of Adelanto Water Department (AWD) website, accessed May 2024, https://ci.adelanto.ca.us/services/water___sewer/index.php; AWD 2020 Urban Water Management Plan (UWMP), prepared by AWD 8-25-2021; AWD wastewater treatment plant (WTP) data, https://www.ci.adelanto.ca.us/214/Water-Sewer AND https://percwater.com/project/adelanto/

a. Water

No Impact – The project area is supplied water by the Adelanto Water Department (AWD) which utilizes groundwater to supply its customers. However, the proposed project will not be supported by any occupied structures that would require potable water service connection, as the project would not support any permanent workers on the site. As discussed under issue X(b) of this document, the water system will not require expansion of existing water facilities to serve the proposed project, as no potable water connection to the site is necessary. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded water facilities. No impacts are anticipated and no mitigation is required.

Wastewater

No Impact – The proposed project will develop a crane component and equipment storage facility within the City of Adelanto. The City operates a recently upgraded 4.0 million gallons per day (MGD) activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. The proposed project would not require a connection to wastewater collection systems. The AWD wastewater treatment plant (WTP) has a 4.0 MGD capacity – it treats approximately 1.5 MGD of wastewater at present which leaves approximately 2.5 MGD of capacity remaining. At this time and for the foreseeable future, AWD maintains ample capacity to treat the wastewater delivered to its treatment plant. Because the project will not generate wastewater, AWD would not need to expand their existing facilities beyond that which is already planned to

accommodate expected growth within the City of Adelanto. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded wastewater facilities. No impacts are anticipated and no mitigation is required.

Stormwater
Less Than Significant Impact – Please refer to the discussion under Section X, Hydrology and Water Quality, of this Initial Study. The project proposes no grading and only very limited construction that will not change the overall drainage pattern on the site or affect any downstream water courses. Surface water will be adequately managed onsite and as such, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

Electric Power
No Impact – Electrical power to the area is provided by SCE, however, the proposed project will only utilize electricity for its high-mast security lighting system and will not have any occupied buildings or spaces that require the use of air conditioning. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded electrical power facilities. No impacts are anticipated and no mitigation is required.

Natural Gas
No Impact – Natural gas will be supplied by Southwest Gas Company. However, the site will not need to connect to the any natural gas connections because the project will have no occupied buildings that require heating or other equipment that requires the use of natural gas. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. No impacts are anticipated and no mitigation is required.

Telecommunications
No Impact – Development of the project would not require installation of telecommunication services, including wireless internet service and phone service, because no occupied buildings are proposed on the site that would require connection to telecommunications ervices. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunications facilities. No impacts are anticipated and no mitigation is required.

b. *No Impact* – The City of Adelanto's AWD is responsible for the water supply for the City. The City's water supply comes solely from groundwater production from 15 potable wells. The City's water system delivers water to three pressure zones and consists of the aforementioned wells, transmission and distribution pipelines, booster stations and reservoirs. The AWD is required to meet water quality requirements of the RWQCB. The project is not anticipated to demand potable water due to its use as an unoccupied equipment storage yard. Therefore, it would not change water consumption estimates in the AWD 2020 UWMP. Furthermore, the 2020 UWMP indicates that AWD's planned water supply exceeds demand through 2045. Therefore, the impact of implementing the proposed project on water systems are forecast to result in no impacts and would not require any changes to the existing water system or existing entitlements. No mitigation is required.

c. *No Impact* – The AWD Wastewater Treatment Plant implements all requirements of the RWQCB, State Water Resource Control Board and City of Adelanto 2007 Sewer System Master Plan that protect water quality and monitor wastewater discharge. The AWD Wastewater Treatment Plant has a capacity of 4.0 MGD. and treats approximately 1.5 MGD of wastewater at present, which leaves approximately 2.5 MGD of capacity remaining. It is estimated that Adelanto's customers generate wastewater roughly proportional to 60 to 70 percent of the City's water demand. However, the project is not expected to generate wastewater because the project will require a connection to the City's wastewater collection service. However, the proposed project will not generate wastewater, and therefore would not contribute to the capacity of the existing AWD Wastewater Treatment Plant as it will not have any permanent onsite employees. Thus, the proposed project would have no potential

to 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. No impacts are anticipated and no mitigation is required.

d&e. *No Impact* – The proposed project will not generate any demand for solid waste service system capacity as it will not have any occupied buildings or permanent onsite employees that would generate solid waste during operation. During construction, there is a limited potential for waste to be generated by the construction workers for the 2 month period in which the project is constructed. The amount of waste generated per day is anticipated to be less than 10 pounds per day, which would fall within the existing daily capacities of area landfills. For instance, the Victorville Sanitary Landfill has a maximum daily permitted capacity of 3,000 tons, with about 14,000,000 tons of capacity remaining available.[6] Even with the City's mandatory source reduction and recycling program, the proposed project is not forecast to cause any significant adverse impact to the City's solid waste disposal system. Because the project will not generate any solid waste, there would be no potential for the project to conflict with solid waste regulations under Federal, State, and local statutes. Furthermore, as the project would not generate any solid waste, it would not contribute to the landfill capacities, and therefore, area landfill(s) would continue to have sufficient permitted capacity to accommodate the area's solid waste disposal needs. No impacts are anticipated under these issues and no mitigation is necessary.

[6] CalRecycle, 2024. Victorville Sanitary Landfill. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652 (accessed 05/18/24)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				**X**
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?				**X**
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				**X**
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				**X**

SUBSTANTIATION: California Department of Forestry and Fire Protection (CAL FIRE), State Responsibility Area Fire Hazard Severity Zones website accessed May 2024, https://www.fire.ca.gov/Search-Results?search=State%20Responsibility%20Area%20maps&type=all.

a-d. *No Impact* – The proposed project is not located within or near a CAL FIRE designated state responsibility area or within lands that have been identified as within a very high or high fire hazard severity zone. According to the San Bernardino Countywide Plan Fire Hazard Severity Zones Map (**Figure IX-5**), the proposed project is located in an area with Moderate wildfire risk. The proposed project is located in in a relatively flat rural area with scattered light industrial uses north, west, and further east of the project site. The remaining land is vacant which contains native desert and non-native weedy vegetation within and surrounding the site. As shown on **Figure IX-5,** the area immediately to the east of the project site is considered non/wildland/non-urban, with no fire risk. This is an area with very little fuel load in the surrounding area that could be susceptible to wildfires. The site is in an area removed from the high fire hazard areas that are located adjacent to the San Bernardino Mountains to the south. As such, no impacts under these issues are anticipated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		**X**		
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)?		**X**		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			**X**	

SUBSTANTIATION: The analysis in this Initial Study and the findings reached indicate that the proposed project can be implemented without causing any new project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control potential environmental impacts of the proposed project to a less than significant impact level. The following findings are based on the detailed analysis of the Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

a. *Less Than Significant With Mitigation Incorporated* – The project has no potential to cause a significant impact any biological or cultural resources. The project has been identified as having no potential to substantially degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The project requires mitigation to prevent significant biology impacts from occurring as a result of implementation of the project. Based on the project area, and the site cultural survey for the project site, the potential for impacting cultural resources is low. The proposed project would not involve any sort of excavation or major ground disturbance that would uncover unknown cultural resources that might be beneath the ground surface at the project site. Thus, no mitigation is required to minimize impacts to cultural resources. Please see biological and cultural sections of this Initial Study.

b. *Less Than Significant With Mitigation Incorporated* – The project has 4 potential impacts that are individually limited, but may be cumulatively considerable. These are: Air Quality, Biological Resources, Hydrology and Water Quality, and Tribal Cultural Resources. The project is not considered growth-inducing, as defined by *State CEQA Guidelines*. These referenced issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no potential significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and thus, less than significant impacts.

c. *Less Than Significant Impact* – The project will achieve long-term community goals by providing additional revenue generating uses within the City of Adelanto. Furthermore, this project will provide a use consistent with those that serve the construction needs of the area. The short-term impacts associated with the project, which are mainly construction-related impacts, are less than significant with mitigation as prescribed, and the proposed project would be compatible with long-term environmental protection. There are no issues that require the implementation of mitigation measures to reduce human impacts to a less than significant level. The potential for direct human effects from implementing the proposed project have been determined to be less than significant.

Conclusion

This document evaluated all CEQA issues contained in the latest Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Aesthetics, Agricultural and Forestry Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire. The issues of Air Quality, Biological Resources, Hydrology and Water Quality, and Tribal Cultural Resources require the implementation of mitigation measures to reduce project specific and cumulative impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact level.

Based on the findings in this Initial Study, the City of Adelanto proposes to adopt a Mitigated Negative Declaration (MND) for the proposed Daisy Road Industrial Storage Project. A Notice of Intent to Adopt a Mitigation Negative Declaration (NOI) will be issued for this project by the City. The Initial Study and NOI will be circulated for 30 days of public comment. At the end of the 30-day review period, a final MND package will be prepared and it will be reviewed by the City for possible adoption at a future City Council or Planning Commission meeting, the date for which has yet to be determined. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting date in accordance with the requirements in Section 21092.5 of CEQA (statute).

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*,(1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; San *Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Revised 2019
Authority: Public Resources Code sections 21083 and 21083.09
Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/ 21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

Air Quality

AQ-1 Dust Control. The following measures shall be incorporated into project plans and specifications for implementation:

- Apply soil stabilizers such as hay bales or aggregate cover to inactive areas.
- Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.
- Stabilize previously disturbed areas if subsequent construction is delayed.
- Water exposed surfaces and haul roads 3 times/day.
- Cover all stockpiles with tarps.
- Replace ground cover in disturbed areas quickly.
- Reduce speeds on unpaved roads to less than 15 mph.
- Trenches shall be left exposed for as short a time as possible.

AQ-2 The following signage shall be erected no later than the commencement of construction: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day:
"[Site Name] {four-inch text}
[project Name/project Number] {four-inch text}
IF YOU SEE DUST COMING FROM {four-inch text}
THIS PROJECT CALL: {six-inch text}
[Contact Name], PHONE NUMBER {six-inch text}
If you do not receive a response, Please Call {three-inch text} The MDAQMD at 1-800-635-4617 {three-inch text}"

AQ-3 During project construction a 4,000-gallon water truck shall be available on-site at all times for dust control.

AQ-4 Wind breaks and/or fencing shall be developed in areas that are susceptible to high wind induced dusting.

AQ-5 The Developer shall use a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. If the site contains exposed sand or fines deposits (and if the project would expose such soils through earthmoving), water application or chemical stabilization will be required to eliminate visible dust/sand from sand/fines deposits.

AQ-6 The Developer shall formulate a high wind response plan that addresses enhanced dust control if winds are forecast to exceed 25-mph in any upcoming 24-hour period.

Biological Resources

BIO-1 All construction activities shall comply with the federal Migratory Bird Treaty Act of 1918 (MBTA) and California Fish and Game Code Sections 3503, 3511 and 3513. The MBTA governs the taking and killing of migratory birds, their eggs, parts, and nests and prohibits the take of any migratory bird, their eggs, parts, and nests. Compliance with the MBTA shall be accomplished by completing the following:

Construction activities involving vegetation removal shall be conducted between September 1 and January 31. If construction occurs inside the peak nesting season (between February 1 and

August 31), a pre-construction survey by a qualified Biologist shall be conducted within 72 hours prior to construction activities to identify any active nesting locations. If the Biologist does not find any active nests, the construction work shall be allowed to proceed. The biologist conducting the clearance survey shall document a negative survey with a report indicating that no impacts to active avian nests shall occur.

If the Biologist finds an active nest within the pre-construction survey area and determines that the nest may be impacted, the Biologist shall delineate an appropriate buffer zone around the nest. The size of the buffer shall be determined by the Biologist and shall be based on the nesting species, its sensitivity to disturbance, expected types of disturbance, and location in relation to the construction activities. These buffers are typically 300 feet from the nests of non-listed species and 500 feet from the nests of raptors and listed species. Any active nests observed during the survey shall be mapped on an aerial photograph. Only construction activities (if any) that have been approved by a Biological Monitor shall take place within the buffer zone until the nest is vacated. The Biologist shall serve as a Construction Monitor when construction activities take place near active nest areas to ensure that no inadvertent impacts on these nests occur. Results of the pre-construction survey and any subsequent monitoring shall be provided to the Property Owner/Developer and the City of Adelanto. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds.

Cultural Resources

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

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

CUL-3 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

Hydrology and Water Quality

HYD-1 The Applicant shall require that the construction contractor to implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the District include the following:

- The use of silt fences or coir rolls;
- The use of temporary stormwater desilting or retention basins;
- The use of water bars to reduce the velocity of stormwater runoff;

- The use of wheel washers on construction equipment leaving the site;
- The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;
- The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and
- Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.

Tribal Cultural Resources

TCR-1 The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in CUL-1, of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

TCR-2 Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

REFERENCES

City of Adelanto, 2008. Adelanto Municipal Code Section 17.90.020, Noise Ordinance

City of Adelanto Water Department, 2020. 2020 Urban Water Management Plan.

City of Adelanto Water Department, 2024. Water and Sewer. https://ci.adelanto.ca.us/services/water___sewer/index.php (accessed 07/11/24)

City of Adelanto, 1995. Final Program Environmental Impact Report for the City of Adelanto General Plan Update.

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

CAL FIRE, 2024. State Responsibility Area Fire Hazard Severity Zones. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008 (accessed 07/11/24)

California Department of Conservation, 2024. Alquist-Priolo Earthquake Fault Zones map

California Department of Conservation, 2024. California Geological Survey https://www.conservation.ca.gov/cgs/. (accessed 07/11/24)

California Department of Conservation, 2024. Important Farmland Finder Map. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed 07/11/24)

California Department of Public Health, 2024. Drinking Water Standards. https://www.cdph.ca.gov/Pages/results.aspx?k=#k=drinking%20water%20standards (accessed 07/11/24)

California Department of Toxic Substances Control, 2024. EnviroStor https://www.envirostor.dtsc.ca.gov/public/ (accessed 07/11/24)

California Department of Water Resources, 2018. Sustainable Groundwater Management Basin Prioritization: Process and Results, https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Basin-Prioritization/Files/2018-Sustainable-Groundwater-Management-Act-Basin-Prioritization.pdf (accessed 07/11/24)

California Department of Water Resources, 2024. Sustainable Groundwater Management Act (SGMA) https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management (accessed 05/17/24)

California Office of Planning and Research, 2023. General Plan Guidelines, Appendix D: Noise Element Guidelines, Land Use Compatibility for Community Noise Exposure,

California State Water Resources Control Board, 2024. GeoTracker https://geotracker.waterboards.ca.gov/ (accessed 07/11/24)

California State Water Resources Control Board, Division of Drinking Water, 2024. Programs. https://www.waterboards.ca.gov/drinking_water/programs/ (accessed 07/11/24)

CalRecycle, 2024. Victorville Sanitary Landfill. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652 (accessed 05/18/24)

CARB, 2024. Website, www.arb.ca.gov/adam/ (accessed 07/11/24)

ELMT Consulting, 2024. *Biological Resources Assessment for the for Proposed Project Located at 0 Daisy Road in the City of Adelanto, San Bernardino County, California (*Appendix 2)

FAA, 2024. Notification of Proposed Construction or Alteration on Airport Part 77. https://www.faa.gov/airports/central/engineering/part77 (accessed 07/11/24)

Federal Transit Authority (FTA), 2020. Noise and Vibration Impact Assessment Manualhttps://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (accessed 07/11/24)

Lahontan RWQCB, 2024. Lahonton. https://www.waterboards.ca.gov/lahontan/ (accessed 07/11/24)

MDAQMD, 2024. Website. https://www.mdaqmd.ca.gov/ (accessed 07/11/24)

San Bernardino County ALUC, 2024. Airport Land Use https://lus.sbcounty.gov/planning-home/airport-land-use/ (accessed 07/11/24)

County of San Bernardino, 2020. San Bernardino Countywide Plan.

SCAG, 2024. Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839 (accessed 05/17/24)

SCE, 2024. Reliable, Affordable Power for you. https://www.sce.com/about-us/reliability/meeting-demand (accessed 05/28/24)

U.S. Environmental Protection Agency, 2023. Noise Control Act

Urban Crossroads, 2024. 0 *Daisy Road Air Quality and Greenhouse Gas Assessment* (Appendix 1)

USDA, 2024. Web Soil Survey Map. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx (accessed 07/11/24);

Victor Valley Transit Authority, 2023. Bus Routes Guide https://ontime.vvta.org/m/regions/96/routes (accessed 07/11/24)

Victor Valley Transit Authority, 2023. Comprehensive Transit Plan

Western Municipal Water District, 2024. Sustainable Groundwater Management Act https://www.wmwd.com/461/Sustainable-Groundwater-Management-Act (accessed 05/17/24)

FIGURES

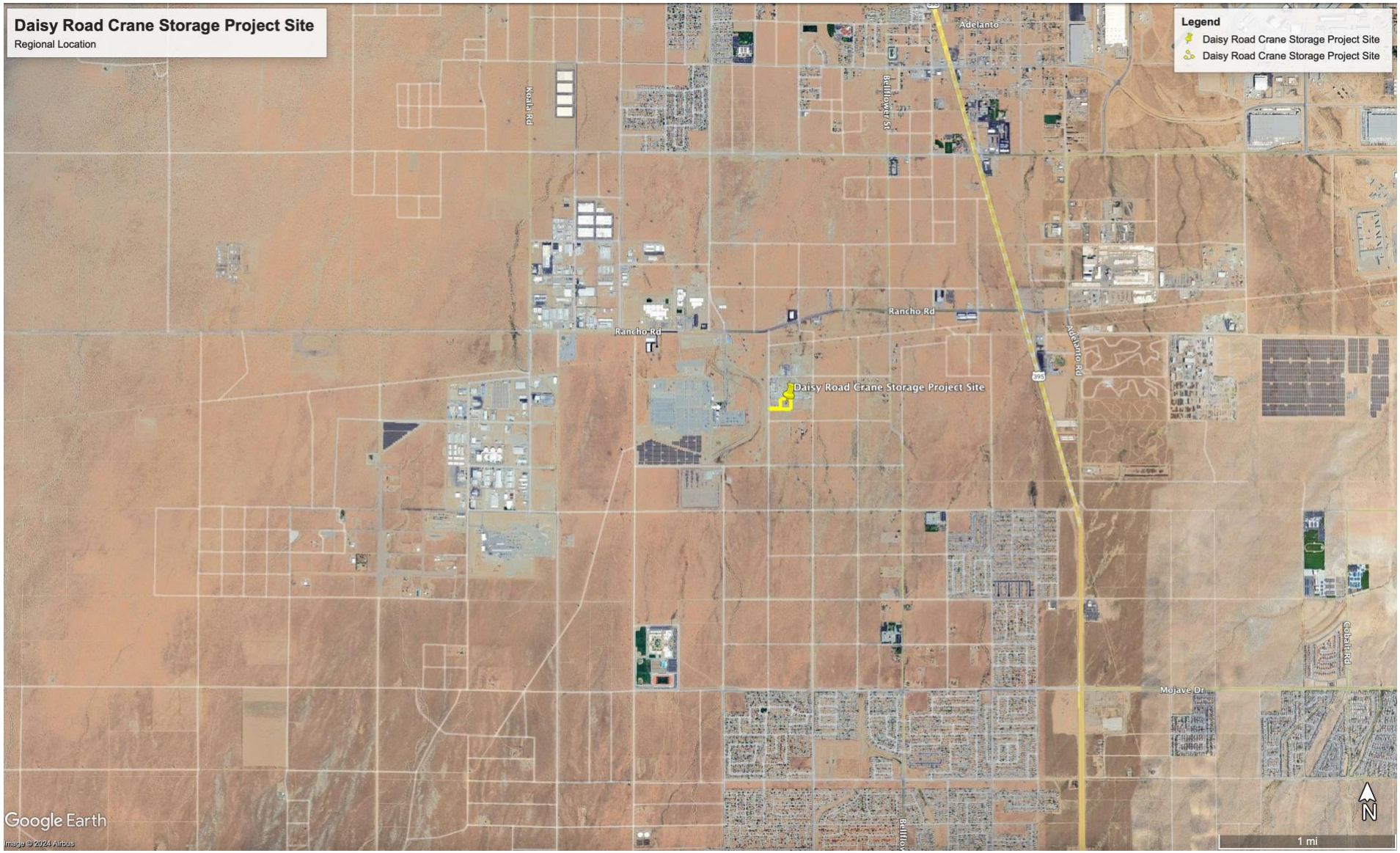


FIGURE 1

Tom Dodson & Associates
Environmental Consultants

Regional Map

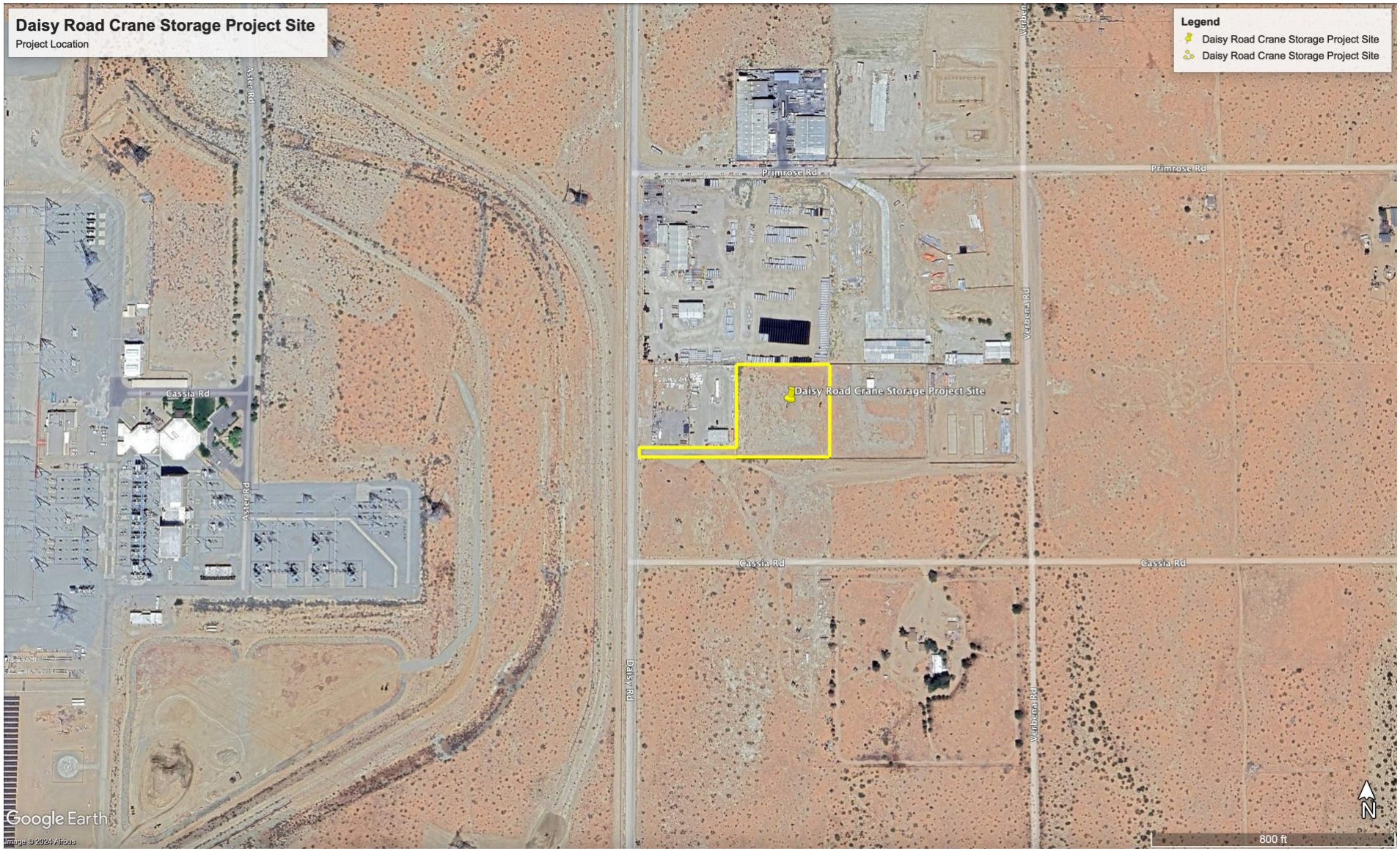
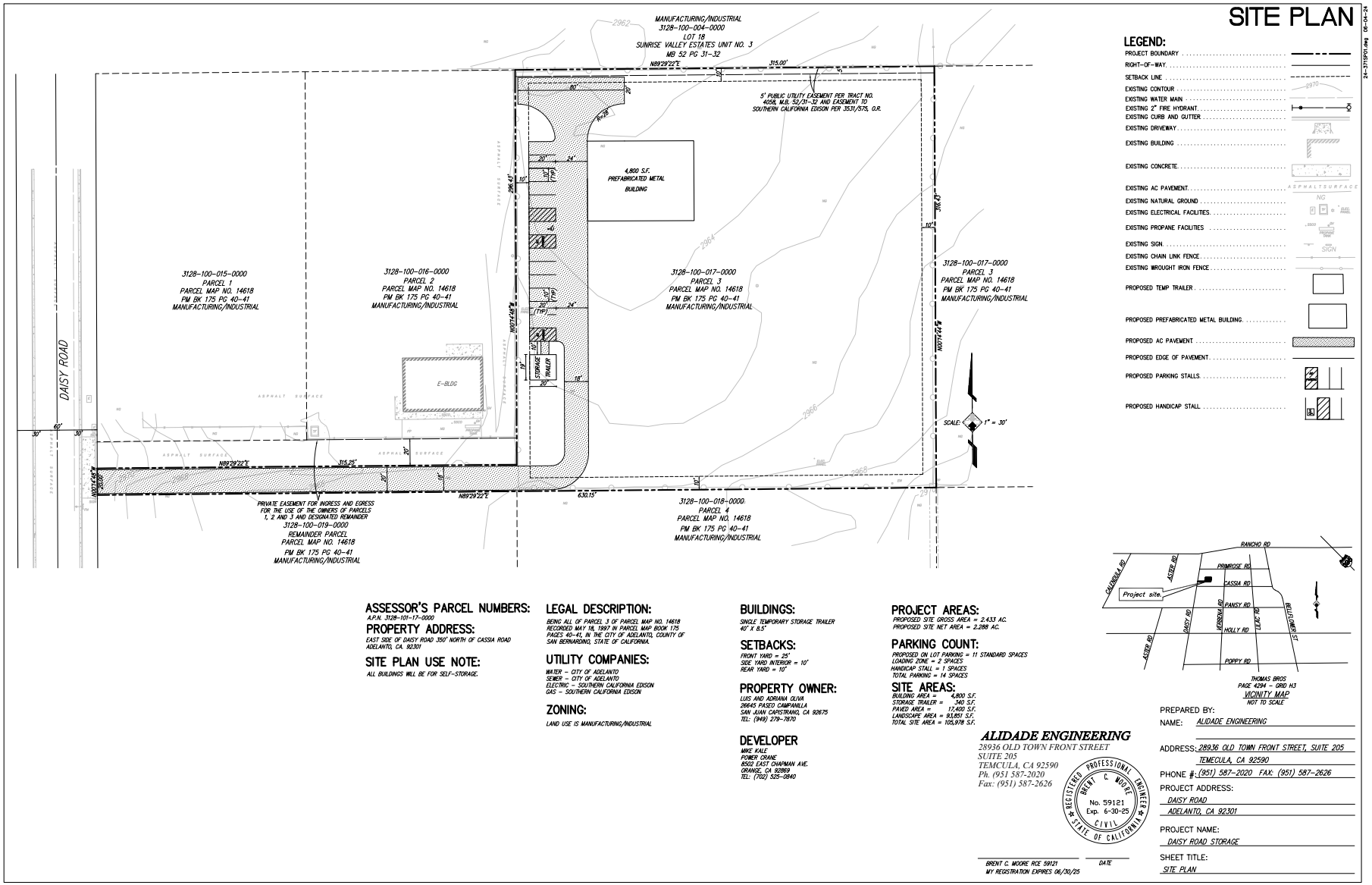


FIGURE 2

Tom Dodson & Associates
Environmental Consultants

Site Location Map



ASSESSOR'S PARCEL NUMBERS:
A.P.N. 3128-101-17-0000

PROPERTY ADDRESS:
EAST SIDE OF DAISY ROAD 350' NORTH OF CASSIA ROAD
ADELANTO, CA. 92301

SITE PLAN USE NOTE:
ALL BUILDINGS WILL BE FOR SELF-STORAGE.

LEGAL DESCRIPTION:
BEING ALL OF PARCEL 3 OF PARCEL MAP NO. 14618 RECORDED MAY 18, 1997 IN PARCEL MAP BOOK 175 PAGES 40-41, IN THE CITY OF ADELANTO, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA.

UTILITY COMPANIES:
WATER - CITY OF ADELANTO
SEWER - CITY OF ADELANTO
ELECTRIC - SOUTHERN CALIFORNIA EDISON
GAS - SOUTHERN CALIFORNIA EDISON

ZONING:
LAND USE IS MANUFACTURING/INDUSTRIAL

BUILDINGS:
SINGLE TEMPORARY STORAGE TRAILER
40' X 8.5'

SETBACKS:
FRONT YARD = 25'
SIDE YARD INTERIOR = 10'
REAR YARD = 10'

PROPERTY OWNER:
LUIS AND ADRIANA OLIVA
26645 PASEO CAMPANILLA
SAN JUAN CAPISTRANO, CA 92675
TEL: (949) 279-7870

DEVELOPER
MIKE KALE
POWER CRANE
8503 EAST CHAPMAN AVE.
ORANGE, CA 92869
TEL: (702) 525-0840

PROJECT AREAS:
PROPOSED SITE GROSS AREA = 2.433 AC.
PROPOSED SITE NET AREA = 2.288 AC.

PARKING COUNT:
PROPOSED ON LOT PARKING = 11 STANDARD SPACES
LOADING ZONE = 2 SPACES
HANDICAP STALL = 1 SPACES
TOTAL PARKING = 14 SPACES

SITE AREAS:
BUILDING AREA = 4,800 S.F.
STORAGE TRAILER = 340 S.F.
PAVED AREA = 17,400 S.F.
LANDSCAPE AREA = 93,851 S.F.
TOTAL SITE AREA = 105,978 S.F.

ALIDADE ENGINEERING
28936 OLD TOWN FRONT STREET
SUITE 205
TEMCULA, CA 92590
Ph. (951) 587-2020
Fax: (951) 587-2626

REGISTERED PROFESSIONAL ENGINEER
BRENT C. MOORE
No. 59121
Exp. 6-30-25
CIVIL
STATE OF CALIFORNIA

BRENT C. MOORE RCE 59121 — DATE
MY REGISTRATION EXPIRES 06/30/25

PREPARED BY:
NAME: ALIDADE ENGINEERING
ADDRESS: 28936 OLD TOWN FRONT STREET, SUITE 205
TEMECULA, CA 92590
PHONE #: (951) 587-2020 FAX: (951) 587-2626
PROJECT ADDRESS:
DAISY ROAD
ADELANTO, CA 92301
PROJECT NAME:
DAISY ROAD STORAGE
SHEET TITLE:
SITE PLAN

FIGURE 3

Tom Dodson & Associates
Environmental Consultants

Site Plan

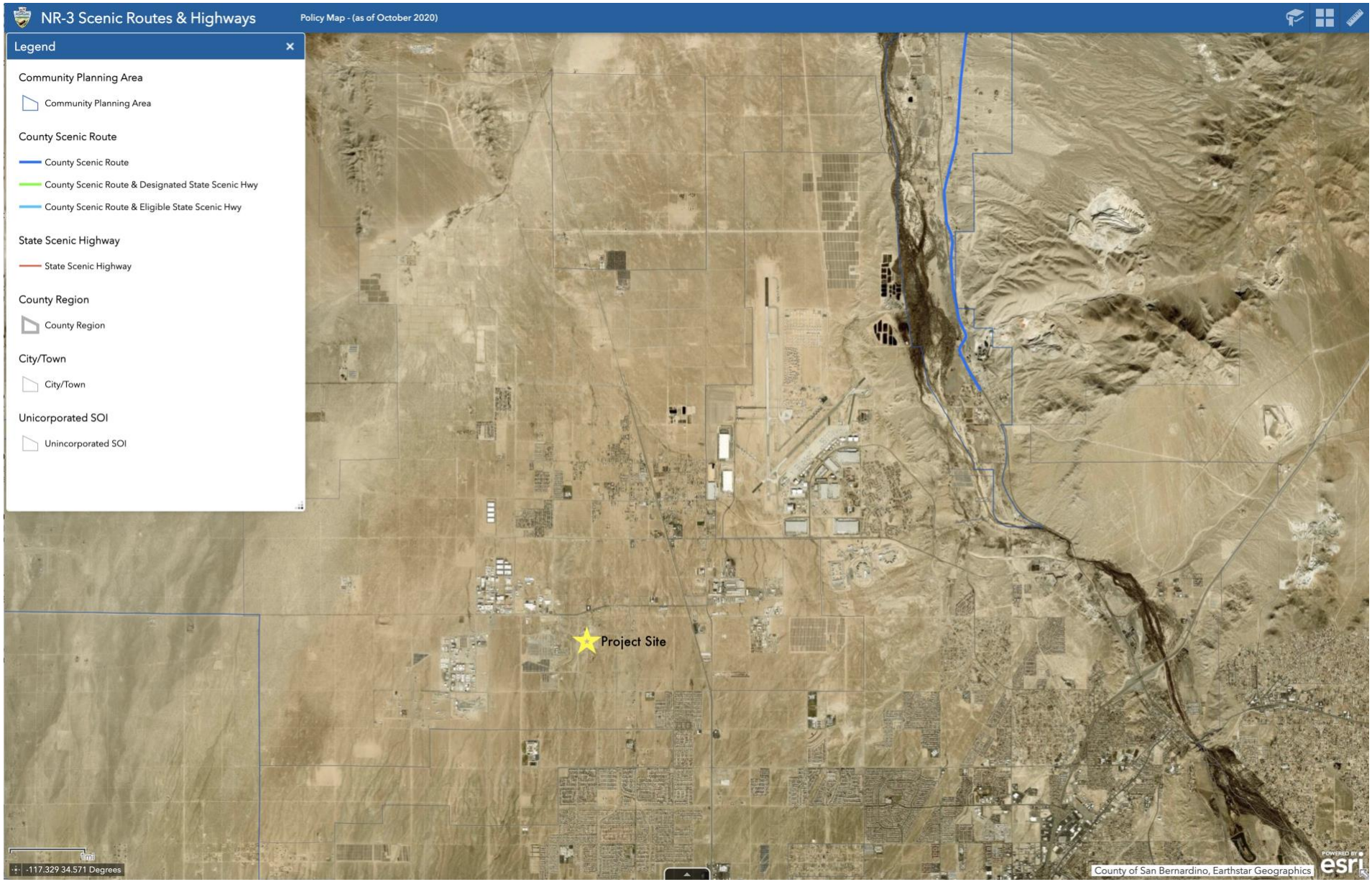


FIGURE I-1

Tom Dodson & Associates
Environmental Consultants

Scenic Routes & Highways

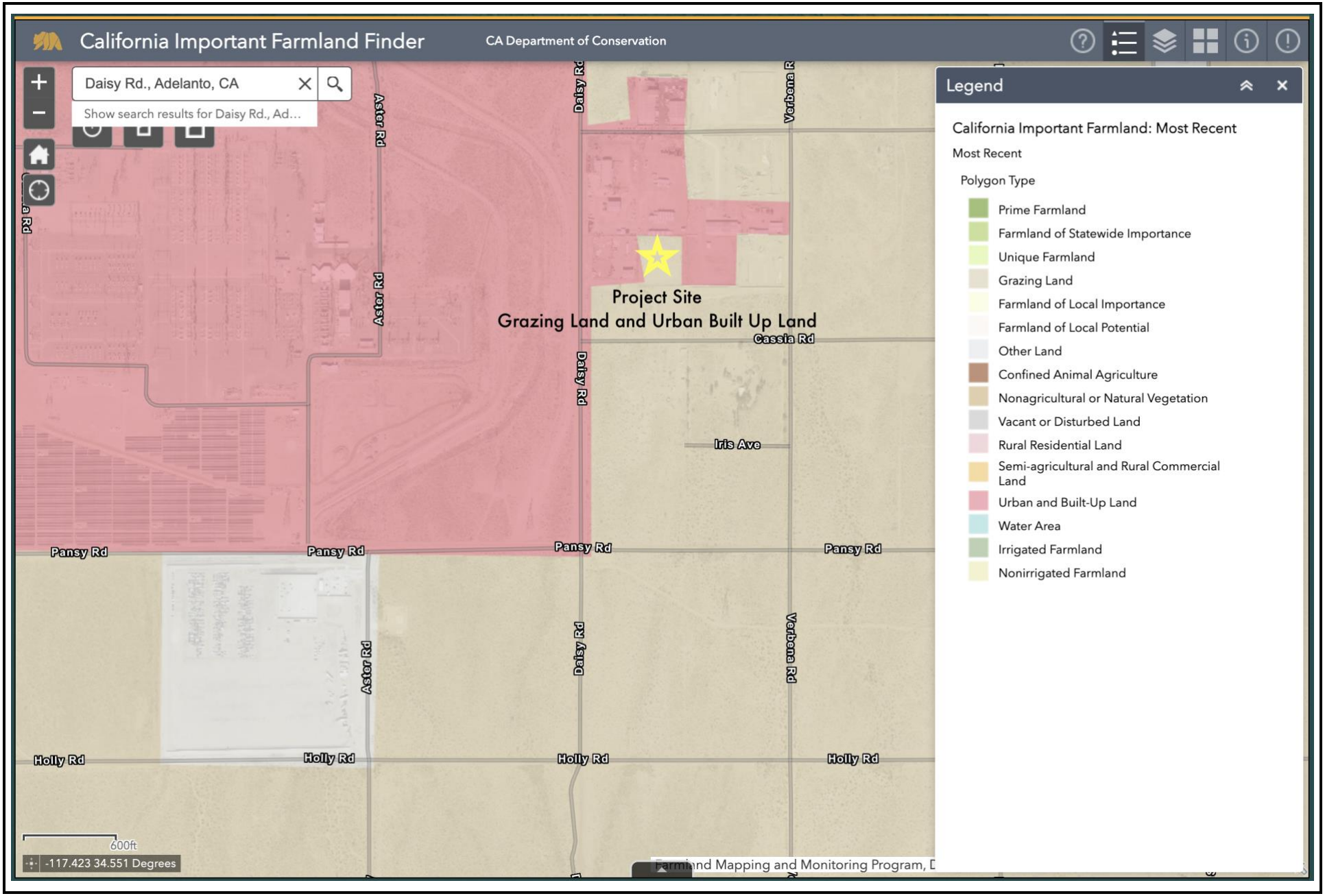


FIGURE II-1

Tom Dodson & Associates
Environmental Consultants

California Important Farmland Finder

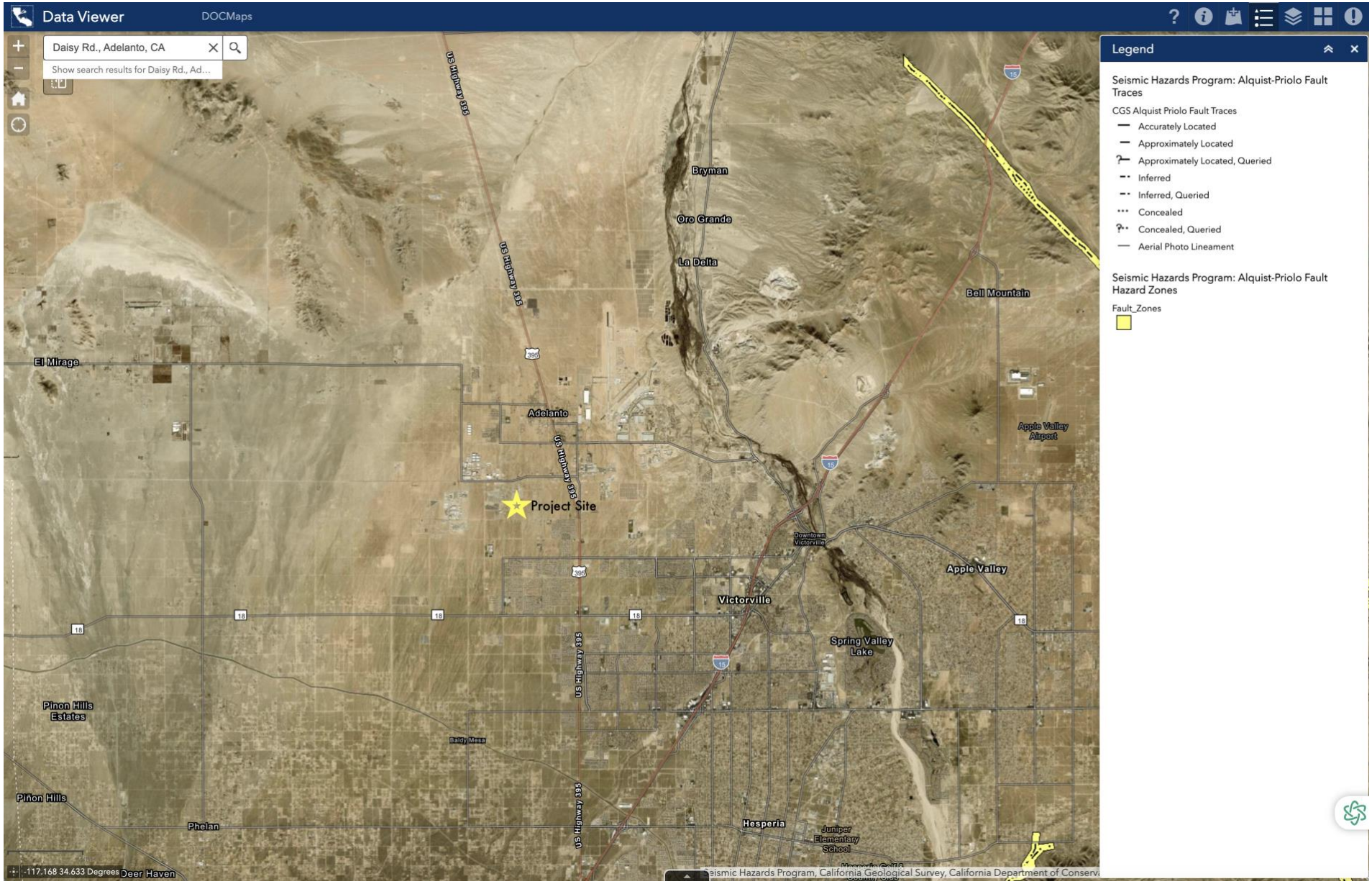


FIGURE VII-1

Tom Dodson & Associates
Environmental Consultants

Alquist Priolo Fault Traves and Fault Hazard Zones

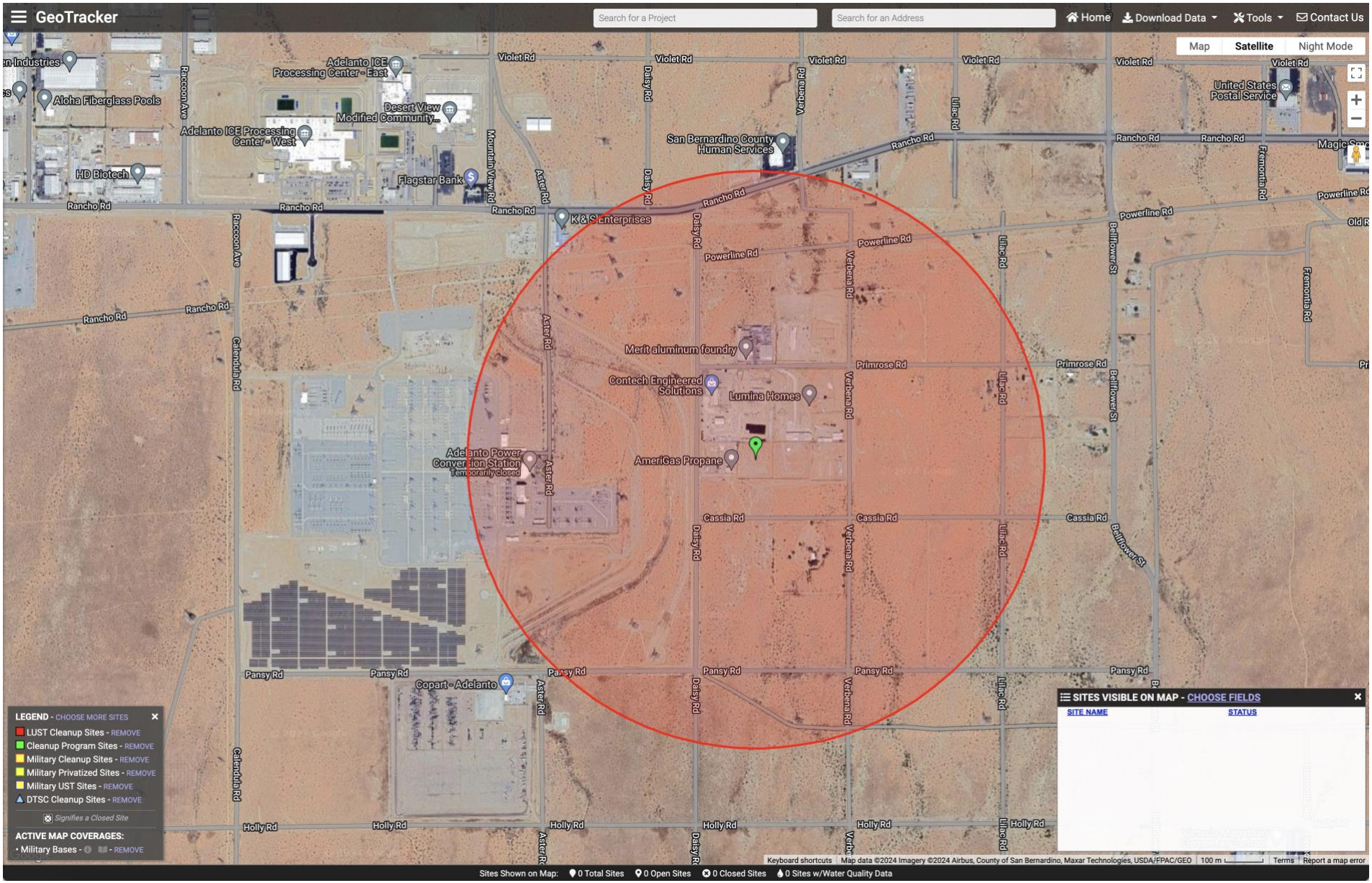


FIGURE IX-1

Tom Dodson & Associates
Environmental Consultants

GeoTracker

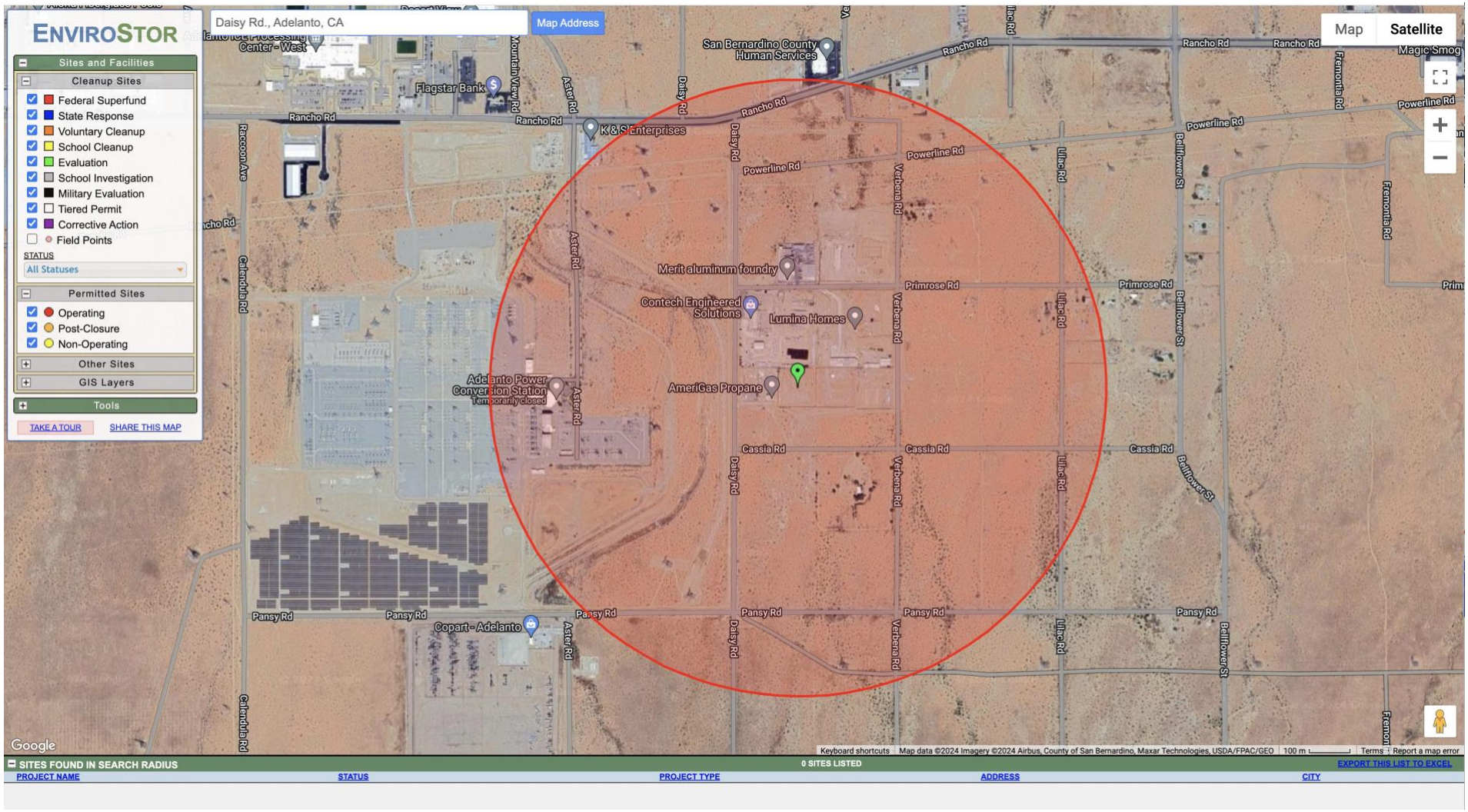


FIGURE IX-2

Tom Dodson & Associates
Environmental Consultants

EnviroStor

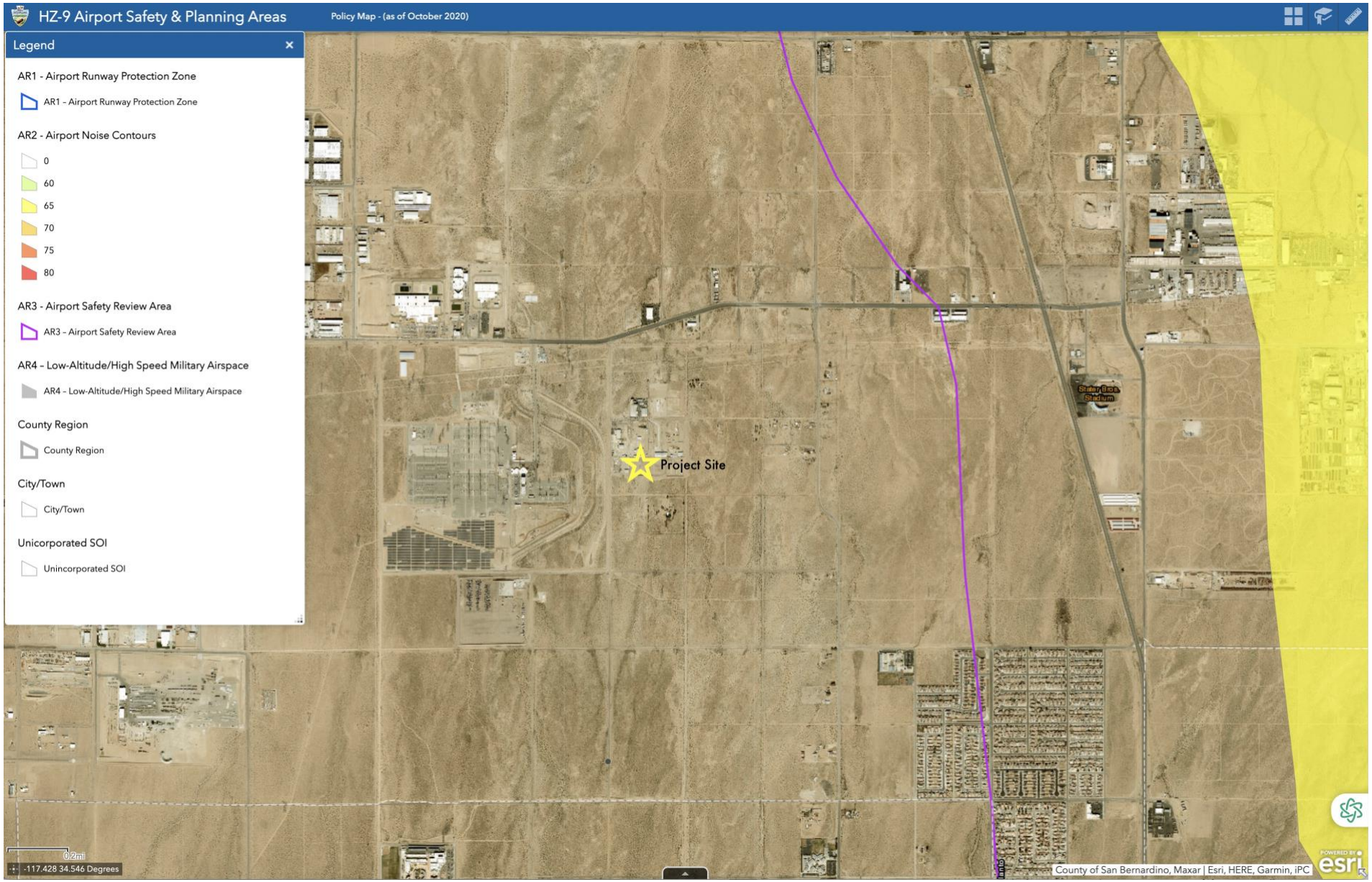


FIGURE IX-3

Tom Dodson & Associates
Environmental Consultants

Airport Safety & Planning Areas

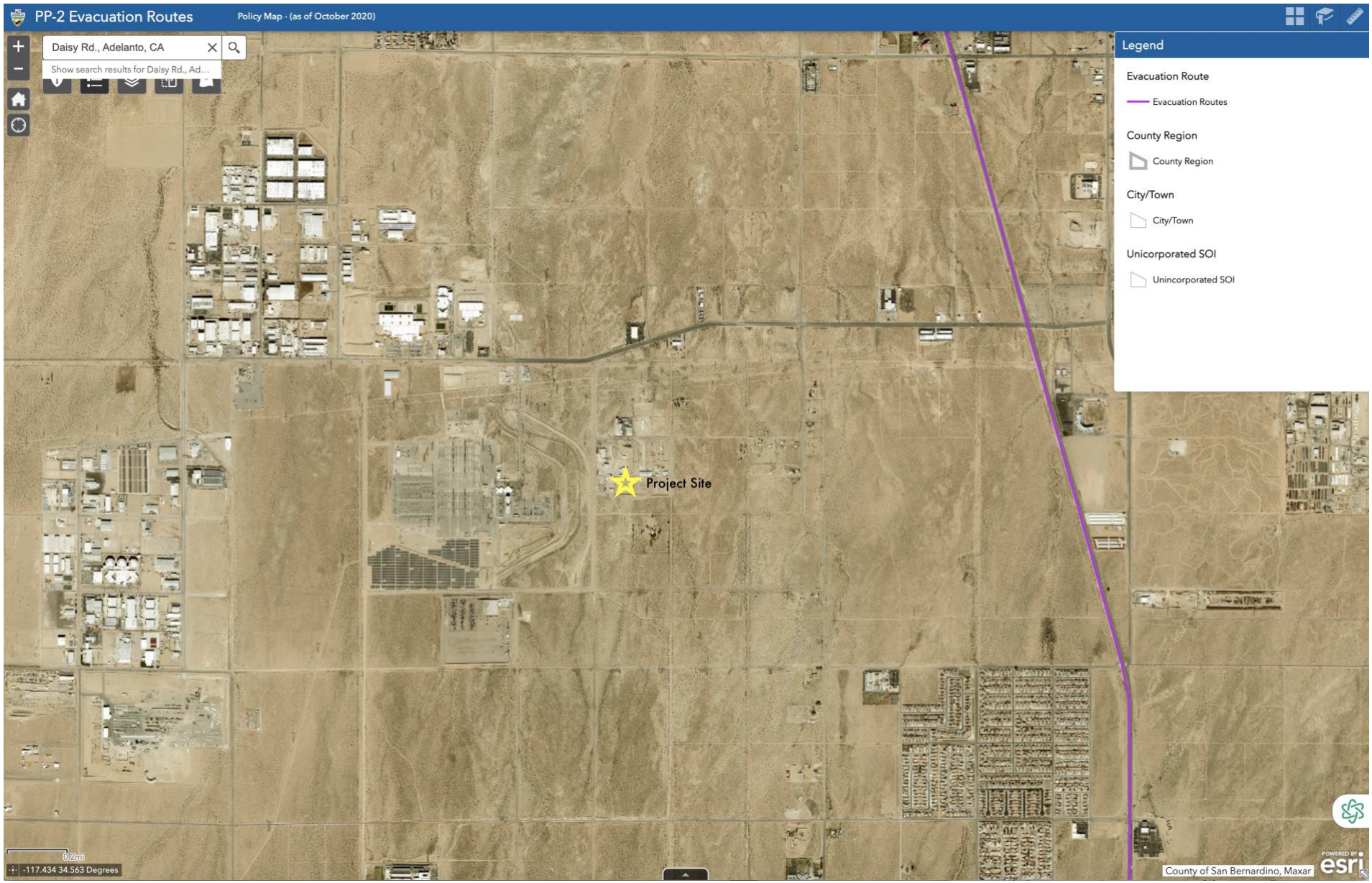


FIGURE IX-4

Tom Dodson & Associates
Environmental Consultants

Evacuation Routes

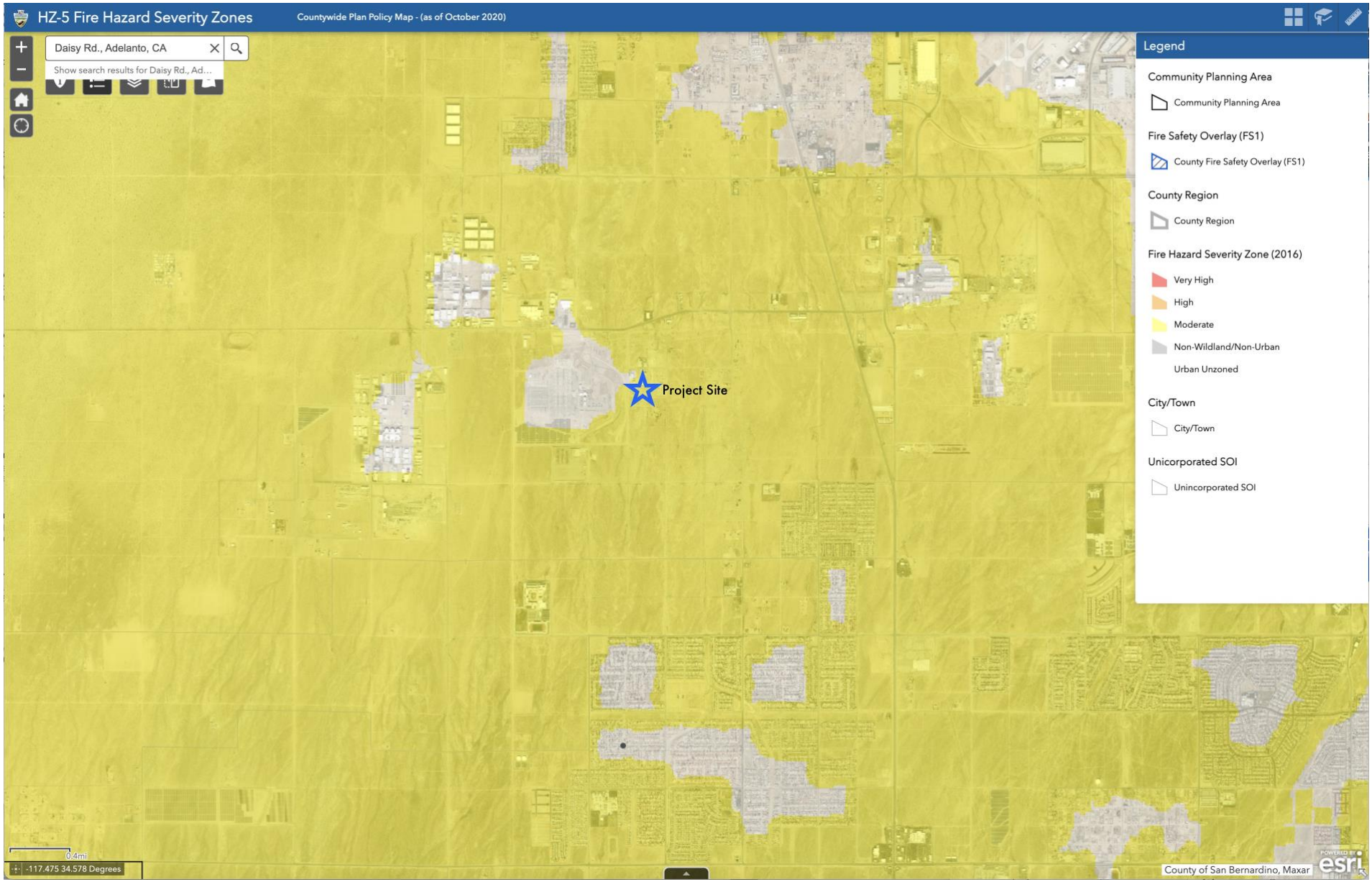


FIGURE IX-5

Tom Dodson & Associates
Environmental Consultants

Fire Hazard Severity Zones

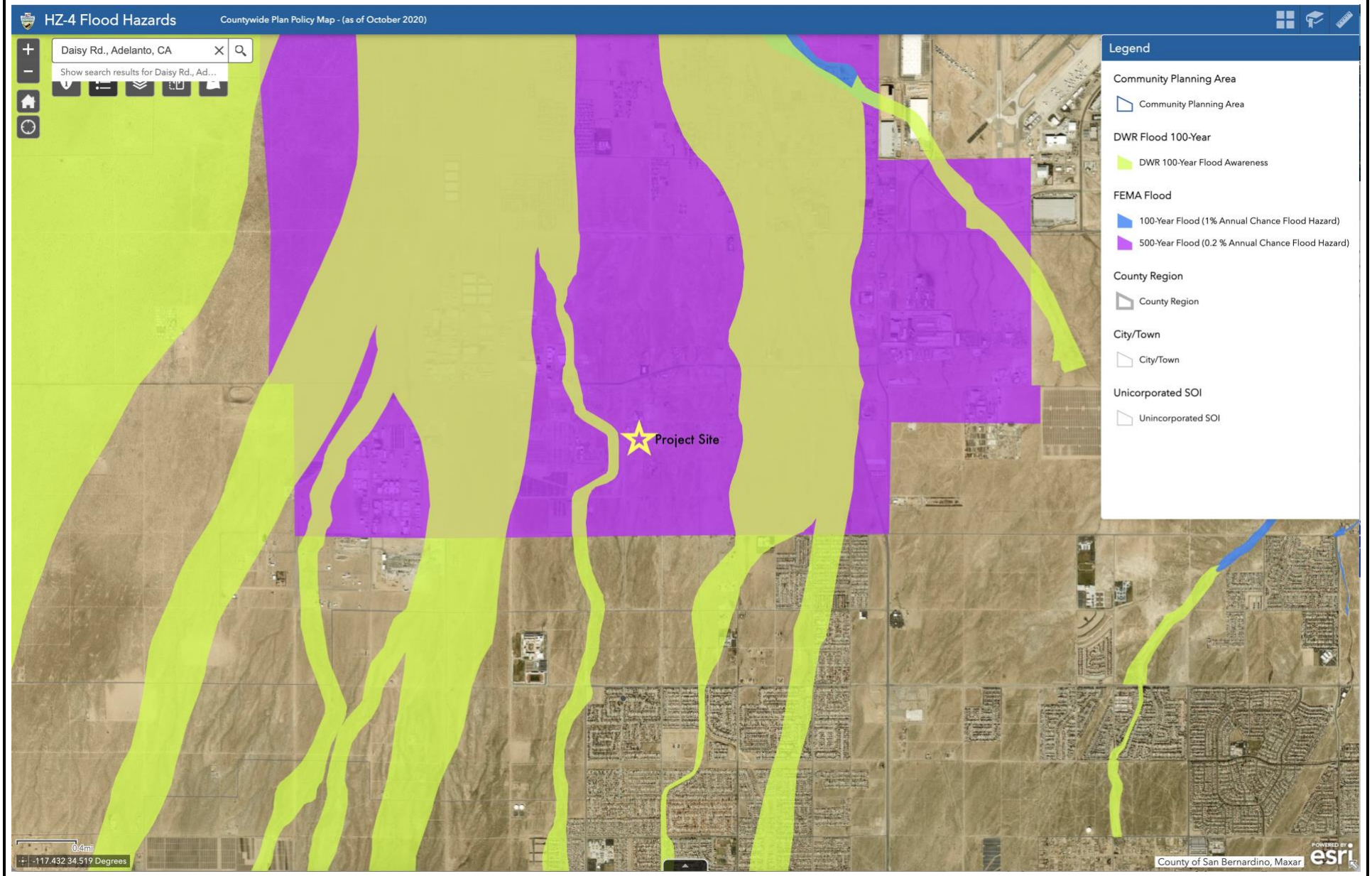


FIGURE X-1

Tom Dodson & Associates
Environmental Consultants

Flood Hazards

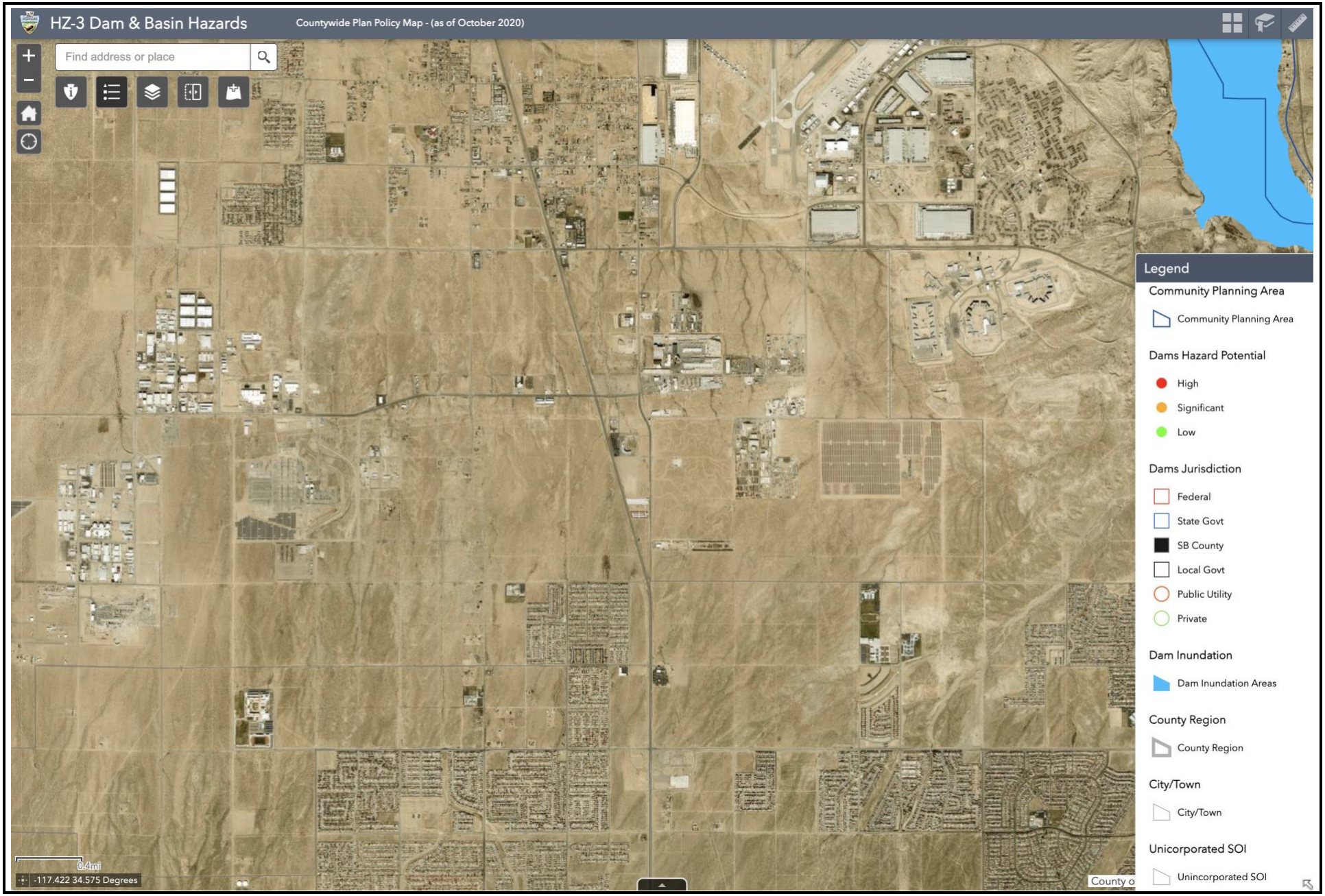


FIGURE X-2

Tom Dodson & Associates
Environmental Consultants

Dam and Basin Hazards

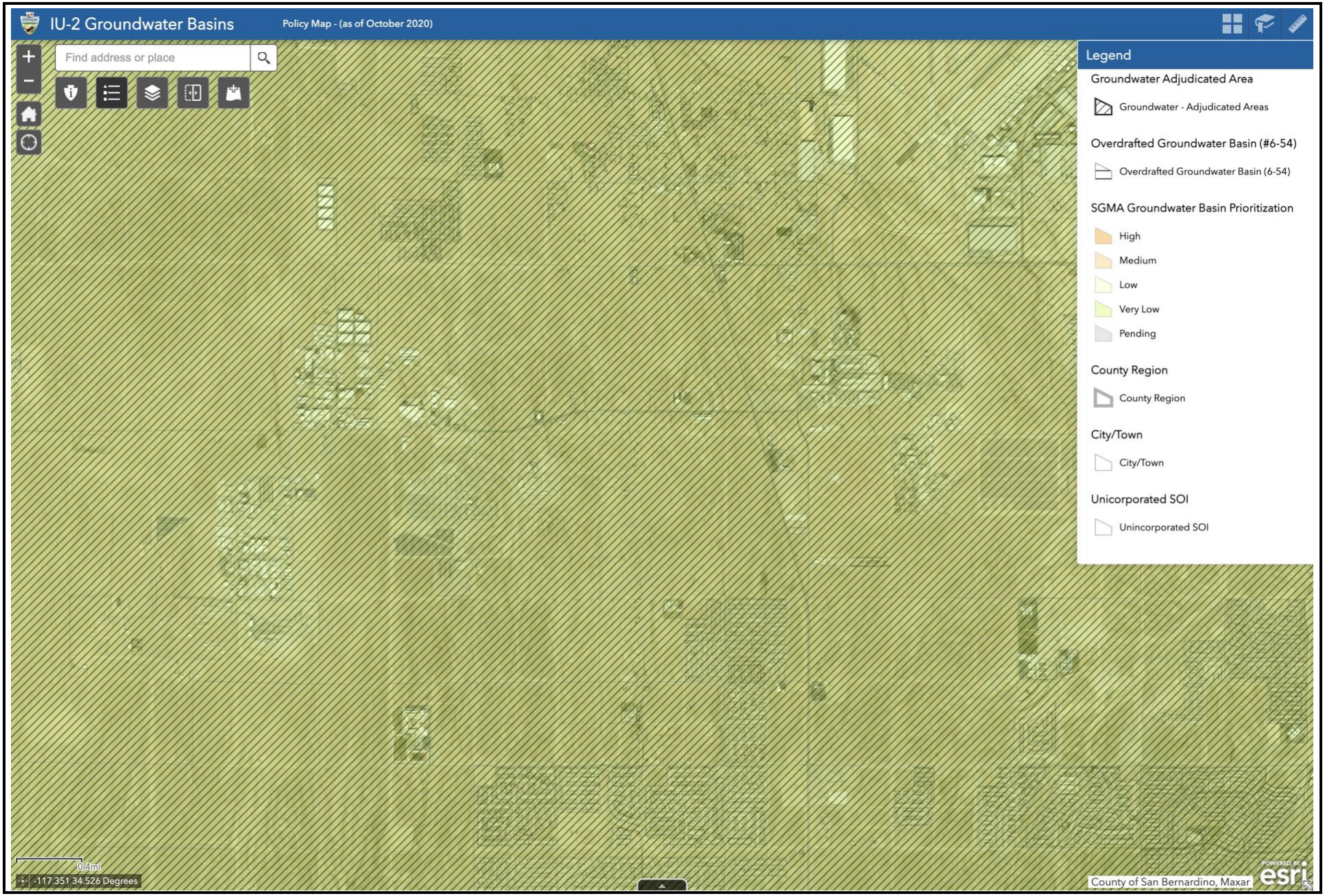


FIGURE X-3

Tom Dodson & Associates
Environmental Consultants

Groundwater Basins

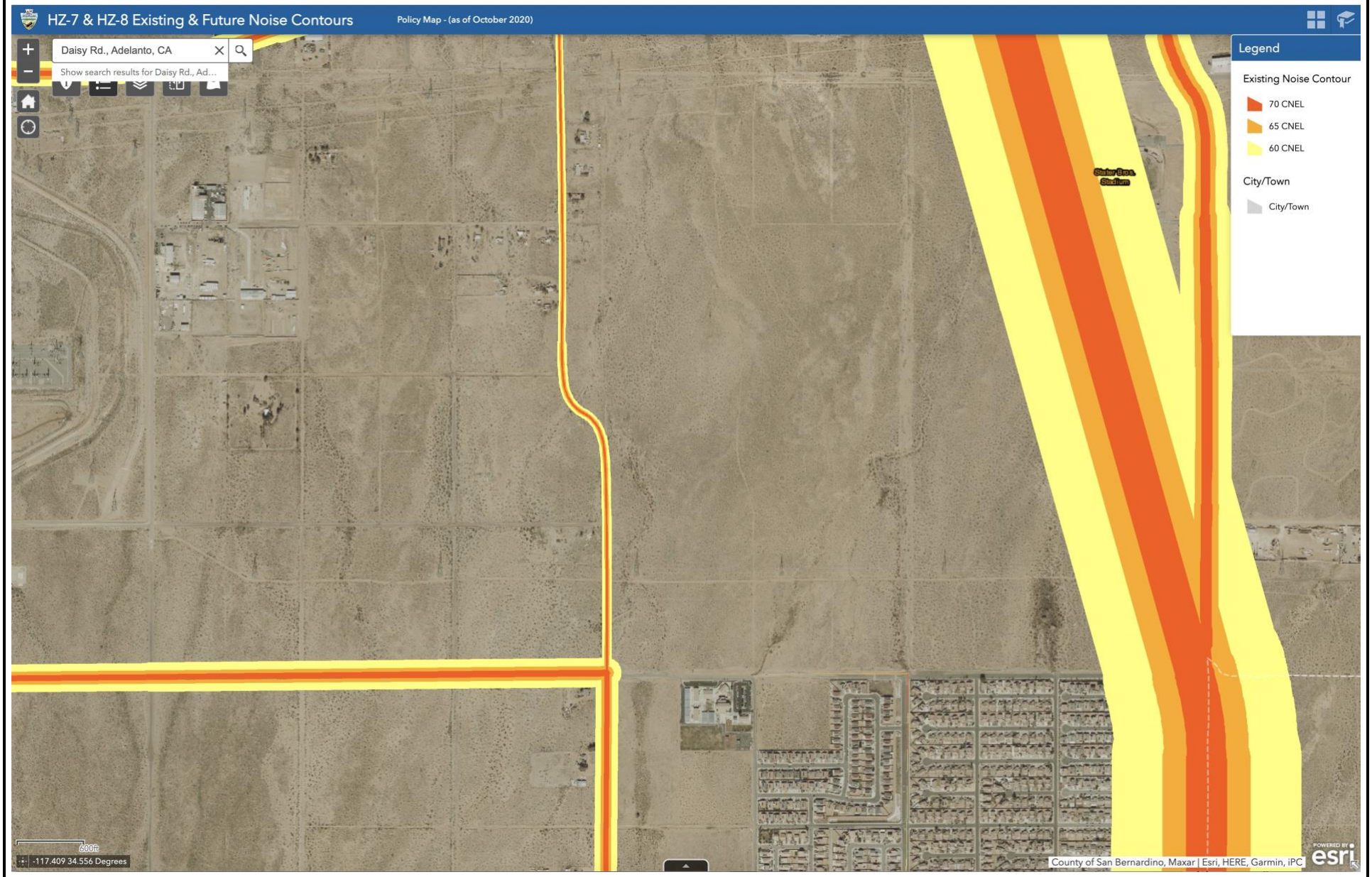


FIGURE XIII-1

Tom Dodson & Associates
Environmental Consultants

Noise Contours: Existing

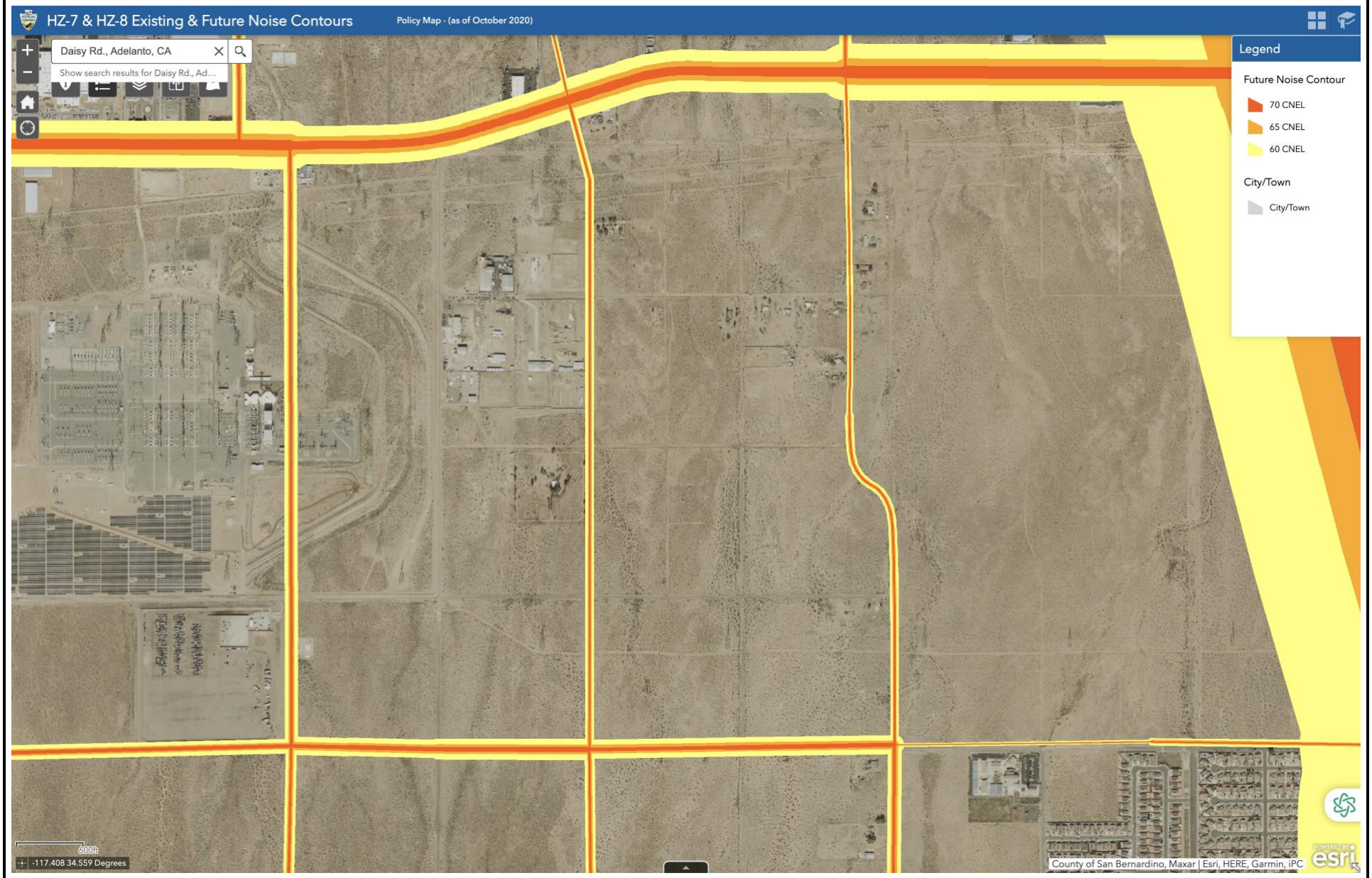


FIGURE XIII-2

Tom Dodson & Associates
Environmental Consultants

Noise Contours: Future

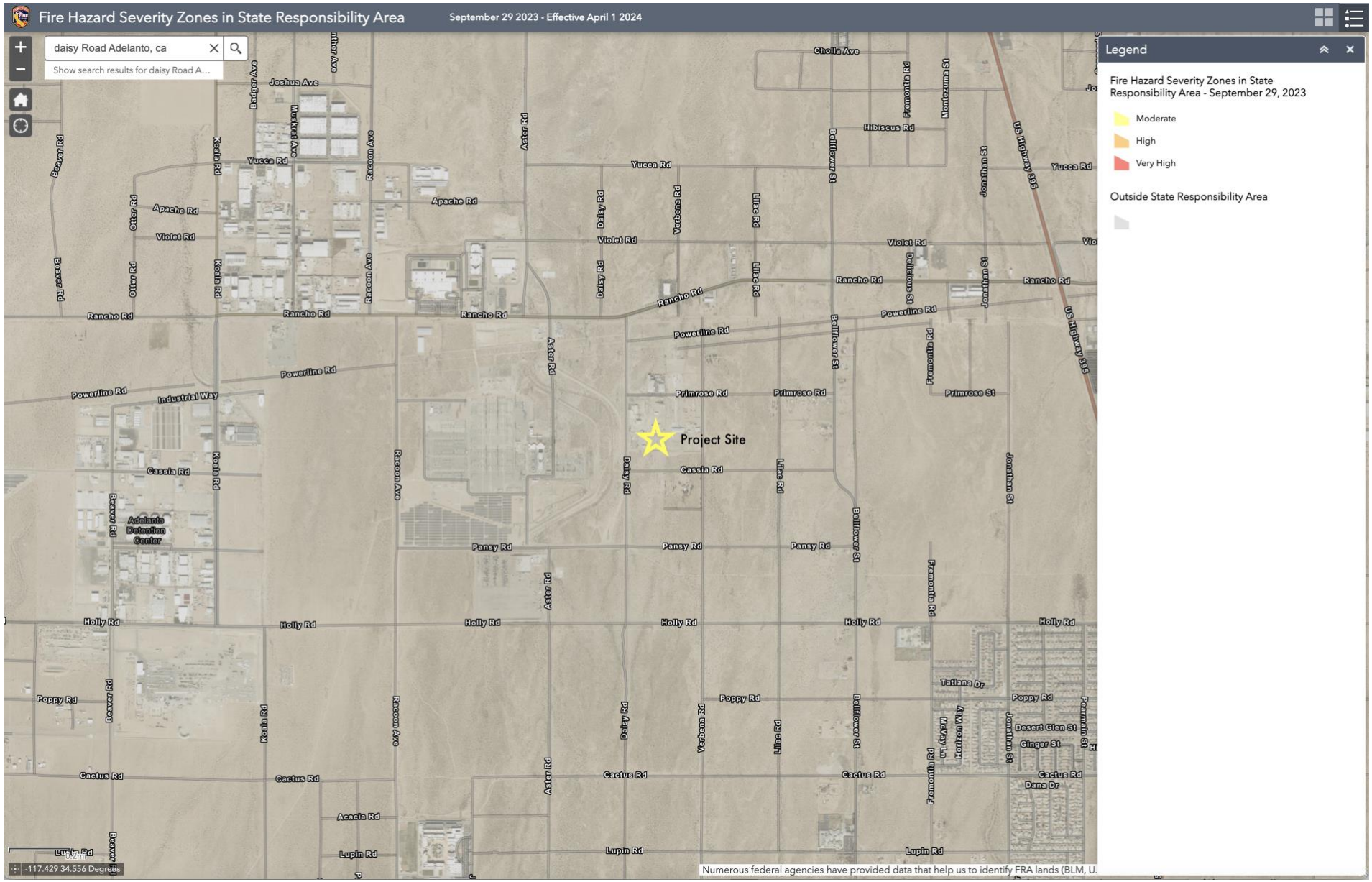


FIGURE XX-1

Tom Dodson & Associates
Environmental Consultants

Fire Hazard Severity Zones in State Responsibility Area

APPENDIX 1

Air Quality/GHG Analyses

MEMORANDUM

URBAN | CROSSROADS

DATE: February 11, 2025
TO: Kaitlyn Dodson-Hamilton, Tom Dodson & Associates
FROM: Haseeb Qureshi, Urban Crossroads, Inc.
Ali Dadabhoy
Shannon Wong
JOB NO: 16064-02 AQ & GHG Assessment

0 DAISY ROAD AIR QUALITY & GREENHOUSE GAS ASSESSMENT

Kaitlyn Dodson-Hamilton,

Urban Crossroads, Inc. is pleased to provide the following Air Quality & Greenhouse Gas Assessment for the 0 Daisy Road (**Project**), which is located east of Daisy Road and north of Cassia Road in the City of Adelanto (Assessor's Parcel Number [APN] 3128-101-17).

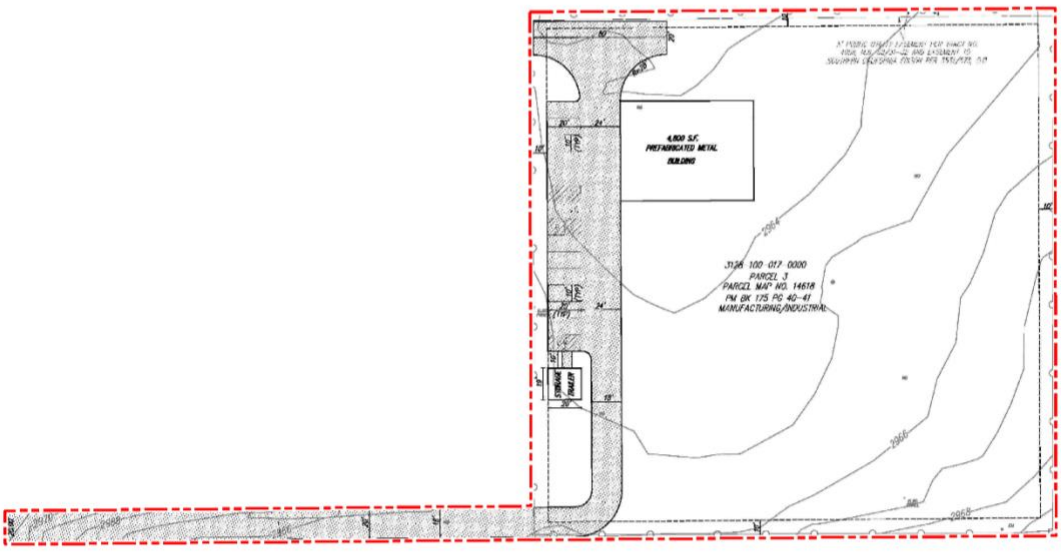
PROJECT OVERVIEW

It is our understanding that the Project is to consist of the development of an outdoor crane component and jobsite equipment storage yard on a 2.43-acre site. Storage of components would come into and out of the yard approximately once a quarter. The cranes would be coming into the property and leaving the property once every 6 months. The proposed Project is anticipated to have an opening year of 2024.

SUMMARY OF FINDINGS

Results of the assessment indicate that the Project would result in a less than significant with respect to air quality and greenhouse gases.

EXHIBIT 1: SITE PLAN



PROJECT AIR QUALITY IMPACTS

AIR QUALITY SETTING

MOJAVE DESERT AIR BASIN (MDAB)

The Project site is located in the portion of the County of San Bernardino, California, that is part of the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the MDAQMD. The air quality assessment for the proposed Project includes estimating emissions associated with short-term construction and long-term operation of the proposed Project. A number of air quality modeling tools are available to assess the air quality impacts of projects. In addition, certain air districts, such as the MDAQMD, have created guidelines and requirements to conduct air quality analyses. The MDAQMD's current guidelines, included in its *California Environmental Quality Act and Federal Conformity Guidelines* (August 2011), were adhered to in the assessment of air quality impacts for the proposed Project.

Regional Climate

Air quality in the Project area is not only affected by various emissions sources (mobile, industry, etc.) but is also affected by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall.

The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains that dot the vast terrain rise from 1,000 to 4,000 ft above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in Southern California by differential heating are channeled through the MDAB. The MDAB is separated from the Southern California coastal and central California valley regions by mountains (highest elevation is approximately 10,000 ft), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, separated from the San Gabriels by the Cajon Pass (4,200 ft). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley), whose primary channel is the San Gorgonio Pass (2,300 ft) between the San Bernardino and San Jacinto Mountains.

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

Snow is common above 5,000 ft in elevation, resulting in moderate snowpack and limited spring runoff. Below 5,000 ft, any precipitation normally occurs as rainfall. Pacific storm fronts normally move into the area from the west, driven by prevailing winds from the west and southwest. During late summer, moist high-pressure systems from the Pacific collide with rising heated air from desert areas, resulting in brief, high-intensity thunderstorms that can cause high winds and localized flash flooding.

Criteria Pollutants

Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3) (precursor emissions include NO_X and reactive organic gases (ROG), CO, particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The San Bernardino County portion of the MDAB is designated as a nonattainment area for the federal O_3 and $PM_{2.5}$ standards and is also a nonattainment area for the state standards for O_3, and PM_{10}.

REGULATORY BACKGROUND

FEDERAL REGULATIONS

The EPA is responsible for setting and enforcing the national ambient air quality standards (NAAQS) for O_3, CO, NO_X, SO_2, PM_{10}, and lead (Pb) (3). The EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of CARB.

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance (4). The CAA also mandates that each state submit and implement state implementation plans (SIPs) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions) (5) (6). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_X. NO_X is a collective term that includes all forms of NO_X which are emitted as byproducts of the combustion process.

CALIFORNIA REGULATIONS

CARB

The CARB, which became part of the California EPA (CalEPA) in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the California ambient air quality standards (CAAQS) for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO_4, visibility, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). However, at this time, H_2S and C_2H_3Cl are not measured at any monitoring stations in the MDAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS (1) (2).

Local air quality management districts, such as the MDAQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS.

Serious non-attainment areas are required to prepare Air Quality Management Plans (AQMP) that include specified emission reduction strategies in an effort to meet clean air goals. These plans are required to include:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g. motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a 5% or more annual reduction in emissions or 15% or more in a period of three years for ROGs, NO_X, CO and PM_{10}. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5% per year under certain circumstances.

AQMP

Currently, the NAAQS and CAAQS are exceeded in most parts of the MDAB. In regard to the NAAQS, the Project region within the MDAB is in nonattainment for ozone (8-hour) and PM_{10}. For the CAAQS, the Project region within the MDAB is in nonattainment for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5}$. In response, the MDAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards (3). AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

APPLICABLE REGULATORY REQUIRMENTS

MDAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings) (8) (5).

MDAQMD Rule 403

This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth moving and grading activities. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All onsite roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

MDAQMD Rule 1113

This rule serves to limit the volatile organic compound (VOC) content of architectural coatings used on projects in the MDAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the MDAQMD must comply with the current VOC standards set in this rule.

METHODOLOGY

In August 2023, the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including MDAQMD, released the latest version of the CalEEMod

Version 2022.1.1.23. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (12). Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality and greenhouse gas emissions.

Standards of Significance

The criteria used to determine the significance of potential Project-related air quality impacts are taken from the California Environmental Quality Act Guidelines (CEQA Guidelines) (14 CCR §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to air quality if it would (13):

- **Threshold 1**: Conflict with or obstruct implementation of the applicable air quality plan.
- **Threshold 2**: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.
- **Threshold 3**: Expose sensitive receptors to substantial pollutant concentrations.
- **Threshold 4**: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

AIR QUALITY REGIONAL EMISSIONS THRESHOLDS

The MDAQMD has developed regional significance thresholds for criteria pollutants, as summarized at Table 1 (12). The MDAQMD's CEQA and Federal Conformity Guidelines (February 2020) indicate that any projects in the Mojave Desert Air Basin (MDAB) with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

TABLE 1: MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Construction/Operations
CO	548 lbs/day
NO_X	137 lbs/day
VOC	137 lbs/day
SO_X	137 lbs/day
PM_{10}	82 lbs/day
$PM_{2.5}$	65 lbs/day

lbs/day – Pounds Per Day

CONSTRUCTION ACTIVITIES

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

- Site Preparation
- Grading (Import/Export)
- Building Construction
- Paving
- Architectural Coating

GRADING ACTIVITIES

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions". Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. This analysis assumes that earthwork activities are expected to balance on site and no import or export of soils would be required. The CalEEMod default trip length of 20-miles will be used to analyze the emissions associated with export activities.

OFF-SITE UTILITY AND INFRASTRUCTURE IMPROVEMENTS

To support the Project development, the Project will include improvement to the dirt road from Daisy Road east to the southwest corner of the project site, a distance of 330 feet. The only utility connection needed for the project is electricity for the high-mast lighting and activation of the gate. Construction emissions from this off-site work would, therefore, be relatively short term, not concentrated in one area. The physical constraints would limit the amount of construction equipment that could be used, and any off-site and utility infrastructure construction would not use equipment totals that would exceed the equipment totals. As such, no impacts beyond what has already been identified in this report are expected to occur.

ON-ROAD TRIPS

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. Worker and hauling trips are based on CalEEMod defaults. It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity.

CONSTRUCTION DURATION

For purposes of analysis, construction of Project is expected to commence in October 2024 and would last through December 2024. The construction schedule utilized in the analysis represents a "conservative" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent[1]. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines (16).

CONSTRUCTION EQUIPMENT

CalEEMod default parameters for equipment have been used. Consistent with industry standards and typical construction practices, each piece of equipment will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code.

REGIONAL CONSTRUCTION EMISSIONS SUMMARY

The estimated maximum daily construction emissions without mitigation are summarized on Table 2. Detailed construction model outputs are presented in Attachment A. Under the assumed scenarios, emissions resulting from the Project construction will not exceed thresholds established by the MDAQMD for emissions of any criteria pollutant and no mitigation is required.

TABLE 2: REGIONAL CONSTRUCTION EMISSIONS SUMMARY

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Winter						
2024	30.31	19.53	23.55	0.04	3.33	1.95
Maximum Daily Emissions	**30.31**	**19.53**	**23.55**	**0.04**	**3.33**	**1.95**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

[1]PM_{10} and $PM_{2.5}$ source emissions reflect 3x daily watering per MDAQMD Rule 403 for fugitive dust.

[1] As shown in the CalEEMod User's Guide Version 2022, Appendix G "Table G-11. Statewide Average Annual Offoad Equipment Emission Factors" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

REGIONAL OPERATIONAL EMISSIONS

Operational activities associated with the Project would result in emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Operational related emissions are expected from the following primary sources: area source emissions, energy source emissions, and mobile source emissions.

The Project related operational air quality impacts derive primarily from vehicle trips generated by the Project. Trip generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) for the Specialty Trade Contractor (ITE Land Use Code 180) land use category were utilized in this analysis (17).

The estimated operation-source emissions from the Project are summarized on Table 3. Detailed operation model outputs are presented in Attachment A. As shown on Table 3, operational-source emissions would not exceed the applicable MDAQMD regional thresholds for emissions of any criteria pollutant and no mitigation is required.

TABLE 3: TOTAL PROJECT REGIONAL OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	0.00	0.20	0.05	0.00	0.05	0.02
Area Source	0.17	0.00	0.22	0.00	0.00	0.00
Energy Source	0.00	0.03	0.02	0.00	0.00	0.00
Total Maximum Daily Emissions	**0.17**	**0.23**	**0.29**	**0.00**	**0.05**	**0.02**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Mobile Source	0.00	0.21	0.05	0.00	0.05	0.02
Area Source	0.13	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.03	0.02	0.00	0.00	0.00
Total Maximum Daily Emissions	**0.14**	**0.24**	**0.07**	**0.00**	**0.05**	**0.02**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 1

Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The Federal Particulate Matter Attainment Plan and Ozone Attainment Plan for the Mojave Desert set forth a comprehensive set of programs that will lead the MDAB into compliance with federal and state air quality standards. The control measures and related emission reduction estimates within the Federal Particulate Matter Attainment Plan and Ozone Attainment Plan are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly,

conformance with these attainment plans for development projects is determined by demonstrating compliance the indicators discussed below:

Consistency Criterion No. 1

The City of Adelanto General Plan designates the Project site for "Manufacturing/Industrial (MI)" uses. The primary purpose of areas designated "MI" is to minimize exposure to its surroundings from more employment-intensive developments such as correctional facilities, controlled hazard uses, renewable energy facilities, manufacturing, distribution and warehousing, and automotive related businesses. The Manufacturing/Industrial designation allows for a maximum FAR of 0.60 (15).

The Project would develop an outdoor crane component and jobsite equipment storage yard on 2.43 acres, which is consistent with the City of Adelanto General Plan land use designation. Additionally, it should be noted that the proposed development would not exceed regional thresholds for operational emissions and would therefore be considered to have a less than significant impact. As such, the development proposed by the Project is consistent with the growth projections in the General Plan and is therefore considered to be consistent with the AQMP.

Consistency Criterion No. 2

All MDAQMD Rules and Regulations

The Project would be required to comply with all applicable MDAQMD Rules and Regulations, including, but not limited to Rules 401 (Visibile Emissions), 402 (Nuisance), and 403 (Fugitive Dust).

Consistency Criterion No. 3

Demonstrating that the project will not increase the frequency or severity of a violation in the federal or state ambient air quality standards

Consistency Criterion No. 3 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional significance thresholds were exceeded. As evaluated, the Project's regional construction and operational emissions would not exceed applicable regional significance thresholds. As such, a less than significant impact is expected

AQMP Consistency Conclusion

The Project would not have the potential to result in or cause NAAQS or CAAQS violations. Additionally, Project construction and operational-source emissions would not exceed the regional or localized significance thresholds. Further, the Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The Project is therefore considered to be consistent with the AQMP.

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 2

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

The MDAQMD relies on the SCAQMD guidance for determining cumulative impacts. The SCAQMD has recognized that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (11). In this report the SCAQMD clearly states (Page D-3):

> *"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Construction Impacts

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project construction-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, the proposed Project construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

Operational Impacts

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project operational-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, the proposed Project operational-source emissions would be considered less than significant on a project-specific and cumulative basis.

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 3

Would the expose sensitive receptors to substantial pollutant concentrations?

The potential impact of Project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. The nearest sensitive receptor is the existing residence located at 11051 Cassia Road, approximately 611 feet south of the Project site.

As per the MDAQMD Guidelines, the following project types located within a specified distance to an existing or planned sensitive receptor land use must be evaluated to determine exposure of substantial pollutant concentrations to sensitive receptors (18):

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The proposed Project consists of outdoor crane components and jobsite equipment storage yard on a 2.43-acre site. Although the Project site would be considered an industrial use and is located within 1,000 feet of existing residential uses, the Project as shown in Table 2 would be well below the applicable thresholds and would not expose sensitive receptors to substantial pollutant concentrations. Therefore, sensitive receptors would not be subject to a significant air quality impact during Project construction and operational activities.

CO "HOT SPOT" ANALYSIS

As discussed below, the Project would not result in potentially adverse CO concentrations or "hot spots." An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak

morning and afternoon time periods[2]. This "hot spot" analysis did not predict any exceedance of the 1-hour (20.0 ppm) or 8-hour (9.0 ppm) CO standards, as shown on Table 4.

TABLE 4: CO MODEL RESULTS

Intersection Location	CO Concentrations (ppm)		
	Morning 1-hour	Afternoon 1-hour	8-hour
Wilshire Boulevard/Veteran Avenue	4.6	3.5	3.7
Sunset Boulevard/Highland Avenue	4	4.5	3.5
La Cienega Boulevard/Century Boulevard	3.7	3.1	5.2
Long Beach Boulevard/Imperial Highway	3	3.1	8.4

Notes: Federal 1-hour standard is 35 ppm and the deferral 8-hour standard is 9.0 ppm.

It should be noted that MDAQMD has not established its own guidelines for CO hotspots analysis. Since the MDAQMD guidelines are based on SCAQMD methodology, it is appropriate to apply the SCAQMD criteria when analyzing CO hotspots within the MDAQMD. Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (*1992 CO Plan*), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, of the 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. intersection (i.e., the highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared (24). In contrast, an adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur.

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (21). Traffic volumes generating the CO concentrations for the "hot spot" analysis is shown on Table 5. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively (20).

The proposed Project considered herein would generate 3 trips and would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the proposed Project.

[2] The CO "hot spot" analysis conducted in 2003 is the most current study used for CO "hot spot" analysis in the SCAB.

Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

TABLE 5: CO MODEL RESULTS

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Wilshire Boulevard/Veteran Avenue	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset Boulevard/Highland Avenue	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374
La Cienega Boulevard/Century Boulevard	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach Boulevard/Imperial Highway	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 4

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

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

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

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with MDAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with

the proposed Project construction and operations would be less than significant and no mitigation is required (19).

PROJECT GHG ANALYSIS

CLIMATE CHANGE SETTING

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

An individual project like the proposed Project evaluated in this memo cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, this memo will evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

REGULATORY SETTING

Executive Order S-3-05

Former California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80% below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Assembly Bill (AB) 32

The California State Legislature enacted AB 32, which requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. "GHGs" as defined under AB 32 include CO_2, CH_4, N_2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

> *"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."*

CARB approved the 1990 GHG emissions level of 427 million metric ton of CO_2 equivalent per year ($MMTCO_2e$) on December 6, 2007 (27). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 $MMTCO_2e$. Emissions in 2020 in a "business as usual" (BAU) scenario were estimated to be 596 $MMTCO_2e$, which do not account for reductions from AB 32 regulations (28). At that level, a 28.4% reduction was required to achieve the 427 $MMTCO_2e$ 1990 inventory. In October 2010, CARB prepared an updated BAU 2020 forecast to account for the recession and slower forecasted growth. The forecasted inventory without the benefits of adopted regulation is now estimated at 545 $MMTCO_2e$. Therefore, under the updated forecast, a 21.7% reduction from BAU is required to achieve 1990 levels (29).

Progress in Achieving AB 32 Targets and Remaining Reductions Required

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The progress is shown in updated emission inventories prepared by CARB for 2000 through 2012 (30). The State has achieved the Executive Order S-3-05 target for

2010 of reducing GHG emissions to 2000 levels. As shown below, the 2010 emission inventory achieved this target.

- 1990: 427 $MMTCO_2e$ (AB 32 2020 target)
- 2000: 463 $MMTCO_2e$ (an average 8% reduction needed to achieve 1990 base)
- 2010: 450 $MMTCO_2e$ (an average 5% reduction needed to achieve 1990 base)

CARB has also made substantial progress in achieving its goal of achieving 1990 emissions levels by 2020. As described earlier in this section, CARB revised the 2020 BAU inventory forecast to account for new lower growth projections, which resulted in a new lower reduction from BAU to achieve the 1990 base. The previous reduction from 2020 BAU needed to achieve 1990 levels was 28.4% and the latest reduction from 2020 BAU is 21.7%.

- 2020: 545 $MMTCO_2e$ BAU (an average 21.7% reduction from BAU needed to achieve 1990 base)

Senate Bill (SB) 32

On September 8, 2016, Governor Jerry Brown signed the SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (31).

AB 197

A condition of approval for SB 32 was the passage of AB 197. AB 197 requires that CARB consider the social costs of GHG emissions and prioritize direct reductions in GHG emissions at mobile sources and large stationary sources. AB 197 also gives the California legislature more oversight over CARB through the addition of two legislatively appointed members to the CARB Board and the establishment a legislative committee to make recommendations about CARB programs to the legislature.

Executive Order B-55-18 and SB 100

Executive Order B-55-18 and SB 100. SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural

Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

Title 24 California Code of Regulations (CCR)

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, industrial, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023[3]. As construction of the Project is anticipated to be completed in 2024, the Project would be required to comply with the Title 24 standards in place at that time.

MDAQMD

According to the MDAQMD's *CEQA and Federal Conformity Guidelines*, a project is significant if it triggers or exceeds the most appropriate evaluation criteria. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO_2e (90,718.5 $MTCO_2e$) per year is sufficient (18). A significant project must incorporate mitigation sufficient to reduce its impact to a level that is not significant. A project that cannot be mitigated to a level that is not significant must incorporate all feasible mitigation.

GHG IMPACTS

Standards of Significance

According to the CEQA Guidelines Appendix G thresholds, to determine whether impacts from GHG emissions are significant. Would the project:

- **Threshold 1**: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- **Threshold 2**: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the CEQA Guidelines Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by

[3] The 2022 California Green Building Standard Code will be published July 1, 2022.

experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

Discussion on Establishment of Significance Thresholds

The City of Adelanto has not adopted its own numeric threshold of significance for determining impacts with respect to greenhouse (GHG) emissions, thus the MDAQMD threshold of 90,718.5 $MTCO_2e$ per year will be utilized. If Project-related GHG emissions do not exceed the 90,718.5 $MTCO_2e$ per year threshold, then Project-related GHG emissions would clearly have a less-than-significant impact pursuant to Threshold GHG-1. On the other hand, if Project-related GHG emissions exceed 90,718.5 $MTCO_2e$ per year, the Project would be considered a substantial source of GHG emissions.

GHG IMPACTS – CONSISTENCY WITH THRESHOLD NO. 1

Would the Project have the potential to generate direct or indirect GHG emissions that would result in a significant impact on the environment?

PROJECT GHG EMISSIONS

The estimated GHG emissions for the Project land use are summarized on Table 6. The estimated GHG emission includes emissions from Carbon Dioxide (CO_2), Methane (CH_4), Nitrous Oxide (N_2O), and Refrigerants (R). As shown on Table 6, the Project would generate a total of

approximately 52.01 $MTCO_2e$/yr. Detailed operation model outputs for the proposed Project are presented in Attachment A.

TABLE 6: TOTAL PROJECT GHG EMISSIONS

Source	Emission (MT/year)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	1.70	6.87E-05	1.69E-05	8.28E-05	1.71
Mobile	20.62	0.00	0.00	0.02	21.61
Area	0.08	0.00	0.00	0.00	0.08
Energy	22.88	0.00	0.00	0.00	23.00
Water	2.85	0.04	0.00	0.00	4.11
Waste	0.43	0.04	0.00	0.00	1.51
Total CO_2e (All Sources)	**52.01**				

The City of Adelanto has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO_2e (90,718.5 $MTCO_2e$) per year is sufficient to determine if additional analysis is required (41).

As shown in Table 6, the Project would result in approximately 52.01 $MTCO_2e$/yr; the proposed Project would not exceed the screening threshold of 90,718.5 $MTCO_2e$/yr. Thus, project-related emissions would not have a significant direct or indirect impact on GHG, and climate change and no mitigation or further analysis is required.

GHG IMPACTS – CONSISTENCY WITH THRESHOLD NO. 2

Would the Project have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (36).

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon (37).

Finally, the Project is consistent with the general plan land use designation, density, building intensity, and applicable policies specified for the Project area in SCAG's Sustainable Community Strategy/Regional Transportation Plan, which pursuant to SB 375 calls for the integration of transportation, land-use and housing policies to plan for achievement of the GHG-emissions

target for the region. Thus, a less than significant impact related to GHG emissions from Project construction and operation would occur and no mitigation is required.

CONCLUSION

Results of the assessment indicate that the Project is not anticipated to result in a significant impact during construction or operational activities associated with air quality and greenhouse gases.

REFERENCES

1. **United States Environmental Protection Agency.** National Ambient Air Quality Standards (NAAQS). [Online] 1990. https://www.epa.gov/environmental-topics/air-topics.

2. **Environmental Protection Agency.** Air Pollution and the Clean Air Act. [Online] http://www.epa.gov/air/caa/.

3. **1990 Clean Air Act Amendment Summary: Title I. [Online] https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary-title-i.**

4. **United States Environmental Protection Agency. 1990 Clean Air Act Amendment Summary: Title II. [Online] https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary-title-ii.**

5. **Air Resources Board. California Ambient Air Quality Standards (CAAQS). [Online] 2009. [Cited: April 16, 2018.] http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm.**

6. **Environmental Protection Agency. National Ambient Air Quality Standards (NAAQS). [Online] 1990. https://www.epa.gov/environmental-topics/air-topics.**

7. **California Air Resources Board. Western Mojave Desert Air Quality Management Plans. [Online] https://www.arb.ca.gov/planning/sip/planarea/mojavesedsip.htm.**

8. **Mojave Desert Air Quality Management District. Rule 403 Fugitive Dust Control for the Mojave Desert Planning Area. [Online] https://www.mdaqmd.ca.gov/home/showpublisheddocument/8482/637393282546170000.**

9. **—. Rule 1113 Architectural Coatings. [Online] http://mdaqmd.ca.gov/home/showdocument?id=418.**

10. **California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod). [Online] May 2022. www.caleemod.com.**

11. **State of California. *2020 CEQA California Environmental Quality Act.* 2020.**

12. **Mojave Desert Air Quality Management District. California Environmental Quality Act (CEQA) and Federal Conformity Guidelines. [Online] February 2020. https://www.mdaqmd.ca.gov/home/showpublisheddocument/8510/638126583450270000.**

13. **State of California. *2020 CEQA California Environmental Quality Act.* 2020.**

14. **Institute of Transportation Engineers. *Trip Generation Manual.* 11th Edition. 2021.**

15. **City of Adelanto. City of Adelanto General Plan. [Online] https://www.ci.adelanto.ca.us/352/City-of-Adelanto-General-Plan.**

16. **Goss, Tracy A and Kroeger, Amy. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. [Online] South Coast Air Quality Management District, 2003. http://www.aqmd.gov/rules/ciwg/final_white_paper.pdf.**

17. South Coast Air Quality Management District. 2003 Air Quality Management Plan. [Online] 2003. https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp.

18. Mojave Desert Air Quality Management District. RULE 402 NUISANCE. [Online] https://www.mdaqmd.ca.gov/home/showpublisheddocument/290/636305704801500000.

19. California Air Resources Board. GHG 1990 Emissions Level & 2020 Limit. *California Air Resources Board.* [Online] https://ww2.arb.ca.gov/ghg-2020-limit.

20. —. *Climate Change Draft Scoping Plan.* 2008.

21. —. STATUS OF SCOPING PLAN RECOMMENDED MEASURES. [Online] [Cited: September 19, 2019.] https://ww3.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

22. —. *First Update to the Climate Change Scoping Plan.* 2014.

23. California Legislative Information. Senate Bill No. 32. [Online] September 8, 2016. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.

24. Mojve Desert Air Quality Management District. *MDAQMD CEQA Guidelines.* 2016.

25. Association of Environmental Professionals. *2018 CEQA California Environmental Quality Act.* 2018.

ATTACHMENT A
CALEEMOD PROJECT EMISSIONS MODEL OUTPUTS

16064 - 0 Daisy Road Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	16064 - 0 Daisy Road
Construction Start Date	10/1/2024
Operational Year	2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.80
Precipitation (days)	1.40
Location	34.551698, -117.428638
County	San Bernardino-Mojave Desert
City	Adelanto
Air District	Mojave Desert AQMD
Air Basin	Mojave Desert
TAZ	5104
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southwest Gas Corp.
App Version	2022.1.1.24

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Unrefrigerated Warehouse-No Rail	5.14	1000sqft	0.12	5,140	93,851	—	—	—
Parking Lot	11.0	Space	2.31	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	30.8	30.3	19.5	23.5	0.04	1.08	2.25	3.33	1.00	0.95	1.95	—	3,993	3,993	0.16	0.04	0.03	4,010
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.38	0.34	1.56	1.69	< 0.005	0.07	0.02	0.09	0.06	0.01	0.07	—	309	309	0.01	< 0.005	0.01	310
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.07	0.06	0.29	0.31	< 0.005	0.01	< 0.005	0.02	0.01	< 0.005	0.01	—	51.1	51.1	< 0.005	< 0.005	< 0.005	51.3

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	30.8	30.3	19.5	23.5	0.04	1.08	2.25	3.33	1.00	0.95	1.95	—	3,993	3,993	0.16	0.04	0.03	4,010
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.38	0.34	1.56	1.69	< 0.005	0.07	0.02	0.09	0.06	0.01	0.07	—	309	309	0.01	< 0.005	0.01	310
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.07	0.06	0.29	0.31	< 0.005	0.01	< 0.005	0.02	0.01	< 0.005	0.01	—	51.1	51.1	< 0.005	< 0.005	< 0.005	51.3

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	0.17	0.23	0.29	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	4.88	328	333	0.51	0.03	0.37	357
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.14	0.14	0.24	0.07	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	4.88	328	333	0.51	0.03	0.01	356
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.16	0.15	0.18	0.17	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	4.88	278	283	0.51	0.03	0.11	304
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.03	0.03	0.03	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.81	46.1	46.9	0.08	< 0.005	0.02	50.3

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	< 0.005	0.20	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.02	—	174	174	< 0.005	0.03	0.37	183
Area	0.17	0.17	< 0.005	0.22	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.92	0.92	< 0.005	< 0.005	—	0.92
Energy	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	138	138	0.01	< 0.005	—	139
Water	—	—	—	—	—	—	—	—	—	—	—	2.28	14.9	17.2	0.23	0.01	—	24.8
Waste	—	—	—	—	—	—	—	—	—	—	—	2.60	0.00	2.60	0.26	0.00	—	9.11
Total	0.18	0.17	0.23	0.29	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	4.88	328	333	0.51	0.03	0.37	357
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	0.21	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.02	—	175	175	< 0.005	0.03	0.01	183
Area	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	138	138	0.01	< 0.005	—	139
Water	—	—	—	—	—	—	—	—	—	—	—	2.28	14.9	17.2	0.23	0.01	—	24.8
Waste	—	—	—	—	—	—	—	—	—	—	—	2.60	0.00	2.60	0.26	0.00	—	9.11
Total	0.14	0.14	0.24	0.07	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	4.88	328	333	0.51	0.03	0.01	356
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	0.15	0.04	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	125	125	< 0.005	0.02	0.11	131
Area	0.15	0.15	< 0.005	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.45	0.45	< 0.005	< 0.005	—	0.45
Energy	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	138	138	0.01	< 0.005	—	139
Water	—	—	—	—	—	—	—	—	—	—	—	2.28	14.9	17.2	0.23	0.01	—	24.8
Waste	—	—	—	—	—	—	—	—	—	—	—	2.60	0.00	2.60	0.26	0.00	—	9.11
Total	0.16	0.15	0.18	0.17	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	4.88	278	283	0.51	0.03	0.11	304
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.6	20.6	< 0.005	< 0.005	0.02	21.6
Area	0.03	0.03	< 0.005	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.08	0.08	< 0.005	< 0.005	—	0.08
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.9	22.9	< 0.005	< 0.005	—	23.0
Water	—	—	—	—	—	—	—	—	—	—	—	0.38	2.47	2.85	0.04	< 0.005	—	4.11

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Waste	—	—	—	—	—	—	—	—	—	—	—	0.43	0.00	0.43	0.04	0.00	—	1.51
Total	0.03	0.03	0.03	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.81	46.1	46.9	0.08	< 0.005	0.02	50.3

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	1.83	1.53	14.4	12.3	0.03	0.72	—	0.72	0.66	—	0.66	—	2,810	2,810	0.11	0.02	—	2,820
Dust From Material Movemen	—	—	—	—	—	—	0.55	0.55	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	0.01	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.70	7.70	< 0.005	< 0.005	—	7.73
Dust From Material Movemen	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.27	1.27	< 0.005	< 0.005	—	1.28
Dust From Material Movemen	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.05	0.45	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.9	98.9	< 0.005	< 0.005	0.01	100
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	2.50	2.10	19.5	17.1	0.02	1.08	—	1.08	1.00	—	1.00	—	2,643	2,643	0.11	0.02	—	2,652
Dust From Material Movemen	—	—	—	—	—	—	2.12	2.12	—	0.92	0.92	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	14.5	14.5	< 0.005	< 0.005	—	14.5
Dust From Material Movemen	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.40	2.40	< 0.005	< 0.005	—	2.41

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Dust From Material Movemen	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.61	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	132	132	0.01	< 0.005	0.02	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.12	0.12	< 0.005	< 0.005	< 0.005	0.12
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	1.64	1.37	11.7	12.7	0.02	0.48	—	0.48	0.44	—	0.44	—	2,312	2,312	0.09	0.02	—	2,320
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	0.19	0.16	1.35	1.46	< 0.005	0.06	—	0.06	0.05	—	0.05	—	266	266	0.01	< 0.005	—	267
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	0.03	0.03	0.25	0.27	< 0.005	0.01	—	0.01	0.01	—	0.01	—	44.0	44.0	< 0.005	< 0.005	—	44.2
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.5	28.5	< 0.005	< 0.005	< 0.005	28.8
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.4	27.4	< 0.005	< 0.005	< 0.005	28.5

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.37	3.37	< 0.005	< 0.005	0.01	3.42
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.15	3.15	< 0.005	< 0.005	< 0.005	3.28
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.56	0.56	< 0.005	< 0.005	< 0.005	0.57
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.52	0.52	< 0.005	< 0.005	< 0.005	0.54
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	0.89	0.75	6.44	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,244	1,244	0.05	0.01	—	1,248
Paving	2.02	2.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	0.01	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.2	10.2	< 0.005	< 0.005	—	10.3

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.69	1.69	< 0.005	< 0.005	—	1.70
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.09	0.91	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.02	200
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.67	1.67	< 0.005	< 0.005	< 0.005	1.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	0.22	0.18	1.21	1.53	< 0.005	0.04	—	0.04	0.04	—	0.04	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	25.9	25.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.98	0.98	< 0.005	< 0.005	—	0.98
Architectural Coatings	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipmen	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.16	0.16	< 0.005	< 0.005	—	0.16
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.69	5.69	< 0.005	< 0.005	< 0.005	5.76
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.01	0.01	< 0.005	< 0.005	< 0.005	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No Rail	0.01	< 0.005	0.20	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.02	—	174	174	< 0.005	0.03	0.37	183
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.01	< 0.005	0.20	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.02	—	174	174	< 0.005	0.03	0.37	183
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.21	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.02	—	175	175	< 0.005	0.03	0.01	183
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	< 0.005	< 0.005	0.21	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.02	—	175	175	< 0.005	0.03	0.01	183
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.6	20.6	< 0.005	< 0.005	0.02	21.6
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.6	20.6	< 0.005	< 0.005	0.02	21.6

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	22.7	22.7	< 0.005	< 0.005	—	22.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	84.2	84.2	0.01	< 0.005	—	84.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	107	107	0.01	< 0.005	—	107
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	22.7	22.7	< 0.005	< 0.005	—	22.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	84.2	84.2	0.01	< 0.005	—	84.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	107	107	0.01	< 0.005	—	107
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	3.75	3.75	< 0.005	< 0.005	—	3.78
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	13.9	13.9	< 0.005	< 0.005	—	14.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	17.7	17.7	< 0.005	< 0.005	—	17.8

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.3	31.3	< 0.005	< 0.005	—	31.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.3	31.3	< 0.005	< 0.005	—	31.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.3	31.3	< 0.005	< 0.005	—	31.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.3	31.3	< 0.005	< 0.005	—	31.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.18	5.18	< 0.005	< 0.005	—	5.20
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.18	5.18	< 0.005	< 0.005	—	5.20

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.12	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	0.04	< 0.005	0.22	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.92	0.92	< 0.005	< 0.005	—	0.92
Total	0.17	0.17	< 0.005	0.22	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.92	0.92	< 0.005	< 0.005	—	0.92
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.12	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.08	0.08	< 0.005	< 0.005	—	0.08
Total	0.03	0.03	< 0.005	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.08	0.08	< 0.005	< 0.005	—	0.08

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.28	14.9	17.2	0.23	0.01	—	24.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.28	14.9	17.2	0.23	0.01	—	24.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.28	14.9	17.2	0.23	0.01	—	24.8

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.28	14.9	17.2	0.23	0.01	—	24.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.38	2.47	2.85	0.04	< 0.005	—	4.11
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.38	2.47	2.85	0.04	< 0.005	—	4.11

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.60	0.00	2.60	0.26	0.00	—	9.11
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.60	0.00	2.60	0.26	0.00	—	9.11
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.60	0.00	2.60	0.26	0.00	—	9.11
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.60	0.00	2.60	0.26	0.00	—	9.11
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.43	0.00	0.43	0.04	0.00	—	1.51
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.43	0.00	0.43	0.04	0.00	—	1.51

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	10/1/2024	10/1/2024	5.00	1.00	3
Grading	Grading	10/2/2024	10/3/2024	5.00	2.00	6
Building Construction	Building Construction	10/4/2024	12/2/2024	5.00	42.0	220
Paving	Paving	11/28/2024	12/2/2024	5.00	3.00	10
Architectural Coating	Architectural Coating	11/29/2024	12/2/2024	5.00	2.00	10

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Average	1.00	8.00	423	0.48
Site Preparation	Crawler Tractors	Diesel	Average	1.00	8.00	87.0	0.43
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Crawler Tractors	Diesel	Average	2.00	8.00	87.0	0.43
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Building Construction	Forklifts	Diesel	Average	2.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT

Phase Name	Trip Type	One Way Trips per Day	Miles per Trip	Vehicle Mix
Building Construction	—	—	—	—
Building Construction	Worker	2.16	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	0.84	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.43	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non Residential Interior Area Coated (sq ft)	Non Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	7,710	2,570	6,037

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	2.00	0.00	—
Grading	—	—	4.00	0.00	—
Paving	0.00	0.00	0.00	0.00	2.31

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	2.31	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	349	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	2.93	0.00	0.00	764	49.8	0.00	0.00	12,975
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non Residential Interior Area Coated (sq ft)	Non Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	7,710	2,570	6,037

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	23,740	349	0.0330	0.0040	97,715
Parking Lot	88,146	349	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	1,188,625	2,077,724
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	4.83	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	33.2	annual days of extreme heat
Extreme Precipitation	1.05	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	84.6
AQ-PM	10.4
AQ-DPM	6.42

Indicator	Result for Project Census Tract
Drinking Water	35.6
Lead Risk Housing	28.5
Pesticides	0.00
Toxic Releases	16.2
Traffic	25.8
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	0.00
Haz Waste Facilities/Generators	26.7
Impaired Water Bodies	0.00
Solid Waste	22.1
Sensitive Population	—
Asthma	91.9
Cardio-vascular	99.9
Low Birth Weights	93.0
Socioeconomic Factor Indicators	—
Education	76.4
Housing	84.2
Linguistic	26.4
Poverty	87.4
Unemployment	90.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	20.23610933
Employed	4.2858976
Median HI	27.06274862
Education	—
Bachelor's or higher	10.34261517
High school enrollment	100
Preschool enrollment	39.79212113
Transportation	—
Auto Access	51.48209932
Active commuting	1.039394328
Social	—
2-parent households	13.55062235
Voting	18.79892211
Neighborhood	—
Alcohol availability	79.45592198
Park access	2.194276915
Retail density	10.67624791
Supermarket access	2.399589375
Tree canopy	2.34826126
Housing	—
Homeownership	54.20248941
Housing habitability	28.48710381
Low-inc homeowner severe housing cost burden	18.0803285

Indicator	Result for Project Census Tract
Low-inc renter severe housing cost burden	13.37097395
Uncrowded housing	44.45014757
Health Outcomes	—
Insured adults	35.82702425
Arthritis	0.0
Asthma ER Admissions	6.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	8.2
Cognitively Disabled	26.7
Physically Disabled	47.8
Heart Attack ER Admissions	0.4
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	65.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—

Indicator	Result for Project Census Tract
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	11.7
Elderly	90.8
English Speaking	71.2
Foreign-born	37.5
Outdoor Workers	62.0
Climate Change Adaptive Capacity	—
Impervious Surface Cover	75.5
Traffic Density	45.6
Traffic Access	23.0
Other Indices	—
Hardship	81.7
Other Decision Support	—
2016 Voting	24.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	42.0
Healthy Places Index Score for Project Location (b)	12.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Per client data, Construction to start in Q4 2024 and will conclude for 2 months.
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases. Standard 8 hours work days.
Land Use	Taken from site plan. Total Project gross site area is 2.43 acres. Industrial use includes the building area + storage trailer.
Operations: Vehicle Data	Trip characteristics based on information from ITE 11th Edition. It should be noted that the closest ITE land use for the Project is ITE LU 180, as such these rates are conservative.
Operations: Fleet Mix	Truck Fleet Mix based on 4 axle trucks.

APPENDIX 2

Biological Resources Assessment

June 3, 2024

TOM DODSON & ASSOCIATES
Contact: Kaitlyn Dodson-Hamilton

SUBJECT: Biological Resources Assessment for the for Proposed Project Located at 0 Daisy Road in the City of Adelanto, San Bernardino County, California

Introduction

This report contains the findings of ELMT Consulting's (ELMT) biological resources assessment for the proposed Project located at 0 Daisy Road in the City of Adelanto, San Bernardino County, California. The field investigation was conducted by ELMT biologist Rachael A. Lyons on April 23, 2024, to document baseline conditions and to assess the probability of occurrence of special-status[1] plant and wildlife species that could pose a constraint to project implementation. Special attention was given to the suitability of the project site to desert tortoise (*Gopherus agassizii*), Mohave ground squirrel (*Xerospermophilus mohavenesis*; MGS), and burrowing owl (*Athene cunicularia*), western Joshua tree (*Yucca brevifolia*), and other special-status plant and wildlife species identified by the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB), and other electronic databases as potentially occurring in the general vicinity of the project site. Additionally, the report also addresses resources protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (FGC), federal Clean Water Act (CWA) regulated by the United States Army Corps of Engineers (Corps) and Regional Water Quality Control Board (Regional Board) respectively, and Section 1602 of the FGC administered by CDFW.

Project Location

The project site is generally located west of U.S. Route 395, north of State Route 18, south of Rancho Road, and east of Calendula Road in the City of Adelanto, San Bernardino County, California. The site is depicted on the Adelanto quadrangle of the United States Geological Survey's (USGS) 7.5-minute topographic map in Section 5 of Township 5 North, Range 5 West. Specifically, the project lies approximately 326 feet east of Daisy Road, 650 feet west of Verbena Road, 645 feet south of Primrose Road, and 328 feet north of Cassia Road. The project is located within Assessor Parcel Number (APN) 3128-101-17. Refer to Exhibits 1-3 in Attachment A.

Methodology

A literature review and records search were conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. In addition to the literature review, a general habitat assessment or field investigation of the project site was conducted to

1 As used in this report, "special-status" refers to plant and wildlife species that are federally or State listed, proposed, or candidates; plant species that have been designated a California Native Plant Society (CNPS) Rare Plant Rank; and wildlife species that are designated by the California Department of Fish and Wildlife (CDFW) as fully protected, species of special concern, or watch list species.

document existing conditions and assess the potential for special-status biological resources to occur within the project site.

Literature Review

Prior to conducting the field investigation, a literature review and records search was conducted for special-status biological resources potentially occurring on or within the vicinity of the project site. Previously recorded occurrences of special-status plant and wildlife species and their proximity to the project site were determined through a query of the CDFW's QuickView Tool in the Biogeographic Information and Observation System (BIOS), CNDDB Rarefind 5, the California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, Calflora Database, compendia of special-status species published by CDFW, and the United States Fish and Wildlife Service (USFWS) species listings.

All available reports, survey results, and literature detailing the biological resources previously observed on or within the vicinity of the project site were reviewed to understand existing site conditions and note the extent of any disturbances that have occurred within the project site that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status and non-special-status biological resources, as well as the following resources:

- Google Earth Pro historic aerial imagery (1985-2023);
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Soil Survey[2];
- USFWS Critical Habitat designations for Threatened and Endangered Species; and
- USFWS Endangered Species Profiles.

The literature review provided a baseline from which to inventory the biological resources potentially occurring within the project site. The CNDDB database was used, in conjunction with ArcGIS software, to locate the nearest recorded occurrences of special-status species and determine the distance from the project site.

Field Investigation

Following the literature review, biologists Rachael A. Lyons inventoried and evaluated the condition of the habitat within a 200-foot buffer around the project site, where applicable, on April 23, 2024. Plant communities and land cover types identified on aerial photographs during the literature review were verified by walking meandering transects throughout the project site. In addition, aerial photography was reviewed prior to the site investigation to locate potential natural corridors and linkages that may support the movement of wildlife through the area. These areas identified on aerial photography were then walked during the field investigation.

Soil Series Assessment

on-site and adjoining soils were researched prior to the field investigation using the USDA NRCS Soil Survey for San Bernardino County, California. In addition, a review of the local geological conditions and

2 A soil series is defined as a group of soils with similar profiles developed from similar parent materials under comparable climatic and vegetation conditions. These profiles include major horizons with similar thickness, arrangement, and other important characteristics, which may promote favorable conditions for certain biological resources.

historical aerial photographs was conducted to assess the ecological changes that the project site has undergone.

Plant Communities
Plant communities were mapped using 7.5-minute USGS topographic base maps and aerial photography. The plant communities were classified in accordance with Sawyer, Keeler-Wolf and Evens (2009), delineated on an aerial photograph, and then digitized into GIS Arcview. The Arcview application was used to compute the area of each plant community and/or land cover type in acres.

Plants
Common plant species observed during the field investigation were identified by visual characteristics and morphology in the field and recorded in a field notebook. Unusual and less-familiar plants were photographed in the field and identified in the laboratory using taxonomic guides. Taxonomic nomenclature used in this study follows the 2012 Jepson Manual (Hickman 2012). In this report, scientific names are provided immediately following common names of plant species (first reference only).

Wildlife
Wildlife species detected during the field investigation by sight, calls, tracks, scat, or other sign were recorded during surveys in a field notebook. Field guides used to assist with identification of wildlife species during the survey included The Sibley Field Guide to the Birds of Western North America (Sibley 2003), A Field Guide to Western Reptiles and Amphibians (Stebbins 2003), and A Field Guide to Mammals of North America (Reid 2006). Although common names of wildlife species are well standardized, scientific names are provided immediately following common names in this report (first reference only).

Jurisdictional Drainages and Wetlands
Aerial photography was reviewed prior to conducting a field investigation in order to locate and inspect any potential natural drainage features, ponded areas, or water bodies that may fall under the jurisdiction of the United States Army Corps of Engineers (Corps), Regional Water Quality Control Board (Regional Board), or CDFW. In general, surface drainage features indicated as blue-line streams on USGS maps that are observed or expected to exhibit evidence of flow are considered potential riparian/riverine habitat and are also subject to state and federal regulatory jurisdiction. In addition, ELMT reviewed jurisdictional waters information through examining historical aerial photographs to gain an understanding of the impact of land-use on natural drainage patterns in the area. The USFWS National Wetland Inventory (NWI) and Environmental Protection Agency (EPA) Water Program "My Waters" data layers were also reviewed to determine whether any hydrologic features and wetland areas have been documented on or within the vicinity of the project site.

Existing Site Conditions

The project site occurs in an area that is primarily undeveloped with a few adjacent parcels allocated to commercial development and equipment storage as well as scattered rural residential and institutional developments throughout the general vicinity. The site is bounded to north, east, and west by commercial development with Primrose Road, Verbena Road, and Daisy Road beyond respectively, and to the south by undeveloped, vacant land with Cassia Road beyond. The site itself supports undeveloped, land which is currently used as an equipment storage yard. The site has been subjected to various anthropogenic disturbances such as weed abatement, grading, vehicle access, and surrounding development.

According to historic aerials, the site has supported undeveloped, vacant land since at least 2009. The earliest observable land uses in the vicinity of the site occurred prior to 1994 in association with storage for adjacent commercial development. The entire project site is disturbed with areas supporting a nonnative grassland plant community.

Topography and Soils

The project site ranges in elevation from 2,970 to 2,980 feet above mean sea level. On-site topography is generally flat with no areas of significant topographic relief. Based on the NRCS USDA Web Soil Survey, the project site is historically underlain by Bryman loamy fine sand (0 to 2 percent slopes; and 2 to 5 percent slopes). Soils onsite have been compacted from recent disturbances and surrounding land-use (refer to Exhibit 4, *Soils* in Attachment A).

Vegetation

The project site supports one plant community that can be classified as non-native grassland, and one (1) land cover type that would be classified as disturbed (refer to Exhibit 5, *Vegetation* in Attachment A). Refer to Attachment B, *Site Photographs*, for representative site photographs.

The majority of the project site supports a disturbed land cover type that has been impacted by anthropogenic disturbances associated with onsite equipment storage operations. The site has also been subjected to historical grading and weed abatement. Portions of the site support a non-native grassland community. Plant species present within the nonnative grassland include mediterranean mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), red-stemmed filaree (*Erodium cicutarium*), Russian thistle (*Salsola tragus*), red brome (*Bromus medidentris*), London rocket (*sisymbrium irio*), cottonwood (*Populus fremontii*), and desert dandelion (*Malacothrix glabrata*).

Wildlife

Plant communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a discussion of those wildlife species that were observed or are expected to occur within the project site. The discussion is to be used as a general reference and is limited by the season, time of day, and weather conditions in which the field investigation was conducted. Wildlife detections were based on calls, songs, scat, tracks, burrows, and direct observation. The project site provides limited habitat for wildlife species except those adapted to a high degree of anthropogenic disturbances and development.

Fish

No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for fish were observed on or within the vicinity of the project site. Therefore, no fish are expected to occur, and are presumed absent from the project site.

Amphibians

No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for amphibian species were observed on or within the vicinity of the project site. Therefore, no amphibians are expected to occur on the project site and are presumed absent.

Reptiles

The project site and surrounding area provide suitable foraging and cover habitat for local reptile species adapted to a high degree of anthropogenic disturbance. No reptile species were observed onsite during the

field investigation. Common reptilian species that could be expected to occur onsite include western side-blotched lizard (*Uta stansburiana elegans*), Great Basin fence lizard (*Sceloporus occidentalis*), and southern alligator lizard (*Elgaria multicarinata*).

Birds
The project site and surrounding area provide suitable foraging and nesting habitat for local bird species adapted to anthropogenic disturbance. Bird species detected during the field investigation include common raven (*Corvus corax*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), Eurasian collared dove (*Streptopelia decaocto*), and northern mockingbird (*Mimus polyglottos*).

Mammals
The project site and surrounding area provide suitable foraging and cover habitat for mammalian species adapted to a high degree of anthropogenic disturbance. No mammalian species were detected during the field investigation. Mammalian species that could be expected to occur onsite include California ground squirrel (*Otospermophilus beecheyi*), and feral cat (*Felis catus*). Perimeter fencing surrounding the project site likely precludes the presence of any additional mammalian species.

Nesting Birds

No active nests or birds exhibiting nesting behavior were observed on-site during the field investigation. An active common raven nest was observed approximately 40 feet south of the project site. The project site and surrounding area provide minimal nesting opportunities for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area and are adapted to a high degree of anthropogenic disturbance. No raptors are expected to nest on-site due to lack of suitable nesting opportunities.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction.

Migratory Corridors and Linkages

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

According to the San Bernardino County General Plan, the project site has not been identified as occurring within a Wildlife Corridor or Linkage. As designated by the San Bernardino County General Plan Open Space Element, the nearest major open space area documented in the vicinity of the project site is the Oro Grande Wash located approximately 5.51 miles northeast of the site. The site is separated from the Oro

Grande Wash by existing development, roadways, and undeveloped land, and there are no riparian corridors or creeks connecting the project site to the wash.

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

Jurisdictional Areas

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 USFWS NWI and the USGS National Hydrography Dataset were reviewed to determine if any blueline streams or riverine resources have been documented on the project site. Based on this review, no blueline streams or riverine resources have been identified on or adjacent to the project site. Additionally, no inundated areas or wetland vegetation were observed during the field investigation and soils mapped as occurring onsite by the identified by the USDA NCRS are not listed as hydric. According to the NWI, the nearest mapped resource to the site is an unnamed blueline stream which occurs approximately 871 feet to the southeast of the project site. This riverine resource is classified as an intermittently flooded streambed and does not connect further downstream to any additional resources.

Implementation of the proposed project is not expected to result in impacts to this stream or any additional surrounding riverine resources. Therefore, regulatory approval from the Corps, Regional Board, and/or CDFW will not be required.

Special-Status Biological Resources

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

The literature search identified seven (7) special-status plant species and twelve (12) special-status wildlife species as having potential to occur within the Adelanto USGS 7.5-minute quadrangle. No special-status plant communities were identified as having the potential to occur. Special-status plant and wildlife species were evaluated for their potential to occur within the project site based on habitat requirements, availability, and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity of the project site are presented in Attachment C*: Potentially Occurring Special-Status Biological Resources*.

Special-Status Plants

According to the CNDDB and CNPS, seven (7) special-status plant species have been recorded in the Adelanto quadrangle (refer to Attachment C). Western Joshua tree was observed adjacent to the project site, but no western Joshua trees were observed within the proposed project footprint. Additionally, due to the level of routine disturbance onsite, it was determined that the project site does not have the potential to support western Joshua tree or any additional special status species known to occur in the area, and all are presumed to be absent.

Based on regional significance, a discussion of western Joshua tree is provided below:

Western Joshua Tree

The California Fish and Game Commission (Commission) designated the western Joshua tree as a candidate for listing under the California Endangered Species Act (CESA) in October 2020. This action afforded the western Joshua tree the same CESA protections as listed species, which means that removal of the desert trees was subject to fines and criminal penalties unless authorized by a "take" permit issued by the CDFW. Such permits were difficult to obtain, and when issued would authorize removal only in limited circumstances. The new law which became effective July 1, 2023, streamlines the western Joshua Tree take permit process and broadens the purposes for which a permit may be issued. A western Joshua tree may now be removed for any purpose, so long as a permit is obtained and the removal is fully mitigated, or alternatively, an in-lieu mitigation fee is paid. The table below summarizes the new rules for the are the project site is located.

Location	Project Type	Requirements
Within the area bounded on the east and west by Interstate 5 and Interstate 15, respectively, and on the north and south by Highway 58 and Highways 138 and 18, respectively.	All project types.	Full mitigation, or in-lieu fee as follows: • $1,000 per tree > 5 meters tall • $300 per tree 1 to 5 meters tall • $150 per tree < 1 meter tall

No western Joshua trees were observed on the project site. However, one (1) live western Joshua tree and one (1) dead Joshua tree was observed outside the boundaries of the project, within a 50 foot buffer around the south to the south. Both trees measured greater than 5 meters in height. No direct impacts will occur to western Joshua tree from project implementation and a Western Joshua Tree Incidental Take Permit will not be required.

Special-Status Wildlife

According to the CNDDB, twelve (12) special-status wildlife species have been reported in the Adelanto (refer to Attachment C). No special-status wildlife species were observed during the field investigation. Based on habitat requirements for specific species and the availability and quality of on-site habitats, and proximity to known occurrences, it was determined that the proposed project site does not have the potential to support any special-status wildlife species, and all are presumed to be absent.

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

Burrowing Owl

The burrowing owl is currently listed as a California Species of Special Concern. It is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground (Haug and Didiuk 1993; Dechant et al. 1999). Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting (Haug and Didiuk 1993). The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drainpipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

No burrowing owls or recent signs (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. The majority of the project site is minimally vegetated with a variety of invasive/weedy species what provide line-of-sight observation favored by burrowing owls. However, no suitable burrows (>4 inches) for roosting and nesting were observed within site boundaries. Further, the site is surrounding by tall equipment, perimeter fencing and utility poles that provide perching opportunities for raptors that may prey on burrowing owl. Therefore, burrowing owl is presumed to be absent from the project site and no further surveys are recommended.

Desert Tortoise

The Mojave population of the desert tortoise inhabits areas north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and southwestern Utah, and in the Sonoran Desert in California. Throughout the majority of the Mojave Desert, desert tortoises occur most commonly on gentle sloping soils characterized by an even mix of sand and gravel and sparsely vegetated low-growing vegetation where there is abundant inter-shrub space. Typical habitat for the Mojave desert tortoise has been characterized as Mojavean desert scrub below 5,500 feet in elevation with a high diversity of perennial and ephemeral plants. The dominant shrub commonly associated with desert tortoise habitat is creosote bush; however, other shrubs including burrobush (*Ambrosia dumosa*), Mojave yucca, cheesebush (*Ambrosia salsola*), and Mojave prickly pear (*Opuntia mojavensis*) also provide suitable habitat. The desert tortoise spends 95 percent of its life underground and will opportunistically utilize burrows of various lengths, deep caves, rock and caliche crevices, or overhangs for cover. Therefore, moderately friable soil is required to allow for burrow construction and ensure that burrows do not collapse.

No live desert tortoises, suitable burrows, or other signs were observed during the field investigation. Further, the nonnative grassland present within the project site does not constitute suitable habitat for desert tortoise. Additionally, the project site is isolated from known desert tortoise habitat by existing development, including roadways which support regular traffic. As such, desert tortoise are presumed to be absent from the project site and focused surveys are not recommended.

Mohave Ground Squirrel

The Mohave ground squirrel is endemic to the western Mojave Desert, California. It occupies portions of Inyo, Kern, Los Angeles, and San Bernardino counties in the western Mojave Desert. In general, the species

ranges from near Palmdale on the southwest to Lucerne Valley on the southeast, Olancha on the northwest and the Avawatz Mountains on the northeast (Gustafson 1993). The historical range of suitable habitat for this species as decreased by 10 to 16% due to urbanization and range-wide declines in trapping success over the last few decades suggesting that their populations are declining. This species was listed as threatened under the California Endangered Species Act in 1985.

The Mohave ground squirrel is a medium-sized ground squirrel that measures 8.3 to 9.1 inches (in; 21 to 23 centimeters; cm) in total length, 2.2 to 2.8 in (5.7 to 7.2 cm) in tail length, and 1.3 to 1.5 in (3.2 to 3.8 cm) in hind foot length (Hall 1981). The Mohave ground squirrel occupies all major desert scrub habitats in the western Mojave Desert. It has been observed in the following habitats described by Holland (1986) as:

- Mojave creosote scrub, dominated by creosote bush and burrobush,
- Desert saltbush scrub, dominated by various species of saltbush (*Atriplex*),
- Desert sink scrub, which is similar in composition to saltbush scrub, but is sparser and grows on poorly drained soils with high alkalinity,
- Desert greasewood scrub, with very sparse vegetation generally located on valley bottoms and dry lake beds,
- Shadscale scrub, which is dominated by *Atriplex confertifolia* and/or *A. spinescens,* and
- Joshua tree woodland, which includes Joshua trees widely scattered over a variety of shrub species (Gutafson 1993).

Mohave ground squirrel was not observed during the field investigation. Although a focused trapping survey was not performed, the habitat assessment conducted for this report and review of available information provided, allowed ELMT to offer its professional opinion as to the presence or absence of this species within the proposed project footprint.

Three criteria are typically used in assessing potential impacts to the Mohave ground squirrel:

Criteria 1: Is the site within the range of the species?

Per the *Current Status of the Mohave Ground Squirrel: an update covering the period 2013-2020* (Leitner 2021) the project site is within the historic range of Mohave ground squirrel. Although the project site is located within the historic range for Mohave ground squirrel, the site is near the southern boundary of the range. Further, the site is not located within any core areas, nor is it located within or immediately adjacent to any corridors, conservation areas, or other known populations identified by Leitner.

The project does not support a plant community suitable for Mohave ground squirrel habitat. Based on the data provided in *Current Status of the Mohave Ground Squirrel: an update covering the period 2013-2020* MGS have not been detected in the immediate vicinity of the project site during protocol grid and regional surveys (refer to Exhibit 7, *CNDDB Species Observations*). The closest documented Mohave ground squirrel was captured on the western outskirts of Victorville to the southeast of the project site (CNDDB 1959). Several areas in the vicinity of the project site have been surveyed to protocol level and regionally on several occasions, yet all of the surveys have been negative for Mohave ground squirrel in the vicinity of the project site. Per the *Current Status of the Mohave Ground Squirrel* Report trapping data, which provides more current data than the CNDDB, no MGS have been trapped in the areas surrounding the project site.

Criteria 2: Is there native habitat with a relatively diverse shrub component?

There is no native habitat within the project site. The majority of the project site is barren and portions of the site support a nonnative grassland. Additionally, creosote bush, spiny hopsage, hoary saltbush, and winterfat, species that are favored by Mohave ground squirrel for cover and forage, were not observed onsite during the field investigation. Dr. Leitner postulated, based on trapping surveys in the southern portion of the Mohave ground squirrel range, that densities of < 24/ha for spiny hopsage and < 100/ha of winterfat on a site was considered poor forage and may be related to the absence of Mohave ground squirrel. Creosote and spiny hopsage occurred in very limited quantities. Further, no wildlife corridors are expected to exist between the closest core MGS population and the project site. The maximum documented movement of MGS is 3.9 miles (Harris and Leitner 2005). Therefore, the project site is not likely to provide the essential habitat necessary to support the occupancy of Mohave ground squirrel.

Criteria 3: Is the site surrounded by development and therefore isolated from potentially occupied habitat?

Based on the results of the field investigation, the project site occurs adjacent to surrounding development including roadways and residential structures. Further, the site has been subject to routine disturbance including grading, weed abatement and ongoing equipment storage.

Based on habitat requirements for Mohave ground squirrel, known distributions, site conditions, and regional trapping studies, it was determined this species is presumed absent from the project site. No further focused surveys are recommended.

Critical Habitat

Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the USFWS regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a Clean Water Act Permit from the United States Army Corps of Engineers). If there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS.

The project site is not located with federally designated Critical Habitat. The nearest designated Critical Habitat is located approximately 5.33 miles to the northeast of the stie for southwestern willow flycatcher (*Empidonax traillii extimus*). Therefore, the loss or adverse modification of Critical Habitat will not occur as a result of the proposed project and consultation with the USFWS will not be required for impacts to Critical Habitat.

Conclusion

Based literature review and field survey, and existing site conditions discussed in this report, if

implementation of the proposed project should result in the removal or impacts on western Joshua tree, mitigation fees and tree removal permits will be required. The project is not expected to result in significant impacts to any additional federally or State listed species known to occur in the general vicinity of the project site. Additionally, the project will have no effect on designated Critical Habitat, or regional wildlife corridors/linkage because none exists within the area. No jurisdictional drainage and/or wetland features were observed on the project site during the field investigation. No further surveys are recommended. With completion of the recommendations provided below, no impacts to year-round, seasonal, or special-status avian residents or special-status species will occur from implementation of the proposed project.

Recommendations

Migratory Bird Treaty Act and Fish and Game Code

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Please do not hesitate to contact Tom McGill at (951) 285-6014 or tmcgill@elmtconsulting.com or Travis McGill at (909) 816-1646 or travismcgill@elmtconsulting.com should you have any questions this report.

Sincerely,

Thomas J. McGill, Ph.D.
Managing Director

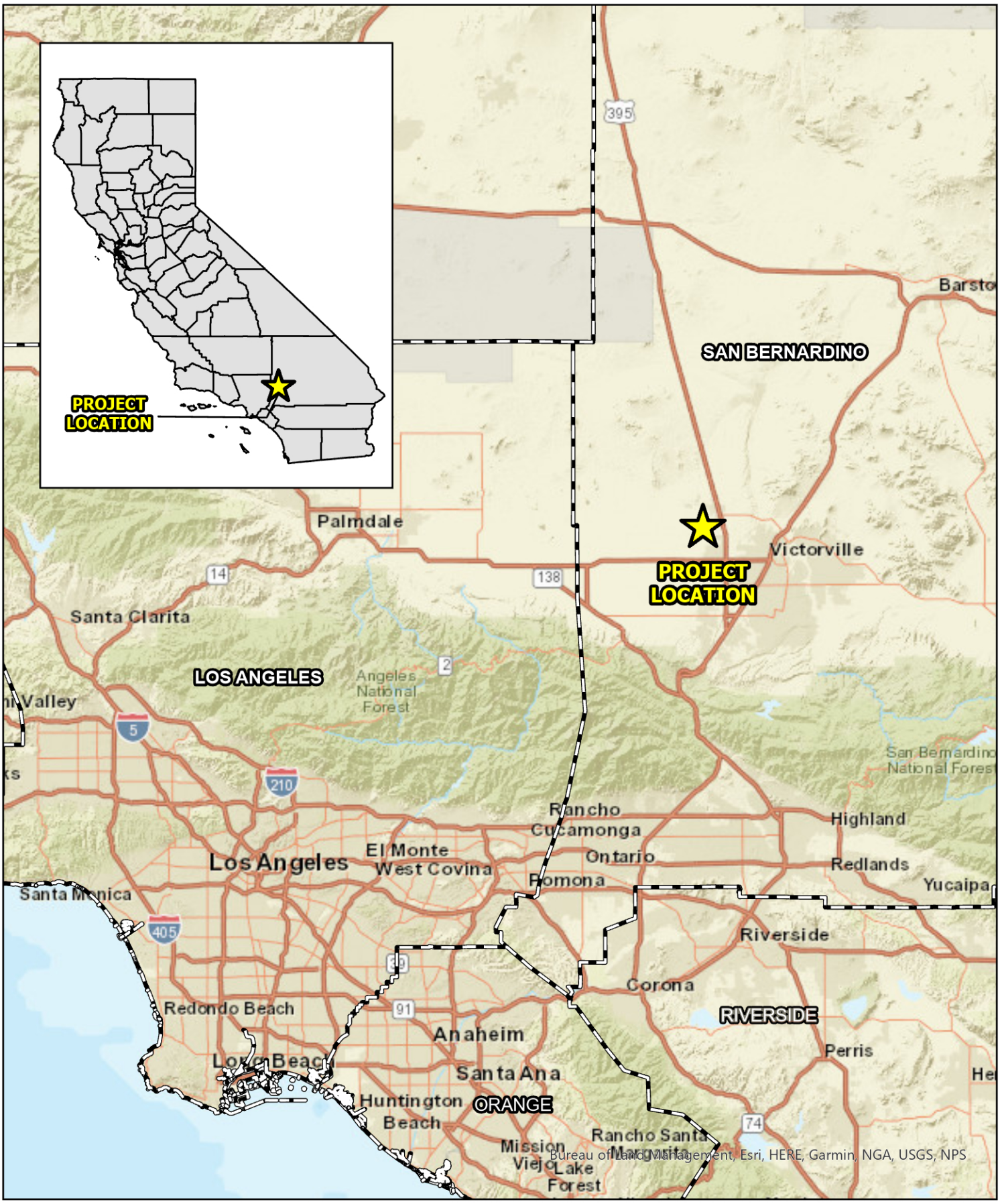
Travis J. McGill
Director

Attachments:

A. *Project Exhibits*
B. *Site Photographs*
C. *Potentially Occurring Special-Status Biological Resources*
D. *Regulations*

Attachment A

Project Exhibits

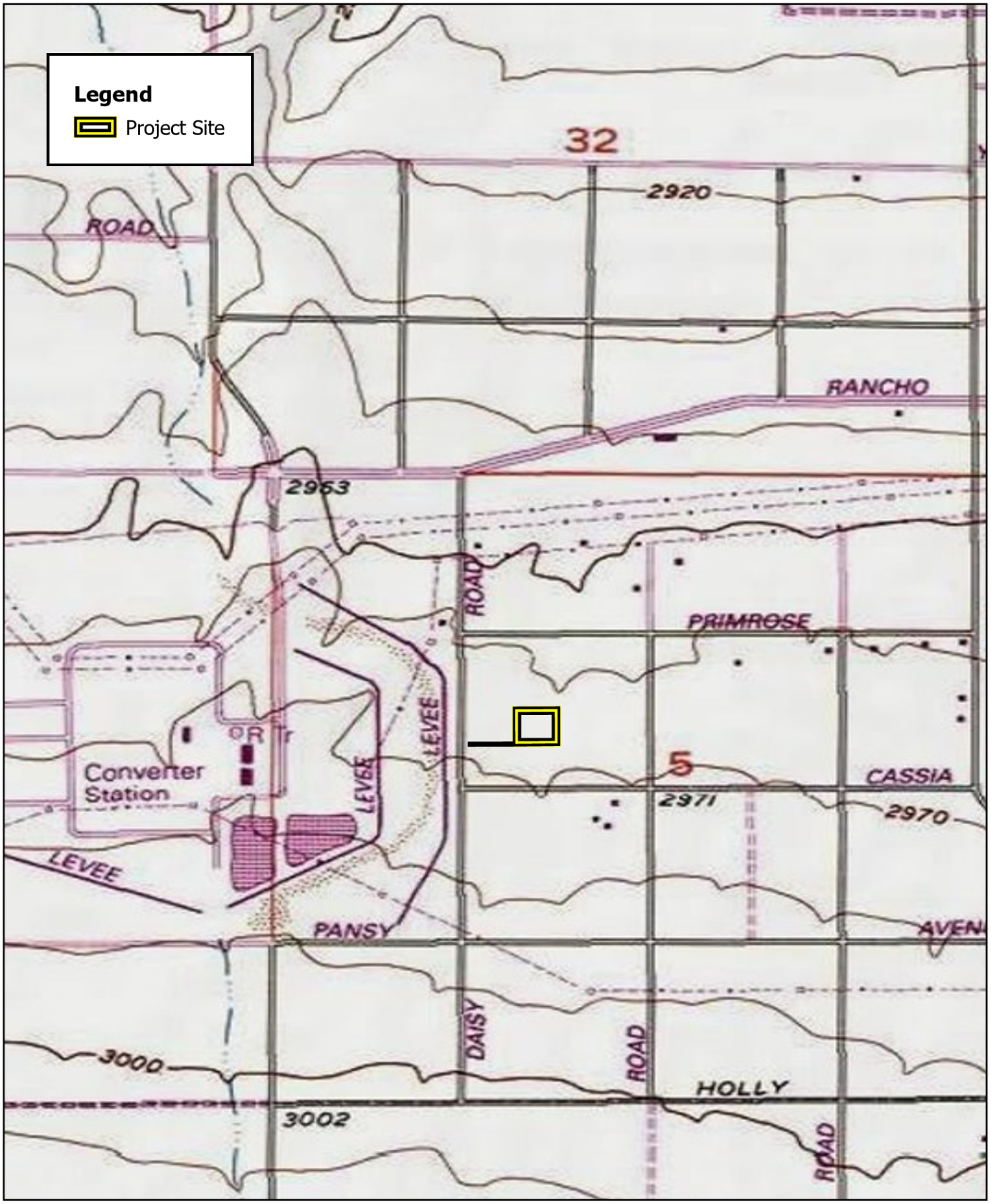


ELMT CONSULTING

0 DAISY ROAD PROJECT SITE
BIOLOGICAL RESOURCES ASSESSMENT

Regional Vicinity

Exhibit 1



ELMT CONSULTING

N

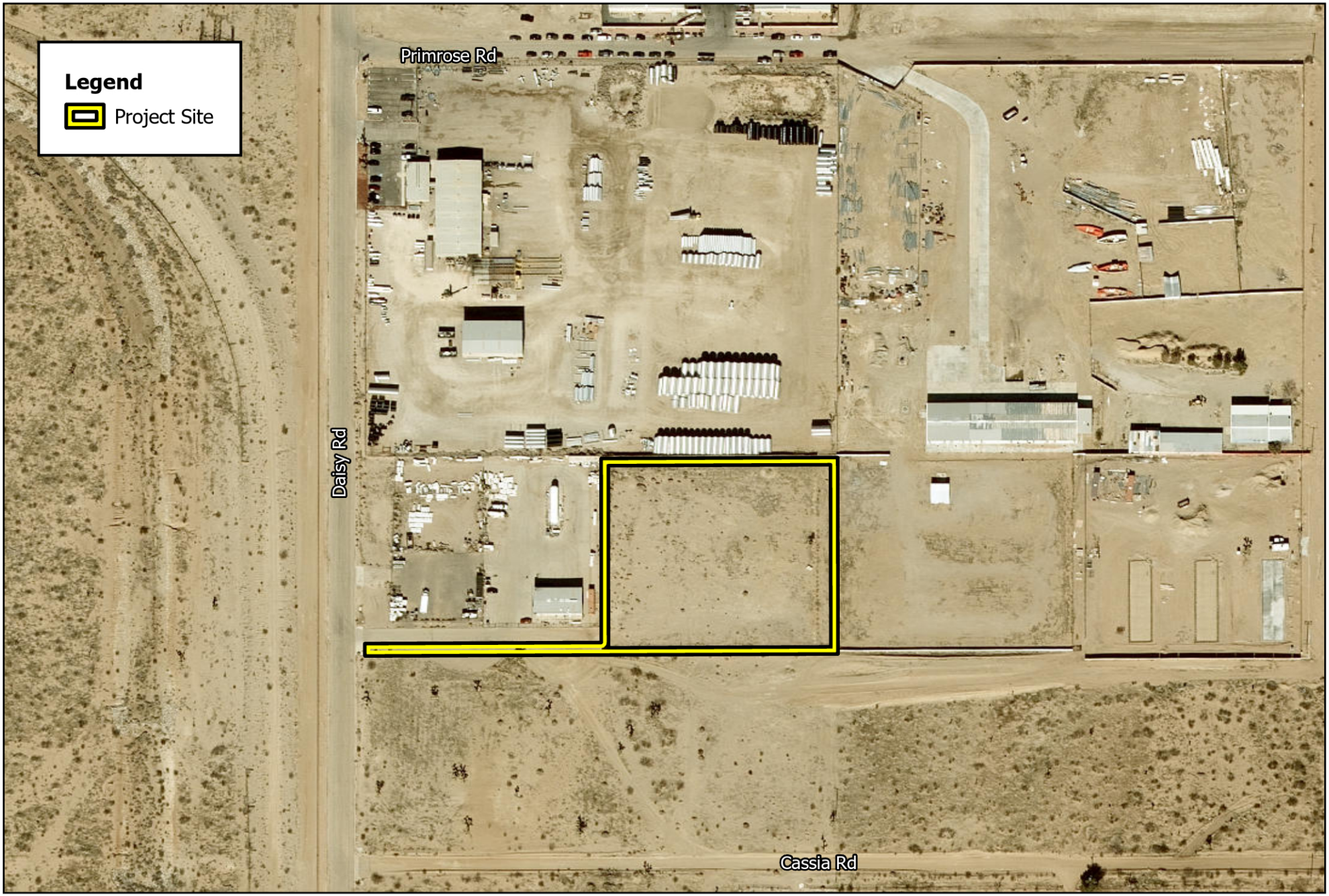
0 0.12 0.24 0.48 Miles

Source: ESRI USA Topographic Map, San Bernardino County

0 DAISY ROAD PROJECT SITE
BIOLOGICAL RESOURCES ASSESSMENT

Site Vicinity

Exhibit 2



ELMT CONSULTING

N

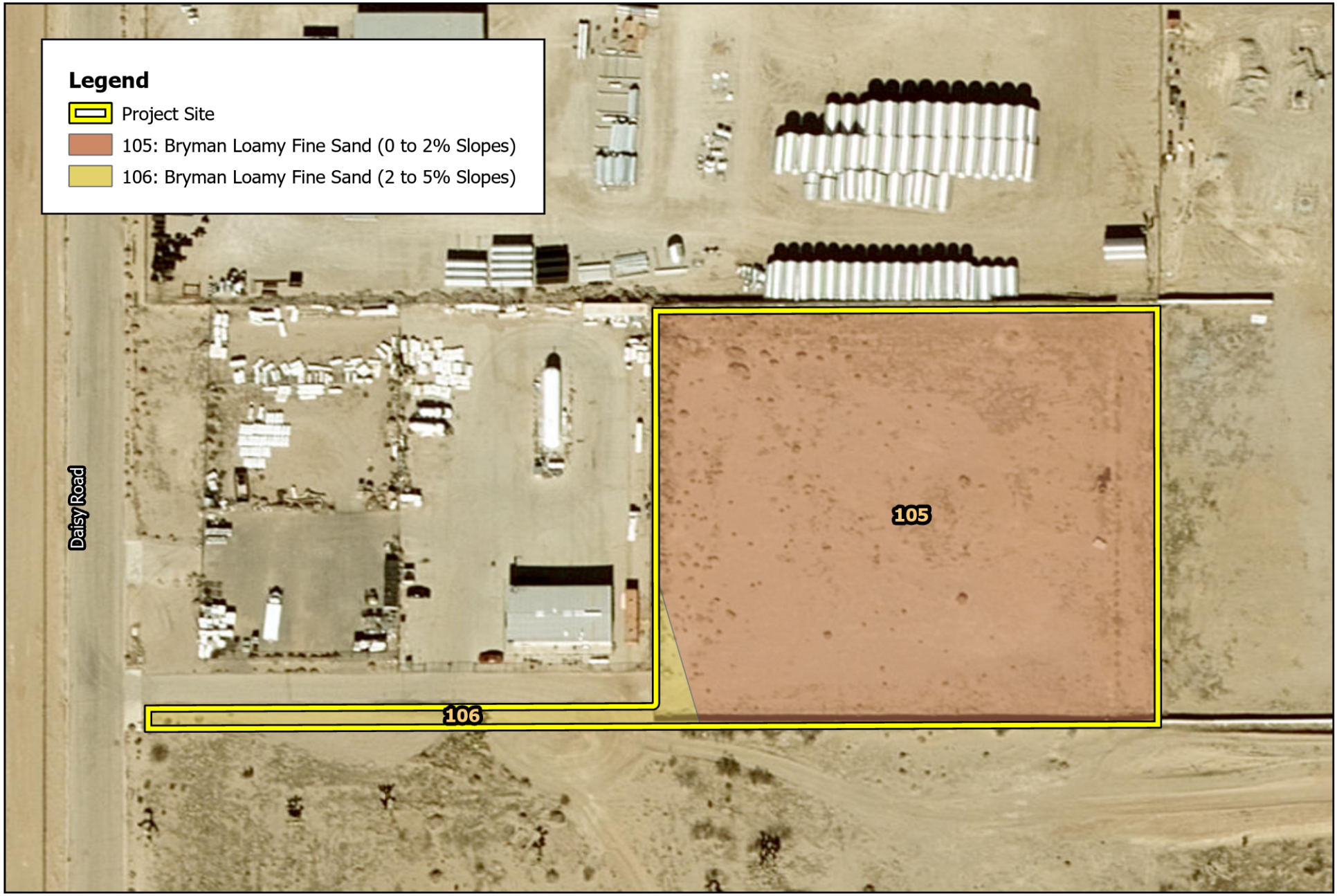
0 155 310 620 Feet

Source: ESRI Aerial Imagery, San Bernardino County

0 DAISY ROAD PROJECT SITE
BIOLOGICAL RESOURCES ASSESSMENT

Project Site

Exhibit 3



ELMT CONSULTING

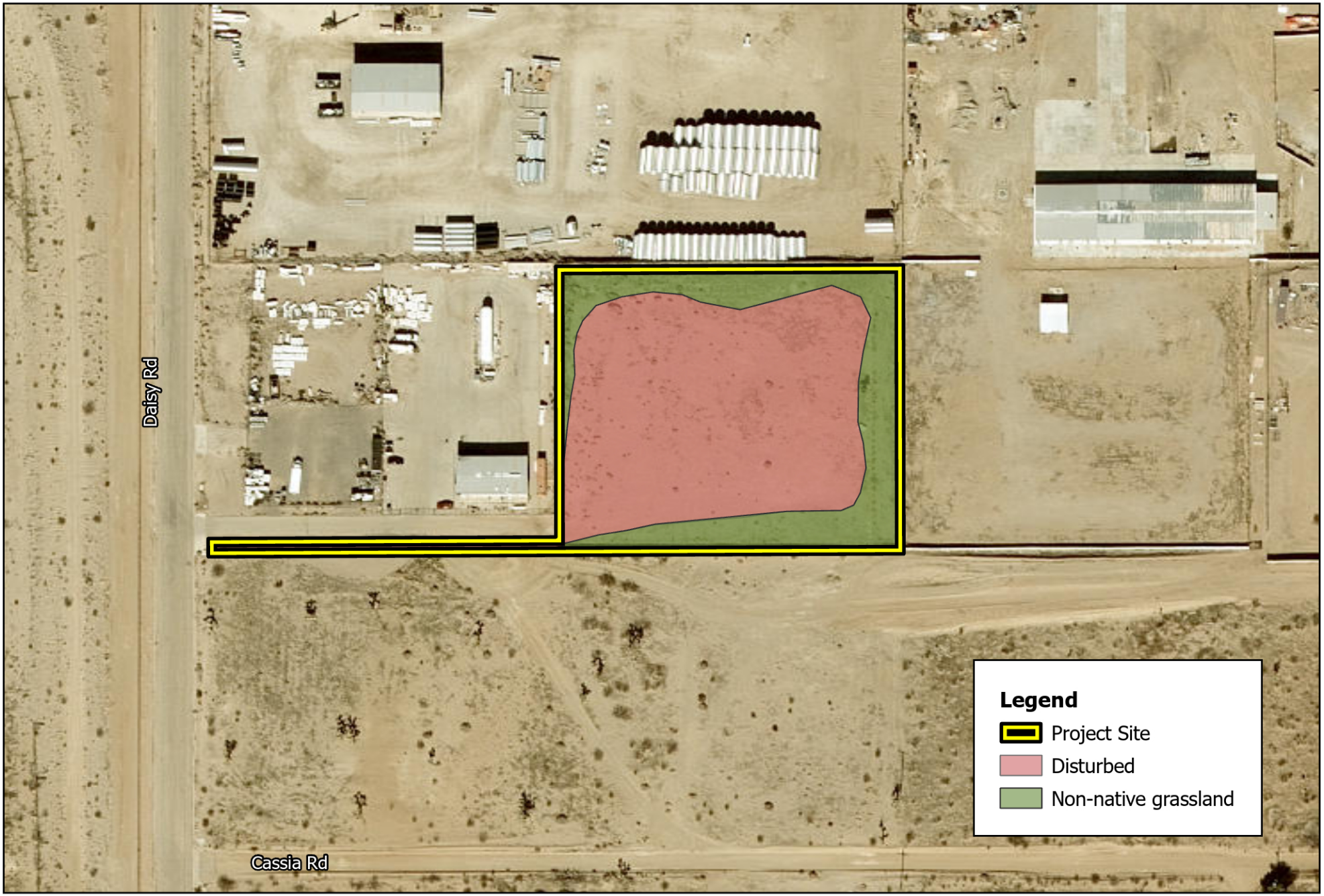
N 0 25 50 100 150 200 Feet

Source: ESRI Aerial Imagery, Soil Survey Geographic Database, San Bernardino County

0 DAISY ROAD PROJECT SITE
BIOLOGICAL RESOURCES ASSESSMENT

Soils

Exhibit 5



ELMT CONSULTING

N

0 125 250 500 Feet

Source: ESRI Aerial Imagery, San Bernardino County

0 DAISY ROAD PROJECT SITE
BIOLOGICAL RESOURCES ASSESSMENT

Vegetation

Exhibit 4

Attachment B

Site Photographs

Photograph 1: From Daisy Road at the western limits of the project site, looking east through the paved access road.

Photograph 2: Depicting the gated entry and perimeter fencing, separating the project site from the surrounding area.

Photograph 3: From the southwest corner of the project site, looking northeast.

Photograph 4: From the southeast corner of the project site, looking west along the southern boundary.

Photograph 5: From the southeast corner of the project site, looking north along the eastern boundary through equipment storage operations.

Photograph 6: From the middle of the eastern boundary, looking west through the project site.

Photograph 7: From the northeast corner of the project site, looking west along the northern boundary.

Photograph 8: From the northeast corner of the project site, looking south along the eastern boundary.

Photograph 9: From the northwest corner of the project site, looking east along the northern boundary.

Photograph 10: From the northwest corner of the project site, looking south along the western boundary.

Photograph 11: From the middle of the western boundary, looking east through the project site.

Photograph 12: Western Joshua tree located within the buffer area to the south of the project site, outside of the limits of disturbance.

Attachment C

Potentially Occurring Special-Status Biological Resources

Table C-1: Potentially Occurring Special-Status Biological Resources

Scientific Name Common Name	**Status**	**Habitat Description**	**Observed On-site**	**Potential to Occur**
SPECIAL-STATUS WILDLIFE SPECIES				
Athene cunicularia burrowing owl	Fed: None CA: SSC	Prefers habitat with short, sparse vegetation with few shrubs and well-drained soils in grassland, shrub steppe, and desert habitats. Primarily a grassland species, but it persists and even thrives in some landscapes highly altered by human activity. Occurs in open, annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. The overriding characteristics of suitable habitat appear to be burrows for roosting and nesting and relatively short vegetation with only sparse shrubs and taller vegetation.	No	**Presumed Absent** Portions of the project site support line-of-sight opportunities favored by burrowing owls; however, no suitable burrows (>4 inches in diameter) are present. In addition, adjacent and surrounding development supports tall structures that provide perching opportunities for predators of burrowing owls.
Buteo swainsoni Swainson's hawk	Fed: None CA: **THR**	Typical habitat is open desert, grassland, or cropland containing scattered, large trees or small groves. Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grassland or suitable grain or alfalfa fields or livestock pastures.	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Circus hudsonius northern harrier	Fed: None CA: SSC	Frequents meadows, grasslands, open rangelands, desert sinks, fresh and saltwater emergent wetlands; seldom found in wooded areas. Mostly found in flat, or hummocky, open areas of tall, dense grasses moist or dry shrubs, and edges for nesting, cover, and feeding.	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Eremophila alpestris actia California horned lark	Fed: None CA: WL	Occurs in meadows, grasslands, open fields, prairie, and alkali flats. This subspecies is typically found in coastal regions.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
Falco mexicanus prairie falcon	Fed: None CA: WL	Commonly occur in arid and semiarid shrubland and grassland community types. Also occasionally found in open parklands within coniferous forests. During the breeding season, they are found commonly in foothills and mountains which provide cliffs and escarpments suitable for nest sites.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
Gopherus agassizii Mojave desert tortoise	Fed: **THR** CA: **THR**	Occurs in desert scrub, desert wash, and Joshua tree habitats with friable, sandy, well-drained soils for nest and burrow construction. Highest densities occur in creosote bush scrub with extensive annual wildflower blooms and succulents with little to no non-native plant species.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat Description**	**Observed On-site**	**Potential to Occur**
Lanius ludovicianus loggerhead shrike	Fed: None CA: SSC	Prefers open habitats with bare ground, scattered shrubs, and areas with low or sparse herbaceous cover including open-canopied valley foothill hardwood, riparian, pinyon-juniper, desert riparian, creosote bush scrub, and Joshua tree woodland. Requires suitable perches including trees, posts, fences, utility lines, or other perches.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
Phrynosoma blainvillii coast horned lizard	Fed: None CA: SSC	Occurs in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. In inland areas, this species is restricted to areas with pockets of open microhabitat, created by disturbance (i.e. fire, floods, roads, grazing, fire breaks). The key elements of such habitats are loose, fine soils with a high sand fraction; an abundance of native ants or other insects; and open areas with limited overstory for basking and low, but relatively dense shrubs for refuge.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
Spizella breweri Brewer's sparrow	Fed: None CA: None	Habitats include sagebrush and brushy plains.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
Taxidea taxus American badger	Fed: None CA: SSC	Primarily occupy grasslands, parklands, farms, tallgrass and shortgrass prairies, meadows, shrub-steppe communities and other treeless areas with sandy loam soils where it can dig more easily for its prey. Occasionally found in open chaparral (with less than 50% plant cover) and riparian zones.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
Toxostoma lecontei Le Conte's thrasher	Fed: None CA: SSC	An uncommon to rare, local resident in southern California deserts from southern Mono Co. south to the Mexican border, and in western and southern San Joaquin Valley. Occurs primarily in open desert wash, desert scrub, alkali desert scrub, and desert succulent shrub habitats; also occurs in Joshua tree habitat with scattered shrubs.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
Xerospermophilus mohavensis Mohave ground squirrel	Fed: None CA: **THR**	Restricted to the Mojave Desert in open desert scrub, alkali desert scrub, annual grassland, and Joshua tree woodland. Prefers sandy to gravelly soils and tends to avoid rocky areas. Occurs sympatrically with the white-tailed antelope squirrel.	No	**Presumed Absent** No suitable habitat is present within or adjacent to the project site.
SPECIAL-STATUS PLANT SPECIES				
Canbya candida white pygmy-poppy	Fed: None CA: None CNPS: 4.2	Occurs on gravelly, sandy, granitic soils in Joshua tree woodland, Mojavean desert scrub, and pinyon and juniper woodland. Found at elevations ranging from 2,297 to 5,249 feet above mean sea level (msl). Blooming period is from March to June.	No	**Presumed Absent** There is no suitable habitat within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat Description**	**Observed On-site**	**Potential to Occur**
Chorizanthe spinosa Mojave spineflower	Fed: None CA: None CNPS: 4.2	Grows in alkaline or non-alkaline soils in chenopod scrub, Joshua tree woodland, Mojavean desert scrub, and playas. Found at elevations ranging from 20 to 4,265 feet. Blooming period is from March to July.	No	**Presumed Absent** There is no suitable habitat within or adjacent to the project site.
Loeflingia squarrosa* var. *artemisiarum sagebrush loeflingia	Fed: None CA: None CNPS: 2B.2	Grows in sandy soils within desert dunes, Great Basin scrub, and Sonoran desert scrub habitats. Blooming period is from April to May. Grows in elevation from 2,297 to 5,299 feet.	No	**Presumed Absent** No suitable habitat is present within the project site.
Monardella exilis Mojave monardella	Fed: None CA: None CNPS: 4.2	Endemic to the Mojave Desert and the southern Sierra Nevada. Grows at 2,000 to 6,900 feet in elevation. Found in desert scrub and Joshua tree woodland habitats as will as pinyon pine woodlands. Blooming period is April to September.	No	**Presumed Absent** No suitable habitat is present within the project site.
Muilla coronata crowned muilla	Fed: None CA: None CNPS: 4.2	Found in chenopod scrub, Joshua tree woodland, Mojavean desert scrub, and pinyon and juniper woodland habitats. Blooming period is from May to April. Grows in elevation from 2,198 to 6,430 feet.	No	**Presumed Absent** There is no suitable habitat within or adjacent to the project site.
Pediomelum castoreum Beaver dam breadroot	Fed: None CA: None CNPS: 1B.2	Occurs in sandy soils, washes, and roadcuts within Joshua tree woodland and Mojavean desert scrub. Found at elevations ranging from 2,000 to 5,000 feet. Blooming period is from April to May.	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Yucca brevifolia western Joshua tree	Fed: None CA: CE CNPS: N/A	Occurs in a variety of arid habitats within the Mojave Desert. Found at elevations ranging from 1,600 to 6,600 feet. Blooming period is from March to June.	No	**Absent** No trees/stems were observed onsite. 2 were observed outside of the project footprint within 50 feet.

U.S. Fish and Wildlife Service (Fed) - Federal
END – Federal Endangered
THR – Federal Threatened
DL - Delisted

California Department of Fish and Wildlife (CA) - California
END – California Endangered
THR – California Threatened
CTHR – California Candidate Threatened
DL - Delisted
FP – California Fully Protected
SSC – California Species of Special Concern
WL – California Watch List
CE – Candidate Endangered

California Native Plant Society (CNPS) - *California Rare Plant Rank*
1B Plants Rare, Threatened, or Endangered in California and Elsewhere
2B Plants Rare, Threatened, or Endangered in California, but More Common Elsewhere
4 Plants of Limited Distribution – A Watch List

Threat Ranks
0.2- Moderately threatened in California
0.3- Not very threatened in California

Attachment D

Regulations

Special status species are native species that have been afforded special legal or management protection because of concern for their continued existence. There are several categories of protection at both federal and state levels, depending on the magnitude of threat to continued existence and existing knowledge of population levels.

Federal Regulations

Endangered Species Act of 1973

Federally listed threatened and endangered species and their habitats are protected under provisions of the Federal Endangered Species Act (ESA). Section 9 of the ESA prohibits "take" of threatened or endangered species. "Take" under the ESA is defined as to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any of the specifically enumerated conduct." The presence of any federally threatened or endangered species that are in a project area generally imposes severe constraints on development, particularly if development would result in "take" of the species or its habitat. Under the regulations of the ESA, the United States Fish and Wildlife Service (USFWS) may authorize "take" when it is incidental to, but not the purpose of, an otherwise lawful act.

Critical Habitat is designated for the survival and recovery of species listed as threatened or endangered under the ESA. Critical Habitat includes those areas occupied by the species, in which are found physical and biological features that are essential to the conservation of an ESA listed species and which may require special management considerations or protection. Critical Habitat may also include unoccupied habitat if it is determined that the unoccupied habitat is essential for the conservation of the species.

Whenever federal agencies authorize, fund, or carry out actions that may adversely modify or destroy Critical Habitat, they must consult with USFWS under Section 7 of the ESA. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highway Administration or a permit from the U.S. Army Corps of Engineers (Corps)).

If USFWS determines that Critical Habitat will be adversely modified or destroyed from a proposed action, the USFWS will develop reasonable and prudent alternatives in cooperation with the federal institution to ensure the purpose of the proposed action can be achieved without loss of Critical Habitat. If the action is not likely to adversely modify or destroy Critical Habitat, USFWS will include a statement in its biological opinion concerning any incidental take that may be authorized and specify terms and conditions to ensure the agency is in compliance with the opinion.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S. Government Code [USC] 703) makes it unlawful to pursue, capture, kill, possess, or attempt to do the same to any migratory bird or part, nest, or egg of any such bird listed in wildlife protection treaties between the United States, Great Britain, Mexico, Japan, and the countries of the former Soviet Union, and authorizes the U.S. Secretary of the Interior to protect and regulate the taking of migratory birds. It establishes seasons and bag limits for hunted species and protects migratory birds, their occupied nests, and their eggs (16 USC 703; 50 CFR 10, 21).

The MBTA covers the taking of any nests or eggs of migratory birds, except as allowed by permit pursuant to 50 CFR, Part 21. Disturbances causing nest abandonment and/or loss of reproductive effort (i.e., killing or abandonment of eggs or young) may also be considered "take." This regulation seeks to protect migratory birds and active nests.

In 1972, the MBTA was amended to include protection for migratory birds of prey (e.g., raptors). Six families of raptors occurring in North America were included in the amendment: Accipitridae (kites, hawks, and eagles); Cathartidae (New World vultures); Falconidae (falcons and caracaras); Pandionidae (ospreys); Strigidae (typical owls); and Tytonidae (barn owls). The provisions of the 1972 amendment to the MBTA protects all species and subspecies of the families listed above. The MBTA protects over 800 species including geese, ducks, shorebirds, raptors, songbirds and many relatively common species.

State Regulations

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) provides for the protection of the environment within the State of California by establishing State policy to prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures for projects. It applies to actions directly undertaken, financed, or permitted by State lead agencies. If a project is determined to be subject to CEQA, the lead agency will be required to conduct an Initial Study (IS); if the IS determines that the project may have significant impacts on the environment, the lead agency will subsequently be required to write an Environmental Impact Report (EIR). A finding of non-significant effects will require either a Negative Declaration or a Mitigated Negative Declaration instead of an EIR. Section 15380 of the CEQA Guidelines independently defines "endangered" and "rare" species separately from the definitions of the California Endangered Species Act (CESA). Under CEQA, "endangered" species of plants or animals are defined as those whose survival and reproduction in the wild are in immediate jeopardy, while "rare" species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

California Endangered Species Act (CESA)

In addition to federal laws, the state of California implements the CESA which is enforced by CDFW. The CESA program maintains a separate listing of species beyond the FESA, although the provisions of each act are similar.

State-listed threatened and endangered species are protected under provisions of the CESA. Activities that may result in "take" of individuals (defined in CESA as; "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") are regulated by CDFW. Habitat degradation or modification is not included in the definition of "take" under CESA. Nonetheless, CDFW has interpreted "take" to include the destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species.

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the

absence of special protection or management. A rare species is one that is considered present in such small numbers throughout its range that it may become endangered if its present environment worsens. State threatened and endangered species are fully protected against take, as defined above.

The CDFW has also produced a species of special concern list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of special concern may receive special attention during environmental review, but they do not have formal statutory protection. At the federal level, USFWS also uses the label species of concern, as an informal term that refers to species which might be in need of concentrated conservation actions. As the Species of Concern designated by USFWS do not receive formal legal protection, the use of the term does not necessarily ensure that the species will be proposed for listing as a threatened or endangered species.

Fish and Game Code

Fish and Game Code Sections 3503, 3503.5, 3511, and 3513 are applicable to natural resource management. For example, Section 3503 of the Code makes it unlawful to destroy any birds' nest or any birds' eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey, such as hawks, eagles, and owls) are protected under Section 3503.5 of the Fish and Game Code which makes it unlawful to take, possess, or destroy their nest or eggs. A consultation with CDFW may be required prior to the removal of any bird of prey nest that may occur on a project site. Section 3511 of the Fish and Game Code lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Pertinent species that are State fully protected by the State include golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*). Section 3513 of the Fish and Game Code makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Native Plant Protection Act

Sections 1900–1913 of the Fish and Game Code were developed to preserve, protect, and enhance Rare and Endangered plants in the state of California. The act requires all state agencies to use their authority to carry out programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit the taking of listed plants from the wild and require notification of the CDFW at least ten days in advance of any change in land use which would adversely impact listed plants. This allows the CDFW to salvage listed plant species that would otherwise be destroyed.

California Native Plant Society Rare and Endangered Plant Species

Vascular plants listed as rare or endangered by the CNPS, but which have no designated status under FESA or CESA are defined as follows:

California Rare Plant Rank

1A- Plants Presumed Extirpated in California and either Rare or Extinct Elsewhere

1B- Plants Rare, Threatened, or Endangered in California and Elsewhere

2A- Plants Presumed Extirpated in California, But More Common Elsewhere

2B- Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere

3- Plants about Which More Information is Needed - A Review List

4- Plants of Limited Distribution - A Watch List

Threat Ranks

.1- Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2- Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

.3- Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known).

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates activities pursuant to Section 404 of the Federal Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFG regulates activities under the Fish and Game Code Section 1600-1616, and the Regional Board regulates activities pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

Federal Regulations

Section 404 of the Clean Water Act

In accordance with the Revised Definition of "Waters of the United States"; Conforming (September 8, 2023), "waters of the United Sates" are defined as follows:

(a) *Waters of the United States* means:

(1) Waters which are:
(i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
(ii) The territorial seas; or
(iii) Interstate waters;

(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;

(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

(4) Wetlands adjacent to the following waters:
(i) Waters identified in paragraph (a)(1) of this section; or
(ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

(5) Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section

(b) The following are not "waters of the United States" even where they otherwise meet the terms of paragraphs (a)(2) through (5) of this section:

(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted

cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;
(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;
(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and

(8) Swales and erosional features (*e.g.,* gullies, small washes) characterized by low volume, infrequent, or short duration flow.

(c) In this section, the following definitions apply:

(1) *Wetlands* means those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

(2) *Adjacent* means having a continuous surface connection

(3) *High tide line* means the line of intersection of the land with the water's surface at the maximum height reached by a rising tide. The high tide line may be determined, in the absence of actual data, by a line of oil or scum along shore objects, a more or less continuous deposit of fine shell or debris on the foreshore or berm, other physical markings or characteristics, vegetation lines, tidal gages, or other suitable means that delineate the general height reached by a rising tide. The line encompasses spring high tides and other high tides that occur with periodic frequency but does not include storm surges in which there is a departure from the normal or predicted reach of the tide due to the piling up of water against a coast by strong winds such as those accompanying a hurricane or other intense storm.

(4) *Ordinary high water mark* means that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

(5) *Tidal waters* means those waters that rise and fall in a predictable and measurable rhythm or cycle due to the gravitational pulls of the moon and sun. Tidal waters end where the rise and fall of the water surface can no longer be practically measured in a predictable rhythm due to masking by hydrologic, wind, or other effects.

Section 401 of the Clean Water Act

Pursuant to Section 401 of the CWA, any applicant for a federal license or permit to conduct any activity which may result in any discharge to waters of the United States must provide certification from the State or Indian tribe in which the discharge originates. This certification provides for the protection of the physical, chemical, and biological integrity of waters, addresses impacts to water quality that may result from issuance of federal permits, and helps ensure that federal actions will not violate water quality standards of the State or Indian tribe. In California, there are nine Regional Water Quality Control Boards (Regional Board) that issue or deny certification for discharges to waters of the United States and waters of the State, including wetlands, within their geographical jurisdiction. The State Water Resources Control Board assumed this responsibility when a project has the potential to result in the discharge to waters within multiple Regional Boards.

State Regulations

Fish and Game Code

Fish and Game Code Sections 1600 et. seq. establishes a fee-based process to ensure that projects conducted in and around lakes, rivers, or streams do not adversely impact fish and wildlife resources, or, when adverse impacts cannot be avoided, ensures that adequate mitigation and/or compensation is provided.

Fish and Game Code Section 1602 requires any person, state, or local governmental agency or public utility to notify the CDFW before beginning any activity that will do one or more of the following:

(1) substantially obstruct or divert the natural flow of a river, stream, or lake;
(2) substantially change or use any material from the bed, channel, or bank of a river, stream, or lake; or
(3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake.

Fish and Game Code Section 1602 applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the State. CDFW's regulatory authority extends to include riparian habitat (including wetlands) supported by a river, stream, or lake regardless of the presence or absence of hydric soils and saturated soil conditions. Generally, the CDFW takes jurisdiction to the top of bank of the stream or to the outer limit of the adjacent riparian vegetation (outer drip line), whichever is greater. Notification is generally required for any project that will take place in or in the vicinity of a river, stream, lake, or their tributaries. This includes rivers or streams that flow at least periodically or permanently through a bed or channel with banks that support fish or other aquatic life and watercourses having a surface or subsurface flow that support or have supported riparian vegetation. A Section 1602 Streambed Alteration Agreement would be required if impacts to identified CDFW jurisdictional areas occur.

Porter Cologne Act

The California *Porter-Cologne Water Quality Control Act* gives the State very broad authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline waters. The Porter-Cologne Act has become an important tool in the post SWANCC and Rapanos regulatory environment, with respect to the state's authority over isolated and insignificant waters. Generally, any person proposing to discharge waste into a water body that could affect its water quality must file a Report of Waste Discharge in the event that there is no Section 404/401 nexus. Although "waste" is partially defined as any waste substance associated with human habitation, the Regional Board also interprets this to include fill discharged into water bodies.